

PRIVACY POLICY

Version dated 01.06.2026

This Privacy Policy (hereinafter referred to as the "Policy") is an official legal document of Limited Liability Partnership "AlmaTeam" (hereinafter referred to as the "Contractor" or the "Company") and establishes the procedure for the collection, processing, storage, protection and cross-border transfer of Personal Data of Users of the "ALMA JOB" digital platform (including the Website and the Mobile Application).

The Policy has been developed in strict compliance with the requirements of the Constitution of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan No. 94-V dated May 21, 2013 "On Personal Data and Its Protection" (hereinafter referred to as the "Law"), as well as other regulatory legal acts of the Republic of Kazakhstan in the field of informatization and information protection.

1. TERMS AND DEFINITIONS

- **the Platform** – a set of software and hardware tools of the Contractor, including a Website on the Internet and the official "ALMA JOB" Mobile Application, intended for automating personnel selection, publication of vacancies and resumes.
- **the Contractor** (Owner and Operator of the database) – Limited Liability Partnership "AlmaTeam", independently organizing and carrying out the processing of personal data, as well as determining the purposes of processing and the composition of data.

- **the User** – any individual or legal entity that has completed the registration and/or authorization procedure on the Platform and has accepted the terms of the User Agreement (Public Offer), the Terms and Rules for the Use of the digital platform, and this Policy.
- **the Job Seeker** – a User (an individual) who posts their Resume on the Platform for the purpose of seeking employment or cooperation offers.
- **the Employer/ the Recruitment Agency/ the Private Employer** – a User (a legal entity, an individual entrepreneur or a natural person) who uses the Platform to search for, evaluate and hire personnel.
- **Personal Data (PD)** – information relating to a specific or identifiable subject of personal data, recorded on an electronic, paper and/or other tangible medium.
- **Collection of personal data** – actions aimed at obtaining personal data.
- **Processing of personal data** – actions aimed at the accumulation, storage, modification, supplementation, use, dissemination, depersonalization, blocking and destruction of personal data.
- **Destruction of personal data** – actions as a result of which it becomes impossible to restore personal data.

2. LEGAL GROUNDS FOR THE COLLECTION AND PROCESSING OF PERSONAL DATA

- 2.1. The Contractor collects, processes, stores and protects the personal data of Users on a lawful and fair basis.
- 2.2. The legal grounds for the collection and processing of personal data are:

- The voluntary, conscious and unconditional Consent of the subject of personal data;
- The conclusion, performance, amendment or termination of agreements and contracts to which the User is a party;
- The performance of obligations imposed on the Contractor by the legislation of the Republic of Kazakhstan (including in the field of tax accounting and accounting reporting);
- Ensuring the legitimate interests of the Contractor for the purposes of the proper functioning of the Platform and the protection of its security.

2.3. This Consent is given by the User in electronic form by performing any of the following implied actions (Acceptance):

- Placing a mark ("checkbox tick") in the special checkbox "I confirm that I have read and agree with the Public Offer, the Privacy Policy, the Terms and Rules for the Use of the platform, and I give my consent to the collection, processing, dissemination and transfer of personal data to third parties" during registration or authorization;
- Entering a one-time password (OTP code) sent by the Contractor to the User's verified phone number or e-mail;
- The actual use of the Platform's functionality (entering data into the Profile, Resume or Vacancy).

2.4. The User's electronic Consent is, in its legal force, fully equivalent to consent signed by the subject of PD by hand on a paper medium.

3. LIST OF PERSONAL DATA COLLECTED AND PROCESSED

The Contractor processes PD to the extent necessary to provide the Platform's services. This list includes:

3.1. Data of Job Seekers (individuals):

- Last name, first name, patronymic (if available);
- Date of birth, age and gender;
- Contact data: mobile phone numbers, e-mail addresses, links to messenger accounts;
- Information about the place of residence / actual location (city, region);
- Professional data: information on education, qualifications, work experience, periods of employment, professional skills (hard skills), language proficiency, possession of a driver's license and permitting documents;
- Media files and images: a personal photo (profile avatar), a video resume or other media files voluntarily uploaded by the Job Seeker;
- Desired salary level, work schedule and field of activity.

3.2. Data of Employers, Recruitment Agencies and Private Employers:

- For legal entities and individual entrepreneurs: Business Identification Number (BIN) or IIN, name of the organization, legal and actual addresses, state registration data, OKED (economic activity code);
- Full name, position and contact data (phone, e-mail) of authorized employees or legal representatives;
- For Private Employers (individuals seeking domestic staff): full name, phone number, address of the place of work performance (household location).

3.3. Technical and system data (collected automatically):

- Device IP address, unique mobile device identifier (Device ID);
- Type of operating system (iOS, Android, Windows) and type of internet browser;

- Cookie file data, pixels and local storage. The User has the right, at any time, to refuse to save cookie files by independently changing the relevant settings of their web browser or mobile device. At the same time, the Contractor notifies that disabling or blocking cookie files may result in the incorrect operation of the Platform and restriction of access to certain of its functions;
- Device geolocation data (with the User's permission);
- Activity logs: date, time and history of the User's actions on the Platform (views, responses, search queries, link transitions).

4. PURPOSES OF THE COLLECTION AND PROCESSING OF PERSONAL DATA

The Contractor collects and processes personal data strictly for the achievement of the following purposes:

4.1. Identification and authorization: Creation, verification and technical support of the functioning of the User's Personal Account (Profile) on the Platform.

4.2. Provision of communication: Sending the User service messages, system notifications, OTP codes for login, as well as responses to requests to the Support Service.

4.3. Performance of core functionality: Providing Job Seekers with the ability to publish Resumes and respond to Vacancies, and Employers – to search for personnel, evaluate candidates and access the Database.

4.4. Financial transactions: Organizing the acceptance of payments for paid Services of the Platform, issuing electronic invoices, Acts of Work Performed (Services Rendered) (via the IS ESF electronic invoicing system) and conducting accounting reporting.

4.5. Analytics and security: Protecting the Platform from fraud, bot attacks, unauthorized parsing of the database; conducting internal marketing research and improving UI/UX interfaces based on depersonalized statistical metrics.

4.6. Marketing and informing: Sending targeted selections of vacancies/resumes, Platform news and promotional offers. The User has the right to refuse mailings at any time by changing the relevant settings in the Personal Account or by following the "Unsubscribe" link in the received e-mail.

5. TRANSFER, DISSEMINATION AND DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

5.1. Conscious dissemination of Job Seekers' PD: By registering and publishing a Resume on the Platform, the Job Seeker understands and agrees that part of their personal data (including full name, contacts, work experience) becomes publicly available within the Platform and is transferred to Employers, Recruitment Agencies and Private Employers who have paid for the relevant Access to the Database.

5.2. The role of the Employer as an Operator: From the moment of obtaining access to the Job Seeker's personal data through the Platform, the Employer, the Recruitment Agency, the Private Employer becomes an independent Operator of such data and bears personal legal responsibility for its confidentiality under the legislation of the Republic of Kazakhstan. The "AlmaTeam" Company does not control and is not responsible for the actions of Employers outside the Platform.

5.3. Transfer to state authorities: The provision of Users' PD to third parties without their consent is not permitted, except in cases directly established by the laws of the Republic of

Kazakhstan (upon lawful and substantiated requests of judicial authorities, prosecution authorities, national security authorities, internal affairs authorities and tax authorities of the Republic of Kazakhstan).

6. TECHNICAL MEASURES FOR INFORMATION PROTECTION

6.1. Data localization in the Republic of Kazakhstan: In accordance with Article 12 of the Law of the Republic of Kazakhstan "On Personal Data and Its Protection", AlmaTeam LLP carries out the collection, processing and storage of personal data of citizens of the Republic of Kazakhstan using databases physically located on servers situated on the territory of the Republic of Kazakhstan.

6.2. Organizational and technical measures: The Contractor has implemented comprehensive measures to protect information from accidental or unlawful access, alteration, copying, leakage or destruction:

- The use of cryptographic encryption protocols (SSL/TLS) during data transmission;
- Two-factor authentication of users and employees via OTP codes;
- Strict delimitation of the Contractor's employees' access rights to databases;
- Regular backup of information and monitoring of system vulnerabilities.

6.3. Response to information security incidents: In the event of detection of unauthorized access, unlawful dissemination or leakage of personal data, the Contractor undertakes, within 1 (one) business day from the moment of detecting the incident, to notify the authorized body of the Republic of Kazakhstan in the

field of personal data protection thereof, as well as to take all necessary technical and organizational measures to contain the incident and notify the affected Users.

7. RIGHTS OF USERS

Each User of the ALMA JOB platform has the right:

7.1. To receive information: to know exactly which of their PD is stored by the Contractor, and to receive confirmation of the fact, purposes and methods of its processing.

7.2. To amend and supplement: to demand the correction of their PD if it is incomplete, outdated or inaccurate (the User can independently change most of the data in the Personal Account).

7.3. To blocking: to demand the temporary suspension of data processing in the event of a dispute concerning the accuracy of the information.

7.4. To withdraw consent and destroy data: To withdraw their Consent to the processing of PD at any time and to demand its complete deletion from the Platform.

8. TERMS AND PROCEDURE FOR THE STORAGE, WITHDRAWAL OF CONSENT AND DESTRUCTION OF PERSONAL DATA

8.1. Methods of data deletion: The User may initiate the procedure for the destruction of their PD in the following ways:

- Independently use the technical function "Delete Account / Profile" in the Personal Account settings on the Platform. In this case, the Profile is deactivated and the data is deleted from the active database;

- Send an official written application to the legal address of AlmaTeam LLP or send a scanned copy of the application to the official e-mail of the Support Service: info@almateam.dev.

8.2. Storage periods: The Users' Personal Data is stored by the Contractor until the moment the User independently deletes the Personal Account, or until the moment an official withdrawal of Consent to data processing is received.

8.3. Destruction periods: The Contractor undertakes to destroy or completely depersonalize the User's personal data within 10 (ten) business days from the moment the account deletion is recorded or the official application is received.

8.4. Exceptions: The Contractor has the right to continue storing a limited part of the User's data (contracts, payment documents, invoices) without their consent solely for the periods established by the Tax and Archival legislation of the Republic of Kazakhstan for the storage of financial reporting.

9. AMENDMENT OF THE PRIVACY POLICY

9.1. Right to amend: The Contractor reserves the right to unilaterally make changes and additions to this Policy in connection with updates to the Platform's functionality or changes in the legislation of the Republic of Kazakhstan.

9.2. Notification procedure: The new version of the Policy takes effect from the moment of its publication on the Platform. The Contractor notifies Users of the changes by publishing an announcement on the Platform, sending e-mail messages or requesting re-acceptance upon the next login to the application.

9.3. Consent to changes: If the User continues to use the Platform after the changes to the Policy take effect, this means their full and unconditional agreement with the new version of the document.

This Policy is drawn up in the Kazakh and Russian languages. In the event of a discrepancy between the versions in different languages, the Russian-language version shall prevail.

10. DETAILS OF THE CONTRACTOR

Owner and Operator of the Database:

Limited Liability Partnership "AlmaTeam"

040900, Republic of Kazakhstan, Kaskelen, Alatau St., 18

BIN: 260540004766

Support Service e-mail: info@almateam.dev