

Personal data processing policy

1. General provisions

This personal data processing policy has been drawn up in accordance with the requirements of the Law of the Republic of Kazakhstan dated May 21, 2013 No. 94-V "On personal data and their protection" (hereinafter referred to as the Law on personal data) and determines the procedure for processing personal data and measures to ensure the security of personal data taken by Medical Innovative Technologies (hereinafter referred to as the Operator).

1.1. The Operator sets as its most important goal and condition for carrying out its activities the observance of the rights and freedoms of man and citizen when processing his personal data, including the protection of the rights to privacy, personal and family secrets.

1.2. This Operator policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator can receive about visitors to the website <https://medico-intech.kz>.

2. Basic concepts used in the Policy

2.1. Automated processing of personal data — processing of personal data using computer technology.

2.2. Blocking of personal data — temporary cessation of processing of personal data (except for cases when processing is necessary to clarify personal data).

2.3. Website — a set of graphic and information materials, as well as computer programs and databases that ensure their availability on the Internet at the network address <https://medico-intech.kz>.

2.4. Personal data information system — a set of personal data contained in databases and information technologies and technical means that ensure their processing.

2.5. Depersonalization of personal data — actions as a result of which it is impossible to determine without the use of additional information the ownership of personal data by a specific User or another subject of personal data.

2.6. Personal data processing — any action (operation) or 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.

2.7. Operator — a government agency, municipal agency, legal entity or individual that independently or jointly with other persons organizes and/or carries out the processing of personal data, as well as determines the purposes of processing personal data, the composition of personal data subject to processing, actions (operations) performed with personal data.

2.8. Personal data — any information relating directly or indirectly to a specific or determinable User of the website <https://medico-intech.kz>.

2.9. Personal data permitted for distribution by the personal data subject — personal data, access to which by an unlimited number of persons is granted by the personal data subject by giving consent to the processing of personal data permitted by the personal data subject for distribution in the manner prescribed by the Law on Personal Data (hereinafter — personal data permitted for distribution).

2.10. User — any visitor to the website <https://medico-intech.kz>.

2.11. Provision of personal data — actions aimed at disclosing personal data to a specific person or a specific group of persons.

2.12. Distribution of personal data — any actions aimed at disclosing personal data to an unlimited number of persons (transfer of personal data) or familiarizing an unlimited number of persons with personal data, including disclosure of personal data in the media, posting in information and telecommunication networks or providing access to personal data in any other way.

2.13. Cross-border transfer of personal data — transfer of personal data to the territory of a foreign state to a foreign government body, foreign individual or foreign legal entity.

2.14. Destruction of personal data — any actions as a result of which personal data are destroyed irrevocably with the impossibility of further restoration of the content of personal data in the personal data information system and/or the tangible media of personal data are destroyed.

3. Basic rights and obligations of the Operator

3.1. The Operator has the right:

— to receive reliable information and/or documents containing personal data from the personal data subject;

— in the event of the personal data subject's withdrawal of consent to the processing of personal data, as well as the submission of an application with a request to terminate the processing of personal data, the Operator has the right to continue processing personal data without the consent of the personal data subject if there are grounds specified in the Personal Data Law;

— independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Law on Personal Data and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Law on Personal Data or other federal laws.

3.2. The Operator is obliged to:

— provide the personal data subject, at his request, with information regarding the processing of his personal data;

— organize the processing of personal data in the manner established by the current legislation of the Republic of Kazakhstan;

— respond to requests and inquiries of personal data subjects and their legal representatives in accordance with the requirements of the Law on Personal Data;

— notify the authorized body for the protection of the rights of personal data subjects, at the request of this body, of the necessary information within 10 days from the date of receipt of such a request;

— publish or otherwise ensure unlimited access to this Policy regarding the processing of personal data;

— take legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data;

— stop the transfer (distribution, provision, access) of personal data, stop processing and destroy personal data in the manner and cases stipulated by the Law on Personal Data;

— perform other duties stipulated by the Law on Personal Data.

4. Basic rights and obligations of personal data subjects

4.1. Personal data subjects have the right to:

— receive information concerning the processing of their personal data, except for cases stipulated by federal laws. Information is provided to the personal data subject by the Operator in an accessible form, and it must not contain personal data related to other personal data subjects, except for cases where there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Law on Personal Data;

- demand that the operator clarify their personal data, block or destroy them if the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing, as well as take measures provided by law to protect their rights;
- put forward a condition of prior consent when processing personal data for the purpose of promoting goods, works and services on the market;
- revoke consent to the processing of personal data, as well as send a request to stop the processing of personal data;
- appeal to the authorized body for the protection of the rights of personal data subjects or in court against the illegal actions or inaction of the Operator when processing his personal data;
- to exercise other rights provided for by the legislation of the Republic of Kazakhstan.

4.2. Personal data subjects are obliged to:

- provide the Operator with reliable data about themselves;
- inform the Operator about clarification (update, change) of their personal data.

4.3. Persons who have transferred to the Operator inaccurate information about themselves, or information about another personal data subject without the consent of the latter, are liable in accordance with the legislation of the Republic of Kazakhstan.

5. Principles of personal data processing

5.1. Personal data shall be processed in a lawful and fair manner.

5.2. Personal data shall be limited to achieving specific, predetermined and lawful purposes. Personal data may not be processed in a manner that is incompatible with the purposes for which the personal data was collected.

5.3. Databases containing personal data processed for purposes that are incompatible with each other shall not be combined.

5.4. Only personal data that meet the purposes for which they are processed may be processed.

5.5. The content and volume of personal data processed shall correspond to the stated purposes of processing. No excess of personal data in relation to the stated purposes of processing shall be allowed.

5.6. When processing personal data, the accuracy of personal data, their sufficiency and, where necessary, relevance in relation to the purposes of processing personal data shall be ensured. The Operator shall take the necessary measures and/or ensure their adoption to delete or clarify incomplete or inaccurate data.

5.7. Personal data shall be stored in a form that allows the subject of personal data to be identified, no longer than required by the purposes of processing personal data, unless the storage period for personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor. Processed personal data shall be destroyed or depersonalized upon achieving the purposes of processing or in the event of loss of the need to achieve these purposes, unless otherwise provided by federal law.

6. Purposes of personal data processing

Purpose of processing	informing the User by sending emails
Personal data	e-mail address phone numbers

	name
Legal grounds	Law of the Republic of Kazakhstan dated May 21, 2013 N 94-V "On personal data and their protection".
Types of personal data processing	Collection, recording, systematization, accumulation, storage, destruction and depersonalization of personal data Sending information letters to an email address

7. Terms of personal data processing

7.1. Personal data shall be processed with the consent of the personal data subject to the processing of his/her personal data.

7.2. Personal data shall be processed to achieve the purposes stipulated by an international treaty of the Republic of Kazakhstan or by law, to exercise the functions, powers and duties imposed on the operator by the legislation of the Republic of Kazakhstan.

7.3. Personal data shall be processed to administer justice, execute a judicial act, an act of another body or official subject to execution in accordance with the legislation of the Republic of Kazakhstan on enforcement proceedings.

7.4. Personal data shall be processed to execute an agreement to which the personal data subject is a party, beneficiary or guarantor, as well as to conclude an agreement on the initiative of the personal data subject or an agreement under which the personal data subject will be a beneficiary or guarantor.

7.5. Personal data shall be processed to exercise the rights and legitimate interests of the operator or third parties, or to achieve socially significant goals, provided that the rights and freedoms of the personal data subject are not violated.

7.6. The processing of personal data is carried out, access to which by an unlimited number of persons is provided by the subject of personal data or at his request (hereinafter referred to as publicly available personal data).

7.7. The processing of personal data is carried out that is subject to publication or mandatory disclosure in accordance with federal law.

8. The procedure for collecting, storing, transferring and other types of processing personal data

The security of personal data processed by the Operator is ensured by implementing legal, organizational and technical measures necessary to fully comply with the requirements of the current legislation in the field of personal data protection.

8.1. The Operator ensures the safety of personal data and takes all possible measures to prevent unauthorized persons from accessing personal data.

8.2. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of current legislation or if the subject of personal data has given consent to the Operator to transfer data to a third party for the fulfillment of obligations under a civil law contract.

8.3. In the event that inaccuracies are detected in the personal data, the User can update them independently by sending a notification to the Operator's email address info@medico-intech.kz marked "Updating personal data".

8.4. The period for processing personal data is determined by the achievement of the purposes for which the personal data were collected, unless another period is provided for by the contract or current legislation.

The User may at any time revoke their consent to the processing of personal data by sending a notification to the Operator via e-mail to the Operator's e-mail address info@medico-intech.kz with the subject "Revocation of consent to the processing of personal data".

8.5. All information collected by third-party services, including payment systems, communication tools and other service providers, is stored and processed by the specified persons (Operators) in accordance with their User Agreement and Privacy Policy. The subject of personal data and/or with the specified documents. The Operator shall not be liable for the actions of third parties, including the service providers specified in this clause.

8.6. The prohibitions established by the subject of personal data on the transfer (except for providing access), as well as on the processing or conditions of processing (except for obtaining access) of personal data permitted for distribution, shall not apply in cases of processing personal data in state, public and other public interests determined by the legislation of the Republic of Kazakhstan.

8.7. The Operator ensures the confidentiality of personal data when processing personal data.

8.8. The Operator shall store personal data in a form that allows the identification of the subject of personal data for no longer than is required by the purposes of processing personal data, unless the storage period of personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor.

8.9. The condition for termination of the processing of personal data may be the achievement of the purposes of processing personal data, the expiration of the consent of the subject of personal data, the withdrawal of consent by the subject of personal data or a requirement to terminate the processing of personal data, as well as the detection of unlawful processing of personal data.

9. List of actions performed by the Operator with the received personal data

9.1. The Operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes and destroys personal data.

9.2. The Operator carries out automated processing of personal data with or without the receipt and/or transmission of the received information via information and telecommunications networks.

10. Cross-border transfer of personal data

10.1. Before starting activities on cross-border transfer of personal data, the Operator is obliged to notify the authorized body for the protection of the rights of personal data subjects of its intention to carry out cross-border transfer of personal data (such notification is sent separately from the notification of the intention to process personal data).

10.2. Before submitting the above notification, the Operator is obliged to obtain relevant information from the authorities of the foreign state, foreign individuals, foreign legal entities to whom the cross-border transfer of personal data is planned.

11. Confidentiality of personal data

The operator and other persons who have gained access to personal data are obliged not to disclose to third parties or distribute personal data without the consent of the subject of the personal data, unless otherwise provided by federal law.

12. Final provisions

12.1. The User may obtain any clarifications on issues of interest regarding the processing of his/her personal data by contacting the Operator via e-mail info@medico-intech.kz.

12.2. This document will reflect any changes to the Operator's personal data processing policy. The Policy is valid indefinitely until it is replaced by a new version.

12.3. The current version of the Policy is freely available on the Internet at <https://medico-intech.kz>.