

# CodiPlay Mobile Application Privacy Policy

## 1. Definitions:

- **Law:** Refers to the Law of the Republic of Kazakhstan "On Personal Data and Their Protection" dated May 21, 2013, No. 94-V, with all amendments and additions, as well as other legislative acts of the Republic of Kazakhstan.
- **Mobile Application:** Software (with all existing additions and improvements) designed to operate on smartphones, tablets, watches, and other mobile devices, developed for a specific platform (iOS, Android, Windows Phone, etc.). For the purposes of this Policy, the Mobile Application is the following software: CODIPLAY.
- **Personal Data:** A set of personal data and/or non-personalized information about the User, provided by the User to the Right Holder and/or automatically collected by the Right Holder and/or third parties.
- **Policy:** This Mobile Application Privacy Policy (with all existing additions and changes).
- **User:** A legal or physical entity that has downloaded the Mobile Application to a smartphone, tablet, watch, or any other mobile device and/or activated such a Mobile Application on one of the specified devices.
- **User Agreement:** An agreement concluded between the Right Holder and the User regarding the procedure, rules, and features of using the Mobile Application by the User. The User joins such an agreement and has no right to make and/or demand changes or additions to it. The User can familiarize themselves with the terms of the User Agreement at the following link: [www.codisplay.kz/terms-of-use](http://www.codisplay.kz/terms-of-use).
- **Right Holder:** The entity that owns exclusive rights to the Mobile Application, LLP "CodiPlay", Address: Republic of Kazakhstan, Almaty, Ergozhina Street 27, Contact details: office@codisplay.kz
- **Cookies:** Small files sent by a mobile application or website and placed on the User's smartphones, tablets, watches, and other mobile devices to improve the operation of such applications or websites and the quality of the content placed in them.

## 2. Relationships Covered by the Policy:

- **General Provisions:** This Policy applies exclusively to Personal Data obtained from the User in connection with their use of the Mobile Application. The provisions of this Policy are aimed at:
  1. Determining the types of Personal Data received, the directions and purposes of their use (processing), and the sources of such Personal Data.
  2. Determining the rights of the User regarding the confidentiality protection of the transmitted Personal Data.
  3. Determining the entities responsible for processing and storing Personal Data, as well as third parties to whom such data is disclosed (in whole or in part).

## 3. List of Collected Personal Data:

- **Non-personalized Information:** The Right Holder may automatically collect and process the following non-personalized information about the User:
  1. Information about traffic, possible number of clicks, logs, and other data.
  2. Information about the device (ID, mobile network operator) used for access, operating system, platform, browser type, and other browser information, IP address.
- **Personal Information:** The User provides the following personal data to the Right Holder:

1. Full name.
  2. Email address.
  3. Data contained in the User's profile, all internal correspondence of the User (if any), as well as other activity within the User's profile.
  4. Name of the educational institution or organization.
  5. Data and information obtained by combining certain Personal Data of a specific User, as well as data and information received from third parties (partners, marketers, researchers).
4. **Purposes of Collecting and Processing Personal Data:**
- Collection and processing of Personal Data are carried out for the following purposes:
    1. To analyze User behavior and identify preferences for specific types of content.
    2. For the correct and efficient operation of the Mobile Application, improving its functionality and content, enhancing the internal architecture and features.
    3. To identify the User.
    4. To send personalized advertising and marketing materials to the User's provided email or mobile phone.
    5. To comply with legal requirements.
    6. To provide technical support, identify and resolve issues.
    7. To maintain communication with the User.
    8. To fulfill other obligations of the Right Holder to the User.
    9. For conducting statistical research.
    10. For other purposes, with the User's separate consent.
5. **Disclosure to Third Parties:**
- The Right Holder has the right to disclose Personal Data to:
    1. Affiliates, branches, and representations in Kazakhstan and other countries.
    2. Successors due to liquidation, reorganization, or bankruptcy.
    3. Third parties solely for providing certain content or access.
    4. When the User consents or as legally required.
6. **Advertising:**
- The Right Holder does not place advertisements in the Mobile Application. The User consents to receive personalized advertising and marketing materials by installing the Mobile Application. The User can unsubscribe at any time.
7. **Complaints and Requests:**
- Users can object to the processing and/or storage of their Personal Data by sending a request to support@codiplay.kz. Questions regarding the application of this Policy or processing methods can also be sent to this email. Users can change or delete their Personal Data unless it contradicts the Policy or law, or the data is evidence in legal proceedings.
8. **Data Storage Periods and Procedures:**
- Data storage is managed by the Right Holder and continues throughout the use of the Mobile Application. Upon termination of use, Personal Data is destroyed or anonymized.
9. **Access by Minors:**
- The application can be used by individuals under 18 only with prior consent from a legal representative. If consent cannot be provided, the minor must cease using the application.
10. **Protection of Personal Data:**

- The Right Holder employs technical and organizational measures to protect Personal Data from disclosure or unauthorized access.

#### **11. Final Provisions:**

- Users can review the Policy at [www.codisplay.kz/privacy](http://www.codisplay.kz/privacy). The current version is effective from September 1, 2023. The Policy may be amended periodically. Users are responsible for regularly reviewing the Policy for changes. The Policy is governed by the laws of the Republic of Kazakhstan. Transmission of Personal Data over the internet carries risks; the User assumes these risks.