

Approved by
the Resolution of the Board of Directors of
Freedom Finance Global PLC
Minutes of the Meeting dated 18 June 2026

Personal Data Processing POLICY

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Chapter 1. General Provisions

1. This Personal Data Processing Policy (hereinafter referred to as the Policy) defines the principles, purposes and procedures for processing personal data carried out by Freedom Finance Global PLC (hereinafter referred to as the Company), and also contains information on the rights of personal data subjects and the measures taken by the Company to ensure protection and proper processing of personal data.
2. The Policy has been developed in accordance with the regulatory legal acts of the Astana International Financial Centre (hereinafter referred to as the applicable legislation) and the Company's Information Security Policy.
3. This Policy applies to all information related to the category of personal data that the Company may receive, in relation to personal data subjects, within the framework of business and employment relationships, when using the Company's Internet resources, as well as when interacting with potential candidates, clients and partners and other personal data subjects.
4. The Policy is intended for a wide range of individuals, is publicly available on the Company's official resources, and can be amended if necessary.
5. The following are the terms and definitions used in the Policy:
 - 1) an Internet resource - an electronic information resource hosted on the Internet and accessible to the general public. It may be a website, a website page, a forum, a blog, an application, or other type of information resource, using Internet technologies;
 - 2) use of personal data - actions with personal data aimed at achieving the goals of an owner, an operator and the third party;
 - 3) accumulation of personal data - actions to systematize personal data by entering them into a database containing the personal data;
 - 4) depersonalization of personal data - actions as a result of which it is impossible to determine the ownership of personal data by the subject of the personal data;
 - 5) processing of personal data - actions aimed at accumulating, storing, changing, supplementing, using, distributing, depersonalizing, blocking and destroying personal data;
 - 6) an official internet resource - <https://fbroker.kz>;
 - 7) personal data - information related to a specific or determinable subject of personal data, recorded on electronic, paper and/or other tangible media;
 - 8) dissemination of personal data - actions that result in transfer of personal data, including through the media, or provision of access to the personal data in any other way;
 - 9) regulations – the regulations for provision of brokerage (agency) services on the securities market;
 - 10) collection of personal data - actions aimed at obtaining personal data;
 - 11) a subject of personal data (hereinafter referred to as the subject) - an individual to whom the personal data relates, representatives and beneficiaries of legal entity clients, counterparties, as well as employees of the Company;
 - 12) destruction of personal data – actions, as a result of which it is impossible to restore personal data;
 - 13) storage of personal data - actions to ensure integrity, confidentiality and availability of personal data.

Chapter 2. Principles of Personal Data Processing

6. The Company is guided by the following principles of personal data processing:
 - 1) legality, fairness, and transparency - the Company processes personal data lawfully, in compliance with applicable laws. All processing activities are carried out fairly and openly, with respect to personal data subjects. The Company ensures transparency in its personal data processing practices, informing subjects about purposes, scope, and conditions of use of their personal data.
 - 2) purpose limitation - collection and subsequent processing of personal data is carried out exclusively for specific, predetermined and legitimate purposes;

- 3) data minimization - the Company processes only the amount of personal data that is necessary to achieve the stated goals;
- 4) storage limitation - personal data are stored no longer than is necessary to achieve the purposes for which they were collected, or for the period established by the applicable law;
- 5) integrity and confidentiality - the Company ensures protection of personal data, using appropriate organizational and technical measures, within the information security management system, including, but not limited to, access control and delimitation, logging of user actions, use of encryption during storage and transmission of the data, as well as backup and availability measures aimed at preventing unauthorized or illegal access, modification, disclosure, loss or destruction of the personal data.

Chapter 3. Purposes of Personal Data Processing

7. Processing of personal data of entities, using the Company's licensed services, is carried out in accordance with the purposes set out in the Regulations located on the Company's official website.
8. Processing of personal data of employees is carried out for the following purposes:
 - 1) Formalization and regulation of labor relations: conclusion, amendment and termination of employment contracts; HR record management; time-keeping and vacation accounting.
 - 2) Compliance with legal requirements: compliance with labor, tax, and other applicable laws; submission of mandatory reports to government agencies.
 - 3) Calculation and payment of wages and other payments: accrual of wages, bonuses, compensation; administration of taxes and mandatory deductions.
 - 4) Providing social guarantees and benefits: arranging vacations, sick leaves, business trips; providing corporate benefits and programs.
 - 5) Ensuring internal security and information protection: controlling access to information systems and premises; preventing information leaks and information security incidents; conducting internal investigations.
 - 6) Organization and management of the Company's activities: resource planning and personnel management; performance assessment (performance management, KPI, 360); employee training and development.
 - 7) Providing communications and corporate interaction: using corporate email, instant messaging, and telephony; maintaining internal employee directories.
 - 8) Occupational health and safety: monitoring compliance with occupational health and safety requirements; investigating accidents and incidents.
 - 9) Ensuring access control and internal facility management: issuing passes; video surveillance and visitor control.
 - 10) Protecting rights and legitimate interests of employers: resolving disputes and claims; representing interests in courts and other bodies.
9. Processing of personal data of subjects who are not the Company's clients but interact with the Company (website users, applicants, the persons who have contacted through feedback forms, the Call Center, and other permitted communication channels) is carried out for the following purposes:
 - 1) consideration of requests, inquiries, complaints and suggestions;
 - 2) providing feedback to the subject of personal data;
 - 3) ensuring and monitoring the service quality, including recording and analysis of telephone conversations;
 - 4) ensuring security, preventing fraud and abuse;
 - 5) compliance with the requirements of the applicable legislation;
 - 6) implementation of actions preceding conclusion of contracts (if there is a corresponding initiative of the subject).

Chapter 4. Legal Grounds for Personal Data Processing

10. The Company processes personal data in accordance with the applicable personal data protection legislation.
11. Processing of personal data may be carried out on the following grounds:
 - 1) consent of the subject of personal data - obtaining voluntary, informed and unambiguous consent to processing of personal data;
 - 2) conclusion and execution of contracts, agreements and other documents, having legal force - if processing is necessary for preparation, conclusion, execution and/or amendment of an agreement to which the subject of personal data is a party;
 - 3) compliance with requirements established by the applicable law or the laws of the Republic of Kazakhstan. Such requirements may include provision of information, in response to requests from authorized government agencies, regulators, law enforcement agencies, or courts, as well as fulfillment of other obligations imposed on the Company by the laws of the Republic of Kazakhstan (e.g., tax, labor, administrative, and others).

Chapter 5. Rights of Subjects

12. Access to data - a subject has the right to request information about whether his/her personal data is being processed by the Company, as well as to obtain access to such data, including information about the purposes of processing, categories of the data, storage periods and recipients to whom such data may be disclosed.
13. Correction – if personal data is inaccurate or outdated, the data subject has the right to request clarification, supplementation, or to perform these actions independently. The data subject may also request deletion if its processing violates the applicable law.
14. Withdrawal of consent – if processing is carried out based on consent, the data subject has the right to withdraw it at any time, provided that the data subject understands that this action will result in termination of the business relationship with the Company. At the same time, the Company may continue to process personal data in accordance with the applicable law.
15. Blocking data - to demand that the Company block personal data, in the event of confirmed information about a violation of the terms of collection and processing of the personal data;
16. Data destruction - to demand that the Company destroy personal data, collection and processing of which was carried out in violation of the applicable legislation.

Chapter 6. Processed Personal Data

17. In order to ensure functioning of the licensed activity, the Company processes personal data as provided for in this Chapter.
18. To verify a subject, when opening a brokerage account, the Company processes the following personal data of subjects, including, but not limited to¹:
 - 1) details of identity documents;
 - 2) electronic copies of identity documents;
 - 3) individual identification number (except in cases where an individual has not been assigned an individual identification number, in accordance with the applicable law);
 - 4) documents or information necessary to confirm a place of residence;
 - 5) phone, email;
 - 6) information on whether the subject or his/her relatives are politically exposed persons;
 - 7) tax residency data;

¹ A complete and detailed list of data is reflected in Appendices 2 (A), 2 (A-1), 2 (B) of the Regulations placed on the Company's official Internet resource.

- 8) financial status data;
- 9) data on additional citizenship and tax residency.
19. To form a client's economic and investment profile, the following data may be requested, including, but not limited to:
 - 1) information about education;
 - 2) an amount of financial resources available for investment;
 - 3) information on sources of funds and wealth;
 - 4) investment skills;
 - 5) an acceptable level of an investment risk;
 - 6) investment objectives;
 - 7) types of fixed assets;
 - 8) a field of activity (*and additional information, depending on the choice made*);
 - 9) information on the presence of additional citizenship and tax residency.
20. When visiting the Company's Internet resources, the following may collect and process technical information:²
 - 1) IP address;
 - 2) a device type;
 - 3) a browser and its version;
 - 4) a date and time of visiting a section of the Internet resource;
 - 5) actions on an Internet resource (for example, clicks, transitions through pages and links);
 - 6) data obtained using cookies and similar technologies.
21. When interacting with the Company via electronic web forms placed on the Company's Internet resources, emails, or telephone calls, the following personal data may be processed:
 - 1) a surname, a first name, a patronymic;
 - 2) telephone;
 - 3) email;
 - 4) individual identification number.

Chapter 7. Transfer of Data to the Third Parties

22. The Company identifies the following cases of transfer of personal data to the third parties:³
 - 1) data processing by the third parties - in some cases, the Company may outsource the processing of personal data to the third parties (e.g., contractors, IT service providers, organizations providing accounting or legal services, auditors), with the explicit consent of the data subject or its official representative. Such transfer is carried out on the basis of the concluded agreements containing obligations to ensure confidentiality and protection of personal data, within the purposes defined in this Policy (Chapter 3);
 - 2) cross-border transfer of personal data is carried out with the explicit consent of the subject or its official representative, and only after confirmation that the receiving party can ensure an adequate level of security and protection of the rights of the personal data subjects;
 - 3) transfer of information to government agencies, in order to comply with the requirements of the applicable legislation or the legislation of the Republic of Kazakhstan.

² The data is processed in a generalized or anonymized form, where possible, and is not used to identify the user without additional consent.

³ In doing so, the Company is guided by the principles of processing personal data, described in Chapter 2, to ensure an adequate level of security for the data entrusted to it.

Chapter 8. Data Retention Period

23. When storing personal data, the Company is primarily guided by the requirements of the applicable legislation.
24. Personal data processed by the Company, within the framework of licensed activities, shall be stored for at least 6 (six) years, starting from the date of termination of the business relationship, with the exception of information that the Company is obliged to store for a longer period, in accordance with the requirements of the legislation on anti-money laundering and financing of terrorism, and other mandatory requirements of the applicable legislation for the Company.
25. In other cases, personal data are subject to deletion after the purposes of collection and processing have been achieved, unless otherwise specified by the requirements of the applicable legislation.

Chapter 9. Procedure for Subjects to Submit Personal Data Processing Requests

26. For questions regarding the processing of personal data, subjects have the right to contact by email at dpo@ffin.kz.
27. A response to a subject's request shall be provided within ten (10) calendar days, starting from the date of receipt of the request.

Chapter 10. Information about the Authorized Body

28. The authorized body (commissioner) regulating the issues of protection and processing of personal data is the Astana Financial Services Authority.