

Approved by
General Director
Rauan Ntech LLP
B.U. Azhgaliyev



Privacy policy



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1. General provisions

1.1. This Privacy Policy (hereinafter referred to as the "Policy") regulates relations related to the protection and use of confidential information in RauanNTech LLP (hereinafter referred to as "LLP") in accordance with the legislative and regulatory acts of the Republic of Kazakhstan.

1.2. The purpose of protecting confidential information is to ensure the economic and legal security of the LLP.

1.3. LLP has the exclusive right to use confidential information in any manner not prohibited by law at its sole discretion.

1.4. In accordance with this Policy, the LLP takes measures to protect confidential information and restrict access to it by third parties.

1.5. If, in connection with the implementation of its activities, the LLP becomes aware of information that constitutes a state secret in accordance with the legislation of the Republic of Kazakhstan, the LLP is obliged to take measures to protect them in accordance with regulatory legal acts on state secrets.

1.6. This Policy applies to all LLP structural divisions, including separate branches and representative offices.

2. Confidential information of the LLP

2. Confidential information includes commercial, official, banking and tax secrets.

2.1. The commercial information of the LLP includes:

- Data of the primary accounting documents of the LLP;
- content of accounting registers of LLP;
- content of the internal accounting statements of the LLP;
- Transactions made and completed by LLP, including contracts, their subject matter, content, price and other essential conditions;
- Information on settlement and other accounts opened in credit institutions, including in foreign currency, on the movement of funds on these accounts, and on the balance of funds on these accounts, information on available deposits in banks, including in foreign currency (banking secrecy);
- Production secrets (know-how) and other information constituting a production secret;
- Other information classified as a trade secret in accordance with this procedure.

2.2. Attribution of the information specified in paragraph 2.1 hereto to the information constituting the commercial secret of the LLP does not require the publication of any other acts besides this Policy.

2.3. The official secret of the LLP consists of any information, including information contained in official correspondence, telephone conversations, mail, telegraphic and other messages transmitted over electric and postal communication networks, which became known to the employee of the LLP in connection with the performance of his/her work duties assigned to him/her.

2.4. Bank secrecy consists of information about the status of the bank account and bank deposit, account transactions and information about the client. Information constituting a banking secret can only be provided to LLP or their representatives. Such information may be provided to state bodies and their officials only in cases and in accordance with the procedure provided for by law.

2.5. Any information about an LLP transferred to tax authorities, bodies of state extra-budgetary funds and customs authorities is a tax secret.

2.6. Any other information, with the exception of information that, in accordance with the legislation, cannot be classified as a trade secret, may be classified as a trade secret by decision of the General Director of the LLP and is carried out by issuing, in each case, an order of the General Director of the LLP. The initiative in issuing an order of the General Director on attributing certain information to



the commercial secret of the LLP may come from the participants of the LLP, heads of structural divisions of the LLP, heads of separate structural divisions of the LLP, contractors of the LLP.

2.7. Confidential secret does not include information disclosed by the LLP independently or with its consent, as well as other information that cannot be classified as confidential secret in accordance with the legislation of the Republic of Kazakhstan and access restrictions that are not allowed in accordance with the legislation of the Republic of Kazakhstan.

3. Protection of confidential information of LLP

3.1. The protection of confidential information of LLP consists in taking a set of measures aimed at restricting access to confidential information of third parties, preventing unauthorized disclosure of confidential information, detecting violations of the confidential information regime of LLP, suppressing violations of the confidential information regime of LLP, bringing persons violating the confidential information regime of LLP to established responsibility.

3.2. A prerequisite for employment contracts concluded with employees of the LLP is the condition that the employee complies with official and commercial secrets.

3.3. Each employee of the LLP, upon hiring, familiarizes himself/herself with the Privacy Policy with the signature in the Acknowledgment Sheet, on responsibility for violating the regime of official and commercial secrets.

3.4. Heads of structural divisions are obliged, at least once a quarter, to instruct employees directly subordinate to them on compliance with the regime of official and commercial secrets.

3.5. Contracts concluded by LLP, in the person of any authorized persons, must contain a condition on the confidentiality of the counterparties.

3.6. Conditions are created in the working and other premises of the LLP that restrict access to confidential information of third parties and unauthorized disclosure of confidential information, including technical means of protection against unauthorized access to information (safes and metal boxes for storing documents, etc.).

3.7. The LLP must have a signed contract with a security company operating in accordance with the contract for the provision of security services with the LLP and the legislation of the Republic of Kazakhstan.

3.8. The LLP takes measures to identify violations of the confidential information regime of the LLP.

3.9. The LLP undertakes all legally permissible ways to suppress the identified violations of the confidential information regime of the LLP.

3.10. Persons guilty of violating the confidential information regime of LLP are brought to the established responsibility.

4. Procedure for the use and provision of confidential information

4.1. The use of confidential information of the LLP is allowed only by those employees of the LLP who need access to such information due to their functions.

4.2. The provision of confidential information of the LLP to third parties is possible only with the permission of the General Director of the LLP.

4.3. The LLP submits annual accounting statements in accordance with the constituent documents to the participants, as well as to the territorial bodies of state statistics at the place of their registration. Accounting statements are submitted to other executive authorities, banks and other users in accordance with the legislation of the Republic of Kazakhstan.

4.4. Other cases of providing confidential information are provided for by the current legislation of the Republic of Kazakhstan.



5. Final provisions

5.1. Persons guilty of violating the confidential information regime of LLP are brought to criminal, administrative, disciplinary and civil liability in accordance with the established procedure.

5.2. In all other matters that are not regulated by this Policy, the provisions of the current legislation of the Republic of Kazakhstan apply.