

## **1. PRIVACY POLICY**

This Privacy Policy was last updated on December 01, 2023.

“Group Four” LLP is a company registered in the Republic of Kazakhstan (BIN 201240020560), where the company’s office is registered at the address: Republic of Kazakhstan, Almaty (AlgaApp, “we”, “our” and “us” are also applicable).

This Privacy Policy applies to your use of the AlgaApp mobile application ("AlgaApp"), which contains a Storefront ("Showcase") and redeems reward points ("Point(s)"), any website operated by Group Four LLP ( including <http://alga-app.kz>) (website "AlgaApp") and the services that can be accessed through them (services "Service"). This Privacy Policy sets out the basis on which we will store and process any personal data we collect from you, or that you provide to us.

## **2. MINIMUM AGE**

Please note that you must be at least 14 years of age to use our services. Please do not use our services or provide us with any personal information if you are under 14 years of age.

## **3. INFORMATION WE MAY COLLECT FROM YOU**

From time to time, we may collect or request personal information from you, including (but not limited to) the following: your first name, last name, gender, mobile phone number, email address, password, ID, your contacts, biographical information, photographs and/ or payment information.

We also automatically collect, store and use information about your use of our services and about your computer, tablet, mobile device or other device through which you access our services. This includes the following information:

- a) Technical Data: including IP address, browser type, Internet service provider, device identifiers, login information, time zone settings, browser plug-in versions and types, preferred language, operating system and platform, and geographic location;
- b) Usage Data: Includes full resource URL (URL), clickstream to, through and from [alga-app.kz](http://alga-app.kz) websites, pages viewed and searched, page response times, length of visit to certain pages, referral source/exit pages, page interactivity information (such as scrolling, clicks and mouse-overs), date and time pages were accessed, website navigation and search terms used, and whether you opened our marketing newsletters.

We may also automatically record purchases you make through the AlgaApp application or [alga-app.kz](http://alga-app.kz) websites using points (“Transaction Data”) to understand your preferences and provide you with more personalized marketing if necessary.

As part of the Services, we may provide functionality that allows you to search for friends using your Meta credentials. When you choose to do this, you will be asked to allow the AlgaApp app to access certain information associated with your Facebook, Google, and Apple ID account, such as your name, profile photo, gender, and friends list. Subject to your consent, we will process such information to identify your Facebook, Google and Apple ID account friends who are AlgaApp App users and to allow you to invite those friends to install the AlgaApp App.

Please note that, with your consent, we will collect information about your location and physical movements to enable the AlgaApp to function properly and to track and validate forms of acceptable movement. You can turn location monitoring and mobile internet connectivity on and off from time to time through your mobile device operating system settings, but if you turn these

features off, we may not be able to collect information about your step count and GPS/Cell-ID location, which prevents tracking and/or converting your movement into points.

At times we work with third parties (including, for example, Apple HealthKit, Google Fit, Health connect, CloudPayments, Near Foundation, business partners, subcontractors in technical, payment and delivery services, advertising networks, analytics providers and search information providers) who may provide us with information about you. This may include your purchase history from business partners who provide you with rewards available through the AlgaApp.

#### **4. PURPOSES OF USING YOUR PERSONAL DATA**

As a data controller, we will only use your personal data if we have a lawful basis for doing so. The table in Appendix 1 sets out the purposes for which we use your personal data and the relevant lawful basis on which we do so.

#### **5. USE OF PERSONAL DATA**

We may use your personal data to achieve the purposes set out in Appendix 1 or as described below:

**Other users.** Some of your personal information may be used and shown to other users of the AlgaApp application as part of the normal operation of the services (for example, your uploaded profile photo and biographical information will be available to all users, and we may from time to time publish your total number of verified steps or other information about movement during a certain period for other users).

**Service Providers.** We may use your personal information to work with third parties who perform services for us or on our behalf, which may include providing data hosting, customer relationship management, payment processing and analytics services.

**Business partners.** We may use your personal data to work with our trusted business partners so that they can contact you from time to time with offers that may be of interest to you and/or to inform you about other products or services, provided that you have given your consent on this.

**Law enforcement agencies, regulators, government agencies and other parties for legal reasons.** We may use your personal data if we are required to do so by law or if we believe in good faith that such disclosure is necessary to comply with a legal obligation or request, to enforce our terms and conditions, to prevent or address security or technical problems, or to protect the rights, property or safety of us, our users, third parties or the public.

**Buyers and third parties in connection with a business transaction.** If we are involved in a merger, acquisition, bankruptcy, restructuring, partnership, sale of assets or other transaction, we may disclose your personal information as part of that transaction.

Additionally, we may use your personal information to work with third parties if you have given your consent to this.

#### **6. DATA STORAGE**

Your personal data will only be retained for the necessary period set out in this policy and for as long as required by law or regulation.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risks of harm from unauthorized use or

disclosure of your personal data, the purposes for processing your personal data, the ability to achieve those purposes through other means, and applicable law, regulation, tax , accounting or other requirements.

## **7. DATA SECURITY**

We take reasonable industry standards to ensure the security of all our data and prevent unauthorized access or illegal use.

## **8. COOKIES**

We use cookies and similar technologies on the AlgaApp app and the [alga-app.kz](http://alga-app.kz) websites for a variety of purposes, including analytics and advertising. For more information about the use of cookies, see Appendix 2.

## **9. YOUR RIGHTS**

Depending on where you are located, you may have a number of rights in relation to your personal data under applicable data protection laws:

- a) Ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing (i.e. "opt-out") by clicking the "unsubscribe" button at the bottom of our marketing emails or by sending an email to [privacy@alga-app.kz](mailto:privacy@alga-app.kz) with the subject "unsubscribe".
- b) Change the personal data we hold about you. You can exercise your right by accessing information about your account in our application (Open the AlgaApp application -> Your account screen -> Write to support).
- c) Ask us about the personal data we hold about you and request a copy of your personal data. You can exercise your right to access this information by sending an email to [privacy@alga-app.kz](mailto:privacy@alga-app.kz) with the subject "data access request".
- d) Delete your account and all personal data we hold about you. You can exercise your right to delete your AlgaApp account and the personal data associated with it by running account deletion through the "Help" section of the AlgaApp application (Open the AlgaApp application -> Your account screen ->Delete account).
- e) Object to any use of your personal data that we make on the basis of our legitimate interests (as set out in Appendix 1), under certain conditions.
- f) Receive a copy of the personal data you have provided to us in a structured, commonly used format that supports reuse, or request that your personal data be transferred to another party, under certain conditions.
- g) Withdraw your consent to the processing of your personal data if it is based on your consent (as specified in Appendix 1). Request restrictions on the purposes of processing your personal data if continued processing of personal data in this way is unreasonable, for example if you dispute the accuracy of the data.

Please note that the above rights are not absolute and we may deny requests, in whole or in part, if exceptions under applicable law apply.

If you would like to exercise one of these rights, please follow the steps above or contact us using the contact details below.

## **10. COMPLAINTS**

If you would like to make a complaint about how we process your personal data, please contact us using the contact details below. We will endeavor to respond to your complaint as quickly as possible. You also have the right to lodge a complaint with your national data protection authority.

## **11. LINKS**

The Services may contain features or links to websites and services provided by third parties. Any information you provide on third party websites or services is provided directly to the operators of such websites or services and is subject to the privacy and security policies of those operators, even if obtained through the AlgaApp application or the alga-app.kz websites. . We are not responsible for the content or privacy and security policies of third parties that are linked or accessed through the AlgaApp application or alga-app.kz websites. We encourage you to review the privacy and security policies of third parties before providing them with your personal information.

## **12. CHANGES TO THE PRIVACY POLICY**

We reserve the right to change this Privacy Policy at any time. Any such changes we may make to this Privacy Policy will be posted on the AlgaApp application and on the alga-app.kz websites, and may be sent to you by email. Please check the Privacy Policy available in the AlgaApp application and on the alga-app.kz websites from time to time.

## **13. CONTACT**

Questions, comments and requests regarding this Privacy Policy are welcomed and should be directed to [privacy@alga-app.kz](mailto:privacy@alga-app.kz) with the subject "request".

## **APPLICATION 1. PURPOSES FOR COLLECTING PERSONAL INFORMATION**

Your use of the AlgaApp application and the sharing of information obtained through the Google API with any other application will be subject to the Google API Services User Data Policy, including the Restricted Use Requirements.

We use the following categories of personal data in the order described below and rely on the following legal basis for processing:

**Contact details** (phone number): We use this information to verify your identity as part of the account creation process. Our legal basis for processing this data is that it is in our and your legitimate interests to ensure that you use the correct telephone number when registering for services.

**Contact details** (email address, phone number, etc.), profile information (username, profile photo, biography, etc.), traffic data (motion data, HealthKit data): We use this data to provide the Services, including for the operation of the AlgaApp Storefront (using our own systems and the systems of relevant third-party service providers). Our legal basis for processing this data is based on the performance of a contract (our terms and conditions).

**Location data** (iOS only): We use this data to verify your physical movement and location and award points based on this verified information. Our legal basis for processing this data is based on your consent (if we process location data) and the performance of a contract.

**Motion data** (Healthkit / Google Fit step data): We use this data to verify your physical movement and award points based on this verified information. Our legal basis for processing this data is based on your consent and performance of a contract.

**Contact details** (email address, telephone number, etc.), payment data (card number, CVC, etc.), profile information (username): We use this data to process your transactions with us. Our legal basis for processing this data is based on the performance of a contract.

**Profile information** (username, profile photo, etc.), movement data (movement data, HealthKit data, Google Fit data): We use this data to create daily user leaderboards that include all users or users who meet certain criteria, ranked by the number of steps taken or using other criteria. Our legal basis for processing this data is that it is in our legitimate interests to make our services social and competitive, and to allow you to see how you stand compared to other users and encourage you to walk more.

**Contact details** (phone number): We use this information to connect you with other users and allow you to invite contacts to use the services. Our legal basis for processing this data is that it is in our legitimate interests to make our services social and to allow you to interact with friends when using the services.

**Contact details** (telephone number, email address, etc.), communication data (personal data included in your requests, survey responses, complaints, etc.): We use this data to respond to your requests and complaints and provide you information and materials that you request from us. We also use this data to communicate with you, including informing you about updates to the AlgaApp application, the alga-app.kz websites, our Terms of Use and/or this Privacy Policy. We also use this data to conduct market and customer research. Our legal basis for processing this data is that it is in our legitimate interests to respond to your requests and provide any information and materials requested in order to maintain good customer relations; it is in our legitimate interests to ensure that any changes to our policies, terms and conditions and other technical updates are communicated to you; and because it is in our legitimate interests to conduct market and customer research so that we can improve our services.

**Transaction data and order history:** We use this data to understand your preferences and maintain accounts and records. Our legal basis for processing this data is that it is in our legitimate interests to understand our users' preferences so that we can improve the services and offers that are displayed on the AlgaApp; and because it complies with a legal obligation.

**Contact details** (phone number, email address, social media accounts), marketing preferences (consent records): We use this data for marketing and advertising (including sending you marketing emails, conducting online behavioral advertising and measuring the effectiveness of our marketing). We also use this data to share your contact details with trusted partners for marketing purposes. Our legal basis for processing this data is your consent (where required by applicable law). Unless consent is required under applicable law, such processing is necessary for our legitimate interests, namely the development and growth of our business.

**Profile information** (username, profile photo, bio, etc.), usage data, transaction data, movement data (movement data, HealthKit data, Google Fit data): We use this data to investigate and/or prevent suspicious fraudulent or other criminal acts, to resolve disputes between users, and for statistical analysis that helps us manage our business, for example regarding our financial performance, customer base, product range or other effective measures. Our legal basis for processing this data is our legitimate interests in addressing and protecting ourselves and users of the Services, AlgaApp and alga-app.kz websites from harmful activities; it is our legitimate interests to ensure that disputes between users are resolved and that appropriate action is taken against rule breakers; and it is our legitimate interests to be as efficient as possible so that we can provide you with the best possible service.

**Profile information** (username, profile photo, biography, etc.), usage data, technical data: We use this data to correct errors and problems with our services and to protect the security of systems and data. Our legal basis for processing this data is that it is in our legitimate interests to monitor the performance of the services and ensure security; comply with our legal and regulatory obligations; and it is also in our legitimate interests to protect systems and data and prevent and detect criminal activity that may be harmful to you and/or us.

**Technical and usage data:** We use this data to analyze the use of our services in order to improve them and ensure that content is presented in the best possible way for you. Our legal basis for processing this data is based on your consent.

**Contact Information** (email address, phone number, etc.), profile information (username, profile photo, biography, etc.): We use this information to protect or enforce our rights in legal proceedings. Our legal basis for processing this data is that it is in our legitimate interests or those of third parties, i.e. to protect our business, interests and rights or the interests of others.

## **APPLICATION 2 COOKIES**

### **What are cookies?**

We use cookies to distinguish you from other users of AlgaApp and the AlgaApp website and to obtain certain information about your use and behavior. Cookies are small files of letters and numbers that we place on your computer when you use AlgaApp or the alga-app.kz website. This helps us provide you with a better experience using AlgaApp or browsing the alga-app.kz website, and also allows us to improve our services. We will use both persistent cookies, which may remain on your device until they expire (which in some cases can be up to ten (10) years), and session cookies, which are temporary files that are deleted from your device when you close your browser.

### **Cookies we use.**

Cookies we may use include:

- a) Strictly necessary cookies that are necessary for the operation of the alga-app.kz application and alga-app.kz websites. For example, these may be cookies that enable you to log into secure areas of our websites.
- b) Analytical/tracking cookies that allow us to recognize and count the number of visitors and analyze service usage and verify transactions.
- c) Advertising and remarketing cookies, which allow us to generate relevant advertising aimed at you on the alga-app.kz websites, as well as in the AlgaApp application and on other third party websites.

Please note that third parties (including, for example, advertising networks and providers of external services such as web traffic analysis services) may also use cookies, which are not under our control. These cookies are likely to be analytical/performance cookies or cookies targeting specific interests. You may block cookies by activating the appropriate settings on your browser, but if you do this you may not be able to use the full functionality of the services.

We use several industry standard data analytics tools such as Google Analytics and Facebook Analytics. They collect certain information about you, such as your device's IP address and browsing and usage behavior, and are used to track and monitor traffic to the AlgaApp application and alga-app.kz websites.

### **Consent to the use of cookies**

We will ask for your permission (consent) to install cookies on your device when using alga-app.kz websites, unless they are necessary to provide you with a service that you have requested.

We place a notice on the home page of our site that describes how we use cookies and requests your consent before we set any optional cookies on your device.

### **How to disable cookies?**

If you do not want to accept cookies, you can change your browser settings to not accept them. However, please be aware that you may lose some functionality on our websites.

To find out more about cookies, including how to find out what cookies have been set and how to manage and delete them, you can visit the third party website: [www.allaboutcookies.org](http://www.allaboutcookies.org)