APPROVED BY
Director of LiTRO RSA LLP

_____ Sobol Y.V.

"17" September 2026

LiTRO – Privacy Policy (hereinafter referred to as the "Policy")

The Application collects certain Personal Data of Members/Users of the LiTRO Auto Club (hereinafter referred to as "Personal Data" or "Data").

Owner and/or Operator of the Personal Data Database (hereinafter referred to as the "Owner")

LiTRO RSA Limited Liability Partnership ("LiTRO RSA" LLP), BIN 240540018445, 70 Khadzhi Mukan Street, Medeu District, Almaty, postal code 050059, Republic of Kazakhstan.

For the purposes of this Policy, all references to the "Application" in the context of the collection, processing, storage, or transfer of Personal Data shall mean actions performed by LiTRO RSA LLP, acting as the Owner and/or Operator of Personal Data, using the technical means of the Application.

Owner's contact email address: info@litro.kz

Categories of Data Collected

The categories of Personal Data collected by the Application, either directly or through third parties, include:

- trackers;
- network resource usage data;
- photographs and video recordings created using the Camera;
- approximate or precise device location data collected on a non-continuous basis;
- data saved by the Application to the Photo Library;
- Members'/Users' contact details: first name, last name, date of birth, telephone number, email address, password, and city.

Complete information regarding each category of Personal Data collected is provided in the relevant sections of this Policy or in specific explanatory notices displayed before the Data is collected.

Personal Data may be provided voluntarily by the Member/User or, in the case of Usage Data, may be collected automatically by the Application when it is used.

Unless otherwise specified, Data expressly designated by the Application as mandatory must be provided. If such Data is not provided, the Application may be unable to provide the relevant service. Data designated as optional may be withheld without affecting the availability of other functions of the Application.

Members/Users who are unsure which Personal Data is mandatory are encouraged to contact the Owner.

The Application or third-party services used by the Application use Cookies (or other tracking technologies) solely for the purpose of providing the Service requested by the Member/User, as well as for any other purposes specified in this Policy and in the Cookie Policy, if applicable.

Members/Users are responsible for any Personal Data of third parties that they obtain, publish, or provide to other persons through this Application and confirm that they have obtained the relevant third party's consent to provide such third party's Personal Data to the Owner.

The Application is not intended for persons under the age of 18. If the Owner becomes aware that Personal Data of a minor is being processed without the consent of their legal representative, such Data shall be blocked and destroyed in accordance with the procedure established by the legislation of the Republic of Kazakhstan.

Method and Place of Data Processing

Methods of Processing

The Owner takes the necessary legal, organizational, and technical measures to prevent unauthorized access to the Data, as well as its disclosure, alteration, or destruction.

Data processing is carried out using computers and/or information technology (IT)-enabled tools in accordance with organizational procedures and methods strictly related to the purposes specified herein. In certain cases, in addition to the Owner, the Data may be accessible to certain categories of authorized personnel involved in the operation of this Application (administration, sales department, marketing department, legal department, system administrators), or to third parties (such as third-party technical service providers, postal service providers, hosting providers, information technology companies, and communications service providers) appointed by the Owner, where necessary, to perform Data processing functions.

Agents/Contractors

For the purposes of entering into and performing the Agreement with the Member/User, as well as providing services under the Subscription, Personal Data may be transferred to the Owner's Agents/Contractors — individual entrepreneurs and/or legal entities acting under agreements entered into with the Owner. Agents/Contractors are required to comply with the requirements of the legislation of the Republic of Kazakhstan on personal data and its protection with respect to the Personal Data received.

Legal Basis for Processing

The Owner processes Members'/Users' Personal Data where one of the following legal grounds provided for by the legislation of the Republic of Kazakhstan applies:

- the Member's/User's consent to the collection and processing of their Personal Data, provided in a manner that allows confirmation that such consent has been obtained (Articles 5, 7, and 8 of the Law of the Republic of Kazakhstan "On Personal Data and Their Protection");
- the collection and processing of Personal Data without the Member's/User's consent in cases expressly provided for by Article 9 of the Law of the Republic of Kazakhstan "On Personal Data and Their Protection" and other laws of the Republic of Kazakhstan.

The Owner may clarify, at the Member's/User's request, the specific legal basis applicable to a particular processing activity.

Place of Processing

The Data is processed at the Owner's operating offices and at any other locations where the parties involved in the processing are located.

Depending on the Member's/User's actual location, the transfer of Data may involve transferring the Member's/User's Data to a country other than their country of residence.

Where such a transfer takes place, Members/Users may obtain additional information by referring to the relevant sections of this Policy or may request such information from the Owner using the details provided in the contact information section.

Personal Data is stored by the Owner in a database located within the territory of the Republic of Kazakhstan. Certain categories of Data may be transferred to third parties outside the Republic of Kazakhstan for the purposes specified in the section "Cross-Border Transfer of Personal Data," subject to the requirements of Article 16 of the Law of the Republic of Kazakhstan "On Personal Data and Their Protection."

Cross-Border Transfer of Personal Data

Where the processing of Personal Data involves its transfer to the territory of a foreign state, including to providers of analytics and authentication services specified in the section "Detailed Information on the Processing of Personal Data," such transfer shall be carried out in accordance with Article 16 of the Law of the Republic of Kazakhstan "On Personal Data and Their Protection": to the territory of a state that ensures the protection of Personal Data, or, where the relevant state does not ensure such protection, subject to the Member's/User's consent to the cross-border transfer of their Personal Data.

Consent to the cross-border transfer of Personal Data shall be provided by the Member/User in a manner that allows confirmation that such consent has been obtained, where such consent is required under the legislation of the Republic of Kazakhstan.

Retention Period

Personal Data shall be retained until the purposes for which it was collected and processed have been achieved, unless a different retention period is prescribed by the legislation of the Republic of Kazakhstan.

Personal Data related to the performance of the Agreement between the Owner and the Member/User shall be retained until the Agreement has been fully performed and thereafter for the period necessary to comply with applicable legal requirements and protect the rights of the parties.

Upon expiry of the applicable retention period or termination of the legal relationship, Personal Data shall be destroyed unless its further retention is required by the legislation of the Republic of Kazakhstan.

Purposes of Processing

Data concerning the Member/User is collected to enable the Owner to provide the Service through the Application, comply with legal requirements, respond to requests from law enforcement authorities, protect its rights and interests (or the rights and interests of Members/Users or third parties), detect any malicious or fraudulent activity, and for the following purposes: Analytics; Permissions for Access to Data Stored on the Member's/User's Device; Registration and Authentication Provided Directly by the Application; Registration and Authentication; Location-

Based Interactions; Contacting the Member/User; and analyzing the Member's/User's service purchase history in order to create personalized offers (segmentation).

Members/Users may find specific information regarding the Personal Data used for each purpose in the section "Detailed Information on the Processing of Personal Data."

Permissions for Access to Data Stored on the Member's/User's Device

Depending on the Member's/User's specific device, the Application may request certain permissions allowing it to access Data stored on the Member's/User's device, as described below.

Such permissions are granted by the Member/User before any information is processed. Once granted, an access permission may be revoked by the Member/User at any time. To revoke a permission, the Member/User may use the device's system settings or contact the Owner using the contact information provided in this Policy.

The procedure for managing access permissions may vary depending on the device and software used by the Member/User.

Revoking one or more access permissions may affect the proper functioning of the Application.

Where the Member/User grants any of the permissions specified below, the relevant Personal Data may be processed (accessed, modified, or deleted) through the Application.

Camera Permission

Used to access the device's camera and to take photographs and record videos directly within the Application.

Write-Only Photo Library Permission

Used to access the Member's/User's Photo Library solely for the purpose of saving content to it.

Approximate (Non-Continuous) Location Permission

Used to access the approximate location of the Member's/User's device. The Application may collect, use, and share the Member's/User's location for the purpose of providing location-based services.

The Member's/User's geographical location is determined on a non-continuous basis. This means that the Application does not continuously track or determine the Member's/User's precise location.

Detailed Information on the Processing of Personal Data

Personal Data is collected for the following purposes and through the following services:

Analytics

The services described in this section enable the Owner to monitor and analyze web traffic and may be used to track the Member's/User's activities.

AppsFlyer (AppsFlyer Ltd.)

AppsFlyer is an analytics service provided by AppsFlyer Ltd.

Personal Data processed: Network Resource Usage Data; Trackers.

Place of processing: Israel – Privacy Policy – Opt-out.

The transfer is carried out on the basis of the Member's/User's consent to the cross-border transfer of Personal Data, provided in accordance with the procedure set out in the "Cross-Border Transfer of Personal Data" section of this Policy.

Location-Based Interactions

Non-Continuous Geolocation (Application)

The Application may collect, use, and share the Member's/User's location Data with other parties for the purpose of providing location-based services.

Most web browsers and devices provide options to disable this feature by default. Where the Member/User expressly grants the relevant permission, the Application may collect the Member's/User's location Data.

The Member's/User's geographical location is determined on a non-continuous basis: either upon a specific request by the Member/User or when the Member/User does not specify their current location in the relevant field and allows the Application to determine the location automatically.

Personal Data processed: precise location.

Permissions for Access to Data Stored on the Member's/User's Device

Use of the Application involves the Member/User granting certain permissions to access Information stored on their device, subject to the terms set out below.

Permissions for Access to Data Stored on the Member's/User's Device (Application)

Use of the Application involves the Member/User granting certain permissions to access Information stored on their device in accordance with the terms set out in this Policy.

Personal Data processed: photographs and video recordings created using the Camera; Data saved to the Photo Library; approximate device location Data.

Registration and Authentication Provided Directly by the Application

By completing the registration or authentication procedure, Members/Users authorize the Application to identify them and provide them with access to dedicated services. Personal Data is collected and stored solely for registration or identification purposes. Only the Data necessary to provide the service requested by the Members/Users is collected.

Direct Registration (Application)

The Application obtains Personal Data directly from the Member/User when the Member/User completes the registration form as part of the registration procedure.

Personal Data processed: email address; city; date of birth; first name; telephone number; password; last name.

Registration and Authentication

By completing the registration or authentication procedure, Members/Users authorize the Application to identify them and provide them with access to dedicated services.

Depending on the services described below, third parties may provide registration and authentication services. In such cases, the Application may access certain Data stored on the servers of these third-party services for registration and authentication purposes.

Some of the services listed below may also collect Personal Data for targeting and profiling purposes (for further information, please refer to the description of each service).

Sign in with Apple (Apple Inc.)

Sign in with Apple is a registration and authentication service provided by Apple Inc. Where Members/Users are required to provide their email address, Sign in with Apple may generate a private relay email address on their behalf that automatically forwards messages to their verified personal email account, thereby preventing the Owner from accessing their actual email address.

Personal Data processed: email address; first name; telephone number; last name.

Place of processing: United States – Privacy Policy.

The transfer is carried out on the basis of the Member's/User's consent to the cross-border transfer of Personal Data, provided in accordance with the procedure set out in the "Cross-Border Transfer of Personal Data" section of this Policy.

Google OAuth (Google LLC)

Google OAuth is a registration and authentication service provided by Google LLC and connected to the Google network.

Personal Data processed: various categories of Data as specified in the service's Privacy Policy.

Place of processing: United States – Privacy Policy.

The transfer is carried out on the basis of the Member's/User's consent to the cross-border transfer of Personal Data, provided in accordance with the procedure set out in the "Cross-Border Transfer of Personal Data" section of this Policy.

Contacting the Member/User

Phone Contact (Application)

Members/Users who have provided their telephone number may, subject to their appropriate consent, be contacted for commercial or advertising purposes in connection with the Application, as well as for the purpose of handling technical support requests.

Personal Data processed: telephone number.

Additional Information on the Processing of Personal Data

Push Notifications

The Application may send notifications from its servers to the Member/User for the purposes specified in this Privacy Policy.

In most cases, Members/Users may opt out of receiving push notifications by changing the relevant settings on their devices, such as mobile notification settings, and may subsequently modify these settings to manage notifications for the Application, certain applications, or all applications installed on a particular device.

Members/Users should be aware that disabling push notifications may adversely affect certain features and functionality provided by the Application.

Online Sale of Goods and Services

The Personal Data collected is used to provide services to the Member/User or to sell goods, including processing payments and, where applicable, arranging delivery.

Personal Data collected for payment purposes may include details relating to a bank card, bank account used for cashless payments, or any other available payment method. The type of Data collected by the Application depends on the payment system used.

Rights of Members/Users

Within the limits provided for by the Law of the Republic of Kazakhstan "On Personal Data and Their Protection," the Member/User has the right to:

- withdraw previously given consent to the processing of Personal Data;
- obtain information regarding the fact, purposes, and methods of processing their Personal Data;
- access their Personal Data and obtain a copy of the Data being processed;
- request clarification, correction, or blocking of their Personal Data where such Data is incomplete, outdated, or inaccurate;
- request the destruction of their Personal Data in cases provided for by applicable law;
- appeal against the Owner's actions (inaction) and decisions to the authorized body of the Republic of Kazakhstan responsible for personal data protection or through judicial proceedings.

Information on the Right to Object to Data Processing

Members/Users should be aware that where their Personal Data is processed for direct marketing purposes, they may object to such processing at any time and free of charge, without providing any justification. Upon receipt of the Member's/User's objection to processing for direct marketing purposes, the processing of Personal Data for such purposes shall cease. The Member/User may determine whether the Owner processes Personal Data for direct marketing purposes by referring to the relevant sections of this Policy.

Procedure for Exercising the Above Rights

Any requests concerning the exercise of the Member's/User's rights may be submitted to the Owner using the contact details provided in this Policy. No fee is charged for considering such requests.

The Owner shall provide the Member/User with the requested information regarding their Personal Data within three business days from the date of receipt of the request. If the Owner refuses to provide such information, it shall provide a reasoned response within the same period. Where the relevant grounds are confirmed, Personal Data shall be amended, blocked, or destroyed within one business day.

Additional Information on Data Collection and Processing

Legal Proceedings

The Member's/User's Personal Data may be used by the Owner in legal proceedings or at stages leading to potential legal proceedings arising from improper use of the Application or related Services.

The Member/User acknowledges that the Owner may be required to disclose Personal Data at the request of public authorities.

Additional Information on the Member's/User's Personal Data

In addition to the information contained in this Privacy Policy, the Application may, at the Member's/User's request, provide additional and contextual information concerning specific Services or the collection and processing of Personal Data.

System Logs and Maintenance

For system operation and maintenance purposes, the Application and any third-party services may collect files recording interactions between the Application and Members/Users (system logs), or may use other Personal Data for this purpose, including IP addresses.

Information Not Contained in this Policy

Additional information concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please refer to the contact details provided at the beginning of this Policy.

Amendments to this Privacy Policy

The Owner may amend or supplement this Policy. The revised version of the Policy shall be made available in the Application and shall indicate the date of its latest update.

If any amendments affect the purposes of processing, the categories of Personal Data collected, the transfer of Personal Data to third parties, cross-border transfers, or other material terms of the consent previously provided, the Owner shall obtain the Member's/User's consent again in cases required by the legislation of the Republic of Kazakhstan.

Definitions of Terms and References to Legal Provisions

Personal Data (or Data)
Information or a set of information relating to the Member/User as a personal data subject, supplemented by one or more Personal Data identifiers.

Usage Data (Network Resource Usage Data)
Information automatically collected by the Application or third-party services used by the Application, including, in particular: the IP addresses or domain names of the computers used by Members/Users who use the Application; URI addresses (Uniform Resource Identifiers); the time a request is submitted; the method used to submit the request to the server; the size of the file received in response; the numerical code indicating the status of the server response (successful outcome, error, etc.); country of origin; characteristics of the browser and operating system used by the Member/User; various time-related details for each visit (for example, the time spent on each page of the Application); information concerning navigation within the Application, with specific reference to the sequence of pages visited; as well as other parameters relating to the operating system of the device and/or the Member's/User's computing and information technology environment.

Member/User
An individual who uses the Application and to whom the Personal Data processed in accordance with this Policy relates.

Application
The means through which the Member's/User's Personal Data is collected and processed.

Service
A service provided through the Application, as described in the applicable terms and conditions (if any), as well as on the relevant website or in the Application.

Agreement
The User Agreement (Public Offer) of LiTRO RSA LLP, available on the Website at https://litro.kz/contract, which sets out the terms and conditions for providing the Member/User with access to the Owner's Services and of which this Policy forms an integral part.

Cookie
Cookies are Trackers consisting of small sets of data stored in the Member's/User's browser.

Tracker
A Tracker is any technology (for example, Cookies, unique identifiers, web beacons, embedded scripts, electronic tags, and digital fingerprints) that enables the tracking of Members'/Users' activities, including by accessing information on the Member's/User's device and storing information on that device.

Legal Information

This Privacy Policy has been prepared in accordance with the Law of the Republic of Kazakhstan No. 94-V dated May 21, 2013 "On Personal Data and Their Protection," as well as other regulatory legal acts of the Republic of Kazakhstan governing the processing and protection of personal data.

Unless otherwise specified herein, this Policy applies exclusively to the Application operated by LiTRO RSA LLP.

This Policy forms an integral part of the User Agreement (Public Offer) available on the Website and shall prevail with respect to matters concerning the processing and protection of Personal Data.

Last updated: "17" September 2026