

## PRIVACY POLICY

### General provisions

AlmaJet LLC (hereinafter referred to as **AlmaJet**) places the utmost importance on maintaining the privacy and security of your personal information. You can be assured that we continuously take all steps to keep your personal data secure and ensure that it is used only for legitimate purposes.

This privacy policy (hereinafter referred to as the Policy) will help you understand what types of personal information when and how we collect, store and use. This Policy may be amended at any time without prior notice at AlmaJet's sole discretion.

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

You can always inquire us about the information you have provided to us and request that all of your personal information to be deleted by contacting AlmaJet.

### Controller of Personal Data

Any personal information processed by AlmaJet under this Policy is controlled by AlmaJet which is considered as the "data controller" of your personal information under the Republic of Kazakhstan's personal data protection law No. 94-V dated 21 May 2013 as well as under European Union and UK data protection law (General Data Protection Regulation No. 2016/679).

Our address is 63A-8 Mashhur Zhusup St., Ekibastuz, 141200, Kazakhstan.

### Application of this Policy

This Policy applies to all your personal information that we collect, use and process regarding your relationship with us as our current or potential customer, including when you use our services, as well as visit and use <https://almajet.aero/> (hereinafter referred to as "our website"), contact our representatives or otherwise interact with us.

### What Personal Data do we collect?

AlmaJet collects and uses your personal information for the sole purpose of providing you with the services you have requested and enhancing its quality.

Information that we may collect includes:

- **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;
- **contact information:** address, phone number, email address, company name, business location;
- **payment information:** bank card information, including the name of cardholder, card number, issuing bank, billing address and expiry date;
- **travel information:** flight information, channel that you used to book your ticket, dietary, seating or other service preferences, baggage requirements, travel companions; your preferences with respect to your flight;
- **health information:** medical records, health issues or special service requests;

- **sensitive information:** dietary preferences that may allude to your religious beliefs, medical records, health issues;
- **technical information:** when you visit our website we may register your IP address, MAC address, browser type, operating system, referring website, web-browsing behavior; we also 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. For more information, please see below (cookies);
- **communication information:** your feedback and email or other correspondence with us, etc.;
- **social media information:** depending on your social network settings we may receive information from your social network provider. 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;
- **information you choose to share with us:** you may share information with us, for example when you leave a comment for us or fill out a customer survey;
- **employment information:** if you are an employee travelling or obtaining other services in relation to one of our 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, web usage data, the website you came 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 our customer profile, personalize your information and improve the service offering.

The failure to supply your personal data may result in a situation where AlmaJet will be unable to provide you with the services requested and to update you on our new services or launches.

### How do we collect your Personal Data?

We may collect your personal information when you:

- book or search for services on our website;
- use or purchase our services;
- interact with our providers or sub-providers during our services (for example, airports, lounge facilities or operators, etc.);
- register to receive our newsletters or other communications;
- tell us about your preferences when receiving our services;
- fill out medical and other forms associated with our services, such as medical clearance, claim or unaccompanied minor forms, etc.
- enter into one of our competitions or promotions;
- visit our website, accept this Policy or just use our website and therefore we collect your cookies;
- contact us or our representatives;
- complete one of our surveys or otherwise provide feedback or interact with us.

### From whom may we collect your Personal Data?

As well as collecting information directly from you or from your authorized representatives, there may be occasions when we collect information about you from a third party. These third parties may include:

- 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;
- Our service providers and contractors (such as ground handlers, cargo handlers, agencies, payment agents, etc.);
- Companies involved in rendering of our services, including operators, airports, etc.;
- Our other partners (insurers, car rentals, transfer providers, hotels, etc.).

### **Why do we need your Personal Data?**

AlmaJet will only process your personal data where we have a legal or contractual basis and/or your explicit consent to do so. We use your personal data in order to provide you with our services and enhance its quality.

We need your Personal Data in order to:

- perform our agreement obligations, including providing you with additional services (e.g., booking and transaction assistance, technical assistance, notification providing, check-in assistance, responding to your enquiries or requests);
- provide airport services (processing information relating to connecting flights, arrangements at airports, customs and migration services);
- provide baggage related services, including mishandled or missing baggage claims;
- provide you with catering and other services that meet your preferences and needs (which we may collect during our interaction with you);
- organize contests or promotional offers you may take part in;
- advertise and communicate with you in relation to our services;
- contact with you for satisfaction surveys;
- improve our services and personalize your experience through research and analytics, including market research;
- comply with safety and security requirements;
- detect and prevent law violations.

If you are requesting our services on behalf of someone else, you must obtain his or her consent to use his or her personal information.

If processing of your data is subject to any other laws, then the basis for processing of your data may differ from the abovementioned one and may be based on your consent.

### **How can you control your Personal Data?**

You may request access, amendment, update, transfer or erasure of your personal data, or object to its use and processing at any time by sending a written request, accompanied with a copy of your proof identification document to the address specified in the contact section of this Policy.

### **With whom may we share your Personal Data?**

In order to facilitate rendering of our services we often need to share your personal information with third parties including:

- air operators;

- airports, airport lounges and ground handling service providers;
- law enforcement agencies, regulatory authorities and governments around the world as well as their service providers (for security, customs and immigration purposes in response to a valid legal requests);
- agents involved in rendering our services;
- third parties providing any additional services (transfer assistance, billing services, catering services, etc.);
- companies who provide information technology services such as data storage, distribution services, passenger booking and processing systems, communication networks, software and system development, maintenance, support and data processing, analysis and reporting;
- companies who provide services in the course of investigating of complaints or security incidents, police and regulatory authorities in order to protect our rights, property and safety of our customers, staff and assets;
- 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;
- third parties such as law firms or courts in order to enforce any contract with you.

We do not sell personal information to third parties.

#### **How do we store your Personal Data?**

We hold your personal information in electronic files and use third party information system providers who may have access to your personal information. AlmaJet will retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected as required by the applicable legislation. At any time, you may contact us to have your personal data be withdrawn from our storage completely. 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.

#### **How do we protect your Personal Data?**

We take all necessary technical and organizational measures to protect your data from any wrongful access, accidental or deliberate manipulation, disclosing or destruction. This includes internal check of processes of gathering, storage and data processing as well as security measures, and also measures on maintenance of physical safety of the data for prevention of wrongful access to the personal data storage systems. Our security measures are being improved continuously as new technology develops. We grant access to the personal data only to those employees, contractors and agents for 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. To ensure the security of your personal data on our website we use 2048-bit SSL encryption.

#### **How can you keep your Personal Data safe and secure?**

- Keep your flight information confidential

Keep your flight ticket or booking reference confidential at all times. If you are traveling with others and would not like your flight information to be accessible to them, you may prefer to have each person make separate bookings.

- Protect yourself against Internet fraud and phishing

There is an Internet fraud practice known as phishing which is an 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 to a cloned or otherwise illegally copied web site.

## **Cookies Policy**

By using our website, you agree that we can place cookies on your device as well as get access and store cookies, IP addresses and use other methods in order to collect website usage data and enhance your online experience. This can include information about your use of our website, the type of your device and browser and your location information. By visiting and using our website you agree that AlmaJet may place cookies on your device.

- 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 on the hard drive of your device. The browser returns cookie to the server the next time the page is referenced. Cookies allow the website to customize visits and to give you a better user experience when you return. Our website uses cookies for collecting information on how visitors use our website and for remembering visitor preferences (e.g., language).

- What cookies do we use and why?

On our website we use session, functional, advertisement/targeting and performance cookies for the following purposes:

### 1. Technical

To ensure smooth and efficient work of our website, including the following:

- balancing website traffic to guarantee that you receive consistent and reliable services;
- limiting traffic to key parts of our website in order to maintain its performance levels;
- storing your acceptance of this Policy and Terms of Use.

### 2. Ease of use

To make navigation on our website easier for you, including remembering your language selection and presenting relevant content.

### 3. Tracking

To gather statistics on how you use and navigate on our website, including gathering your feedback through a survey.

### 4. Marketing

To enable us to provide you with some relevant messages, including allowing our website to display different versions of a web page for marketing purposes.

- What personal information do cookies collect?

Generally, a cookie is 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 have provided our website with this personal information.

- How to delete and block our cookies?

You may block cookies by activating the corresponding setting of your browser that allows you to refuse all or some cookies. 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 of cookies will not prevent device from being identified and the related data from being collected.

- 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. Also, you can use the 'Help' menu of your browser for more details.

- How to withdraw your consent?

Once you have given us your consent to use cookies, we will store cookies on your device to remember this for the next time. Your consent will expire periodically (but in all cases within 13 months). If you wish to withdraw your consent at any time, you may delete your cookies using your internet browser settings. For more information about deleting and blocking cookies please visit <http://www.aboutcookies.org/Default.aspx?page=2>.

## **Minors**

Due to the nature of our services, we may collect 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 it is required in order to provide transportation and related services to a child. We do not 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.

AlmaJet cannot determine the age of persons who access and use our website. If you are a parent or guardian of a minor (according to applicable laws) who has provided AlmaJet with any personal data without your knowledge and consent, you should contact us in order to remove the relevant personal data.

## **Google Analytics**

Our website uses Google Analytics as web analysis services provided by Google Inc. These services use “cookies” in order to track and analyze your use of our website and to prepare reports on its activities. IP addresses collected by our Google Analytics are anonymized. For more details, please refer to Google privacy policy.

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

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 browser’s cookie file.

## **Contacts**

For any questions or concerns regarding your personal information please contact AlmaJet. In order to address your complaint to AlmaJet you may send your written request, attaching a copy of your identification document, to:

AlmaJet LLC  
63A-8 Mashhur Zhusup St.  
Ekibastuz, 141200  
Kazakhstan