

Approved by decision
board of JSC «QAZAQ AIR»
from «__» _____2022
(minutes of the Board № __)

Privacy Policy
when collecting and processing personal data
at QAZAQ AIR JSC

Nur-Sultan, 2022 г.

Contents

1. General Statement	3
2. Controller of Personal Data	3
3. Application of the Policy	3
4. What Personal Data We Collect	3
5. How We Collect Your Personal Data	4
6. Whom We May Collect Your Personal Data from	4
7. Why We Need Your Personal Data.....	5
8. How You Can Control Your Personal Data	5
9. Whom We May Share Your Personal Data With.....	6
10. How We Store Your Personal Data	6
11. How We Protect Your Personal Data	6
12. How You Can Keep Your Personal Data Safe and Secure.....	7
13. Cookie Policy	7
14. Links to other websites	9
15. Google Analytics, Facebook Pixel and Yandex Metrics	9
16. Email services	9
17. Minors	9
18. Final part	9

1. General Statement

1.1. QAZAQ AIR respects your privacy and takes its responsibilities in regard to the protection of your personal data very seriously. You can rest assured that we continuously take steps to keep your personal data secure and ensure it is used only for legitimate purposes.

1.2. This privacy policy will help you understand what types of personal information, when and how we collect, store and use. This policy may be amended any time without prior notice at QAZAQ AIR's discretion due to a business need or as required by law changes.

1.3. We will never willfully disclose personal information about you to any third party other than to process your order without first receiving your permission or unless we are under a legal obligation to do so.

1.4. You can always enquire about or check the information that you have given us or request to delete all your personal information by contacting us at info@flyqazaq.com.

2. Controller of Personal Data

2.1. Any personal information processed by QAZAQ AIR in connection with this Privacy Policy is controlled by QAZAQ AIR, which is considered the "data controller" of your personal information under the Republic of Kazakhstan's personal data protection law (#94-V as of 21 May 2013; changed and amended as of 28 December 2017) and European Union and UK data protection law (General Data Protection Regulation 2016/679). Our address is QAZAQ AIR, 010017, Nur-Sultan s., Esil district, Mangilik El av., building 20, BC «Palazzo degli Affari», Kazakhstan.

3. Application of the Policy

3.1. This Privacy Policy applies to all personal information about you that we collect, use and process regarding your relationship with us as a customer, frequent flyer program member or potential customer, including when you travel with us or use our services, visit and use our websites, contact our Contact Centre, book to use our services through third parties (such as travel agents and other airlines) or otherwise interact with us.

4. What Personal Data We Collect

4.1. QAZAQ AIR collects and uses your personal information for the sole purpose of delivering you the service you have requested and enhancing the quality of it by offering you the right product at the right time via the right channel.

4.1.1. Information we may collect includes:

1) **Personal information:** full name, gender, title, date of birth, nationality, country of residence, passport or other personal identification numbers, visa information, photographs, videos, voice recordings;

2) **Contact information:** address, phone number, email address, company name, business location;

3) **Payment information:** credit or debit card information, including the name of cardholder, card number, issuing bank, billing address and expiry date. If you buy tickets for someone else, we may collect your billing information but may communicate with the passenger directly about their flight;

4) **Travel information:** flight information, upgrades received, channel that you used to book your ticket (travel agent, website, etc.), dietary, seating or other service preferences, baggage requirements, travel companions; your preferences with respect to your travel on our flights and any pre-purchased item;

5) **Health information:** medical records, health issues, or special service requests;

6) **Sensitive information:** dietary preferences that may allude to your religious beliefs, medical records, health issues, racial or ethnic origin;

7) **Technical information:** when you visit our websites or use one of our apps, we may register your IP address, MAC address, browser type, operating system, referring website, web-browsing behavior and app use; we may receive an automatic notification when you open a newsletter or click

on a link in such newsletter; with your permission we may also receive your location data; you can also agree to provide us with access to certain data stored on your mobile phone (such as photos and contacts). For more information, please see below (cookies);

8) **Communication information:** your feedback and email correspondence with our call center, customer relations, etc.

1. **Social media information:** Depending on your social network settings we may receive information from your social network provider. For example, when you sign in for our services using a social network account, we may receive your social network profile including your contact details, interests and contacts. For more information on the personal data that we receive from your social network provider and how to change your settings, please check the website and privacy policy of your social network provider;

2. **Information you choose to share with us:** You may choose to share information with us, for example when you leave a comment for us on Facebook, fill out a customer survey or submit an entry for a contest.

• **Employment information:** If you are an employee travelling or obtaining other products or services in relation to one of our corporate, business or government clients, we may also collect information about your role with the client, your employment type, your employee number, your start date with the client and details of any employer paid travel arrangement.

• **Statistical information,** number of passengers flown, web usage data, the website you come from, internet banner advertisements and links which appear on our marketing partners' websites, your searches and the content you have viewed on our website. This information will only be aggregated for statistical analysis so that we can better understand QAZAQ AIR's customer profile, personalize your information and improve the service offering.

4.2. The failure to supply personal data may result in 1) QAZAQ AIR being unable to provide you with the services and/or products requested; 2) QAZAQ AIR being unable to update you on our latest products and/or launches; and/or 3) your inability to enter or participate in contests, promotions or redemption activities organized by QAZAQ AIR.

4.3. For specific services, apps or events, we may collect other types of data and use such data for different purposes than described in this privacy policy. We will inform you about this when you register for a service or an event or download an app.

5. How We Collect Your Personal Data

5.1. We may collect personal information about you when/if you:

5.1.1. book or search for a flight or other products or services on our website, or our other sales channels, such as through a travel agent;

5.1.2. use our services or purchase our goods;

5.1.3. register to receive our newsletters or other communications, opt-in for push- or in-app notifications in our ;

5.1.4. sign up on website;

5.1.5. tell us about your preferences when flying with us;

5.1.6. fill out medical and other forms associated with your travel, such as medical clearance, claim or unaccompanied minor forms, etc.;

5.1.7. enter into one of our competitions or promotions;

5.1.8. contact our Contact Centre

5.1.9. travel with us, use airports where we operate and use our lounge facilities;

5.1.10. complete one of our surveys or otherwise provide feedback or interact with us via including but not limited to our social media;

6. Whom We May Collect Your Personal Data from

6.1. As well as collecting information directly from you or from your authorized representatives (i.e. persons whom you have authorized or your authorized representative pursuant to our then-

current security procedures), there may be occasions when we collect information about you from a third party. These third parties may include:

6.1.1. Travel agents and other people who make or update travel bookings on your behalf, or otherwise interact with us on your behalf; this can be a family member, travel or sales agents, your employer or other representative as part of a corporate or group booking;

6.1.2. Our service providers and contractors (such as ground handlers, cargo handlers, agencies, data analytics and market research providers, sales agencies, payment fulfilment and fraud protection providers);

6.1.3. Third parties that run competitions and other promotions on our behalf or for which we are the sponsor;

6.1.4. Companies involved in your travel, including airlines involved in your journey, relevant airport operators, immigration, customs, border security and other regulatory authorities, etc.;

6.1.5. Our airline and non-airline partners, including travel insurance providers, car rental, transfer providers, hotels, including those that participate in our frequent flyer program and other customer programs;

6.1.6. Recruitment agencies and previous employers, if you have applied for a job with us and provided your consent.

7. Why We Need Your Personal Data

7.1. QAZAQ AIR will only process your personal data where we have a legal, contract basis and/or your explicit consent to do so. Our legitimate interest as an airline is to use your personal data to operate and enhance the quality of our service as an airline and travel provider.

7.1.1. We need your personal data to:

1) fulfill our agreement with you, including providing services to you such as processing a transaction (e.g., making a booking, sending you your itinerary), providing technical assistance, assisting you in the transaction, providing sms notifications or flight alert messages through , facilitating web check-in and self check-in and responding to your enquiries or requests;

2) provide airport services such as processing information relating to connecting flights, arrangements at airports, and customs and immigration facilities;

3) provide baggage related services such as processing of any baggage related queries, including mishandled or missing baggage claims;

4) provide in-flight catering and other services that best meet your preferences and needs (which we may collect during our interactions with you);

5) administer any contest or promotional offer you may enter into and notify in case you win;

6) market and communicate with you in relation to products and services offered by QAZAQ AIR;

7) contact you for product or customer satisfaction surveys;

8) to improve our services and personalize your travel experience through research and analytics, including market research;

9) for safety, security and legal compliance;

10) for crime prevention and detection.

7.2. If you are booking a flight on behalf of someone else, you must obtain their consent to use their personal information.

7.3. If processing of your data is subject to any other laws, then the basis of processing your data may be different to that set out above and may in those circumstances be based on your consent in all cases.

8. How You Can Control Your Personal Data

8.1. You can request access, amendment, update, transfer or erasure of your personal data, or object to its use and processing at any time, unless your request contradicts with the law, by sending a written request, accompanied by a copy of your proof of identity to the address specified in the Contact section of this Privacy Policy.

9. Whom We May Share Your Personal Data With

9.1. In order to facilitate your travel arrangements, we will often need to share your personal information with third parties including:

9.1.1. other airlines (codeshare and interline partners);

9.1.2. airport and airport lounge operators, ground handling services;

9.1.3. in response to a valid, legal request from various law enforcement agencies, regulatory authorities and governments around the world and their service providers for security, customs and immigration purposes and to comply with our legal obligations;

9.1.4. travel agents involved in making your travel arrangements;

9.1.5. our frequent flyer program partners so that we can administer the benefits of the frequent flyer program to you;

9.1.6. third parties who deliver services either to you or to us, such as companies that provide transfer assistance, billing services, catering services;

9.1.7. companies who conduct market research and analysis, provide marketing services or run customer surveys on our behalf;

9.1.8. companies who provide information technology services such as airline related systems, data storage, distribution services, passenger booking and processing systems, communication networks, software and system development, maintenance and support, and information processing, analysis and reporting;

9.1.9. companies who provide services in the course of investigating a complaint or a security incident. police and regulatory authorities, to protect our rights, property, or the safety of our customers, staff and assets;

9.1.10. if you are an employee of one of our corporate, business or government clients and are travelling for work purposes on a ticket purchased by your employer, we may also disclose your travel details and any information associated with your travel (such as incident reports) to your employer;

9.1.11. credit and charge card companies, credit reference agencies and anti-fraud screening service providers to process payments and (where necessary) to carry out fraud-screening;

9.1.12. third parties, such as law firms and law courts, to enforce or apply any contract with you;

9.1.13. we may provide usage information (but not your personal details) to other websites so that they know that you have visited our websites.

We do not sell personal information to third parties.

10. How We Store Your Personal Data

10.1. We hold your personal information in electronic files and use third party information system providers who may have access to your personal information.

10.2. QAZAQ AIR will retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, the legal or business purposes of QAZAQ AIR, or as required by relevant laws.

10.3. At any time you may contact us at info@flyqazaq.com to have your personal data withdrawn from our storage completely.

10.4. When destroying your personal data, we will take commercially reasonable and technically possible measures to make it irrecoverable or irreproducible in accordance with the applicable laws.

11. How We Protect Your Personal Data

11.1. We take necessary technical and organizational measures for the protection of the data we hold about you against wrongful access, accidental or deliberate manipulation, disclosing or destruction. This includes internal check of processes of gathering, storage and data processing and security measures, and also measures on maintenance of physical safety of the data for prevention of wrongful access to systems in which we store the personal data. Our security measures are being improved continuously as new technology develops.

11.2. We give access to the personal data only those workers, contractors and agents of QAZAQ AIR whom this information is necessary for operation, development and improvement of our services. These persons are contractually obliged to maintain the confidentiality of this information.

11.3. To ensure the security of your personal data information when you browse our website, SSK (Security Sockets Layer) with 128 Bit encryption technology, and when you book flights through <https://www.flyqazaq.com/>, TLS 1.2 encryption technology is used to transfer your data securely. It encrypts all of your personal information, including credit/debit card number, so that it cannot be read as the information travels over the Internet.

11.4. If your browser does not support TLS 1.2, we recommend you to update to the latest version of any browser to improve the security of transactions, otherwise the transmission of your personal information may not be protected and QAZAQ AIR disclaims any responsibility in this regard.

12. How You Can Keep Your Personal Data Safe and Secure

12.1. Keep your booking reference confidential.

When you make a booking, you will be given a booking reference (a PNR, Passenger Name Record) and/or a ticket number. This will appear on the email confirmation or ticket of each person in your booking. You should keep your booking reference confidential at all times.

If you are traveling with others and would not like your individual booking details to be accessible by them, you may prefer to have each person make separate bookings, to be paid for individually.

To make sure your access to our website and is secure, we recommend that you avoid sharing or communicating passwords to others. When you finish using our website and and/or your social media accounts (especially if these accounts are linked together) you should log out if others are able to access your computer or device, and especially when using a public device to access the web. This way, other users will not be able to access your personal data.

12.2. Be aware of and protect yourself against Internet fraud and “phishing.”

There is an Internet fraud practice known as "phishing" which is the illegal gathering of personal information by deception. Unsolicited emails are sent to individuals from lists illegally gathered by a third party, and recipients are asked to enter or reconfirm bank or password details into a "cloned" or illegal copy web site.

13. Cookie Policy

13.1. By using <https://www.flyqazaq.com/> and our , you agree that we can place cookies on your device and store and access cookies, IP addresses and use other methods in order to collect website usage data, and enhance your online experience.

13.2. This can include information about your use of the website, the browser and device type you are accessing it from and where you are in the world.

13.3. By visiting and using <https://www.flyqazaq.com/> you agree that QAZAQ AIR places cookies on your device.

13.3.1. What Is a Cookie?

A cookie is a small piece of information sent from a website that you visit or certain emails you open and temporarily stored in your web browser or the hard drive of your device. The browser then returns the cookie to the server the next time the page is referenced. Cookies allow a website to customize a visit and give you a better user experience when you return to the website.

<https://www.flyqazaq.com/> uses cookies for collecting information about how visitors use <https://www.flyqazaq.com/>, for remembering visitor preferences (e.g., country, language), and visitor profiling for retargeting/remarketing purposes.

13.3.2. What Cookies Do We Use and Why?

QAZAQ AIR uses session, functional, advertisement/targeting and performance cookies on our website and for the following purposes:

1) Technical

To ensure the smooth and efficient work of our website and , including but not limited to:

- a) balancing website traffic to guarantee you receive consistent and reliable service;
- b) limiting traffic to key parts of the website in order to maintain performance levels;
- c) storing your acceptance of our Privacy, cookie policy and Terms and conditions of our website use

2) *Ease of use*

To make navigation in our website and easier for you, including but not limited to:

- a) remembering your language and country selections and presenting relevant content;
- b) keeping track of your Nomad Club membership number when you have logged in; and
- c) remembering your selected departure airport when booking a flight

3) *Tracking*

To gather statistics on how you use, navigate and transact on our website and , including but not limited to:

- a) gathering feedback on your satisfaction through a survey; and
- b) gaining insight into how you use, navigate and transact on our websites so that we can make improvements to its usability.

4) *Marketing*

- a) To enable us to present appropriate messages to you, including but not limited to:
 - allowing our website to serve up different versions of a page for marketing purposes;
- b) allowing third parties to display appropriate advertising and to track its effectiveness, and displaying of relevant messages, which offer a selection of products based on your viewing behaviour on our websites and other selected websites.

13.3.3. What Personal Information Do Cookies Collect?

Generally, a cookie will contain a string of text that contains information about the browser.

Some cookies we use may store more personal information about you. However, this can be done only if you yourself have provided our website with that personal information.

13.3.4. How to Delete and Block Our Cookies?

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon you visit our website. Turning off or deleting cookies will not prevent device identification and related data collection from occurring.

13.3.5. How to Turn Cookies off?

Internet browsers allow you to change your cookie settings. These settings are usually found in the 'options' or 'preferences' menu of your internet browser. In order to understand these settings, the following links may be helpful. Otherwise you should use the 'Help' option in your internet browser for more details.

Cookie settings in Internet Explorer <https://support.microsoft.com/ru-kz/help/17442/windows-internet-explorer-delete-manage-cookies>

Cookie settings in Firefox <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer?redirectlocale=en-US&redirectslug=Cookies>

Cookie settings in Chrome <https://support.google.com/chrome/answer/95647?hl=ru>

Cookie settings in Safari <https://support.apple.com/ru-ru/HT201265>

Cookie settings in Yandex <https://browser.yandex.ru/help/personal-data-protection/cookies.html>

13.3.6. How to Withdraw Your Consent?

Once you have given us your consent to the use of cookies, we shall store a cookie on your computer or device to remember this for next time. This will expire periodically (and in all cases within 13 months). If you wish to withdraw your consent at any time, you will need to delete your cookies using your internet browser settings.

For further information about deleting or blocking cookies, please visit: <http://www.aboutcookies.org/Default.aspx?page=2>

14. Links to other websites

14.1. Our website may contain links to other websites for your convenience and information. You access these websites at your own risk and QAZAQ AIR is not responsible for these websites. Whilst we will protect your personal data on our website and , we cannot control or be responsible for the policies of other sites we may link to, or the use of any personal data you may share with them. Please note that this Privacy policy does not cover these other websites, and we highly recommend that you get familiarized with their specific policies.

15. Google Analytics, Facebook Pixel and Yandex Metrics

15.1. Our website uses Google Analytics, Facebook Pixel and Yandex Metrics, web analysis services provided by Google, Inc., Facebook and Yandex LLC correspondingly. These services utilize “cookies” in order to track and analyse your use of <https://www.flyqazaq.com/> and to prepare reports on its activities (please refer to our cookies policy above). IP addresses collected by our Google Analytics are anonymized. For more details, please refer to [Google](#), [Facebook](#) and [Yandex’s Privacy Policies](#).

15.2. To opt out of Google Analytics, please use this link: <https://tools.google.com/dlpage/gaoptout>

15.3. To opt out of Yandex.Metrics, please use this link: <https://yandex.com/support/metrica/general/opt-out.xml>

15.4. These opt outs are cookie-based, therefore, you may need to opt out again if you get a new device or if you erase your browsers cookie file.

15.5. For more information on Facebook Pixel please consult [this website](#).

16. Email services

16.1. When you subscribe to receiving such communications as QAZAQ AIR’s electronic newsletter, you are giving QAZAQ AIR permission to use your email address for sending you the newsletter, and other mail such as surveys and news about special offers.

16.2. If you wish to retract your permission for QAZAQ AIR and do not want to receive information by email, you can do so any time by clicking the ‘unsubscribe’ link at the bottom of the email.

17. Minors

17.1. Due to the nature of our services, we may collect travel information, which may include personal information, about children when it is required to comply with the law, including local aviation or security regulations, or as otherwise required to provide transportation needs and services. We may retain personal information when required to provide transportation and related services to a child. We do not knowingly collect personal information directly from children – persons under the age of 18, or another age according to applicable law – other than when required to comply with the law or for safety and security reasons.

17.2. QAZAQ AIR cannot distinguish the age of persons who access and use its website and. If you are a parent or guardian of a minor (according to applicable laws) who has provided QAZAQ AIR with personal data without your knowledge and consent, you should contact QAZAQ AIR at info@flyqazaq.com/ to remove the relevant personal data.

18. Final part

18.1. This policy, as well as changes and additions to it, are approved and put into effect on the basis of a decision of the Management Board of the Company.

18.2. This Policy is reviewed as necessary, but at least once a calendar year.

**Director
Of Legal Department**

B.Nugmanov