

**“Approved”**

By the Order of the General Director  
of Subsidiary Company of JSC Bank  
CenterCredit Limited Liability  
Partnership BCC Leasing.  
No.239 dated 18.11.2025

**Privacy Policy****of the Subsidiary Company of JSC Bank CenterCredit Limited Liability Partnership BCC Leasing.****General Provisions**

**Subsidiary Company of JSC Bank CenterCredit Limited Liability Partnership BCC Leasing** (*Partnership*) hereby extends its gratitude to you for your interest in the products and services provided by the Partnership (*Services*). Protection of your personal information is very important to us, which is why the Partnership takes a responsible approach to ensuring the confidentiality of personal data processed under concluded agreements and/or other transactions.

The Partnership's Services include the website [bccleasing.kz](http://bccleasing.kz), which contains information about the Partnership's products, allows users to submit online applications for the Partnership's products, and other online services, including those integrated into the services of JSC Bank CenterCredit (*Bank*), enabling Users of the Partnership's Services (*Users*) to interact with the Partnership both within the framework of concluded transactions and without such transactions, in accordance with the legislation of the Republic of Kazakhstan.

Accessing and using the Partnership Services constitutes the User's unconditional consent to provisions of this Privacy Policy (*Policy*).

This Policy applies to information obtained by the Partnership as a result of Users' interaction with the Services.

**What is Meant by User Data**

The Partnership places great importance on the objectives, key principles, and legal norms governing the collection, processing, storage, and security of data. User personal data refers to information provided by the User in any form while using the Partnership's Services.

**List and Sources of Personal Data**

Users include individuals, individual entrepreneurs, legal entities, authorized employees, and/or legal representatives of individuals, legal entities, or individual entrepreneurs who use the Partnership's Services.

Personal data that the Partnership receives during the use of the Services includes, but is not limited to: Full name, IIN, mobile phone number, biometric data, email address, identity document details, financial information, data from government services, and other sources.

**Purposes of Processing User Data**

The Partnership collects and processes only the personal data necessary for provision of its services. User data is collected by the Partnership to comply with and fulfil legal requirements, as

well as for other purposes specified in this Policy and in the Partnership's internal regulatory documents.

### **Disclosure of User Information to Third Parties**

The Partnership does not disclose User information to third parties that do not have contractual or other lawful relations with the Partnership, except in the following cases:

- to comply with the laws of the Republic of Kazakhstan;
- to transfer information to partners, affiliates, contractors, and other parties within contractual relationships for the proper provision of services;
- with the User's explicit consent.

All third parties who receive access to personal data are required to maintain confidentiality and ensure protection of the transmitted information in accordance with the legislation of the Republic of Kazakhstan. These obligations include requirements of this Policy, as well as provisions of nondisclosure agreements concluded with the Partnership, but are not limited to them.

The Partnership may provide partners with aggregated, anonymized User data that does not allow identification of an individual without additional information. Such data may be used, including for statistical, analytical, and other research purposes.

### **Cross-Border Data Transfer**

When transferring User information outside the Republic of Kazakhstan, the Partnership ensures compliance with applicable legislation by entering into agreements that guarantee the recipients' adherence to appropriate levels of information security, service reliability, data protection, and safeguards against unlawful access.

### **Ensuring Personal Data Security**

The Partnership takes all possible administrative, legal, and technical measures to protect Users' personal data from unauthorized access, alteration, disclosure, destruction, or any other security breaches.

The Partnership protects information at all stages of its "life cycle," including collection, accumulation, storage, modification, supplementation, use, distribution, anonymization, blocking, and destruction of personal data, and prevents breaches of confidentiality.

To ensure secure data storage in information systems in accordance with legal requirements, the Partnership uses the following methods (including, but not limited to):

- access control to information resources;
- data transmission via the secure HTTPS protocol;
- use of the TLS cryptographic protocol version 1.2 or higher;
- storage and transmission of data exclusively in encrypted form;
- use of secure communication channels, etc.

The incident response process for personal data compromise includes identifying, assessing, containing, and eliminating consequences of incidents related to data leaks or unauthorized access.

Additionally, the Partnership implements employee awareness programs aimed at training and informing staff on the importance of personal data protection, compliance with legislation and internal policies, and methods of preventing data compromise. Data retention and deletion periods are determined in accordance with the laws of the Republic of Kazakhstan, internal regulatory

documents, and documents governing the Partnership's contractual relationships with Users and their consents for data processing.

### **User Rights**

Collection and processing of Users' personal data by the Partnership is carried out with the User's consent, except in cases established by the RoK legislation.

The Partnership processes Users' personal data in accordance with this Policy and internal regulatory documents for as long as necessary to fulfil purposes of collection and/or legal requirements.

User rights are governed by the current legislation "On Personal Data and Their Protection."

User shall have the right to:

- request the amendment, supplementation, blocking, or destruction of personal data if such data is incomplete, outdated, inaccurate, unlawfully obtained, or does not correspond to the purposes of processing, provided there are grounds confirmed by the relevant documents.
- withdraw the consent for the collection, processing, dissemination in publicly accessible sources, transfer to third parties, and cross-border transfer of personal data, except in cases provided for by the RoK legislation.
- exercise other rights established by the RoK legislation and other regulatory legal acts of the Republic of Kazakhstan. To ensure proper provision of services, the Partnership maintains the relevance of the User's personal data by updating it based on:
  - data provided by the User;
  - data obtained from governmental and non-governmental services;
  - other sources permitted by the RoK legislation and terms of agreements concluded with Users.

### **Amendments to the Privacy Policy**

The Partnership reserves the right to update and amend provisions of this Policy at any time. The new version of the Policy enters into force upon its publication on the website, unless otherwise specified in the new version. The Partnership recommends that Users review this Policy regularly to stay informed of the most up-to-date version.

### **Dispute Resolution**

All disputes and disagreements arising between the User and the Partnership in connection with the application of this Policy shall be resolved through negotiations. If it is not possible to reach an agreement, disputes shall be resolved in accordance with the legislation of the Republic of Kazakhstan.

If a dispute cannot be satisfactorily resolved through negotiations, the User has the right to contact the authorized body for the protection of personal data — the Ministry of Artificial Intelligence and Digital Development of the Republic of Kazakhstan.

### **Final Provisions**

If the User does not agree with the terms of this Privacy Policy, they have the right to terminate the legal relationship. To submit a written request or questions related to the processing of personal data, the User may send an application to the official address of the Partnership or use the contact details provided below.

### **Contact information**

For inquiries related to personal data processing and the exercise of User rights, as well as for submitting comments and complaints, the User may use the following contact details:

- Email: [info@bccleasing.kz](mailto:info@bccleasing.kz)
- Official website: <https://bccleasing.kz>
- Contact numbers: 8 (727) 341 04 73, 8 (707) 1111 605
- Office address of the Partnership: Almaty, Almaly District, 143A Tole bi Street

Written requests are reviewed by the Partnership in accordance with internal regulations and within the timeframes established by the legislation of the Republic of Kazakhstan.