

Privacy Policy

The operator of the SredaPay System, represented by "TOO SredaPay", values the trust of its customers. In order to ensure the safety of our customers, we collect, use and store information. This privacy policy governs this process.

Familiarization with the provisions of this Policy before using the Services provided by SredaPay is mandatory for all Customers.

1. Definitions of key terms

- Client – natural (private) person or legal entity that is registered in SredaPay and create an account.
- Confidentiality – availability of information only to its owner, as well as to persons to whom this information can and / or should be provided in accordance with the law and / or agreement with this person.
- Confidential information – any data not related to Public data that the Parties have agreed to treat as confidential or that applicable laws should be considered confidential.
- Disclosure of Confidential Information – transfer to any third party of any Confidential Information in accordance with the requirements of this Policy, including leakage, theft, loss, distortion, forgery, destruction, modification, copying and blocking of Confidential Information in the form of non-performance or improper performance of the conditions of this Application by the Receiving Party.
- Informational materials (Data) – any text, graphic, audio, video or mixed informational material.
- Personal data – any information relating to an individual (private) person whose identity is known or can be directly or indirectly established using the following data: a personal code or one or more physical, physiological, psychological, economic, cultural or social characteristics specific to people.

2. General provisions

- Using any part of the website: www.sredapay.kz and / or any Services, the Client grants the Administrator the right to receive, store, process and use Personal Data and other Client Information Materials in accordance with the terms of this Policy.
- The main purpose of receiving, storing, processing and using personal, public and other data of the Client is to protect the interests of the Client, as well as to improve the quality of personalized and common services provided by the Administrator to the Client.
- The privacy policy, including the service provider, confirms in writing to Clients that the service provider will comply with all applicable PCI DSS requirements to the extent that the service provider processes, has access to or stores, processes or otherwise stores, transmits or transmits the cardholder's data client or sensitive authentication data, or manages the client's cardholder data environment on behalf of the client.

3. Data collection

- The administrator can collect and process the following information about the Client:
 - full name and surname, occupation, address, e-mail address, telephone number, date of birth and details of the bank or client's payment card, as well as documents confirming the identity and address of the client, at our request;

- information about the Transactions that the Client performs through the SredaPay System using the Account, and about the execution of the Client's Orders;
 - general information about the Company (legal name, legal address, type of legal entity, registered number, etc.).
 - In order to fulfill their legal obligations to combat fraud and money laundering, the Administrator will receive information concerning the Client from third parties, including information on financial history, decisions of local courts and bankruptcies, as well as from credit bureaus and fraud prevention agencies. Wallet and at any other time when it is necessary to prevent fraud and minimize financial risks.
- 4. Registration in the SredaPay system and creating an account**
- A client who wants to start using SredaPay must register with SredaPay using the website: www.sredapay.kz.
 - To register with SredaPay, you must provide your phone number and email address.
 - For depositing or withdrawing money, the Client may indicate the details of a bank card.
 - After the Wallet has been created and used (by the Client), the Administrator can identify the Client every time the Client uses the SredaPay system and visits the website: www.sredapay.kz.
 - Periodically, our System may ask Clients to complete additional forms. This is done to determine the needs of our clients and assess the services we provide and their quality.
 - When the Client visits the website: www.sredapay.kz, the Administrator automatically saves, processes and uses data that does not relate to Personal Data, such as: Client's IP address, information about the Client's location, which can be determined using IP addresses, technical parameters. Client's computer, presence or absence of certain software on the client's computer, settings of this software, cookies and statistical information about the Client's activities.
- 5. Account Data Security**
- We may also ask you to answer various questions to check the security of your account. We may need this information to process your transactions or requests for a new password, in case you have forgotten or lost your password, protect you from data theft on your card, prevent fraud and theft from your account, and contact you if You need to manage your account.
 - We may also ask you to provide information about the transaction, including the amount and name of the user (sender). All this information is stored and cannot be deleted without a formal request. We also store all the IP addresses of the devices from which you log in to your account. All these measures are aimed at preventing fraud and theft.
- 6. Information disclosure**
- The Administrator undertakes not to provide Personal data to third parties without the consent of the Client to whom this data relates.
 - The transfer of Personal Data to third parties is allowed in the following cases:
 - after obtaining the consent of the Client to whom the information relates;
 - in response to reasonable requests from public authorities entitled to receive such data;
 - In other cases, in accordance with the provisions of this Policy and applicable law.
 - The Client has the right to require the Administrator to restrict access to his / her Personal Data for marketing purposes by third parties, if this does not contradict

the provisions of the applicable law and this Policy by sending a corresponding request to the Administrator for his / her details.

7. Information processing

- By submitting your Personal Data when registering with SredaPay, the Client agrees to the processing of this data both using automation and without using automation, including collecting, storing, transferring to third parties and using the Data Administrator for the purpose of providing the Services to the Client and for other purposes specified in politics.

8. Final provisions

- The Parties guarantee the confidentiality of information obtained when fulfilling the requirements of the Policy, except as expressly provided for in the Policy and other agreements of the Parties.
- Confidentiality terms are contained in this Policy and are accepted by the Client in full after the Policy is adopted.
- As follows from other sections of this Policy, Clients are responsible for maintaining the confidentiality of their Authentication data. The Administrator is not responsible for the consequences arising from the inappropriate storage or loss of this information by the Client.
- The Administrator has the right to store the Personal and other data of the Client for as long as it is necessary to fulfill the objectives specified in this Policy, either for the periods established by the current legislation, or until the Client deletes this data.
- The client is responsible for providing accurate information, as well as for updating the data previously provided to them in case of any changes.
- The Client allows the Administrator to authorize other users with whom the Administrator has entered into relevant agreements to receive, store and process Client data (except for Personal Data and Information Materials), such as the Client's IP address, cookies and statistical information. on the activities of the Client to improve the quality of services provided by these persons and the provision of promotional information.
- The client agrees that the confidentiality of data transmitted via the Internet is not guaranteed, and if access to this data is obtained by third parties outside the technical communications area controlled by the Administrator, the latter is not responsible for any damage caused by such access.