**Privacy policy**

Revision 03.04.2025

This privacy policy (hereinafter referred to as the "Policy") applies to all information, including personal data within the meaning of applicable law, that COUBE BIN LLP: 230340018743 (hereinafter referred to as the "Operator") may receive about you in the course of your use of the website (including, but not limited to, the website located on the Internet at: https://coube.kz/, application programs (including programs for mobile devices) of the Operator and its affiliates that are a software and hardware complex (hereinafter referred to collectively as the "Service"), as well as in the course of the Operator's performance of any agreements and contracts concluded with you in connection with your use of the Service.

The Operator may receive Personal Data from its partners ("Partners"), websites, programs, products or services that you use (e.g., from the Operator's advertisers). The transfer of Personal Data is possible only in accordance with applicable law, and is carried out on the basis of special agreements between the Operator and each of the Partners.

In order for you to use the Service, your Personal Data is collected and used by the Operator.

**Concepts**

*"Personal Data"* means any information directly or indirectly related to a specific or identifiable individual. Personal Data may include last name, first name, patronymic, name of organization, position, phone number, identity document details, email address and other business contact information recorded on electronic, paper and/or other tangible media

*"Personal data processing"* means any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

"Confidentiality of personal data" means a mandatory requirement for the Operator and other person who has access to personal data not to allow their dissemination without the consent of the personal data subject or other legal grounds.

"User" means a user of the Service https://coube.kz/, a person who has access to the Service via the Internet and uses the Service, including those who have entered into an Agreement with the Operator or are its authorized representative.

1. **General Provisions**

The Operator may collect and use personal data when:

- You access the Operator's Service from any device or contact the Operator in any form in accordance with this Policy;

- You contact us with a question, complaint, send us your comments or remarks and suggestions (provide data such as name, contact information and the content of the request). In these cases, the Operator will use the Personal Data provided solely for the purpose of preparing a response to the request and considering the issue in accordance with the established procedure;

- The Operator provides services to its Users.

**2. Principles of collection, processing and storage of personal data**

- the processing of personal data is carried out on a legal and impartial basis;

- only personal data that meet the purposes of their processing are subject to processing;

- the content and volume of the processed personal data correspond to the stated purposes of processing. The processed personal data are not redundant in relation to the stated purposes of their processing;

- the processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes;

- The Operator takes all necessary measures to ensure the security of personal data during their processing;

- The Operator respects the rights and legitimate interests of personal data subjects and ensures their protection during the processing of personal data;

- If there is a need to process personal data for the provision of its services, the Operator asks its Users to obtain the consent of the relevant person and provide the necessary information to the personal data subjects about the use of their data.

**3. Data collected by the Operator**

The Personal Data collected about you by the Operator during your use of the Service may be matched and linked to other Personal Data collected by the Operator as part of your use of your account. The Operator does not verify the Personal Data provided by you, except as provided for in the Service Agreement, and cannot judge their accuracy, as well as whether you have sufficient legal capacity to provide your Personal Data.

Nevertheless, the Operator assumes that you provide true and sufficient Personal Data, as well as update it in a timely manner.

The Operator may collect the following types of data:

- personal data that you provide to the Operator when filling in the information fields on the Operator's Service, including when filling out the contact form;

- personal data and other information contained in messages you send to the Operator, including attachments to e-mails and letters;

- Electronic data (HTTP headers, IP address, cookies, web beacons/pixel tags, browser ID data, hardware and software information, Wi-Fi network data);

- geolocation information;

- personal data that you provide to the Operator when visiting the Operator's office;

- information about you that the Operator receives from its Partners in accordance with the terms of the agreements concluded between you and the relevant Partner and the agreements concluded between the Operator and the Partner;

- personal data that the Operator needs to receive and process in order to provide services and provide or receive professional advice and work results.

The Controller does not purposefully collect sensitive personal data (such as racial origin, political opinions, health information and biometric data). However, you should take into account that the Data Controller cannot request your consent for such processing, as it is not aware in advance of the potentially sensitive nature of the Personal Data that you may provide to the Data Controller.

The Operator does not collect data for the purpose of creating a "portrait" of the User to the extent that this may significantly affect your rights and freedoms in accordance with applicable law.

**4. Purposes of personal data processing**

The Data Controller may process your personal data solely for the purposes for which it was provided, including:

- register you on the Operator's Service to provide you with access to its individual sections;

- fulfillment of the Operator's contractual obligations to you, as well as to its Users, including ensuring the operation of the Service;

- providing you with information about the Contractor and its services;

- respond to your requests and respond to requests for additional information;

- providing or receiving professional services;

- development of the Operator's activities and services;

- verification of the integrity and reliability of Users (including their employees, drivers, employees, managers, members of companies) involved in the provision of services or to whom services are provided;

- providing Personal Data to the Operator's employees for the purpose of providing services and attracting new Users;

- Identifying Users with similar needs;

- analytical research of market trends, schemes of relationships and prospects for sales;

- compliance with statutory obligations;

- administration of the processes of management of activities and services and their development, including:

* management of the Operator's relations with Users;
* development of the Operator's services and activities (in particular, identification of the Users' needs and opportunities to improve the efficiency and quality of services);
* maintenance and use of relevant information systems;
* administer and manage the Service;
* implementation of measures to ensure safety, quality and management
* risks, including:
* detect, investigate and remediate security threats;
* quality control of services and risk management in relation to Users within the framework of standard procedures for accepting the User and concluding an agreement with him/her;
* for other purposes with your consent.

- The operator processes technical data for:

- ensuring the functioning and security of the Operator's Service;

- improving the quality of the Operator's Service.

The Operator does not make decisions that give rise to legal consequences for you or otherwise affect your rights and legitimate interests on the basis of exclusively automated processing of personal data.

The Operator hereby informs you, and you confirm that you have no obligation to provide the Operator with any Personal Data when you use the Service or Services. The provision of Personal Data is based solely on your free will. At the same time, you are aware that without providing Personal Data, the Operator will not be able to provide you with the opportunity to use the Service in full, and your use of the Service will be limited.

**5. Territory where your Personal Data is stored and processed**

Your Personal Data will be stored and processed in the territory of the Republic of Kazakhstan.

**6. Your rights**

To ensure the protection of your rights and freedoms, at your request, the Contractor:

- confirm whether it processes your personal data within 30 calendar days from the date of receipt of the request;

- inform you about the source of receipt and the composition of your personal data that it processes;

- inform you about the legal basis, purposes, terms and methods of processing your personal data;

- make the necessary changes to your personal data, if you confirm that they are incomplete, inaccurate or not up-to-date, within 7 working days from the date of receipt of such confirmation and notify you of the changes made;

- inform you of the name and location of organizations that have access to your personal data and to which your personal data may be disclosed with your consent;

- inform you of the name of the legal entities to which, with your consent, the processing of your personal data may be entrusted;

- Exclude you from our newsletter when requested;

- stop processing your personal data within 30 calendar days from the date of receipt of the withdrawal of consent, unless there are other legal grounds for the processing of personal data provided for by the legislation of the Republic of Kazakhstan;

- stop processing your personal data if it is confirmed that they are being processed unlawfully, and notify you of the measures taken;

- destroy your personal data, if it is confirmed that they were obtained illegally or do not correspond to the stated purposes of processing, within 7 working days from the date of receipt of the relevant confirmation and notify you of the measures taken.

**7. How you can contact the Operator**

You can contact the Operator with a request or complaint regarding the processing of your personal data by sending a letter with the subject line "Request for personal data" to the e-mail address: [office@coube.kz](mailto:office@coube.kz) or by mail to the address: Kazakhstan, Almaty city, 050040/A15G7M6, Baizakov Street, 280, Smart Point, COUBE LLP.

The Operator reserves the right to ask you to provide additional information regarding your request necessary to prepare its response to you.

**8. Withdrawal of consent to the processing of personal data**

You can send the Operator a withdrawal of consent to the processing of personal data with the subject line "Withdrawal of consent to the processing of personal data" to the e-mail address: [office@coube.kz](mailto:office@coube.kz) or to the address: Kazakhstan, Almaty city, 050040/A15G7M6, Baizakov Street, 280, Smart Point, COUBE LLP. The request must include: full name of the subject, phone number, e-mail or postal address, personal data, the processing of which should be stopped.

**9. Terms and procedure for the transfer of personal data**

The Operator has the right to exchange Personal Data with other parties only if there are legal grounds for this. When transferring Personal Data to other parties, the Operator enters into contracts and uses security mechanisms to protect Personal Data and comply with the Operator's security standards, confidentiality and protection.

The Operator may transfer the personal data stored by it:

- Third parties that provide applications, functionality, data processing services, or IT services. For example, information technology providers, cloud software as a service, website hosting and management services, data analytics, data backup, and data protection and retention services;

- Third parties that otherwise assist the Third Party in providing services, products or information;

- Auditors and other professional advisers;

- Law enforcement and other government and regulatory authorities, as well as other third parties and persons as required by applicable laws and regulations;

- Third parties authorized to request the disclosure of personal data for the purpose of verifying their compliance with applicable laws and regulations, or for the purpose of investigating an alleged crime, or establishing, exercising, or defending legal rights;

- The Operator discloses personal data only in cases where the Operator has the right to do so in accordance with the requirements of applicable laws and regulations.

**10. Termination of personal data processing**

The Operator stops processing your personal data:

- the occurrence of conditions for the termination of the processing of personal data or upon the expiration of the established periods;

- upon achievement of the purposes of their processing or in case of loss of the need to achieve these goals;

- at your request, if the processed personal data are illegally obtained or are not necessary for the stated purpose of processing;

- in case of detection of unlawful processing of personal data, if it is impossible to ensure the lawfulness of processing;

- upon expiration of the consent to the processing of personal data or in case of withdrawal of such consent, if there are no other legal grounds for the processing of personal data provided for by applicable law;

- in case of liquidation of the Operator.

**11. Security of personal data**

To ensure the security of personal data, during their processing, the Operator takes the necessary and sufficient legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, their destruction, modification, blocking, copying, provision, distribution, as well as from other illegal actions in relation to personal data.

In order to ensure adequate protection of your personal data, the Operator assesses the damage that may be caused in the event of a personal data security breach, as well as identifies current threats to the security of personal data when they are processed in personal data information systems.

The operator has adopted local regulations on the security of personal data.

The Operator's employees who have access to personal data are familiar with

with this Policy and local acts on the security of personal data.

**12. Cookies**

The Operator uses cookies. Cookies are small text files placed on your computer's hard drives when you visit websites,

designed to improve the efficiency of the sites, as well as to obtain information about preferences by the site owner. Disabling cookies may result in the inability to access parts of the site that require authorization.

**13. Links to Third Party Websites**

The Operator's website may contain links to third-party websites and services that the Operator does not control. The Operator is not responsible for the security or privacy of any information collected by third-party sites or services.

**14. Changes to the Policy**

The Operator has the right to make changes to this Privacy Policy without the consent of the Users.

The new privacy policy comes into force from the moment it is posted on the https://coube.kz Website, unless otherwise provided by the new version of the Privacy Policy.

The current Privacy Policy is available at: [https://coube.kz](https://coube.kz/)

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