

# Privacy Policy (English)

Last Updated: 08.01.2025

## Welcome to Proxima Research LLC!

**We, Proxima Research LLC ("Proxima," "we," or "our"), are committed to protecting your**

privacy in compliance with the Law of the Republic of Kazakhstan on Personal Data and

Its Protection.

This Privacy Policy explains how we collect, use, and process your personal data when you

use our website, mobile applications, and services (collectively, "Services").

## 1. Information We Collect

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### 1.1 Information You Provide

We may collect:

- Contact Information: Name, email address, phone number, and mailing address.
- Business Information: Company name, job title, and industry.
- Communications: Data provided via forms or customer support.

### 1.2 Information Collected Automatically

We collect:

- Log Data: IP address, browser type, pages visited, and timestamps.
- Device Information: Device type, operating system, and unique identifiers.
- Cookies and Tracking Technologies: Used for analytics and functionality.

### **1.3 Information from Third Parties**

We may receive data from social media platforms, analytics providers, or partners.

## **2. Legal Basis for Processing**

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We process your data based on:

- **Consent:** When you explicitly agree to data collection for marketing communications, analytics cookies, surveys, and research participation.
- **Contract Performance:** To fulfill agreements or provide requested services, process orders, create and manage your account, process payments.
- **Legitimate Interests:** For business operations and improvements, internal analytics, security of our systems, fraud prevention, direct marketing (with right to opt-out).
- **Legal Obligations:** Compliance with Kazakhstan laws, tax reporting, responding to law enforcement requests, court orders.
- **Vital Interests:** In emergency situations to protect life and health.

You have the right to withdraw your consent at any time. This will not affect the lawfulness of processing based on consent before its withdrawal.

## **3. How We Use Your Data**

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We use your data to:

- Provide and improve our Services.
- Respond to your inquiries.
- Comply with legal obligations under Kazakh law.

## 4. Data Sharing

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Your data may be shared with:

- Service Providers: Companies providing hosting, analytics, or payment processing.
- Legal Authorities: When required by Kazakhstan law.
- With Your Consent: When you explicitly agree to share data.

## 5. Your Rights

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### 5.1 For Kazakhstan Residents:

Under Kazakh law, you have the right to:

- Access your personal data.
- Request corrections or deletions.
- Withdraw consent for data processing.
- Know about sources of collection and location of your personal data.
- Demand blocking of illegally processed personal data.

### 5.2 For EU Residents (GDPR):

EU residents have the right to:

- Access: Request information about how your data is processed.
- Rectification: Correct inaccurate or incomplete data.
- Erasure: Request deletion of your data ("Right to be Forgotten").
- Restriction: Limit the processing of your data.
- Portability: Receive a copy of your data in a machine-readable format.
- Objection: Object to data processing, including profiling.
- Not to be subject to automated decision-making: Right not to be subject to decisions based solely on automated processing.
- Lodge a complaint: You can file a complaint with your local data protection authority.

### **5.3 For US Residents (CCPA):**

California residents have the right to:

- Know what personal information is collected about them.
- Request deletion of their personal information.
- Opt-out of the sale of their personal information.
- Non-discrimination for exercising their privacy rights.

### **5.4 For Uzbekistan Residents:**

According to the legislation of the Republic of Uzbekistan on personal data, you have the right to:

- Free access to your personal data.
- Request cessation of use of personal data for direct marketing purposes.
- Compensation for material and moral damage caused by illegal processing of personal data.
- Request notification of all third parties about changes made or deletion of personal data.
- Anonymity when using certain types of services.

## 5.5 For Brazil Residents (LGPD):

Under the Brazilian General Data Protection Law, you have the right to:

- Confirmation of the existence of processing of your personal data.
- Access to your personal data.
- Correction of incomplete, inaccurate or outdated data.
- Anonymization, blocking or deletion of unnecessary or excessive data.
- Data portability to another service or product provider.
- Deletion of personal data processed with the data subject's consent.
- Information about public and private entities with which the controller has shared data.
- Information about the possibility of not providing consent and the consequences thereof.

## 5.6 For Ukraine Residents:

According to the Law of Ukraine on Personal Data Protection, you have the right to:

- Know about sources of collection, location of your personal data, purpose of their processing.
- Access to your personal data.
- Demand updating, correction or deletion of your personal data.
- Object to processing of your personal data.
- Protect your personal data from illegal processing and accidental loss.

To exercise these rights, contact us at [office.kz@proximaresearch.com](mailto:office.kz@proximaresearch.com).

## 6. International Data Transfers

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Your data may be transferred outside Kazakhstan in compliance with the legislation of the

Republic of Kazakhstan.

## 7. Data Retention

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We retain your personal data for the period necessary to achieve the purposes specified in this Policy or as required by law:

- Account data: During account activity plus 3 years after last activity.
- Transaction and financial data: 5 years in accordance with Kazakhstan tax legislation.
- Marketing data: Until consent is withdrawn or 3 years of inactivity.
- Cookie data: From session cookies (deleted when browser is closed) to a maximum of 2 years.
- Customer support data: 3 years after request resolution.
- Data for legal compliance: According to the periods established by legislation.
- Data for litigation protection: During the statute of limitations plus 1 year.

After the retention period expires, personal data is deleted or anonymized in such a way that it cannot be used to identify a specific person.

## 8. Children

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Our Services are not intended for persons under:

- 16 years old for EU residents
- 18 years old for residents of other jurisdictions, including Kazakhstan

We do not knowingly collect personal data from children under the specified age. If you are a parent or guardian and have learned that your child has provided us with personal data without your consent, please contact us at the contacts specified in section 10. We will take necessary measures to remove such information from our systems.

If we become aware that we have accidentally collected personal data from a child, we will immediately delete such data unless we are required to retain it by law.

## 9. Automated Decision-Making and Profiling

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We may use automated systems to process your personal data, including:

### 9.1 Purposes of automated processing:

- Analysis of service usage to improve functionality and user experience.
- Fraud detection and prevention, ensuring security of our systems.
- Personalization of content, recommendations and marketing offers.
- Creditworthiness assessment when providing services with deferred payment.
- User segmentation for marketing purposes.

### 9.2 Your rights regarding automated processing:

- You have the right not to be subject to a decision based solely on automated processing if such decision has legal effects for you or similarly significantly affects you.
- You may request human intervention in the decision-making process.
- You have the right to express your point of view and challenge the decision.
- You may request information about the logic of automated decision-making.

### 9.3 Exceptions:

Automated decision-making may be carried out if it is:

- Necessary for entering into or performance of a contract between you and us.
- Authorized by Kazakhstan law.
- Based on your explicit consent.

To exercise your rights regarding automated processing, please contact us at the contacts in section 10.

## 10. Contact Us

For inquiries or requests, contact:

### **Proxima Research LLC**

- Email: [office.kz@proximaresearch.com](mailto:office.kz@proximaresearch.com)
- Телефон: +7 777 247 47 93, +7 727 293 58 97, +7 727 293 58 96, +7 727 292 04 38
- Адрес: 111, st. Zhambyla, office 27, Almaty, Kazakhstan
- Data Protection Officer: [dataprotection@proximaresearch.com](mailto:dataprotection@proximaresearch.com)

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