PERSONAL DATA PROCESSING POLICY

1. General Provisions

- **1.1 SmartThings LLP** (hereinafter referred to as the Operator) places the observance of the rights and freedoms of citizens as one of the most important conditions for carrying out its activities.
- 1.2 The Operator's policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator may obtain about visitors to the website https://smartthings.kz/ Personal data is processed in accordance with the Federal Law "On Personal Data" No. 152-FZ.

2. Basic concepts used in the Policy:

- 2.1 Website a set of graphic and informational materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address https://smartthings.kz/;
- 2.2 User any visitor to the website

https://smartthings.kz;

- $2.3\, \hbox{Personal Data any information related to the User of the website $$https://smartthings.kz/;}$
- 2.4 Processing of personal data any action with personal data performed with or without the use of a computer;
- 2.5 Personal data depersonalization actions which result in the impossibility to determine the identity of personal data of a particular User or person without using additional information;
- 2.6 Dissemination of personal data any actions resulting in disclosure of personal data to an indefinite number of persons;
- 2.7 Provision of personal data any actions that result in disclosure of personal data to a certain circle of persons;
- 2.8 Destruction of personal data any action resulting in irretrievable destruction of personal data on a computer or any other media.

3. The Operator may process the following personal data:

- 3.1 User's e-mail address
- 3.2 User's phone number
- 3.3. User Name
- **3.4** The site also collects and processes anonymized data about visitors (including cookies) using Internet statistics services (Yandex Metrica and Google Analytics and others).

4. Purposes of personal data processing

- 4.1 The purpose of processing e-mail address, phone number, surname, first name, patronymic of the User is to clarify the details of the order. Also, the Operator has the right to send the User notifications about new products and services, special offers and various events. The User can always refuse to receive informational messages by sending a letter to the Operator at support@smartthings.kz.
- 4.2 Anonymized User data collected through the services Internet statistics, are used to collect information about Users' actions on the site, to improve the quality of the site and its content.

5. Legal basis for processing personal data

- 5.1 The Operator processes the User's personal data only if the User submits it through the forms located on the website https://smartthings.kz. By sending his/her personal data to the Operator, the User expresses his/her consent to this Policy.
- 5.2 The Operator processes anonymized data about the User if it is allowed in the User's browser settings (cookies and JavaScript technology enabled).

6. Procedure for collection, storage, transfer and other types of personal data processing

- 6.1 The Operator ensures the safety of personal data and takes all possible measures to exclude access to personal data by unauthorized persons.
- 6.2 The User's personal data will never, under any circumstances, be disclosed to third parties, except in cases related to the execution of applicable law.
- 6.3 If any inaccuracies in personal data are detected, the User may update them by sending a notification to the Operator by e-mail to

the Operator's e-mail address support@smartthings.kz, marked "Personal data update"

6.3 The period of personal data processing is unlimited. The User may withdraw their consent to the processing of personal data at any time by sending a notice to the Operator by e-mail to the Operator's e-mail address support@smartthings.kz marked "Withdrawal of consent to the processing of personal data".

7. Final provisions

- 7.1. The User may obtain any clarifications on the issues of interest regarding the processing of his/her personal data by contacting the Operator via e-mail at support@smartthings.kz.
- 7.2. This document will reflect any changes to the Operator's personal data processing policy. In case of material changes, the User may be sent information to the e-mail address specified by the User.