**CODITEACH WEBSITE PRIVACY POLICY**

**1. DEFINITION OF CONCEPTS**

“Law” means the Law of the Republic of Kazakhstan “On Personal Data and Their Protection” dated May 21, 2013 No. 94-V with all amendments and additions, as well as other legislative acts of the Republic of Kazakhstan.

“Site” means an information unit on the Internet, a resource of web pages (documents) that are united by a common topic and linked to each other using links. It is registered to the Company and is necessarily tied to a specific domain, which is its address. This Policy has been developed for the following website: [www.coditeach.kz](http://www.coditeach.kz), as well as other services and products for which personal data is provided to Company.

“Personal Data” means a set of personal data and/or non-personalized information about the User provided by the User to the Company and/or automatically collected by the Company and/or third parties.

“Policy” means this Privacy Policy for the Site (with all existing additions and changes).

“User” means an individual who uses the Site and/or has accessed it from any device.

“User Agreement” means the agreement concluded between the Company and the User regarding the procedure, rules and features of using the Site. The user accedes to such an agreement and does not have the right to make and/or demand any changes or additions to it. The User can read the terms of the User Agreement at the following link: www.coditeach.kz/terms-of-use.

“Company” means the following person in whose name the Site is registered:

“CodiPlay” LLP, ​

Address: Republic of Kazakhstan, Almaty, st. Ergozhina 27, ​

Contact details: office@codiplay.kz

“Cookies” means small files sent by a website and placed on the User’s computers, smartphones, tablets, watches and other mobile devices to improve the performance of the sites and the quality of the content they contain.

**2. RELATIONS COVERED BY THE POLICY**

**Legal context**

The Company complies with the recommendations of the relevant authorities and strive to ensure its compliance with the regulatory framework established by the Law and any other laws or regulations concerning Personal Data that relates to it. In order to comply with best practices, the Company applies the principles of the General Data Protection Regulation (GDPR) 2016/679 of the European Parliament and of the Council in this Privacy Policy.

**General provisions**

This Policy is used and applies exclusively to Personal Data received from the Users in connection with their use of the Site. The provisions of this Policy are aimed at:

(1) determination of the types of Personal Data received, directions and purposes of use (processing) of Personal Data, as well as sources of obtaining such Personal Data; And

(2) determination of the User’s rights regarding the protection of the confidentiality of Personal Data transmitted by him; And

(3) identification of persons responsible for the processing and storage of Personal Data.

The rules of this Policy do not apply in case of processing by third parties of Personal Data that is voluntarily provided by the User.

By using the Site, the User agrees to the terms of this Policy and gives his consent to the Company to collect, process, retain and store Personal Data in the manner and under the conditions provided for in this Policy.

If the User does not agree with the terms of the Policy and/or certain terms of the Policy are not clear to him, in this case the User is obliged to immediately stop using the Site.

**User’s rights to protect Personal Data**

The Users have the following rights to your Personal Data, which the Company undertakes to comply with:

• request access to the Personal Data and a copy of it

• ask the Company to modify the Personal Data if you consider it obsolete, inaccurate or incomplete.

• object to the processing of the Personal Data if based on the legitimate interest in certain circumstances.

• request to restrict the processing during a limited period of time, in certain circumstances.

• opt-out from a consent already given, without this withdrawal affecting the lawfulness of the processing operations already carried out.

• when technically feasible, ask to send Personal Data that was provided to the Company or that the Company communicates it to a third party.

• ask the Company to delete your personal information if it meets legal grounds for which it is applicable.

These rights can be exercised directly and at any time by sending an email to the Company.

**3. LIST OF PERSONAL DATA COLLECTED**

Non-personal information about users

In connection with the use of the Site, the Company may automatically collect and process the following non-personal information about the User:

(1) information about traffic, the possible number of clicks, logs and other data.

(2) device information (identification number of the device from which you are logging in, operating system, platform, browser type and other browser information, IP address).

Personal data about users

The User provides the Company with the following personal information about himself:

(1) Identification data (full last name, first name and patronymic)

(2) Contact data (email address)

(3) data contained in the User’s personal account (profile), all internal correspondence of the User (if any), as well as other activity of the User’s personal account (profile).

(4) name of the educational institution or organization and their details

(5) data and information obtained as a result of combining certain Personal Data of a particular User, as well as data and information obtained about the User received from third parties (partners, marketers, researchers).

The User is the only responsible person for the completeness of the personal data provided and is obliged to change it in a timely manner (updating, checking, adjusting) on a regular basis.

The Company assumes that all personal data provided by the User is reliable and that the User keeps such information up to date.

**Use of cookies**

The site uses certain Cookies to store the IP address, preferences of Users or the type of device used for the purpose of (1) maintaining statistics of visits and traffic to the site, and (2) personalizing the data displayed on the User's screen, and (3) storing data necessary for identification the User, including when accessed from different devices, and (4) displaying advertising in accordance with the interests and preferences of the User. The Site may use both its own Cookies belonging to the Company and Cookies of third parties.

The site uses the following cookies:

(1) Technical (functional) cookies, which are necessary to control traffic and data transfer, to identify Users and provide the User with access to content, and without which the use of the Site is functionally limited, as well as to prevent the provision of recommendations that are not in line with the interests of the User.

(2) Statistical Cookies, which are needed to track the frequency of visits to the Site, the ways in which the Site and/or its content is used by Users, and identify the type and type of content that is popular or interesting to the User.

(3) Third party cookies, which are installed by third parties with the permission of the User and are intended to conduct statistical studies regarding the User’s behavior on the Internet and/or sending personalized advertising or marketing materials to the User and/or providing goods or services.

The user has the right to disable cookies at any time by changing certain settings in his browser. Such disabling does not entail a restriction or change in the User's access to the functionality of the Site and/or its content. To disable cookies you need to do the following:

Go to the browser on your device, go to “Settings”, then select “Cookies”, then “Change settings” and set the desired configuration.

**4. PURPOSES OF COLLECTION AND PROCESSING OF PERSONAL DATA**

**Determination of processing purposes**

The collection and processing of Personal Data is carried out for the following purposes:

(1) to analyze the User’s behavior, as well as identify the User’s preferences for a certain type of content.

(2) for the prompt and correct operation of the Site, improving its functionality and content.

(3) to identify the User.

(4) to send personalized advertising and marketing materials to the specified email address and/or mobile phone of the User.

(5) to comply with the requirements of the Law.

(6) for technical support of the Site, identifying problems in its operation and eliminating them.

(7) to maintain contact with the User (communication).

(8) to fulfill other obligations of the Company that have arisen to the User.

(9) to conduct statistical studies.

(10) for any other purposes, subject to separate consent from the User.

The processing of Personal Data is carried out on the basis of the following principles: (1) the legality of the purposes and methods of processing; and (2) integrity; and (3) compliance of the purposes of processing of Personal Data with the purposes previously determined and stated when collecting such Personal Data; and (4) compliance of the volume and nature of the Personal Data processed with the stated purposes of their processing.

**Conditions for processing personal data**

Processing of Personal Data is carried out in the following cases: (1) obtaining consent from the User; or (2) achievement by the Company of the goals provided for by an international treaty or Law; or (3) the User provides his Personal Data to an unlimited number of persons; or (4) fulfilling other obligations of the Company to the User, including, but not limited to, providing certain content to the User; or (5) saving the life or health of the User when consent to the processing of his Personal Data cannot be obtained in advance.

In the event of depersonalization of Personal Data, which does not allow direct or indirect identification of the User, subsequent use and disclosure of such data to third parties is permitted and the rules of this Policy no longer apply to them.

The Company takes all possible measures to protect the confidentiality of the received Personal Data, except in cases where the User has made such data publicly available.

Processing of Personal Data is carried out using automation tools and without the use of such automation tools.

**5. ACCESS OF THIRD PARTIES TO PERSONAL DATA**

**Disclosure of personal data to third parties**

The Company has the right to disclose Personal Data (1) to its affiliates, branches and representative offices opened both in the territory of the Republic of Kazakhstan and in the territory of other states; (2) successors of the Company who arose as a result of its liquidation, reorganization or bankruptcy, and who received exclusive rights to own the Site; (3) to third parties solely for the purpose of providing the User with or access to certain content; (4) to third parties when the User has given consent to the disclosure, transfer or processing of his Personal Data, as well as in other cases expressly provided for by the Law or this Policy.

The Company discloses Personal Data only if (1) it is confident that third parties will comply with the terms of this Policy and take the same measures to protect the confidentiality of Personal Data that the Company itself takes, and (2) consent to such disclosure has been previously expressed by the User and/or permitted on the basis of the Law.

**6. ADVERTISING**

Advertising on the website

The Company does not place advertising on the Site.

Distribution of promotional materials

The User agrees with the right of the Company to send personalized advertising and marketing materials to the provided email address and/or mobile phone.

The User has the right to refuse to receive such advertising and marketing materials at any time by performing the following actions:

in the general settings of the user’s personal account, uncheck the box next to “Receive advertising mailings”.

Please note that if you refuse to receive advertising and marketing materials, the User may continue to receive any notifications from the Company related to the use of the Site and/or its content.

**7. DIRECTION OF COMPLAINTS AND QUESTIONS TO THE COMPANY**

**Request to stop processing personal data**

Each User has the right to express his objection to the Company against the processing and/or storage of his Personal Data. Such an objection can be expressed as follows:

the request should be sent to the Company at the following email address: support@coditeach.kz

**Request for information about personal data**

If the User has questions related to the procedure for applying or using this Policy, the procedure and/or method of processing Personal Data, the User can ask such a question as follows:

the question should be sent to the Company at the following email address: support@coditeach.kz

**Change (update, addition, correction) or deletion of personal data**

The User has the right to independently change or delete his Personal Data at any time, except in cases where such change or deletion may lead to (1) a violation of the rules of this Policy; or (2) to violate the Law; or (3) the nature of such Personal Data is evidence in any legal proceeding arising between the Company and the User. To do this, the User must delete his personal account (profile) on the Site.

The Company has the right to delete the User’s personal account/profile at any time, as well as all Personal Data about the User if he has violated the terms of this Policy and/or the User Agreement.

**8. TERMS AND PROCEDURE FOR STORING PERSONAL DATA**

Storage is carried out independently by the Company.

Storage is carried out for the entire period of use of the Site by the User.

**9. ACCESS OF MINORS TO THE SITE**

The Site may be used by persons under the age of 18.

The Site collects personal data about Users, therefore the use of this Site by minor Users is permitted only upon receipt of prior consent from the legal representative (guardian) for the processing of Personal Data. Such consent must be provided in the following way:

sending the consent of the child’s legal representative and/or the management of the educational institution or organization in which the children are studying.

If a minor User cannot provide consent to the processing of his Personal Data from his legal representative (guardian), in this case such User is obliged to immediately stop using the Site.

**10. PROCEDURE FOR PROTECTING PERSONAL DATA**

Protecting the confidentiality of Personal Data is a primary and important task for the Company. The Company adheres to all required international standards, rules and recommendations for the protection of Personal Data.

The Company has implemented a number of technical and organizational methods aimed at protecting Personal Data from disclosure or unauthorized access to it by third parties.

**11. FINAL PROVISIONS**

**Availability of the policy text for review**

Users can review the terms of this Policy at the following link: www.coditeach.kz/privacy.

This version of the Policy is effective from September 1, 2023.

**Changes and additions to the Policy**

This Policy may be changed from time to time. The Company does not bear any responsibility to the User for changing the terms of this Policy without the permission and/or consent of the User.

The User undertakes to regularly check the provisions of this Policy for possible changes or additions.

**Applicable Law**

This Policy has been developed in accordance with the current legislation on the protection of personal data of the Republic of Kazakhstan.

**Risk of disclosure**

Regardless of the measures taken by the Company to protect the confidentiality of the received personal data, the User is hereby considered to be properly aware that any transfer of Personal data on the Internet cannot be guaranteed secure, and therefore the User carries out such transfer at his own risk.