Privacy Policy

(Policy on the Processing of Personal Data)

1. General Provisions

- 1. This personal data processing policy has been developed 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" and establishes the procedure for processing personal data and measures to ensure their security by the company "Clinic of Phlebology and Laser Medicine" (hereinafter the Operator).
- 2. The Operator's primary goal and condition of its activities is to respect the rights and freedoms of individuals and citizens during the processing of their personal data, including the protection of the right to privacy, personal, and family secrets.
- 3. This Operator's policy regarding the processing of personal data (hereinafter the Policy) applies to all information that the Operator may obtain about visitors to the website https://klinikaven.com.

2. Key Terms Used in the Policy

- 1. Automated processing of personal data processing of personal data using computing technology;
- 2. Blocking of personal data temporary suspension of personal data processing (except when processing is necessary to clarify the data);
- 3. Website a collection of graphic and informational materials, software, and databases accessible on the internet at the network address https://klinikaven.com;
- 4. Personal data information system a set of personal data contained in databases and the information technologies and technical means that ensure their processing;
- 5. De-identification of personal data actions that make it impossible to determine the ownership of personal data to a specific User or other personal data subject without additional information;
- 6. Processing of personal data any action or set of actions performed with personal data, with or without automation, including collection, recording, systematization, accumulation, storage, updating, modification, retrieval, use, transfer (distribution, provision, access), de-identification, blocking, deletion, or destruction;
- 7. Operator a state or municipal authority, legal or natural person, independently or jointly organizing and/or carrying out the processing of personal data, as well as determining the purposes of processing, the composition of personal data to be processed, and the actions (operations) performed with personal data;
- 8. Personal data any information relating directly or indirectly to a specific or identifiable User of the website https://klinikaven.com;
- 9. User any visitor to the website https://klinikaven.com;
- 10. Provision of personal data actions aimed at disclosing personal data to a specific person or group of persons;
- 11. Dissemination of personal data actions aimed at disclosing personal data to an indefinite group of persons (transfer of personal data) or making personal data accessible to an unlimited number of persons, including publication in the media, posting on information and telecommunication networks, or providing access to personal data in any other way;

- 12. Cross-border transfer of personal data transfer of personal data to a foreign state's authority, foreign individual, or foreign legal entity;
- 13. Destruction of personal data actions resulting in the irreversible destruction of personal data, making it impossible to restore the content of personal data in the information system and/or destroying the physical media containing personal data.

3. Personal Data the Operator May Process

- 1. Surname, first name, patronymic;
- 2. Email address;
- 3. Phone numbers;
- 4. The website also collects and processes de-identified data about visitors (including "cookie" files) using internet statistics services (such as Yandex Metrica, Google Analytics, and others).
- 5. The above data are collectively referred to as Personal Data throughout the Policy.

4. Purposes of Processing Personal Data

- 1. The purpose of processing the User's personal data is to inform the User by sending emails.
- 2. The Operator is entitled to send notifications to the User about new products, services, special offers, and events. The User may opt out of receiving such notifications by sending an email to the Operator at info@klinikaven.com with the note "Unsubscribe from notifications about new products, services, and special offers."
- 3. De-identified User data collected through internet statistics services are used to gather information about User actions on the website, improve its quality, and enhance its content.

5. Legal Grounds for Processing Personal Data

- 1. The Operator processes the User's personal data only if the User fills out and/or submits them through special forms on the website https://klinikaven.com. By filling out the relevant forms and/or submitting personal data to the Operator, the User expresses consent to this Policy.
- 2. The Operator processes de-identified User data if this is permitted by the User's browser settings (i.e., "cookie" storage and JavaScript technology are enabled).

6. Procedure for Collection, Storage, Transfer, and Other Types of Personal Data Processing

The security of personal data processed by the Operator is ensured through the implementation of legal, organizational, and technical measures necessary to fully comply with the requirements of applicable personal data protection legislation.

- 1. The Operator ensures the security of personal data and takes all possible measures to prevent unauthorized access to personal data.
- 2. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to compliance with applicable legislation.

- 3. If inaccuracies in personal data are identified, the User may update them independently by sending a notification to the Operator's email address <u>info@klinikaven.com</u> with the note "Personal Data Update."
- 4. The duration of personal data processing is unlimited. The User may withdraw their consent to the processing of personal data at any time by sending a notification to the Operator's email address info@klinikaven.com with the note "Withdrawal of Consent to Personal Data Processing."

7. Cross-Border Transfer of Personal Data

- 1. Before initiating a cross-border transfer of personal data, the Operator must ensure that the foreign state to which the personal data is to be transferred provides reliable protection of the rights of personal data subjects.
- 2. Cross-border transfer of personal data to the territories of foreign states that do not meet the above requirements may only occur with the written consent of the personal data subject for the cross-border transfer of their personal data and/or in the performance of a contract to which the personal data subject is a party.

8. Final Provisions

- 1. The User may obtain clarifications on any questions regarding the processing of their personal data by contacting the Operator via email at info@klinikaven.com.
- 2. Any changes to the personal data processing policy will be reflected in this document. The Policy remains in effect indefinitely until replaced by a new version.
- 3. The current version of the Policy is freely available on the internet at https://klinikaven.com/conf.