

This Privacy Policy applies to your use of the Platform of Tech Hub Limited (doing business as the AIFC Data Marketplace (“Marketplace”), its online services (“Service”) and Data Products available therein. The use of the Marketplace is possible without any indication of Personal Data; however, if a Data Subject wants to use special commercial services, processing of Personal Data could become necessary.

PRIVACY POLICY

This Privacy Policy (the “Policy”) is provided by the Marketplace (hereinafter referred to as “We”, “Us”, “Our”) and intended to describe Our policies and procedures regarding the collection, use, and disclosure of personal data when you use the Services and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the processing of information in accordance with this Policy.

1. Definitions

In this Policy the following terms shall have the meanings specified below. Other terms may be defined, as indicated from time to time, in the AIFC Data Protection Regulations, unless the contrary intention appears.

A) CUSTOMER

Customer means a user of the Platform who licenses a Data Product on the basis of a Listing through the Platform and is granted a limited right to use it in accordance with the applicable license terms and the Standard Data Transferring Agreement.

B) DATA CONTROLLER

Data Controller means Tech Hub Limited (doing business as the AIFC Data Marketplace (“Marketplace”), a private company with BIN 190440900127 registered in the Astana International Financial Centre, which, alone or jointly with other Persons, determines the purposes and means of the Processing of Personal Data.

C) DATA PROCESSOR

Data Processor means any Person who Processes Personal Data, including the Data Controller or a Person that does it on behalf of the Data Controller.

D) DATA PRODUCT

Data Product means any dataset, data feed, API, structured file or other data-related asset listed by the Publisher on the Platform, including any associated documentation, metadata, and delivery tools.

E) DATA SUBJECT

Data Subject, in relation to Personal Data, means the individual to whom the Personal Data relates.

F) PERSONAL DATA

Personal Data means any Data referring to an Identifiable Natural Person.

G) PLATFORM

Platform means the online platform accessible at <http://datamarketplace.kz>, including any associated websites, web pages, applications, services, or tools operated by the

Marketplace, through which users can access, browse, license, or interact with Data Products.

H) PROCESSING

Process, in relation to Personal Data, means perform any operation or set of operations on the Personal Data, whether or not by automatic means, and includes, for example, the collection, recording, organisation, storage, adaptation or alteration, retrieval, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction of the Personal Data.

I) PUBLISHER

Publisher means a person or entity that lists, offers, and licenses Data Products to Customers through the Platform, retaining all intellectual property rights in the Data Products unless expressly transferred under a separate written agreement.

J) RECIPIENT

Recipient, in relation to Personal Data, means any Person to whom the Personal Data is disclosed (whether or not a Third Party), but does not include a regulator, the police or another government agency of any jurisdiction if the agency receives the Personal Data in the framework of a particular inquiry.

K) LISTING

Listing means the catalogue entry or description of a Data Product displayed on the Platform, including its description, metadata, pricing, and applicable license terms. Each Listing constitutes the Publisher's offer to license the Data Product under the terms specified therein and becomes binding upon acceptance by the Customer through the Platform.

2. Collection of Personal Data

We collect several different types of information for various purposes to provide and improve our Service to you. While using Our Service, We may ask you to provide Us with certain personally identifiable information that can be used to contact or identify you. By accepting this Privacy Policy, you consent to the collection and Processing of such information in accordance with this Privacy Policy. Personally identifiable information may include, but is not limited to:

- (a) identification data (e.g., name, email, ID/Passport data, job title, company);
- (b) contact details (e.g., address, phone number);
- (c) technical data (e.g., IP address, device/browser type);
- (d) usage and interaction data (e.g., platform behavior, access logs);
- (e) transaction data (e.g., dataset purchases, licensing history);
- (f) communications data (e.g., support inquiries).

3. Usage of Personal Data

We may use the collected data for various purposes:

- (a) account registration and management;
- (b) Platform operation and service delivery;
- (c) communication and support;
- (d) legal compliance;

- (e) security and fraud prevention;
- (f) analytics and service improvement.

4. Requirements for legitimate Processing

In accordance with the AIFC Data Protection Regulations, as a Data Controller We are committed to ensure that Personal Data that We or other Data Controllers engaged by Us Process is:

- (a) Processed fairly, lawfully and securely; and
- (b) Processed for specified, explicit and legitimate purposes in accordance with the Data Subject's rights and not further Processed in a way incompatible with those purposes or rights; and
- (c) adequate, relevant and not excessive in relation to the purposes for which it is collected or further Processed; and
- (d) accurate and, if necessary, kept up to date; and
- (e) kept in a form that permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data was collected or for which it is further Processed.

A Data Processor will take every reasonable step to ensure that Personal Data that is inaccurate or incomplete, having regard to the purposes for which it was collected or for which it is further Processed, is erased or rectified.

Personal Data will not be Processed unless:

- (a) the Data Subject has consented to the Processing of the Personal Data; or
- (b) the Processing is necessary for the performance of a contract to which the Data Subject is a party or to take steps at the request of the Data Subject for a contract to which the Data Subject intends to become a party; or
- (c) the Processing is necessary to comply with any legal obligation to which the Data Controller is subject; or
- (d) the Processing is necessary for the performance of a task carried out: (i) in the interests of the AIFC; or (ii) in the Exercise of Functions of the AIFCA, the Astana Financial Services Authority, the AIFC Court, the Security Registrar or the Registrar of Companies that are vested in the Data Controller or in a Third Party to whom the Personal Data is disclosed; or
- (e) the Processing is necessary for the purposes of the legitimate interests of the Data Controller or of the Third Party or parties to whom the Personal Data is disclosed, except if those interests are overridden by compelling legitimate interests of the Data Subject relating to the Data Subject's particular situation.

5. Data Sharing and Transfers

Your information, including Personal Data, may be transferred to – and maintained on – computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to this transfer.

Data Processors will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

6. Disclosure of Data

We may disclose your Personal Data in the good faith belief that such action is necessary:

- (a) to comply with a legal obligation;
- (b) to protect and defend the rights or our property;
- (c) to prevent or investigate possible wrongdoing in connection with the Service;
- (d) to protect the personal safety of users of the Service or the public;
- (e) to protect against legal liability.

7. Cookies and Tracking Technologies

During the interaction with the Platform, it uses cookies and tracking technologies to enhance your browsing experience and monitor site performance. These include:

- Essential Cookies: Necessary for the basic functionality of the website. These cookies ensure security, network management, and accessibility.
- Functional Cookies: Enable enhanced functionality and personalization. These cookies may be set by Us or by third-party providers whose services We have added to our pages.
- Analytical Cookies: Provide insights into how users interact with the Platform. These cookies help Us understand user behavior, track site performance, and identify areas for improvement.

8. Data Retention

The Data Controller retains Personal Data only for as long as is necessary to fulfill the purposes for which it was collected, including to meet legal, regulatory, contractual, and operational obligations, in accordance with the AIFC Data Protection Regulations.

We determine appropriate retention periods based on:

- the type of Personal Data;
- the purpose for which the data is processed;
- legal, regulatory or contractual obligations;
- the potential risk of harm from unauthorized use or disclosure;
- whether We need to retain the data to establish, exercise, or defend legal claims.

9. User Rights

9.1 Right to information about Personal Data and to rectification etc.

A Data Subject has the right to obtain from the Data Controller on request, at reasonable intervals and without excessive delay or expense:

- (a) Written confirmation about whether or not Personal Data relating to the Data Subject is being Processed and Written information at least about the purposes of any Processing, the categories of any Personal Data being Processed, and the Recipients or categories of Recipients to whom any Personal Data is disclosed; and

(b) communication to the Data Subject in an intelligible form of the Personal Data being Processed and of any available information about its source; and

(c) as appropriate, the rectification, erasure or blocking of Personal Data if the Processing of the Personal Data Contravenes this Policy or the AIFC Data Protection Regulations.

9.2 Right to object to Processing

A Data Subject has the right:

(a) to object at any time, on reasonable grounds relating to the Data Subject's particular situation, to the Processing of Personal Data relating to the Data Subject; and

(b) to be informed before the Personal Data is disclosed for the first time to a Third Party or used on a Third Party's behalf for the purposes of direct marketing, and to be expressly offered the right to object to such a disclosure or use.

If there is a justified objection by the Data Subject in relation to Personal Data, the Data Controller must no longer Process that Personal Data.

10. Data Security

As a Data Controller We implement appropriate technical and organisational measures to protect the collected data against willful, negligent, accidental or unlawful destruction, or accidental loss, alteration or unauthorised disclosure or access and against all other unlawful forms of processing or unlawful transfers. We undertake to ensure the appropriate level of data security.

11. Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on Our behalf, to perform Service-related services or to assist Us in analysing how Our Service is used.

These third parties have access to your Personal Data only to perform these tasks on Our behalf and are obligated not to disclose or use it for any other purpose.

12. Changes to the Policy

We may update Our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

13. Contact Information

If you have any questions about this Privacy Policy, please contact Us by email: tech@aifc.kz

