



**FREEDOM
BROKER**

Public

Approved by

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the Board of Directors of
Freedom Finance JSC
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Effective

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PERSONAL DATA PROCESSING POLICY

Almaty

2025

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Chapter 1. General Provisions

1. This Personal Data Processing Policy (hereinafter referred to as the Policy) defines the principles, purposes and procedures for processing personal data carried out by Freedom Finance Joint Stock Company (hereinafter referred to as the Company), and also contains information on the rights of personal data subjects and the measures taken by the Company to ensure protection and proper processing of personal data.
2. This Policy has been developed in accordance with the requirements of the Law of the Republic of Kazakhstan, On Personal Data and Protection (hereinafter referred to as the Law) and the Company's Information Security Policy.
3. This Policy applies to all information related to the category of personal data that the Company may receive, in relation to personal data subjects, within the framework of business and employment relationships, when using the Company's Internet resources, as well as when interacting with potential candidates, clients and partners and other personal data subjects.
4. The Policy is intended for a wide range of individuals and publicly available on the Company's official resources, and can be amended if necessary.
5. Terms and definitions used in the Policy:
 - 1) Internet resource - an electronic information resource posted on the Internet, accessible to the general public. An Internet resource may be a website, the website page, a forum, a blog, an application, or other types of information resources, using Internet technologies;
 - 2) personal data - information related to a specific or determinable subject of personal data, recorded on electronic, paper, and/or other tangible media;
 - 3) accumulation of personal data - actions to systematize personal data by entering it into a database containing personal data;
 - 4) collection of personal data - actions aimed at obtaining personal data; 5) destruction of personal data - actions as a result of which it is impossible to restore personal data;
 - 6) depersonalization of personal data - actions as a result of which it is impossible to determine ownership of personal data by the subject of personal data;
 - 7) use of personal data - actions with personal data, aimed at achieving the business objectives of an owner, an operator, or the third party;
 - 8) storage of personal data - actions to ensure integrity, confidentiality, and availability of personal data;
 - 9) dissemination of personal data - actions resulting in transfer of personal data, including through the media, or provision of access to personal data in any other way;
 - 10) processing of personal data - actions aimed at accumulating, storing, modifying, supplementing, using, distributing, depersonalizing, blocking, and destroying personal data;
 - 11) subject of personal data (hereinafter referred to as the Subject) - an individual to whom the personal data relates;
 - 12) license - License No. 3.2.238/15 dated October 2, 2018 to operate on the securities market. License No. 4.3.12 dated February 4, 2020 for banking operations in foreign currency.

Chapter 2. Principles of Personal Data Processing

6. The Company is guided by the following principles of personal data processing:
- 1) lawfulness, fairness, and transparency - the Company processes personal data lawfully, in compliance with applicable laws. All processing activities are carried out fairly and openly with respect to personal data subjects. The Company ensures transparency in its personal data processing practices, informing data subjects of the purposes, scope, and conditions of use of their personal data;
 - 2) purpose limitation - collection and subsequent processing of personal data is carried out exclusively for specific, predetermined, and legitimate purposes;
 - 3) data minimization - the Company processes only the amount of personal data necessary to achieve the stated purposes;
 - 4) accuracy - the Company takes reasonable measures to ensure relevance and accuracy of the personal data processed;
 - 5) storage limitation - personal data stored no longer than necessary to achieve the purposes for which they were collected, or for the period established by law;
 - 6) integrity and confidentiality - the Company ensures protection of personal data, using appropriate organizational and technical measures aimed at preventing unauthorized or illegal access, alteration, disclosure, loss, or destruction of personal data, within the framework of the information security management system.

Chapter 3. Purposes of Personal Data Processing

7. The Company identifies the following purposes of personal data processing:
- 1) accession to the Brokerage and Dealer Regulations (hereinafter referred to as the Regulations);
 - 2) provision by the Company to the Client of services stipulated by the license, in accordance with the terms of the Regulations;
 - 3) biometric identification of the Client, when establishing business relations with them remotely, as well as when the Company provides electronic services rendered by the Company to the Client, in accordance with the terms of the Regulations;
 - 4) internal control, monitoring, and accounting of services rendered by the Company to the Client, in accordance with the terms of the Regulations;
 - 5) the Company's compliance with the applicable legislation on anti-money laundering, terrorist financing and financing of proliferation of weapons of mass destruction;
 - 6) ensuring compliance with the legal requirements applicable to the Company and its affiliates;
 - 7) developing and improving the services provided by the Company and its affiliates;
 - 8) developing marketing and advertising actions by the Company and its affiliates for marketing purposes, conducting the actions, including posting information about winners in the media, on the Company's website or social media, and providing the client with any informational materials;
 - 9) carrying out activities (responsibilities) related to identification/authentication/authorization of the client (their agents and representatives) and verifying authenticity (correctness) of the information/data/algorithms/codes/symbols provided/used by the client/Company.

- identifiers/numbers, etc. (including by obtaining verification of the Personal Data and other information from the information available to the Company), in order to minimize the risk of unauthorized transactions, in accordance with the applicable law and the terms of the relevant agreements;
- 10) the Company's interactions with the third parties who are and/or may be involved in conclusion and/or execution and/or servicing of any transactions/operations concluded (which may be concluded) within the framework of the relationship between the client and the Company;
 - 11) the Company's provision of reports and/or information to authorized government agencies, auditors, consultants, appraisal and other professional organizations, the Company's affiliates, database operators, telecom operators, and the Company's counterparties, as well as the Company's receipt of reports and/or information from the indicated persons;
 - 12) provision of the Personal Data to the Company's affiliates and the third parties, for the purpose of implementing cooperation in the field of the information technology, information security, and integration of information assets, taking into account the requirements of the applicable law to ensure provision of services, using the modern information technologies;
 - 13) possible assignment of rights under the Regulations;
 - 14) the Company's compliance with the requirements of the applicable law regarding storage and accounting of information;
 - 15) implementing judicial and extrajudicial protection of the Company's rights, in the event of disputes related to fulfillment of obligations stipulated by the Regulations, including in the event of disputes with the third parties, regarding provision of services by the Company;
 - 16) processing and exchanging information, in connection with consideration of client requests, complaints, and suggestions and providing responses thereto, including when transmitting (receiving) correspondence (mail) for sending (delivering or receiving) via postal services or courier services;
 - 17) the Company's provision, to the client, of any informational materials, including about the Company's products and services, by notification, using telephone, email, and any other available communication channels, including direct marketing;
 - 18) conducting internal audits and investigations by the Company employees;
 - 19) the Company's compliance with any other requirements of the applicable law.
 - 20) analyzing visitor behavior, improving the quality of services and maintenance provided, optimizing the website structure and content, and ensuring the stable and secure operation of the web resource;
 - 21) creating an economic and investment profile for the client;
 - 22) recruiting, evaluating, and selecting candidates for employment and forming a talent pool.

Chapter 4. Legal Grounds for Personal Data Processing

8. The Company processes personal data in accordance with the Law.
9. The personal data may be processed on the following grounds:
 - 1) consent of the personal data subject - obtaining voluntary, informed, and unambiguous consent to processing of personal data;
 - 2) concluding and executing contracts, agreements, and other documents - if processing is necessary for preparation, conclusion, execution, and/or amendment of an agreement to which the personal data subject is a party;

- 3) fulfilling obligations established by law - personal data is processed in cases expressly provided for by law. This includes providing information in response to requests from authorized government agencies, regulators, law enforcement agencies, and courts, as well as fulfilling other obligations imposed on the Company by laws (e.g., tax, labor, administrative ones, and others).

Chapter 5. Rights of Subjects

10. Access to data - a subject has the right to request information about whether their personal data is being processed by the Company, as well as to access such data, including information about the purposes of processing, data categories, retention periods, and recipients to whom such data may be disclosed.
11. Data correction - if personal data is inaccurate or outdated, subjects have the right to request clarification, supplementation, or perform these actions independently. A subject may also request deletion of data, if its processing is carried out in violation of the Law.
12. Withdrawal of consent – If processing is carried out on the basis of consent, the subject has the right to withdraw it at any time, but the subject shall understand that this action will result in termination of the business relationship with the Company. At the same time, the Company may continue to process personal data, in accordance with the requirements of the legislation of the Republic of Kazakhstan.
13. Data blocking – to request the Company to block own personal data, if there is confirmed information about violation of the terms of collection and processing of personal data;
14. Data destruction – to request the Company to destroy own personal data, collection and processing of which was carried out in violation of the legislation of the Republic of Kazakhstan, as well as in other cases established by the Law and other regulatory legal acts of the Republic of Kazakhstan.

Chapter 6. Processed Personal Data

15. To ensure functioning of its licensed activities, the Company processes the personal data provided for in this Chapter.
16. To verify a client, when opening a brokerage account, the Company processes the following personal data, including, but not limited to:
 - 1) information contained in identity documents;
 - 2) electronic copies of identity documents;
 - 3) individual identification number (except in cases where an individual has not been assigned an individual identification number, in accordance with the legislation of the Republic of Kazakhstan);
 - 4) tax residency;
 - 5) documents or information necessary to confirm the place of residence.
17. To create a client's economic and investment profile, the following data may be requested, including, but not limited to:
 - 1) information about education;
 - 2) amount of financial resources available for investment;
 - 3) information on sources of funds and wealth;
 - 4) investment skills;
 - 5) acceptable level of an investment risk;
 - 6) investment objectives;

- 7) types of fixed assets;
 - 8) a field of activity (and additional information, depending on the choice made);
 - 9) information about additional citizenship and tax residency.
18. When visiting the Company's Internet resources, technical information may be collected and processed (data are processed in an aggregated or anonymized form, if possible, and not used to identify the user without additional consent):
- 1) IP address;
 - 2) device type;
 - 3) browser and its version;
 - 4) date and time of visiting a section of the Internet resource;
 - 5) actions on the Internet resource (e.g., clicks, page and link clicks);
 - 6) data obtained using cookies and similar technologies.
19. When interacting with the Company via electronic web forms posted on the Company's Internet resources, emails, or phone calls, the following personal data may be processed:
- 1) last name, first name, patronymic;
 - 2) telephone number;
 - 3) email;
 - 4) individual identification number.

Chapter 7. Transfer of Data to the Third Parties

20. The Company identifies the following cases of transfer of personal data to the third parties:
- 1) data processing by the third parties - in some cases, the Company may outsource processing of personal data to the third parties (e.g., contractors, IT service providers, organizations providing accounting or legal services, auditors) with the explicit consent of the data subject or its official representative. Such transfer is carried out on the basis of concluded agreements containing obligations to ensure confidentiality and protection of personal data, within the purposes defined in this Policy (Chapter 3);
 - 2) cross-border transfer of personal data is carried out with the explicit consent of the data subject or its official representative and only after confirmation that the receiving party can ensure an adequate level of security and protect the rights of the personal data subjects;
 - 3) transfer of information to government agencies, for the purpose of complying with the legislation of the Republic of Kazakhstan.

In doing so, the Company is guided by the principles of personal data processing described in Chapter 2 to ensure an adequate level of security for the data entrusted to it.

Chapter 8. Data Storage Period

- 21. When storing personal data, the Company is primarily guided by the requirements of the legislation of the Republic of Kazakhstan.
- 22. The minimum storage period for personal data processed by the Company, within the framework of licensed activities, is 5 years starting from the moment of termination of the business relationship.
- 23. In other cases, personal data are subject to deletion, after the purposes of collection and processing have been achieved, unless otherwise provided by the legislation of the Republic of Kazakhstan.

Chapter 9. Procedure for Subjects to Submit Personal Data Processing Requests

24. For questions regarding processing of personal data, the subjects have the right to contact by email at dpo@ffin.kz.
25. A response to the subject's request will be provided within three business days of receipt of the request from the subject or its legal representative, unless other timeframes are provided by the laws of the Republic of Kazakhstan.

Chapter 10. Information on the Authorized Body

26. Processing and protection of personal data is regulated by the Law of the Republic of Kazakhstan, On Personal Data and Protection, by the authorized body controlling over implementation by the Information Security Committee under the Ministry of Artificial Intelligence and Digital Development of the Republic of Kazakhstan.