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## **LiTRO – Confidentiality Policy (hereinafter – the Policy)**

The Application collects certain Personal data of LiTRO Auto Club Members/Users.

### **Data Owner and Controller (hereinafter – the Owner)**

LiTRO RSA Limited Liability Partnership (LiTRO RSA LLP) BIN 240540018445, 050040, 3, Mitin Str., Medeusky district, Almaty city

**Contact email of the Owner: [info@litro.kz](mailto:info@litro.kz)**

### **Categories of data collected**

Categories of Personal data collected by the Application (independently or through mediation of third parties) include:

- trackers;
- Data of network resources use;
- authorization of access to Camera;
- authorization for Approximate (short-term) localization;
- authorization of access to Photolibrary for recording only;
- contact data of Members/Users: name, surname, date of birth, phone number, e-mail, password, city, exact location.

Full data of each category of collected Personal data is given in respective sections of the Policy or in specific explanatory texts that are displayed on a screen before data collection.

Personal data can be provided by a Member/User independently, or in case of Usage data, it can be automatically collected by the Application while its use.

Unless otherwise specified, all data requested by the Application is mandatory. In case of failure to provide specified Data, the Application may become unable to provide its services. In cases when the Application directly indicates optionality of providing certain data, Members/Users shall have the right not to provide respective data with no consequences as concerns accessibility or functioning of the Application Services.

It is recommended to the Members/Users who are unsure which Personal data is mandatory, to contact the Owner.

The Application or third-party service owners that use the Application, use Cookies (or other tracking tools) only with the purpose of providing the Service required to a Member/User, and also for any other purpose specified herein, and in the rules associated with the use of Cookies (if any).

Members/Users are liable for any Personal data of any third parties that they receive, publish or grant to third parties, that was received, published or transferred through the Application, and confirm that they obtained consent of a respective third party for Third-party data disclosure to the Owner.

### **Data processing method and place**

#### **Processing methods**

The Owner takes reasonable security measures to prevent unauthorized access to Data, its disclosure, change or unauthorized destruction.

Data is processed with the use of computers and (or) tools supporting information technologies (IT) in accordance with organizational procedures and methods strongly associated with the specified purposes. In some cases, in addition to the Owner, Data can be accessible for certain categories of responsible persons who participate in the Application operation (administration, sales, marketing, legal, system administrators), or third-party organizations (such as third-party suppliers of technical services, postal organizations, hosting services providers, companies supplying information technologies, communication services), that the Owner instructs if necessary to carry out functions of Data processor.

### **Legal grounds for processing**

The Owner may process Personal data related to Members/Users, if one of the following criteria is applicable:

- Members/Users gave their consent to the use of Data for one or more specific purposes. Note: under legislation of some jurisdictions, the Owner can be permitted to process Personal data until a Member /User objects against such processing (“denial”), without necessity to rely on consent or any other legal ground as listed below. Along with that, the above provision is not applicable when Personal data processing is regulated by European legislation on data protection;
- Data provision is required for implementation of user agreement with a Member/User (hereinafter – the Agreement) and (or) any commitments preceding such Agreement concluding;
- the processing is required for the execution of a legal obligation that the Owner is charged with;
- the processing is associated with a specific task that is being carried out in the interests of public or in the course of exercising official powers entrusted to the Owner;
- the processing is required for the serving of lawful interests of the Owner or any third party.

In any case, the Owner has the right to clarify a specific legal ground applicable to processing and, in particular, whether such provision of Personal data is a requirement stipulated by a law/contract, or a pre-requisite for the Agreement concluding.

### **Place**

Data is processed in operational offices of the Owner and in any other places where processing parties are located.

Depending on physical location of a Member/User, data provision may stipulate for Member/User Data transfer to any country beyond borders of such Member/User country.

If such transfer takes place, Members/Users may obtain additional information having read respective sections of this document or request it from the Owner by making use of information presented in the section with contact info.

### **Retention period**

Personal data must be processed and retained until it is necessary for purposes it was collected for.

Thus:

- Personal data collected for purposes associated with the execution of the Agreement between the Owner and Member/User is retained until such Agreement is fully executed;
- Personal data collected with the purpose of serving lawful interests of the Owner is retained until it is required for the implementation of such purposes. Members/Users may find specific information about lawful interests, served by the Owner in respective sections of this document or by contacting the Owner.

The Owner may be permitted to retain Personal data for a longer period if a Member/User gives consent for such processing, until such consent is withdrawn by such Member/User. Besides, the Owner may be obliged to retain Personal data for a longer period if such retention is required in order to fulfill a legal obligation, or based on order of any government authority.

Upon expiration of retention period, Personal data is deleted. Thus, right to access, right to delete, right to correct and the right for data transfer may not be exercised upon expiration of the retention period.

### **Purpose of processing**

Data related to a Member/User is collected in order to provide the Owner with a possibility to provide Service through the Application, comply with legislation, respond to requests of law enforcement bodies, protect its rights and interests (or rights and interests of the Members/Users or any third parties), detect any intentional or fraudulent acts, and also with the following purposes: Analytics, Authorizations to access data stored on a Member/User device, Registration and authentication is carried out directly by the Application, Registration and authentication, Interaction with reference to location and Establishing connection with a Member/User.

Members/Users may find specific information about Personal data used for implementing each purpose in the section “Detailed information about Personal data processing”.

### **Authorization to access for data stored on a Member/User device**

Depending on a Member/User specific device, the Application may request certain authorizations that will allow it to refer to Data of a Member/User device as described below.

Specified authorizations are provided by a Member/User prior to the processing of any information. Upon granting access authorization, it can be cancelled by a Member/User at any time. To withdraw an authorization, a Member/User may use system settings or address to the Owner as per contact information specified in this document.

The procedure of access authorization control may vary depending on devices and software used by Member/User.

Withdrawal of one or several access authorizations may affect correct functioning of the Application.

In case of provision of the below authorizations by a Member/User, relevant Personal data will be processed (access, change or deletion) with the help of the Application.

### **Camera access authorization**

Used to obtain access to camera, photo and video stored on a device.

### **Authorization of Photolibrary write-only access**

Used to obtain write-only access to Member/User Photolibrary.

### **Authorization for approximate (short-term) localization**

Used to obtain access to approximate Member/User device location. The Application is authorized to collect, use and share Member/User location with the purpose of provision of services association with location.

Member/User geographical location is identified on a temporary basis. This means that the Application is unable to continuously identify exact location of a Member/User.

## **Detailed information about Personal data processing**

Personal data is collected with the following purposes and with the help of the following services:

### **Analytics**

Services described in this section enable the Owner's control and analysis of web-traffic and may be used to record Member/User actions.

### **Appsflyer (AppsFlyer Ltd)**

Appsflyer – analytical service provided by AppsFlyer Ltd.

Processed personal data: Network resources usage data; Trackers.

[Place of processing: Israel – Personal data privacy policy – Refusal to participate.](#)

## **Interactions with reference to location**

### **Geolocation not in continuous mode (Application)**

The Application may collect, use and disclose Member/User location data to any third parties with the purpose of providing services based on its location identification.

Majority of web browsers and devices provide for tools to reject this function by default. In case of granting a relevant authorization expressly, the Application may record data of Member/User location.

Member/User geographical location is identified by method that is not continuous: whether by specific request of a Member/User, or when a Member/User does not specify his/her current location in the respective box and allows the Application automatic location identification.

Processed Personal data: exact location.

### **Authorization for access to data stored on Member/User device**

Use of the Application suggests Member/User's granting of individual authorizations for access to Information stored on his/her device on the following terms.

### **Authorizations for access to data stored on Member/User device (Application)**

Use of the Application suggests Member/User's granting of individual authorizations for access to Information stored on his/her device on terms specified in this document.

Processed personal data: Camera access authorization; Photolibrary write-only access authorization; Approximate (short-term) localization authorization.

## **Registration and authentication are carried out directly by the Application**

As the result of Members/Users completion of registration or authentication procedure, the Application obtains the authorization to identify them and grant them access to dedicated services. Personal data is collected and stored only with the purpose of registration and identification. Collected is only Data necessary for provision of service requested by Members/Users.

### **Direct registration (Application)**

The Application receives Personal data directly from a Member/User as the result of his/her filling out the registration form during the registration procedure.

Processed personal data: e-mail address; city; date of birth; name; phone number; password; surname.

## **Registration and authentication**

As the result of Members/Users' completion of registration or authentication procedure, the Application obtains the authorization to identify them and grant them access to dedicated services. Depending on the below-described, third parties may provide registration and authorization services. In this case, the Application obtains a possibility of accessing some Data stored on servers of such third-party services with the purpose of carrying out registration and authentication. Some of the below-listed services may also collect Personal data with the purpose of targeting and profiling (see additional information in each service description).

### **Signing in with Apple (Apple Inc.)**

Signing in with Apple – registration and authentication service provided by Apple Inc. In cases when Members/Users must provide their e-mail addresses, Signing in with Apple may generate on behalf of Members/Users a private variable address that automatically sends messages to their verified personal e-mail account thus without providing the Owner access to their actual e-mail address. Processed personal data: e-mail address; name; phone number; surname. Processing place: USA – Personal data privacy policy.

### **Google OAuth (Google LLC)**

Google OAuth – registration and authentication service provided by Google LLC and associated with Google network.

Processed personal data: various categories of Data specified in the service personal data privacy policy.

[Processing place: USA – Personal data privacy policy.](#)

### **Establishing contact with a Member/User**

#### **Phone contact (Application)**

Members/Users who specified their phone numbers can be contacted with commercial or advertising purposes with offers with the Application as subject matter, as well as with the purpose of executing requests for technical support.

Processed personal data: phone number.

### **Additional information about Personal data processing**

#### **Notifications received by client from server**

The Application may send notices to Member/User from its servers in order to achieve goals specified in the Confidentiality policy.

In the majority of cases, Members/Users may refuse to receive notifications from the server by selecting respective settings on their devices, for instance, notification settings for mobile phones, and then change such settings so that the Application, some or all applications on a specific device would have their own settings.

Members/Users must be aware that switching off notifications received from server may have adverse effect on useful features provided by the Application.

### **Goods and services sale through the Internet**

Collected Personal data is used for providing a Member/User services or for selling goods, including payment and possible delivery.

Personal data collected with the purpose of payment making may relate to a bank card, bank account used for electronic funds transfer or any other provided methods of payment. Nature of Data collected by the Application depends on a payment system used.

### **Rights of Members/Users**

Users may exercise certain rights in respect of their Data processed by the Owner.

In particular, Members/Users have the right to perform the following actions within limits stipulated by law:

**Withdraw their consent at any time.** Members/Users have the right to withdraw their consent if previously they gave such consent for processing of their Personal data.

**Object against processing of their data.** Members/Users have the right to object against processing of their Data, if processing is carried out on the of any legal ground apart from their consent. More detailed information about this is given in relevant section below.

**Be granted access to their Data.** Members/Users have the right to know if data is processed by the Owner, receive information about individual aspects of processing and receive copy of Data being processed.

**Check Data and demand correction.** Members/Users have the right to check accuracy of their Data and request data updating or correction.

**Restrict processing of their Data.** Members/Users have the right to restrict processing of their Data. In this case, the Owner will not process their Data except for storage.

### **Demand deletion of their Personal data or otherwise destroy it.**

Members/Users have the right to demand from the Owner to delete their Data.

**Receive their Data and transfer it to another controller.** Members/Users have the right to receive their Data in structured, widely-accepted and machine-readable format and, if it is technically feasible, to unimpededly transfer it to another controller.

**File a complaint.** Members/Users have the right to file a complaint to any competent data protection authority.

### **Information about the right to object against Data processing**

In cases when Personal data is processed in the interest of public, while discharging official powers entrusted to the Owner, or with the purpose of serving legal interests pursued by the Owner, Members/Users may object against such processing presenting grounds related to their specific situation as basis for their objection.

Along with that, Members/Users must know that in case of their Personal data processing with the purpose of direct marketing, Members/Users may at any time and free of charge object such processing without any grounds. After receiving an objection of a Member/User against processing with the purpose of direct marketing, Personal data processing with such purpose is stopped. A Member/User may find out if the Owner processes Personal data with the purpose of direct marketing having read relevant sections of this document.

### **Procedure of exercising the specified rights**

Any requests related to exercising rights of a Member/User, can be sent to the Owner with the use of contact data specified in this document. No fee is charged for such matters consideration. The Owner will respond to such requests within as soon as practicable but no later than in one month, providing Members/Users information stipulated by law. Any personal data correction or deletion or processing restriction will be informed by the Owner to each recipient who was disclosed the Personal data (if any), save for cases when it is impossible or requires inadequate effort. By request of Members/Users, the Owner will inform about such recipients.

### **Additional information about Data collection and processing**

#### **Legal actions**

Member/User Personal data can be used by the Owner in judicial proceedings or at stages leading to possible legal recourse in connection with improper use of the Application or associated Services.

Member/User states his/her awareness about possibility of the Owner being obliged to disclose Personal data based on demand of government authorities.

### **Additional information about Member/User Personal data**

In addition to information contained in this **Confidentiality** policy, the Application may provide additional and contextual information about specific Services or Personal data collection and processing by request from a Member/User.

### **System logs and maintenance**

With the purpose of ensuring the system operation and its maintenance, the Application and other third-party services may gather files where it is recorded how the Application interacts with Members/Users (system logs), or use other Personal data with this purpose (in particular IP-address).

### **Information missing in this Policy**

Additional information about Personal data collection or processing can be requested from the Owner at any time. See contact data specified above in this document.

### **How requests “No tracking” are processed**

The Application does not support “No tracking” requests.

To identify if any third-party service use “No tracking” requests, it is necessary to read relevant Personal data privacy policy.

### **Making changes to this Personal data privacy policy**

The Owner reserves the right to make changes at any time to this Personal data privacy policy by giving notice to Member/Users on this page and probably within the Application and (or) — as far as technically and legally practicable — by sending notifications to Members/Users with the use of any contact information available to the Owner. It is strongly recommended to often check this page cross-checking the date of the most recent update indicated at the page bottom.

If changes affect activity of processing carried out on the basis of consent of a Member/User, the Owner must obtain Member/User consent again if necessary.

### **Definition of terms and references to legal regulations**

**Personal data (or Data)**

Any information that directly, indirectly or in connection with other information – including personal identification number – ensures the detectability or recognizability of an individual.

**Usage data (network resources)**

Information automatically collected by the Application or third-party services used by the Application), in particular: IP-addresses or domain names of Members/Users computers that use the Application, URI-addresses (Uniform Resource Identifiers), request access time, method of request access to server, file size received in response, numeric code indicating the server response status (successful outcome, error etc.), country of origin, characteristics of browser and operating system used by Member /User, various data of each visit time (for instance, time spent on each page of the Application), and information about movements within the Application with separate indication of order of page visits, and also other parameters of Member/User device operating system and (or) computing or information environment.

**Member/User**

An individual using the Application which, unless otherwise stated, matches the Data subject.

**Data subject**

An individual Personal data are related to.

**Data processor (or Data administrator)**

An individual or body corporate, official public authority, agency or any other authority that process personal data by directions of the Controller.

**Data controller (or Data owner)**

An individual or body corporate, public authority, department or any other person that individually or collectively with other persons determines intended use and processing tools of Personal data including safety precautions related to how Application is operated and used. Unless otherwise specified, Data controller is the Owner, i.e. person owning the Application.

**Application**

A tool used for User personal data is collected and processed.

**Service**

A service provided by the Application described under respective conditions (if any), and also on this website or in this Application.

**European Union (or EU)**

Unless otherwise specified, all references herein to the European Union shall include all existing at present member countries of the European Union and European Economic Area.

**Cookies**

Cookies are Trackers comprising small data sets stored in Member/User browser.

**Tracker**



Any technology (for instance, Cookies, unique identifiers, web beacons, integral scripts, electronic tags and fingerprints) allowing tracking of Members/Users actions, is called a Tracker, for instance obtaining access to information on a Member/User device and its saving on such device.

**Legal information**

This confidentiality statement was prepared on the basis of provisions of various statutes, including Cl. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

Unless this document specifies otherwise, the personal data confidentiality policy covers the Application only.

**Last updated: June 27, 2024**