



**MINISTRY OF SCIENCE AND HIGHER
EDUCATION OF THE REPUBLIC
OF KAZAKHSTAN**

**NON-PROFIT JOINT-STOCK COMPANY
"D. SERIKBAYEV EAST KAZAKHSTAN
TECHNICAL UNIVERSITY"**

INFORMATION SECURITY DEPARTMENT

APPROVED BY

Chairman of the Management Board –
Rector of NJSC "D. Serikbayev EKTU"
S. Rakhmetullina
10.03.2026

**INFORMATION
CONFIDENTIALITY POLICY**

P NJSC "EKTU" 183-I-2026

**Ust-Kamenogorsk
2026**

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1. Purpose and scope

1. The Confidentiality and Personal Data Protection Policy for the mobile application of NJSC "D. Serikbayev EKTU" (hereinafter — the Policy) is an official document of the University and governs the procedure for collecting, processing, storing and protecting personal data and other information received from users of the University's mobile application (hereinafter — the Application).

The Policy defines the conditions for processing the personal data of natural persons (hereinafter — Users) who use the University's mobile application distributed via digital platforms (including Google Play, the App Store and other official distribution channels), as well as the related electronic services and information systems.

Use of the University's mobile application signifies the User's agreement to the terms of this Policy. If the User does not agree with the terms of the Policy, the User must cease using the Application and delete it from their device.

The Policy applies to personal data obtained both directly through the functionality of the Application and through its interaction with the University's information systems, including where the Internet and other information and telecommunications technologies are used.

This Policy takes into account the current state and near-term development prospects of the University's informatization assets, the purposes, objectives and legal basis of their operation, their operating modes, and an analysis of security threats to the University's resources, and establishes rules, requirements and liability for their breach.

This Policy enters into force on the date of its approval in the established manner and applies to all information that the mobile application may obtain about the User in the course of its use.

2. Reference documents

2. The following regulatory documents were used in developing this Policy:

1) Law of the Republic of Kazakhstan "On Personal Data and Its Protection" (No. 94-V of 21.05.2013);

2) Law of the Republic of Kazakhstan "On Informatization" (No. 418-V of 24.11.2015);

3) Law of the Republic of Kazakhstan "On Electronic Documents and Electronic Digital Signatures" (No. 370 of 07.01.2003);

4) Resolution of the Government of the Republic of Kazakhstan "On Approval of the Rules for the Implementation of Personal Data Protection Measures by the Owner and/or Operator and by a Third Party" (No. 909 of 03.09.2013);

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- 5) International standard ISO 37001:2016 "Anti-bribery management systems — Requirements with guidance for use";
- 6) Security guidelines for the education sector (ESG);
- 7) Other applicable regulatory and internal acts.

3. Terms, definitions and abbreviations

3. This Policy uses the following terms with the corresponding definitions and abbreviations:

- 1) Availability — the ability of authorized users to obtain information when required.
- 2) Confidentiality — the property of information being inaccessible to persons without the corresponding access rights.
- 3) Personal data security breach — a breach of personal data protection resulting in the unlawful dissemination, alteration or destruction of, unauthorized dissemination of, or unauthorized access to personal data that is transmitted, stored or otherwise processed.
- 4) Unauthorized action — an action by a subject that breaches the information processing rules established in the system.
- 5) Processing of personal data — actions aimed at the accumulation, storage, alteration, supplementation, use, dissemination, depersonalization, blocking and destruction of personal data.
- 6) User — any natural person using this Application.
- 7) Personal data — information relating to a data subject who is identified or identifiable on the basis of that information, recorded on an electronic, paper and/or other tangible medium.
- 8) Dissemination of personal data — actions resulting in the transfer of personal data, including through mass media, or the provision of access to personal data by any other means.
- 9) Collection of personal data — actions aimed at obtaining personal data.
- 10) Personal data subject (hereinafter — the subject) — a natural person to whom the personal data relates.
- 11) Third party — a person who is not the subject, the owner and/or the operator, but who is connected with them by circumstances or legal relations concerning the collection, processing and protection of personal data.
- 12) Storage of personal data — actions to ensure the integrity, confidentiality and availability of personal data.
- 13) Integrity — protection of information against unauthorized alteration, deletion or substitution.

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4. Collection and purposes of data processing

4. For the purposes of this Policy, the processing of personal data means any action (operation) or set of actions performed by the University with or without the use of automation tools, including but not limited to: collection, recording, systematization, accumulation, storage, clarification (updating, alteration), use, transfer (provision, access), blocking, depersonalization and destruction of personal data.

5. Personal data is processed on the principles of lawfulness, good faith and transparency, of correspondence between the purposes of processing and the previously defined and declared purposes of collection, and of minimizing the volume of data processed in line with the stated purposes.

6. Personal data is processed with the consent of the data subject, except in cases provided for by the legislation of the Republic of Kazakhstan.

7. The University processes personal data in order to fulfil its statutory objectives, support its educational, scientific and administrative activities, and operate the University's mobile application.

8. Depending on the purposes of processing, the University may collect the following categories of personal data:

- 1) surname, given name, patronymic;
- 2) date and place of birth;
- 3) sex;
- 4) citizenship;
- 5) individual identification number (IIN) (where necessary);
- 6) identity document details (in cases provided for by law);
- 7) contact telephone number;
- 8) email address;
- 9) information on education and qualifications;
- 10) bank details (where payments are made);
- 11) other data necessary for the performance of the University's contractual and statutory obligations.

9. The University is entitled to request additional information where this is necessary to identify the data subject, conclude a contract, provide services or comply with statutory requirements.

10. Personal data is processed in the University's mobile application for the following purposes:

- 1) identification of the User;
- 2) registration of the User's account in the Application;
- 3) provision of access to the University's information systems and services;
- 4) organization of the educational process;

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5) sending notifications and official information;
6) processing of enquiries, applications and requests;
7) ensuring information security;
8) prevention of fraud and other unlawful acts;
9) provision of technical support;
10) sending news and information mailings (subject to the data subject's consent);

11) analysis of depersonalized, aggregated and anonymized information in order to improve the quality of educational, administrative and information services and to optimize the operation of the mobile application.

10. The University collects personal data in connection with the use of the mobile application in the following cases:

1) when the User registers and creates an account in the mobile application in the manner established by the User Agreement;

2) when the User directly uses the functionality of the mobile application, including obtaining access to educational materials, personal account services, class schedules and academic results, submitting applications, arranging services and taking other actions available within the application;

3) when the User and the University communicate through the mobile application, including sending enquiries, applications and messages and receiving notifications and other official information;

4) when payments are made (where such functionality is provided in the application) — with regard to information on the fact and status of the payment;

5) when technical data is collected automatically during use of the mobile application (including information about the device, operating system, access time and other technical parameters necessary to ensure correct operation and information security).

11. Personal data is collected solely to the extent necessary to ensure the operation of the mobile application, to carry out the University's educational and administrative activities, and to comply with the requirements of the legislation of the Republic of Kazakhstan.

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5. Storage and use of personal data

12. The University stores personal data on electronic and/or paper media and in the University's information systems, which are hosted and operated in accordance with the requirements of the legislation of the Republic of Kazakhstan on personal data and information security. Personal data is stored for the period necessary to achieve the purposes set out in this Policy, in the terms of concluded contracts, in the University's internal regulatory documents and in the applicable legislation of the Republic of Kazakhstan.

13. The University processes personal data on the basis of the data subject's consent, except in cases expressly provided for by the legislation of the Republic of Kazakhstan.

14. Once the purposes of processing have been achieved, or where the need to achieve them ceases, and also where contractual or other legal relations are terminated, personal data is subject to destruction or depersonalization in the manner established by law and by the University's internal documents, except where its further storage is necessary to comply with statutory requirements, ensure information security, prevent fraud or protect the University's legitimate interests.

15. The University uses personal data for the following purposes:

- 1) performance of obligations towards students, employees, applicants and other data subjects;
- 2) organization and support of the educational process;
- 3) provision of access to the University's information systems and services;
- 4) sending notifications, official information and other communications relating to the University's activities;
- 5) confirmation of transactions, applications and enquiries;
- 6) internal analysis and audit and improvement of the quality of educational and administrative services.

16. The University is entitled to send data subjects notifications concerning changes to internal documents, rules, regulations and conditions of study, as well as other information of material importance for their interaction with the University. Refusal to receive mandatory notifications may make proper performance of mutual obligations impossible.

17. In order to ensure the resilience and security of information systems, data backup, access control, antivirus protection and other information protection measures are applied.

6. Transfer of personal data to third parties

18. As the owner of the mobile application, the University discloses and transfers personal data to third parties solely where this is necessary to achieve the

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purposes set out in this Policy and to comply with the requirements of the applicable legislation of the Republic of Kazakhstan.

19. Users' personal data may be transferred to the following categories of persons:

1) third parties that are partners of the University and/or engaged organizations providing services to support the operation of the mobile application and information systems (technical support, software maintenance, hosting, database administration, information security and other similar services). In such cases, the transfer is made solely to the extent necessary to provide the relevant services and on condition that such persons assume obligations to ensure the confidentiality and security of the personal data;

2) telecommunications operators and organizations that deliver notifications and messages to Users;

3) payment service providers (payment systems) and banking institutions — where payments are made through the mobile application. In such cases, financial data relating to bank cards and other payment details is processed by the relevant payment system or banking institution in accordance with its own internal rules and privacy policies;

4) representatives of state authorities of the Republic of Kazakhstan — on the basis of a duly executed and substantiated request, in the cases and in the manner provided for by the legislation of the Republic of Kazakhstan;

5) the University's professional advisers (auditors, lawyers and other specialists) — for the purposes of legal, financial and other review, audit and ensuring compliance with statutory requirements;

6) other persons — solely with the consent of the data subject or in cases expressly provided for by this Policy and/or the legislation of the Republic of Kazakhstan.

20. The University transfers to third parties only the minimum necessary volume of personal data sufficient to achieve the specific purpose of processing.

21. The University does not sell, exchange or transfer Users' personal data to third parties for advertising and/or marketing purposes.

22. Disclosure of personal data is also permitted in order to protect the rights and legitimate interests of the University, Users or third parties, and in order to ensure information security and prevent fraud and other unlawful acts.

23. In the event of reorganization, merger, accession or any other change to the University's organizational and legal structure, personal data may be transferred to the legal successor, provided that the successor complies with the requirements of the legislation of the Republic of Kazakhstan on personal data protection.

24. Where the University receives a submission from a data subject, their legal representative or an authorized body concerning the inaccuracy of personal data or

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the unlawfulness of its processing, the University blocks the relevant personal data for the duration of the review, in the manner established by the legislation of the Republic of Kazakhstan.

7. Destruction of personal data

25. A User of the University's mobile application is entitled at any time to change, update and clarify the personal data provided, using the personal account functionality or by sending a corresponding request to the University in the manner established by this Policy and the User Agreement.

26. A data subject is entitled to withdraw their consent to the processing of personal data. In such a case, the University ceases processing the personal data and ensures its destruction or depersonalization within the time limits and in the manner provided for by the legislation of the Republic of Kazakhstan and the University's internal regulatory documents, except for personal data whose retention is necessary to comply with statutory requirements, perform contractual obligations, ensure information security and prevent fraud.

27. Personal data is destroyed by means that preclude its restoration, including deletion from information systems, destruction of tangible media, or depersonalization of the data.

28. The User accepts that, after deletion of the account in the mobile application or cessation of use of the application, some data may be retained temporarily on the servers of the University and/or engaged partners as part of backup procedures. Such data is retained for a limited period and is subsequently deleted in the established manner.

8. Rights and obligations of the parties

29. A User of the University's mobile application has the right to:

1) obtain information about the processing of their personal data, including the purposes and grounds for processing, the processing methods applied, and the persons who have access to the personal data or to whom such data may be disclosed in accordance with the legislation of the Republic of Kazakhstan;

2) obtain information about the personal data retention periods;

3) require the clarification, updating, blocking or destruction of their personal data where it is incomplete, out of date, inaccurate, unlawfully obtained or not necessary for the stated purposes of processing;

4) withdraw consent to the processing of personal data in the manner provided for by the legislation of the Republic of Kazakhstan and this Policy;

5) cease using the mobile application, including by deleting their account;

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6) appeal against the University's acts or omissions to the authority responsible for protecting the rights of data subjects or through the courts, in accordance with the legislation of the Republic of Kazakhstan;

7) contact the University, using the contact details provided in the mobile application or on the official website, on matters relating to the processing of personal data and the application of this Policy;

8) exercise other rights provided for by the legislation of the Republic of Kazakhstan on personal data protection.

30. The User undertakes to:

1) provide accurate, correct and up-to-date personal data and update it promptly if it changes;

2) refrain from the unlawful collection, systematization, storage, processing or dissemination of other users' personal data;

3) refrain from attempting to gain unauthorized access to other users' accounts and personal data;

4) comply with the requirements of the User Agreement, this Policy and the legislation of the Republic of Kazakhstan when using the mobile application;

5) refrain from posting or distributing through the mobile application any information that breaches the legislation of the Republic of Kazakhstan, the rights and legitimate interests of third parties, or standards of morality and public order, including information of an offensive, defamatory, discriminatory, extremist or pornographic nature, materials containing calls to unlawful acts, and other prohibited materials.

31. As the owner of the mobile application, the University is entitled to:

1) collect, process, store, transfer and otherwise handle personal data within the limits and on the terms provided for by this Policy and the legislation of the Republic of Kazakhstan;

2) moderate content and User activity in the mobile application (where such functionality exists) in order to ensure compliance with the User Agreement and this Policy;

3) restrict a User's access to the mobile application or delete their account in the event of a breach of the User Agreement, this Policy or the requirements of the legislation of the Republic of Kazakhstan;

4) exercise other rights provided for by the legislation of the Republic of Kazakhstan and the University's internal regulatory documents.

32. The University undertakes to:

1) process personal data in accordance with the legislation of the Republic of Kazakhstan and this Policy;

2) ensure the confidentiality and security of personal data and take the necessary legal, organizational and technical measures to protect it against unlawful

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access, destruction, alteration, blocking, copying, dissemination and other unlawful acts;

3) use personal data solely for the purposes set out in this Policy;

4) not disclose personal data to third parties without lawful grounds or the data subject's consent, except in cases provided for by this Policy and the legislation of the Republic of Kazakhstan;

5) cease processing personal data and ensure its destruction or depersonalization where the data subject withdraws consent, unless otherwise provided by the legislation of the Republic of Kazakhstan.

9. Amendments to the Policy

33. As the owner of the mobile application, the University is entitled to amend and supplement this Policy at any time without obtaining the prior consent of Users.

34. If individual provisions of this Policy are declared invalid in the manner established by law, this does not render the remaining provisions of the Policy invalid.

35. The updated version of the Policy is published in the mobile application and/or on the University's official website, indicating the date of the last update. The amendments take effect from the moment of publication, unless the new version of the Policy provides otherwise, and apply to all personal data processed by the University.

36. The User undertakes to monitor amendments to this Policy independently in the relevant section of the mobile application or on the University's official website. Continued use of the mobile application after the publication of amendments signifies the User's agreement with the new version of the Policy.

10. User consent

37. By using the University's mobile application, the User gives their full, free, specific, informed and conscious consent to the processing of their personal data in accordance with the legislation of the Republic of Kazakhstan "On Personal Data and Its Protection" and the terms of this Policy.

38. The User confirms that they have been informed of the purposes, scope and methods of processing personal data, and of the rights provided for by the legislation of the Republic of Kazakhstan.

39. Personal data may be processed and stored on the University's servers located in the Republic of Kazakhstan and transferred to third parties in the cases and in the manner provided for by this Policy and the legislation of the Republic of Kazakhstan.

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40. Processing of personal data for purposes not provided for by this Policy is not permitted.

41. The User is entitled at any time to withdraw their consent to the processing of personal data by deleting their account in the mobile application or by sending a written or electronic request to the University. Withdrawal of consent does not affect the lawfulness of the processing of personal data carried out before such withdrawal.

11. Anti-corruption restrictions and liability in processing mobile application information

42. This section establishes the anti-corruption restrictions, obligations and liability of University employees when processing the information and personal data of users of the mobile application.

43. The requirements of this section apply to all employees who have access to mobile application data, as well as to persons engaged on a contractual basis.

44. Employees are prohibited from:

1) using their official access to information and personal data in order to obtain a personal benefit or to grant advantages to third parties;

2) transferring, disclosing or providing access to data without lawful grounds and proper authority;

3) altering, deleting or amending information in the mobile application in the interests of particular persons;

4) accepting rewards, gifts, services or other advantages for acts (or omissions) connected with data processing;

5) using mobile application information to exert pressure, discriminate or otherwise unlawfully influence others.

45. Employees are obliged to:

1) ensure the lawfulness and confidentiality of personal data processing;

2) comply with information security requirements;

3) prevent and declare conflicts of interest;

4) immediately inform management or the anti-corruption compliance service of any instances of unlawful access, offers of reward or other corruption risks;

5) undergo training on personal data protection and anti-corruption compliance.

46. The University ensures the segregation of access rights, periodic review of authorizations and the conduct of internal reviews where violations are identified.

47. The authorized structural unit (official) of the University responsible for the mobile application ensures that the actions of users with elevated access rights are recorded and logged.

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48. The anti-corruption compliance service is entitled to initiate reviews of compliance with this section.

12. Liability

49. The management, officials and employees of the University bear collective responsibility for observing and fulfilling all the requirements set out in the University's policy and provided for by personal data legislation, being aware of the consequences of failing to comply with this policy.

50. Breach of the requirements of this Policy entails disciplinary, material, administrative or criminal liability in accordance with the legislation of the Republic of Kazakhstan.

51. The use of personal data and official information in order to obtain an improper benefit is treated as a corruption offence.

13. Final provisions

52. This Policy has been developed in accordance with the legislation of the Republic of Kazakhstan on personal data protection and information security.

53. Matters not governed by this Policy are resolved in accordance with the applicable legislation of the Republic of Kazakhstan.

54. This Policy of the University's mobile application is available for review by all Users before they begin using the application.

55. This version of the Policy enters into force on the date of its approval by the University and remains in effect until a new version is adopted.

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Annex 1

Record of amendments to document P NJSC "EKTU" 183-I-2026 "Confidentiality Policy of NJSC “D. Serikbayev EKTU”"

No.	Title of the administrative document introducing the amendment	Date of approval of the amendment	Amendment entered into this copy by		
			Full name of the person responsible for documentation	Signature	Date