

Personal Data Collection and Processing Policy

1. General Provisions

Vortara, a private enterprise providing technological and consulting services (hereinafter referred to as the Company), registration number 051014501920, prioritizes the security of personal data in its operations. All business processes at the Company are structured to ensure the security of personal data.

This Personal Data Processing Policy (hereinafter referred to as the Policy) has been developed in accordance with the requirements of the Law of the Republic of Kazakhstan dated May 21, 2013, No. 94-V "On Personal Data and Their Protection" (hereinafter referred to as the Personal Data Law), the Law of the Republic of Kazakhstan dated November 24, 2015, No. 418-V "On Informatization" (hereinafter referred to as the Informatization Law), and other regulatory legal acts of the Republic of Kazakhstan. It defines the procedure for collecting and processing personal data and measures to ensure the security of personal data.

Concepts contained in Article 1 of the Personal Data Law are used in this Policy with the same meaning.

This Policy is a publicly available document of the Company and is posted on the Company's official website at vortara.io (hereinafter referred to as the "Website").

This Policy may be accessed in Russian and English. The Russian and English versions of the Policy have equal legal force.

The English and Russian versions are available at the following links:

- <https://vortara.io/assets/documents/privacy-en.pdf>
- <https://vortara.io/assets/documents/privacy-ru.pdf>

2. Personal Data Subjects and List of Personal Data

The Company collects and processes personal data of the following categories of personal data subjects:

2.1. Individual Clients

Personal data of individuals who are the Company's clients (end users of services).

List of personal data:

last name, first name, patronymic (if any);

Year, month, date, and place of birth;

Citizenship;

Gender;

Identity documents: name, number, and date of issue;

Individual identification number;

Permanent residence address and registration information at the place of residence;

Actual residence address;

Postal addresses and email addresses;

Telephone numbers;

Bank details (bank account number, bank name, and BIC);

Payment card details (to the extent necessary for payment processing);

Order and payment history;

IP address and access device details.

2.2. Representatives of Legal Entities and Sole Proprietorship Owners

Personal data of managers, employees, and representatives of legal entities, as well as sole proprietors, interacting with the Company as part of potential cooperation, negotiations regarding the conclusion, execution, and execution of civil law contracts.

List of personal data:

last name, first name, patronymic (if any);

job title;

email address;

mobile phone number;

identity document details (if necessary);

bank details (if necessary).

2.3. Website Visitors

Anonymous and technical data about Website visitors:

Device data: operating system type, device type (personal computer, mobile phone, tablet), browser type, geographic location.

Anonymous data about Website visitors collected using cookies and internet statistics services (Yandex.Metrica, Google Analytics).

3. Purposes of Personal Data Processing

3.1. Processing the Personal Data of Individual Clients

The Company processes the personal data of its clients for the following purposes:

Fulfillment of contractual obligations: provision of hosting services, billing services, technical support, payment processing.

Communication with clients: sending notifications, requests, and informational messages about service status, changes in service operation, and maintenance.

Processing requests and applications: registering support requests, processing claims and complaints.

Security: preventing fraud, unauthorized access, and violations of the terms of service.

Improving service quality: analyzing service usage, identifying technical issues, and developing new features and services.

Marketing communications: sending promotional offers, information about special promotions, and new services and products (only with the client's express consent).

Statistical research: conducting anonymized analysis of user behavior and evaluating the effectiveness of advertising campaigns.

Compliance with legislation: compliance with the requirements of tax and accounting legislation of the Republic of Kazakhstan, and reporting to authorized bodies.

3.2. Processing of Personal Data of Legal Entities' Representatives

The Company processes the personal data of legal entities' representatives for the following purposes:

Negotiating, concluding, and executing contracts with legal entities.

Fulfilling the Company's obligations to counterparties, and providing feedback to counterparties.

Providing technical support for the Company's products and services.

Sending commercial offers and information about new services (only with consent).

3.3. Processing Website Visitor Data

The Company processes anonymized data of Website visitors for the following purposes:

Improving the Website's performance and navigation.

Statistical analysis of user traffic and behavior.

Evaluating the effectiveness of marketing campaigns.

Targeting advertising messages (when using relevant services).

4. Personal Data Processing and Storage Periods

4.1. Clients' personal data is processed and stored for the entire duration of the contractual relationship and for three (3) years after its termination.

4.2. An extended storage period is necessary for the following purposes:

Compliance with the requirements of tax and accounting legislation of the Republic of Kazakhstan (storage of primary documents).

Ensuring the ability to resolve disputes, file, and consider claims within the statute of limitations.

Compliance with anti-money laundering legislation.

4.3. Upon expiration of the specified period, personal data is subject to destruction, unless otherwise provided by the legislation of the Republic of Kazakhstan.

4.4. Storage of personal data after the expiration of the processing period is permitted only if it is anonymized for statistical purposes.

4.5. The data subject has the right to request early deletion of their personal data at any time in accordance with the procedure established in Section 6 of this Policy.

5. Principles of Collection, Processing, and Storage of Personal Data

5.1. The collection and processing of personal data is carried out with the consent of the data subjects, except for cases established by paragraph 2 of Article 8 of the Law on Personal Data.

5.2. Methods of Collection of Personal Data:

Provision of personal data by the data subject upon registration on the Website, filling out web forms, or ordering services.

Provision of personal data when contacting customer support (via email, instant messaging, or social media).

Automatic collection of technical data on the Website using cookies, web protocols, and analytics counters.

Provision of personal data in writing (when concluding contracts or sending inquiries by mail).

5.3. Use of Cookies:

The Website uses cookies to ensure the functioning of services, save user settings, and collect statistics.

Analytical cookies (Google Analytics, Yandex.Metrica) are used to analyze traffic and user behavior on the Website.

The user has the right to disable cookies in their browser settings; however, this may limit the functionality of the Website.

5.4. The content and volume of personal data processed correspond to the stated purposes specified in Section 3 of this Policy. The Company does not collect excessive data.

5.5. Personal data is kept confidential, except in cases where such data is publicly available at the request of the data subject.

5.6. For the purposes of marketing and statistical research, the Company collects and processes anonymized personal data.

5.7. Location of storage of personal data:

Personal data is stored on servers located in data centers within the European Union, the Russian Federation, and the Republic of Kazakhstan that comply with the personal data protection laws of the relevant jurisdictions.

5.8. Transfer of Personal Data to Third Parties:

Personal data may be transferred to the following categories of third parties solely for the purposes specified in Section 3 of this Policy:

Banks and payment systems (for processing payments and settlements).

Billing system providers (for maintaining records of services rendered and issuing invoices).

Email and SMS messaging providers (for sending notifications and informational messages).

Web analytics services (Google Analytics, Yandex.Metrica - for statistical analysis).

Data may be transferred to third parties only if such third parties undertake confidentiality obligations and comply with other requirements stipulated by the Law on Personal Data.

5.9. Personal data may be transferred to authorized government agencies of the Republic of Kazakhstan only on the grounds and in the manner established by the legislation of the Republic of Kazakhstan.

6. Rights of the Personal Data Subject and the Procedure for Exercising Them

6.1. The subject has the right to:

6.1.1. Know whether the Company has their personal data, as well as receive information containing:

confirmation of the fact, purpose, sources, and methods of collecting and processing personal data;

a list of the personal data being processed;

the processing timeframes for personal data, including the retention period.

6.1.2. Request that the Company amend or supplement their personal data if there are grounds for doing so, supported by relevant documents.

6.1.3. Request that the Company block their personal data if there is information about a violation of the terms of collecting or processing personal data.

6.1.4. Request that the Company destroy their personal data collected or processed in violation of the laws of the Republic of Kazakhstan.

6.1.5. Revoke consent to the collection and processing of personal data, except in cases provided for in paragraph 2 of Article 8 of the Law on Personal Data.

6.1.6. Give consent (or refuse consent) to the Company's dissemination of your personal data in publicly accessible sources.

6.1.7. Opt out of receiving marketing communications by sending a corresponding request or using the unsubscribe function in the received message.

6.1.8. Protect your rights and legitimate interests, including claiming compensation for moral and material damages.

6.1.9. Exercise other rights provided for by the Law on Personal Data and other laws of the Republic of Kazakhstan.

6.2. Procedure for Exercising Subject Rights

6.2.1. To exercise the rights specified in Section 6.1 of this Policy, the subject may submit a written request in one of the following ways:

By email: support@vortara.io with the subject "Request regarding personal data."

Via social media: via the Company's official accounts listed on the Website's contact page.

By postal address: Almaty Region, Ili District, Bayserkensky S.O., Bayserke Village, Bereke Street, Building 1 with the subject "Request regarding personal data."

In-person: at the Company's legal address during office hours.

6.2.2. Request Requirements:

The request must be sent from the email address to which the client's account is registered, or through verified messengers (where the Company has identified the subject).

When submitting a request by mail or in person, the subject must provide:

- Identity document (copy of passport or other document).
- A written statement stating the nature of the request and contact information for a response.

6.2.3. Request Processing Timeframes:

The Company will review the request and provide a response within ten (10) business days of receipt, unless otherwise provided by the laws of the Republic of Kazakhstan.

If the request is denied, the Company will provide a reasoned response within the same timeframe.

6.2.4. Provision of information to the subject is free of charge.

7. Company Responsibilities

7.1. The Company is obligated to:

7.1.1. Approve the list of personal data necessary and sufficient to fulfill the Company's tasks, unless otherwise provided by the laws of the Republic of Kazakhstan.

7.1.2. Adopt and comply with the necessary legal, organizational, and technical measures to protect personal data in accordance with the laws of the Republic of Kazakhstan. 7.1.3. Comply with the legislation of the Republic of Kazakhstan on personal data and its protection.

7.1.4. Take measures to destroy personal data upon achievement of the purpose of its collection and processing, expiration of the storage period, and at the request of the data subject or authorized body.

7.1.5. Provide evidence of the data subject's consent to the collection and processing of their personal data in cases stipulated by the legislation of the Republic of Kazakhstan.

7.1.6. Consider data subjects' requests within the timeframes established in Section 6 of this Policy.

7.1.7. Provide the data subject or their legal representative with the opportunity to access personal data related to them free of charge.

7.1.8. Appoint a person responsible for organizing the processing of personal data.

7.2. The person responsible for organizing the processing of personal data is obligated to:

Exercise internal control over the Company's and its employees' compliance with the legislation of the Republic of Kazakhstan on personal data and its protection.

Disseminate the provisions of legislation on personal data and the requirements for its protection to Company employees.

Oversee the receipt and processing of requests from data subjects or their legal representatives.

8. Personal Data Protection

The Company applies a range of legal, organizational, and technical measures to ensure the security of personal data.

8.1. Legal Measures:

Concluding confidentiality agreements with third parties who have access to personal data.

Adopting internal Company documents defining personal data protection policies and security incident response procedures.

Concluding agreements on the processing of personal data with Company employees.

8.2. Organizational Measures:

Establishing a security regime for premises where personal data storage media are stored to prevent unauthorized access by unauthorized persons.

Securing personal data from other information by storing it on separate storage media.

Separating personal data into publicly accessible and restricted access.

Determining storage locations for personal data storage media, ensuring their safety.

Determining the list of persons with access to personal data and monitoring their actions.

Assigning a person responsible for organizing the processing of personal data.

Conducting internal audits of compliance with personal data legislation.

Training employees on personal data protection legislation.

8.3. Technical measures:

Use of the HTTPS/TLS protocol to encrypt data during transmission between the user's device and the Company's servers.

Use of protection against unauthorized access (firewalls, intrusion detection systems).

Use of antivirus software.

Data backup to prevent loss.

Use of specialized software to anonymize personal data during statistical research.

Restrict access to personal data based on a role-based model (providing access only to the extent necessary to perform job duties).

9. Cross-border Transfer of Personal Data

9.1. The Company carries out cross-border transfers of personal data to the territories of the following countries: the European Union, the Russian Federation, and the Republic of Kazakhstan.

9.2. Cross-border transfers of personal data are carried out only if these countries ensure adequate protection of personal data in accordance with the requirements of the Law on Personal Data.

9.3. When transferring personal data to third parties located outside the Republic of Kazakhstan, the Company ensures that such parties undertake obligations to ensure the confidentiality and security of the personal data received.

9.4. Personal data may be transferred to foreign countries that do not ensure adequate protection of personal data only in cases stipulated by the Law on Personal Data (with the written consent of the subject, for the performance of an agreement, to protect the life and health of the subject, and in other cases established by law).

10. Marketing Communications

10.1. The Company reserves the right to send marketing communications to clients (information about special promotions, new services, and promotional offers) only with the client's express consent to receive such communications.

10.2. Consent to receive marketing communications is provided by the client:

By checking the appropriate box when registering on the Website or in their personal account.

By sending a written request to the Company.

10.3. The Client has the right to unsubscribe from receiving marketing communications at any time in one of the following ways:

Use the unsubscribe function provided in each marketing communication.

Change subscription settings in your personal account on the Website (if available).

Send an unsubscribe request to support@vortara.io.

10.4. After you unsubscribe from marketing communications, the Company will stop sending you promotional messages within three (3) business days, but will continue to send transactional messages (notifications of payments, service changes, and technical work) necessary for the fulfillment of contractual obligations.

11. Final Provisions

11.1. This Policy is an integral part of the agreement concluded with the personal data subject, including a public offer agreement.

11.2. This Policy is subject to amendment or supplementation in the following cases:

Upon changes in the legislation of the Republic of Kazakhstan on personal data and its protection.

Upon changes in the purposes of personal data processing.

Upon the use of new technologies for collecting, processing, and protecting personal data.

Upon changes in the composition of third parties to whom personal data is transferred.

In other cases, by decision of the authorized bodies and officials of the Company.

11.3. The Company reserves the right to unilaterally amend this Policy (in whole or in part) at any time. All amendments shall take effect upon posting the new version of the Policy on the Website.

11.4. When making significant changes to the Policy (changes in processing purposes, expansion of the list of third parties, changes in retention periods), the Company will notify personal data subjects by sending an informational message to the email address specified during registration or by posting a notice on the Website.

11.5. Personal data subjects undertake to independently monitor changes to the Policy by reviewing the current version on the Website.

11.6. Continued use of the Company's services after the entry into force of changes to the Policy constitutes the subject's consent to such changes. If a subject does not agree with the changes made, they have the right to stop using the services and request deletion of their personal data in accordance with Section 6 of this Policy.

11.7. Compliance with the requirements of the Policy is monitored by the person responsible for organizing the processing of the Company's personal data.

11.8. This Policy shall take effect from the moment it is posted on the Website.

The current version is published on the Provider's official website (vortara.io)