

# Privacy Policy

**ALTN Limited**, a company registered and operating under the laws of the Astana International Financial Centre (AIFC) under the incorporation number **240840900301**, with its registered office at **010000, Astana, Nura district, 50/3 Turan, office 5**,

This Privacy Policy, along with the Terms of Use and other integral documents, governs the collection, processing, and use of your Personal Data by **ALTN Limited**. **ALTN Limited** acts as a data controller in accordance with this Privacy Policy, which defines how the company, as a data controller, may collect, process, store, and use your Personal Data.

**ALTN Limited** and its affiliates are committed to taking all reasonable measures to protect your privacy. **ALTN Limited** uses the information collected about you to fulfill its contractual and legal obligations and to improve the quality of customer service.

Please read this document carefully to understand our approach and policies regarding your Personal Information, as well as the ways in which we will process and use your Personal Data.

## What Data We Collect About You

We may collect and process the following categories of data about you:

### Information You Provide to Us

You may provide us with information about yourself by filling out the relevant forms on our Website, or by providing such information by phone, email, video conference, or any other means of communication. This information is collected, for example:

- when registering on our Website;
- when subscribing to our Services;
- when opening an Account and verifying the identity of the Account owner or authorized persons;
- when providing payment instruments;
- when searching for goods or using any of the Services offered on our Website;
- when placing Orders;
- when participating in chat discussions or using other communication tools on our Website;
- when participating in sweepstakes, promotions, or surveys;
- when reporting problems or inquiries regarding the Website.

The information you provide may include (but is not limited to) the following **Personal Data**:

1. **Full name** (surname, given name, patronymic if applicable).
2. **Photographs and videos** provided for the purposes of identity verification under our **AML/CFT Policy**.
3. **Residential address and citizenship**.
4. **Identification documents** such as passport, driver's license, or any other government-issued ID.
5. **Tax residency** information.
6. **Contact details** — phone number and email address.
7. **Username and account alias** used to access the **ALTN Limited** platform.

8. **Bank details**, including account numbers, payment details, and information required under the **Foreign Account Tax Compliance Act (FATCA)** and **Common Reporting Standard (CRS)**.
9. **Date and place of birth**.
10. **Educational background**.
11. **Employment history** and current place of work.
12. **PEP (Politically Exposed Person) status** in accordance with applicable AIFC regulations.
13. **Sources and amounts of income** and/or deposits to your account.
14. **Status of accounts** you maintain with banks and/or payment service providers.
15. **Support requests** submitted to **ALTN Limited**.
16. **Balance and transaction records** related to trading or other operations.
17. **Location data** and records of your activities obtained during your use of the **ALTN Limited** platform.
18. **Other personal information** that we may be required to collect in accordance with applicable laws, including the **Anti-Money Laundering and Counter-Terrorist Financing Policy**.

ALTN Limited does not collect or process sensitive personal data of Users, such as their racial or ethnic origin, political views, religious or philosophical beliefs, trade union membership, genetic or biometric data, information about their health, sexual life, or sexual orientation. However, we warn you that if you disclose any information in a public Chat on our site, it may be collected by individuals or companies over which ALTN Limited has no control.

#### Information we collect about you

Every time you visit our Website and use our Website, we may collect the following information about you (including automatic collection of such information), for example:

1. Technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, login details for your Account, your browser type and version, time zone settings, types and versions of browser plug-ins, operating system, and platform.
2. Information about your visit, including the full flow of clicks on a Single Resource Access Identifier (URL) to, through, and from our Website (including the date and time); products and Services that you viewed or searched for; page response time, loading errors, duration of visits to certain pages, and interaction information with the page (for example, scrolling, clicking, and hovering), as well as the methods used to navigate from the page, and any phone number used to call our customer support team.
3. Geolocation information: We may collect real-time location information based on data from your device at any time while you download or use our services; we may use this information to optimize your experience.
4. Financial data and information about the use of the Services and services provided by our Site, including information about transactions performed and their participants, including transactions, information about the status of Accounts and cash flows on them, accrued commissions, information about deposits to Accounts and withdrawals from Accounts opened on our Platform.

#### Information we receive from other sources

We may receive information about you if you use our other websites or other services that we provide. We also work closely with third parties (including, for example, business partners, subcontractors for technical, payment, and courier services, advertising networks, analytics

service providers, security verification service providers, credit scoring agencies) and may receive information about you from them. Such information may include:

1. Information about the financial institutions that you use for depositing funds and/or withdrawing funds.
2. Confirmation by credit agencies of the information that you have provided to us.
3. Information about your financial situation, name, and/or address that may be provided to us by third parties with whom we cooperate.
4. Your personal data, such as your email address and nickname, which you provide to us during registration on the ALTN Limited platform and which is stored by us, regardless of whether your registration process is completed or not. The same applies to your personal data during the incomplete verification process, in accordance with the Anti-Money Laundering and Counter-Terrorist Financing policies and Know Your Customer requirements.
5. Use of cookies  
Our website uses cookies to enhance your user experience, improve the functionality of our site, and provide you with more personalized content. By using our website, you agree to our use of cookies in accordance with this Privacy Policy.
6. What are cookies?  
Cookies are small text files that are placed on your computer or device by websites that you visit. They are widely used to make websites work or function more efficiently, as well as to provide information to the owners of the site.
7. Types of cookies we use  
Essential cookies: These cookies are necessary for our website to function properly. They include, for example, cookies that enable you to log into secure areas of our website or use a shopping cart.  
Analytical/performance cookies: These cookies allow us to recognize and count the number of visitors to our website and see how they navigate the site. This helps us improve the way our website works, ensuring that users find what they are looking for easily.  
Functionality cookies: These cookies are used to recognize you when you return to our website. This enables us to personalize our content for you, greet you by name, and remember your preferences, such as your choice of language or region.  
Targeting cookies: These cookies record your visit to our website, the pages you have visited, and the links you have followed. We use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.
8. Managing your cookie preferences  
Most web browsers allow you to manage your cookie preferences, including the ability to delete or block cookies. Please note that if you choose to block or delete cookies, it may affect the functionality of our website, and you may not be able to access certain areas or features. For more information about managing cookies, please refer to your browser's help section or visit [www.allaboutcookies.org](http://www.allaboutcookies.org).
9. Changes to our cookie policy  
We may update our cookie policy from time to time in line with industry best practices and legal requirements. Any changes to our cookie policy will be posted on this page, and we recommend that you check this page regularly to stay informed of any updates or changes.
10. If you have any questions or concerns about our use of cookies, please do not hesitate to contact us at [swap@altn.kz](mailto:swap@altn.kz).

## Why we use your personal data

We will use your Personal Data for the following purposes:

### Providing our Services

1. To fulfill obligations under contracts concluded with you, and to provide you with the information, products, and services you have requested.
2. To ensure the security of our Website, our Service, and your Account.
3. For the administration of our Website and for internal operations, including troubleshooting, data analysis, testing, collecting statistics, and conducting surveys.
4. To provide you with access to the interactive features of the Website if you wish to use them.
5. To support, respond to, and resolve your complaints and questions related to your use of our Services and features of our Website.

### Providing you with information about our products and Services

1. To notify you of other existing and/or new products and services that are similar to the products or Services you have already purchased, or the information you have searched for.
2. To notify you of changes related to our products and Services.

### Help us improve our products and Services

1. To improve our Website and ensure that our content is most suitable for your computer's operating system.
2. To evaluate and understand the effectiveness of the advertising materials that we provide to you and other Users, as well as to provide you with the necessary advertising information.
3. To ensure that the content of our Website is presented to you in the most effective way and that it is used on your computer.

### Protecting the interests entrusted to us

1. For risk management.
2. To ensure the security and control of our IT systems and prevent crimes.
3. To evaluate the use of our Services and Products for their further development and growth.
4. To achieve internal business and research objectives, i.e., to contact you about our products and services.
5. To analyze anonymous data using web beacons and pixel tags to ensure that our products and Services are relevant to the market in which we operate.

### Provision of legal procedures

1. To respond to requests from law enforcement agencies.
2. To initiate legal actions and/or develop responses to such actions.
3. To research and/or settle disputes with you.

### Compliance with legal norms

1. To verify and authenticate the identity of Users who open and use Accounts, in order to prevent fraud and related illegal activities.
2. To comply with the legal requirements of our Anti-Money Laundering and Counter-Terrorist Financing policies, as well as other relevant laws and regulations.
3. To notify our Users about changes in the policy and terms of use of the ALTN Limited platform.

#### Marketing and third parties

To provide you with information about new products or services of ALTN Limited or third-party providers that we believe may be of interest to you; if you are already a User, we will contact you via electronic means of communication (by email or SMS) to inform you about products or services similar to those that have been the subject of offers or promotions in the past. If you are a new User, we will request your consent to transfer your Personal Data to other service providers to offer products and services.

#### Disclosure of your personal data

We may share your personal information within ALTN Limited.

We may share your information with certain third parties, including:

1. Business partners, suppliers, subcontractors, and service providers who perform appropriate credit and due diligence checks to fulfill contractual obligations that we enter into with them or with you.
2. Marketing networks that require specific data to select and promote relevant ads; we do not disclose confidential information about our customers to marketing companies, but we can provide them with aggregated information about our Users (for example, we can inform them that 500 women under the age of 30 clicked on their ads on a particular day). We may also use such aggregated information to help marketing companies reach the audience they want to target (for example, women who live in a specific region); we may use Personal Data collected from you so that we can fulfill the wishes of our advertisers by showing their ads to a specific target audience.
3. Analytics and search engine service providers that help us improve and optimize our Website.

We may also disclose your Personal Data to third parties in the following cases:

1. If we sell or buy any business or assets; users' personal data may be disclosed to a potential buyer or seller.
2. If ALTN Limited or all its assets are acquired by a third party, the personal data of users will be transferred as one of the types of assets.
3. If we are required to disclose or transfer the User's Personal Data in accordance with any applicable law or in the framework of executing decisions of relevant courts, requests from judicial and law enforcement agencies, or we are forced to compel Users to comply with the terms of agreements signed with us.
4. If this is necessary to protect our rights, property, or to ensure the security of ALTN Limited, our Users, or others; this includes sharing information with relevant organizations to prevent fraud and reduce the likelihood of default.

#### Security and storage of personal data

We have implemented security measures to ensure the confidentiality of your Personal Data and

protect it from loss, misuse, alteration, or destruction. Only authorized personnel of ALTN Limited have access to your Personal Data, and such persons are required to treat such information as confidential. The current security measures will be reviewed from time to time in accordance with legal and technical changes.

The information we receive from you may be transmitted and stored outside the Republic of Kazakhstan (“ROK”) and/or the European Economic Area (“EEA”) for the purpose of providing you with our Services. Information about you may be processed by our employees or employees of service providers outside the Republic of Kazakhstan and/or the EEA. If your Personal Data is stored or otherwise processed by third parties outside the above-mentioned territories, we guarantee that we will notify such third parties of our obligations under this Privacy Policy and enter a relationship with them that will impose obligations on them with respect to your Personal Data, provided that they have the appropriate level of security specified in this Privacy Policy. These employees can process your requests, payment details, and provide technical support, among other things. By providing us with your Personal Data, you consent to the transfer, storage, and processing of your Personal Data. In turn, we will take all necessary measures to ensure that your Personal Data is processed in accordance with international security standards and in accordance with the provisions of this Privacy Policy.

Although the transmission of information over the Internet is not completely secure, we will take all measures to protect your Personal Data. However, we cannot guarantee the security of the channels that you will use to transmit your personal information to our Website. Therefore, you are solely responsible for possible failures in the transmission of your Personal Data to the Website. After receiving your Personal Data, we will use strict procedures and all necessary technical and security measures to prevent unauthorized access to your Personal Data.

#### Basis for processing personal data

We collect and process your Personal Data only if we have a legitimate reason to do so. Legal grounds may include:

1. Your consent.
2. Agreement, when processing is necessary to fulfill the terms of the agreement between you and ALTN Limited.
3. Compliance with legal obligations when ALTN Limited is required to request/receive, process, and store your Personal Data in order to comply with the requirements of current legislation, such as laws related to countering money laundering and terrorist financing.
4. To protect legitimate interests, for example, when data processing is necessary to protect you or us from certain threats, such as fraud, security threats, etc.
5. Compliance with the provisions of the current legislation in order to carry out our activities (quality of services provided, identification of needs, preparation of reports) in accordance with regulatory requirements.
6. Implementation of corporate transactions (sale of shares/shares of participants, mergers, acquisitions), etc.

In cases where the basis for processing personal data is your consent, you have the right to withdraw it at any time.

#### Access to personal data

You have the right to access the information we store about you. If you send us a written request by emailing [swap@altn.kz](mailto:swap@altn.kz), we will consider your application and make a decision based on the laws of the Republic of Kazakhstan, and will provide you with stored data concerning you. If

your request is clearly unfounded or excessive, or if you request additional copies of your Personal Data after your initial request, we may ask you to pay for our services.

## **Storage of personal data**

Ensuring the safety and security of your personal data is a top priority for us. We use secure storage facilities that ensure the security of your Personal Data, which you transmit to us at all stages of interaction with our Platform, using our products and Services. Our security team takes all necessary measures to protect your personal data from possible hacker attacks, loss, or misuse.

We will only store your Personal Data for the duration of your use of our products and Services through your Account, subject to the purposes described in this Privacy Policy, as well as the legal and regulatory obligations that we fulfill. In accordance with our record-keeping obligations, we will retain your Account information and your Personal Data for a minimum of 6 (six) years from the date you stop using our Services or terminate your customer relationship with us, unless otherwise required by law.

We may access or store your Personal Data for a longer period of time if this is the subject of a formal request or legal obligation, an investigation by government authorities, or an investigation into possible violations of our User Agreement and its essential parts, or in other cases to prevent possible damage based on our reasonable opinion.

If you unsubscribe from our email newsletter, we will save your email address in the inactive email list.

### **Changes to this privacy policy**

Any changes that we may make to our Privacy Policy in the future will be posted on this page and, if necessary, a notification will be sent to you by email. We recommend that you check this page more often to keep up to date with any updates or changes to the Privacy Policy.