#### **PRIVACY POLICY**

This Personal Data Privacy Policy (hereinafter referred to as the "Privacy Policy") is a public Contract concluded between the owner of the Internet platform "Online Store https://whitedown.net/" LLC "NNG Store" (BIN 201240025541, address: Republic of Kazakhstan, Bostandyk district, Shymkent city, Karatau district, Akzhaiyk microdistrict, Altybakan street, house 77.) and the Buyer, based on the Law of the Republic of Kazakhstan "On Personal Data and Their Protection", applies to all information that the Internet platform "Online Store https://whitedown.net/", located at the domain name https://whitedown.net/, can obtain about the Buyer while using the website of the Internet platform.

#### 1. DEFINITION OF TERMS

1.1. The following terms are used in this Privacy Policy:

1.1.1. "Company" - LLC "NNG Store" (BIN 201240025541, address: Republic of Kazakhstan, Bostandyk district, Shymkent city, Karatau district, Akzhaiyk microdistrict, Altybakan street, house 77.) and its structural units;

1.1.2. "Website" - Internet platform "Online Store https://whitedown.net/" owned by LLC "NNG Store" on the Internet at: https://whitedown.net/.

1.1.3. "Website Administration" - authorized employees managing the Website, acting on behalf of LLC "NNG Store", and/or engaged third parties, who organize and/or carry out the processing of personal data, as well as determine the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.

1.1.4. "Buyer" - a physical or legal entity that has concluded a Public Sale and Purchase Agreement (offer) with the Company, or intending to order or purchase, or ordering, purchasing, or using Goods, a visitor to the Company, or contacting it, as well as a person having access to the Website via the Internet and using the Website.

1.1.5. "Personal data" - any information relating directly or indirectly to an identified or identifiable subject of personal data.

1.1.6. "Non-personal data" - data automatically transmitted in the process of viewing advertising blocks by the Buyer and when visiting pages where the statistical script of the system (pixel) is installed.

1.1.7. "Processing of personal data" - any action (operation) or a set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data. 1.1.8. "Website Services" - a set of services available for use on the Website.

1.1.9. "Goods" - a list of names of multimedia assortment for computer games presented on the Website.

1.1.10. "Confidentiality of personal data" - a mandatory requirement for the Website Administration or another person who has gained access to personal data not to allow their dissemination without the consent of the subject of personal data or the presence of another legal basis.

1.1.11. "Cookies" - a piece of data sent by a web server and stored on the Buyer's computer, which the web client or web browser sends to the web server in an HTTP request each time it tries to open a page of the Website.

1.1.12. "IP address" - a unique network address of a node in a computer network built using the IP protocol.

# 2. GENERAL PROVISIONS

2.1. The use of the Website by the Buyer implies consent to this Privacy Policy and the terms of processing the Buyer's personal data.

2.2. In case of disagreement with the terms of the Privacy Policy, the Buyer must stop using the Website.

2.3. This Privacy Policy applies only to the Internet platform "Online Store https://whitedown.net/", does not control and is not responsible for third-party websites to which the Buyer can go through links available on the Website.

2.4. The Website Administration does not verify the authenticity of personal data provided by the Buyer. However, the Website Administration assumes that the Buyer provides accurate personal data and keeps this data up to date. All responsibility, as well as possible consequences of providing false or outdated personal data, is borne by the Buyer.

# 3. SUBJECT OF THE PRIVACY POLICY

3.1. This Privacy Policy establishes the obligations of the Website Administration for non-disclosure and ensuring the protection of the confidentiality of personal data that the Buyer provides at the request of the Website Administration when registering on the Website, placing an order to purchase Goods, or using any Website Services.

3.2. Personal data allowed for processing under this Privacy Policy may include the following information:

3.2.1. surname, name, patronymic of the Buyer;

3.2.2. gender of the Buyer;

3.2.3. contact phone numbers of the Buyer;

3.2.4. addresses of registration and/or actual residence;

- 3.2.5. email address;
- 3.2.6. delivery address of the Goods;
- 3.2.7. individual identification number of the Buyer;
- 3.2.8. date of birth;

3.2.9. information on the purchase history, including the names of purchased goods/services and their cost, accumulated bonuses;

3.2.10. information about interests based on the analysis of the Buyer's actions on the Internet, in telecommunications and Internet networks;

3.2.11. name, legal address, and details of the legal entity.

3.3. The Website protects non-personal data: • IP address; • information from cookies; • information about the browser (or other program that provides access to display advertising); • access time; • address of the page where the advertising block is located; • referrer (address of the previous page).
3.3.1. Disabling cookies may result in the inability to access parts of the Website requiring authorization, including the inability to place an order on the Website.

3.3.2. The Website collects statistics on the IP addresses of its Buyers. This information is used to identify and solve technical problems.

3.4. Any other personal information not specified above (purchase history, used browsers and operating systems, etc.) is subject to secure storage and non-disclosure, except for cases provided for in clauses 5.2. and 5.3. of this Privacy Policy.

#### 4. PURPOSES OF COLLECTING THE BUYER'S PERSONAL INFORMATION

4.1. The Buyer's personal data may be used by the Website Administration for the purposes of:4.1.1. identifying the Buyer registered on the Website for concluding a Public Contract and (or) placing

an order on the Website;

4.1.2. providing the Buyer with access to personalized Website Services;

4.1.3. establishing feedback with the Buyer, including sending notifications and requests related to the use of the Website, providing services, as well as processing requests and applications from the Buyer;

4.1.4. creating an account for making purchases;

4.1.5. notifying the Buyer of the Website about the status of the Order;

4.1.6. processing and receiving payments, disputing payments;

4.1.7. delivery of Goods;

4.1.8. providing the Buyer with effective customer and technical support in case of problems related to the use of the Website;

4.1.9. improving the quality of Services, ease of use, developing new Services and services;

4.1.10. informing the Buyer about the update of the assortment, special offers, price information, about the events, promotions, and other information on behalf of the Website or on behalf of the partners of the Website Administration;

4.1.11. conducting statistical and other studies based on non-personal data, as well as optimizing advertising messages;

4.1.12. distribution of advertising information about the update of the assortment, special offers, price information, about the events, promotions, and other information.

4.2. The Buyer's personal data may be obtained through the following sources:

4.2.1. when contacting the Company electronically;

4.2.2. when contacting the Company in writing (when processing the application on paper);

4.2.3. when contacting the Company through the Call-center;

4.2.4. when registering and/or filling in information about oneself on the Website, on electronic Internet platforms (web resources) engaged by the Website Administration;

4.2.5. when placing an order and/or purchasing and/or delivering Goods.

#### 5. METHODS AND TERMS OF PROCESSING PERSONAL INFORMATION

5.1. The processing of the Buyer's personal data is carried out without any time limit, by any legal method, including in personal data information systems using automation tools or without using such tools.

5.2. The Buyer agrees that the Website Administration has the right to transfer personal data to third parties, including, but not limited to: courier services, postal communication organizations, cellular operators, and other Seller's contractors within the framework of concluded contracts, for the purpose of fulfilling the Buyer's order and informing about its progress, including the delivery of Goods and receiving special information, including, but not limited to information about marketing promotions. 5.3. The Buyer's personal data may be transferred to authorized state authorities of the Republic of Kazakhstan only on the grounds and in the manner established by the legislation of the Republic of Kazakhstan.

5.4. In case of loss or disclosure of personal data, the Website Administration informs the Buyer about the loss or disclosure of personal data.

5.5. The Website Administration takes the necessary organizational and technical measures to protect the Buyer's personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

5.6. The Website Administration, together with the Buyer, takes all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of the Buyer's personal data.

### 6. OBLIGATIONS OF THE PARTIES

6.1. The Buyer is obliged to:

6.1.1. Provide up-to-date information about personal data requested by the Website at the time of its use. 6.2. The Buyer has the right to:

6.2.1. Access and edit information about personal data at any time through the web interface of the Website.

6.2.2. Request the deletion of Personal data from the Website. To do this, it is necessary to send a notification to the email address support@whitedown.net from the email specified in the Buyer's account.

6.3. The Website Administration is obliged to:

6.3.1. Use the obtained information exclusively for the purposes specified in clause 4 of this Privacy Policy.

6.3.2. Ensure the storage of confidential information in secret, not to disclose it without the prior written permission of the Buyer, and not to sell, exchange, publish, or disclose in other possible ways the transferred personal data of the Buyer, except for clauses 5.2. and 5.3. of this Privacy Policy.6.3.3. Take precautions to protect the confidentiality of the Buyer's personal data according to the procedure usually used to protect such information in the existing business turnover.

6.3.4. Block personal data related to the respective Buyer from the moment of the application or request of the Buyer or his legal representative or the authorized body for the protection of the rights of personal data subjects for the period of verification, in case of detection of inaccurate personal data or illegal actions.

6.3.5. Delete the Buyer's Personal data after receiving the corresponding notification specified in clause 6.2.2. within 5 working days after its receipt, except in cases where such processing may be necessary in accordance with the current legislation of the Republic of Kazakhstan.

6.4. The Administration has the right to:

6.4.1. Provide access for the collection and analysis of non-personal data of the Buyer to third parties for the purposes of statistics and optimization of advertising messages. The use of non-personal data by third parties is regulated by their own privacy policies, and the Website Administration is not responsible for their use.

6.4.2. Delete the Buyer's Personal data from the Website without the possibility of recovery if more than twelve months have passed since the Buyer's last activity on the Website.

6.4.3. After receiving the corresponding notification specified in clause 6.2.2., request additional confirmation from the Buyer before deleting Personal data.

# 7. LIABILITY OF THE PARTIES

7.1. The Website Administration, which has not fulfilled its obligations, is liable for the losses incurred by the Buyer in connection with the illegal use of personal data, in accordance with the legislation of the Republic of Kazakhstan, except for cases provided for in clauses 5.2., 5.3. and 7.2. of this Privacy Policy.

7.2. In case of loss or disclosure of Confidential information, the Website Administration is not responsible for this confidential information:

7.2.1. Became public domain before its loss or disclosure.

7.2.2. Was received from a third party before it was received by the Website Administration.

7.2.3. Was disclosed with the consent of the Buyer.

7.2.4. The Company does not verify the authenticity and relevance of the Personal data provided by the Buyer and is not responsible for their invalidity and irrelevance. In the case when the Buyer specified Personal data not belonging to him, the Website Administration is not responsible for the distribution of advertising information about the update of the assortment, special offers, price

information, about the events, promotions, and other information before the actual owner of the Personal data. Such responsibility is assigned to the Buyer who specified unreliable Personal data.

# 8. DISPUTE RESOLUTION

8.1. Before filing a lawsuit in disputes arising from the relationship between the Website Buyer and the Website Administration, it is mandatory to submit a claim (a written proposal for voluntary dispute resolution).

8.2. The Website Administration shall notify the claimant in writing of the results of the claim consideration within the timeframes established by the current legislation of the Republic of Kazakhstan.

8.3. If an agreement is not reached, the dispute will be referred to a judicial authority in accordance with the current legislation of the Republic of Kazakhstan.

8.4. The current Privacy Policy and the relationship between the Buyer and the Website Administration are governed by the current legislation of the Republic of Kazakhstan.

# 9. ADDITIONAL TERMS

9.1. The Website Administration has the right to make changes to this Privacy Policy without the consent of the Buyer.

9.2. The new Privacy Policy comes into effect from the moment it is posted on the Website, unless otherwise provided by the new edition of the Privacy Policy.

9.3. All suggestions or questions regarding this Privacy Policy should be reported in the "Contact Us" section of the Website or by email at support@whitedown.net.

9.4. The current Privacy Policy is posted on the page at https://whitedown.net/.

#### 10. COMPANY DETAILS:

LLC "NNG Store" BIN 201240025541 Address: Republic of Kazakhstan, Bostandyk district, Shymkent city, Karatau district, Akzhaiyk microdistrict, Altybakan street, house 77. Email: support@whitedown.net Website: https://whitedown.net/