

## PRIVACY POLICY

This privacy policy (the "**Privacy Policy**") applies to all processing of personal data (the "**Personal Data**") implemented in the context of the access to the services (the "**Services**") via the 24 Goals app (the "**App**").

For the purpose of this Privacy Policy, the term "**Applicable Data Protection Regulation**" means the European regulation No. 2016/679 of 27 April 2016 (the "**General Data Protection Regulation**" or "**GDPR**") as well as any other data protection legislation or regulation applicable to the processing of personal data described in this Privacy Policy (such as Law of the Republic of Kazakhstan No. 94-V "On personal data and their protection" dated May 21, 2013 (the "**KZ Law on PDP**").

For the purpose of this Privacy Policy, "**Processing**" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction

For the purpose of this Privacy Policy, "**Personal Data**" means any information relating to an identified or identifiable individual. This includes Information you provide or generated when you use the App. When you use the Services, you accept and understand we collect, process, use and store your Personal Data as described in this Privacy Policy. If you do not agree with this Privacy Policy, you must not use any of the Services. If you change your mind in the future, you must stop using the Services and you may exercise your rights in relation to your Personal Data as set out in this Privacy Policy.

## IDENTITY OF THE DATA CONTROLLER

The processing of Personal Data described in this Privacy Policy are implemented under the responsibility of the following entity:

**Individuel Entrepreneur Yerkezhan Zholdasova, duly registered under the laws of the Republic of Kazakhstan, Individual Identification Number 991124400098**

## COLLECTED DATA AND PURPOSES OF THE PROCESSING

- The Personal Data that you provide

Type of Personal Data	Purposes of the processing	Legal basis
Email address* Password*		Our legitimate interest in ongoing improvement of our customer relations

\*These Personal Data are mandatory and necessary to the creation of your Account and condition access to the relevant Service.

## PURPOSES OF THE COLLECTION AND PROCESSING

We collect and process your Personal Data for direct marketing purposes. We kindly note that we are not eligible to process your Personal Data that is out of the purposes stipulated herein.

## DATA RETENTION PERIODS

We keep your Personal Data for as long as necessary to achieve the purposes set out above. Generally, it is stored for as long as you are registered and using our Services. Some information we collect will be stored for longer where we have an overriding legitimate interest to retain such information (for example, information on suspicious behaviour of certain users of our Services and transaction records).

When deleting Information, we will take measures to make the Personal Data irrecoverable or irreproducible, and electronic files which contain Information will be deleted permanently.

## STORAGE PLACE OF THE PERSONAL DATA

According to the KZ Law on PDP, Your Personal Data will be stored by the Data Controller in the Republic of Kazakhstan. We take steps to ensure all transfers are protected by adequate safeguards, including the standard contractual clauses approved by the European Commission.

## USERS' RIGHTS

Pursuant to the Applicable Data Protection Regulation, you benefit from the following rights in relation to the processing of your Personal Data:

- **Right of access:** you can ask to obtain a copy of your Personal Data from us, as well as to receive information regarding the processing of your Personal Data (such as the categories of Personal Data that are processed, the purposes of the processing, the categories of recipients to whom the Personal Data is communicated, the retention period of the Personal Data);
- **Right to rectification:** you can ask us to correct, complete, update your Personal Data if it is inaccurate, incomplete, ambiguous and/or expired;
- **Right to erasure:** you can ask us to obtain the deletion of your Personal Data under certain circumstances set out in Article 17 of the GDPR (for example, if your Personal Data is no longer necessary for the purposes for which they were collected or are processed; or if you have withdrawn your consent for processing your Personal Data, as long as the prior consent was the legal basis for their collection and processing and there is no longer any other legal basis justifying the latter);
- **Right to restriction:** you can ask us to limit the processing of your Personal Data under certain circumstances set out in Article 18 of the GDPR (for example, when you contest the accuracy of the Personal Data, the time needed for us to verify this point);
- **Right not to be subject to certain specific processing** (set out in Article 22 of the GDPR): you can ask us not to be subject to a decision based exclusively on automated processing, including profiling, producing legal effects concerning you or significantly affecting you in a similar manner;

- **Right to object:** you may object to the processing of your Personal Data for a reason relating to your specific situation as set out in Article 21 of the GDPR (for example, you can, at any time, object to the processing of your Personal Data for purposes of direct marketing and profiling related to such prospecting activities);
- **Right to portability:** you can ask to receive your Personal Data – when they are processed on the legal basis of your consent or their necessity for the performance of a contract – in a structured, commonly used and machine-readable format, and that we transmit them to another data controller (for example, another service provider);
- **Right to withdraw consent:** you can withdraw your consent at any time, without providing a reason, for all of the processing described in the Privacy Policy for which the legal basis is your consent;
- **Right in case of death:** you can define guidelines relating to the preservation, erasure and communication of your Personal Data after your death. These guidelines may be general or specific (in accordance with article 85 of the French Data Protection Legislation). The general guidelines relate to all of your Personal Data and can be recorded with a trusted digital third party certified by the French supervisory authority. The specific guidelines relate to the processing of Personal Data described in this Privacy Policy, and is recorded with us;
- **Right to lodge a complaint:** you may file a claim with a supervisory authority, in particular in the EEA country in which you reside or work, or in the EEA where the alleged breach has occurred, if you feel that one or several of our Personal Data processing breach the GDPR;
- **Other rights:** you have other rights as described in the KZ Law on PDP.

To exercise one of these rights, you may send your request at any time, using the contact information provided in the "[Contact us](#)" section of this Privacy Policy. Requests will be processed as long as you can validly prove your identity and the subject of your request is clearly identified.

Requests will be processed promptly, and in any case within no more than one month from receipt of the request. If needed, this period may be extended by two months, depending on the complexity and number of requests. In this case, we will inform you of the reasons for this extension.

## MODIFICATION OF THE PRIVACY POLICY

You can see the date of the last update to the Privacy Policy by referring to the "Last update" note at the top of the Privacy Policy.

When we are considering making substantial changes to this Privacy Policy (for example, a change to the processing purposes of the Personal Data, the identity of one or several data controllers, or the manner in which you can exercise your rights), we will inform you before these changes become effective, through a notice on the App or by email. This information is accompanied by an "I understand" button, which we ask you to click on in order to confirm that you have understood the changes.

You are hereby informed that you can consult this Privacy Policy at any time on our \_\_\_\_\_, which is accessible from your App.

## CONTACT US

By email:

Via the online form on the website

By mail: