

# Privacy Policy

## Privacy and Cookie Usage Policy

Welcome to the investlink.io website (hereinafter referred to as the "Platform"). By connecting to the Platform, viewing the information posted on the Platform, and/or using the services and features of the Platform, you confirm that you have read, understood, and accepted this Privacy and Cookie Usage Policy (hereinafter referred to as the "Policy") without any limitations or reservations. Disagreement with this Policy, either in whole or in part, is an unconditional basis for discontinuing the use of the Platform's services and features. The purpose of this Policy is to inform you of the rights and freedoms that you can exercise in connection with our use of your personal data, as well as the order and terms of their collection, processing, transmission, and protection.

Investlink Ltd., BIN 211140900412 (hereinafter referred to as the "Data Controller"), registered in the jurisdiction of the Astana International Financial Centre (hereinafter referred to as the "AIFC"), is the personal data operator and is responsible for the collection, processing, transmission, and protection of your personal data. The collection, processing, transmission, and protection of your personal data will be carried out by the Data Controller in accordance with AIFC Regulation No.10 of 2017 "On Personal Data Protection"

[https://authority.aifc.kz/files/legals/191/file/10.-aifc-data-protection-regulations-2017\\_new-design.pdf](https://authority.aifc.kz/files/legals/191/file/10.-aifc-data-protection-regulations-2017_new-design.pdf)

(hereinafter referred to as "AIFC Regulation"), as well as other applicable laws and rules not contradicting the AIFC Regulation.

This Policy applies exclusively to the Platform and does not extend its action to any other websites.

## 1. Purpose of Processing and Retention Period of Personal Data

In accordance with applicable laws and rules, to provide you access to the services and features of the Platform, the Data Controller must obtain your personal data from you. The processing of your personal data is based on the legitimate interest of the Data Controller in providing you access to the services and features of the Platform and third parties to whom your personal data will be disclosed for the stated purposes. The collection, processing, and transmission of your personal data may also be carried out for the purposes of compliance with applicable laws and rules.

Your personal data may also be used for direct marketing purposes.

Unless otherwise specified by this Policy, your personal data will not be used for any other purposes.

Your personal data will not be stored beyond the period necessary to achieve the stated purposes. In the absence of a need for your personal data, your personal data will be destroyed by the Data Controller.

## 2. Categories of Processed Personal Data

Your personal data processed by the Data Controller include, but are not limited to:

- full name (including any previous full names);
- year, month, date, and place of birth;
- gender;
- all details of the passport or other identity documents;
- contact information (phone number, including mobile and home, email address, including personal, registration address, residence address);
- information about citizenship, country of residence, and tax residency;
- all information from the user's personal account on the Platform, including information about transactions made and other data;
- income and tax payment information;
- individual identification number or other tax or social identification number;
- biometric data;
- information collected using cookie files;
- any data for user authentication (including logins and API keys);
- other personal data provided to the Data Controller for the purposes stated in this Policy, including restricted access data.

The Data Controller does not specifically collect your sensitive personal data that disclose or relate to (directly or indirectly) your racial or ethnic origin, community origin, political affiliations or views, religious or philosophical beliefs, criminal records, trade union membership, health status, or sexual life.

### **3. Data Recipients**

Your personal data may be transferred to employees of the Data Controller, as well as to third parties. Such third parties may include:

- any partners and/or independent contractors of the Data Controller (including third-party personal data processors);
- any national and/or international regulatory bodies, law enforcement agencies, central or local executive authorities, other official or state bodies, courts and arbitration institutions, based on an appropriate request made in accordance with applicable laws and rules;
- any other third parties for the purpose of ensuring the legal protection of the interests of the Data Controller or third parties when signs of violations of this Policy, user agreement with the Platform, or in a situation where there is a threat of such a violation are established.

### **4. Principles of Collection, Processing, and Transfer of Personal Data**

When using your personal data, the Data Controller adheres to the following principles:

- compliance with legality and your constitutional rights and freedoms as a person and citizen;
- any information is provided by you voluntarily, a refusal to answer any questions or to provide certain personal data can lead to a full or partial refusal to provide access to the services and functions of the Platform;
- you bear full responsibility for the authenticity of the information provided, including on issues related to your legal or business capacity and you understand all the negative consequences of providing false or outdated information;

The Data Controller takes all reasonable organizational and technical measures to protect your personal data from unlawful or accidental access, destruction, alteration, blocking, copying, distribution, as well as from other unlawful actions of third parties, however, these measures are knowingly insufficient if you will also not take all necessary reasonable measures to protect your personal data.

### **5. Data Transfer**

The Data Controller will carry out data transfer (including cross-border) in accordance with the AIFC Regulations.

### **6. Cookies**

The Platform uses cookies (small pieces of data stored in text files, which are saved on your computer or other device when websites are loaded in a browser) to distinguish you from other users of the Platform for the purpose of providing you with access to the Platform's services and features, tracking traffic, analytics, personalization and service improvement, as well as identifying and preventing potential security threats. By continuing to use the Platform, you agree that the Platform may place cookies on your computer or other devices for the above purposes. You can delete such cookies at any time, but this may limit access to some of the Platform's services or features.

Personal information collected through cookies placed on your computer or other device may be transferred by the Data Controller to third parties.

When first visiting the Platform, additional consent may be requested for the use of cookies.

### **7. Consent to the collection and processing of personal data**

By connecting to the Platform, viewing information posted on the Platform and/or using the Platform's services and features for any purpose, you confirm your personal consent to the following:

- You consent to the collection (including receiving from you and/or any third party), processing, and cross-border transmission by any means not contrary to applicable laws and regulations, of your personal data as specified in Section 2 of the Policy above.
- You confirm your understanding that your personal data will be processed by the Data Controller using various means, including but not limited to the following ways: storage, recording and storage on electronic and paper media, labeling, mixed processing and transmission of personal data (automated and manual). You also understand that your personal data will not be distributed by the Data Controller in open sources without your direct consent.
- You also agree that your personal data may be transferred by the Data Controller to any third party (provided that confidentiality and personal data protection are observed during processing), including for the purpose of performing or concluding any contract in which you are or intend to be a party.
- You also confirm and agree that you grant such consent to any such third party, and that such third party has the right to process your personal data based on this consent.
- Consent is given for an indefinite period and will remain in effect no longer than is provided by applicable laws and

regulations or is required for the purposes stated in Section 1 above.

- You have the right at any time to revoke your consent by sending an appropriate statement to the Data Controller (however, you understand that consent cannot be revoked if such withdrawal contradicts applicable laws and regulations or if there is an unfulfilled obligation).
- You also confirm that you fully and adequately understand the content of the Policy and this consent, and that you will not have any claims against the Data Controller regarding the collection and processing of personal data in the future, provided the Data Controller complies with the requirements of applicable laws and regulations.

The consent takes effect from the moment I approve the User Agreement and is valid until I provide a written statement (revocation) or until the termination of the use of your personal account on the Platform.

## **8. Your rights**

In accordance with applicable laws and regulations, you have the right to access your personal data, the right to modify, supplement, delete, or block your personal data at any time at your discretion. Personal data deletion can be performed by deleting the user account in one of the following ways:

By using the "delete account" function in the "settings" section of the user's personal cabinet. After activating the mentioned function, a window will appear requesting confirmation of account deletion. Confirmation of deletion will automatically send a request to delete the account and all information related to its content. If you do not confirm the account deletion, the deletion operation will be automatically canceled. In case of using the automatic account deletion function, the deletion operation cannot be canceled by the user, data cannot be restored.

Based on a written statement sent from the email address specified during registration on the Platform to the email address [support@investlink.io](mailto:support@investlink.io). In this case, the support service specialist will request confirmation of the account deletion. In case of confirmation of the statement, the account deletion will be carried out by the support service specialist manually within 7 working days.

You also have the right to file a complaint with AIFC Data Protection Commissioner about any unlawful action or inaction by the Data Controller.

If you have any questions related to the Policy, please contact us at the email address mentioned above in this Section 8.

## **9. Rights and Obligations of the Data Controller**

The Data Controller has the right to unilaterally change the content of this Policy. The new edition of the Policy comes into effect from the moment of its posting on the relevant pages of the Platform, unless otherwise provided by the new edition.

The Data Controller is obliged to comply with the requirements of applicable laws and regulations.