

## Bolashak Privacy Policy

Bolashak is committed to protecting individual's safety and privacy, and takes its responsibilities regarding the security of individual's personal data very seriously. This privacy policy explains what personal data we collect about individuals, how and why we use it, who we disclose it to, and how we protect your privacy.

### 1. This policy

This policy (and any documents referred to in it) sets out the basis on which we process data about individuals including:

- applicants and potential applicants for jobs in the oil and gas, mining, engineering and other industries ("**Candidates**");
- contractors that we place with Clients in the oil and gas, mining, engineering and other industries ("**Contractors**"); and
- clients/customers of Bolashak ("**Clients**").
- anyone who visits our website ("**Website Visitors**").

Bolashak reserves the right to make amendments to this policy from time to time. Any changes to this policy will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

Besides this policy, Bolashak has a regulation governing personal data collection, processing and protection of Bolashak's employees which is applicable when a person becomes an employee of Bolashak.

Providing us with your data by means of your registration or by uploading your curriculum vitae (resume) or by submitting your data by applying for vacancies on our website or by any other means of communications, you hereby agree and give us your consent for collection, retaining, disclosure and processing your data.

### 2. Who is responsible for your data

Our Privacy Policy applies to the personal data that Bolashak collects and uses.

References in this Privacy Policy to "Bolashak", "we", "us" or "our" mean "Bolashak-Atyrau" LLC (a company registered in the Republic of Kazakhstan with business identification number 001240000920 and registered office at 6A, Marat Temirkhanov Street, Atyrau city, Atyrau oblast, 060002). We control the ways your personal data are collected and the purposes for which your personal data are used by Bolashak. Bolashak is the "data controller" for the purposes of the Law of the Republic of Kazakhstan dated 21 May, 2013 No. 94-V "On Personal Data and their Protection" (as amended or replaced), and other applicable data protection legislation of the Republic of Kazakhstan (together the "**Data Protection Legislation**").

### 3. Personal data we collect about you

When using the term "personal data" in our Privacy Policy, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. Your personal data may include for example your name, your contact details and date of birth.

### 4. How we collect data about you

We collect data from you in two primary ways: (1) the data that you give to us; and (2) the data that we receive/obtain from other sources (e.g. from your referees, our clients and third party sources such as LinkedIn and other job sites).

## 5. Categories of data we collect

Please see the attached appendix for details of the categories of information that we may collect and process about you.

## 6. Special categories of data

In the course of providing services to you, we may collect information that could reveal “special categories of data” (e.g. regarding your physical or mental health). We only collect this information where you have given your explicit consent or one of the other exemptions apply (e.g. it is necessary to comply with our employment law obligations).

## 7. Disclosure of your personal information

We may disclose your personal data, in various ways and for various reasons, with the following categories of people:

- Candidates: clients, partners and subcontractors of Bolashak to increase your chances of finding employment;
- Contractors: clients of Bolashak who you are seconded to;
- Employees of Bolashak who will be dealing with your personal information for the purposes of your employment and/or for seeking employment opportunities for you;
- Tax, audit or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);
- Third party service providers who perform functions on our behalf (including professional advisors such as lawyers, auditors, accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
- Travel and visa agencies, insurers and medical assistance providers; and
- When disclosure of data and/or information to be disclosed is in accordance with local laws and regulations or which is requested to be disclosed to the relevant competent state authorities, law enforcement authorities, courts or officials.

## 8. Transferring your information

Bolashak needs to transfer your information to be able to provide services to you. We want to make sure your information is stored and transferred in a way which is secure. We will therefore only transfer data where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:

- Transferring your data to a country where there has been a finding of adequacy in respect of that country’s levels of data protection via its legislation; or
- Where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract;
- Where it is necessary for the conclusion or performance of a contract between you and us or the implementation of pre-contractual measures taken at your request; or
- Where you have consented to the proposed transfer, after having been informed of the possible risks of such transfers.

## 9. Retaining/Deleting your information

For Candidates who are successful and become our employees, we will retain your personal data for such period as required to comply with employment obligations according to laws and regulations.

For candidates who are unsuccessful we will retain your data for such period as we or our affiliate or partner believe in good faith is necessary to continue to seek employment opportunities for you or that the law or relevant regulators requires us or our affiliate or partner to preserve such data.

## 10. Security

We will use technical and organisational measures to safeguard your information, for example:

- we use encryption in our local mail system, firewalls, VPN, certificates and domain credential authentication;
- when we transfer your information to third parties, in order to protect your information, we may use encryption and password protected files containing your information;
- we store your information on secure servers;
- we use access controls to protect your information.

## 11. Cookies

Our website uses cookies in order to provide you with a good experience when you browse our website, to make the content more interesting and suitable for you, improve our site and to analyze our traffic.

## 12. Your rights

You have the following rights in relation to your information:

- 12.1. Right to request a copy of your information.** You can request a copy of your information which we hold (this is known as a subject access request).
- 12.2. Right to correct any mistakes in your information.** You can require us to correct any mistakes in your information which we hold.
- 12.3. Right to request we stop processing your information.** In certain circumstances, you may request that we cease processing your information.
- 12.4. Right to request deletion of your information.** You can ask us to erase your information (also known as the “right to be forgotten”) in certain circumstances.
- 12.5. Right of data portability.** You have the right to transfer your personal data between data controllers in certain circumstances.

If you would like to request any of the above, please contact us at [info@bolashak.com](mailto:info@bolashak.com) to make any such requests. We will comply with the Data Protection Legislation in responding to any such requests.

## 13. Right to lodge a complaint

If you have any complaints about the way in which we collect, store and use your information, you can do so by applying to the relevant competent state authorities and courts of the Republic of Kazakhstan.

## APPENDIX: CATEGORIES OF DATA WE COLLECT

### CANDIDATES

What	Why	Basis of Processing
Name	To communicate with you	Performance of contract
Contact details	To communicate with you	Performance of contract
Education details	To be able to identify appropriate roles for you	Performance of contract
Qualification details	To be able to identify appropriate roles for you	Performance of contract
Employment history	To be able to identify appropriate roles for you	Performance of contract
Immigration status	To confirm your eligibility to work	Compliance with a legal obligation
References	To be able to identify appropriate roles for you	Performance of contract

### CONTRACTORS&EMPLOYEES

What	Why	Basis of Processing
Name	To communicate with you	Performance of contract
Contact details	To communicate with you	Performance of contract
Education details	To be able to identify appropriate roles for you	Performance of contract
Qualification details	To be able to identify appropriate roles for you	Performance of contract
Employment history	To be able to identify appropriate roles for you	Performance of contract
Immigration status	To confirm your eligibility to work	Compliance with a legal obligation
References	To be able to identify appropriate roles for you	Performance of contract
Next of kin details	To communicate with, in the event of an emergency	Performance of contract
Bank details	To process payments for your services	Performance of contract
Passport details	To process visas or make travel arrangements, if you are required to travel overseas in the course of your assignment	Performance of contract
Medical check ups	To be able to identify appropriate roles for you	Compliance with a legal obligation

### CLIENTS

What	Why	Basis of Processing
Name	To communicate with you about Candidates	Performance of contract
Contact details	To communicate with you about Candidates	Performance of contract