PERSONAL DATA PROCESSING POLICY

Edition of October 6, 2026

1. General

1.1. This Personal Data Processing Policy (the "Policy") sets out how personal data is processed and protected by **Denovels LLC**, Tax ID 221140015455 (BIN), address: 6/2 Saken Seifullin St., Saryarka District, Astana 010000, Kazakhstan (the "Operator").

1.2. The Policy applies to personal data the Operator receives from users of the website **deoscms.com** (the "Site").

1.3. By using the Site and submitting personal data through its forms, the user confirms that they have read this Policy.

1.4. The Operator processes personal data in accordance with the applicable data protection laws.

2. Definitions

Personal data means any information relating to an identified or identifiable natural person.

Operator means the person who determines the purposes and means of processing personal data.

Processing means any operation performed on personal data, including collection, recording, organisation, storage, adaptation, retrieval, use, disclosure, restriction, erasure and destruction.

3. Personal data we may process

Depending on the forms used on the Site, the Operator may process:

- first name, last name and middle name;
- phone number;
- e-mail address;
- company name;
- job title;
- information the user provides in the text of a message, request, order or enquiry.

The forms of the Site are not designed to collect special categories of personal data (racial or ethnic origin, political opinions, religious or philosophical beliefs, sex life, biometric data). If a User chooses to mention health information in a message, for example the reason for an appointment, the Operator uses it only to respond to the request and to provide the service, keeps it confidential and does not disclose it to third parties except where required by law.

4. Purposes of processing

- handling user enquiries and requests;
- contacting the user;

- providing information about the Operator's goods, works or services;
- preparing offers at the user's request;
- preparing, concluding and performing contracts;
- processing orders, where the Site offers ordering;
- complying with legal obligations;
- operating, securing and improving the Site.

Personal data is used for marketing communications only with the user's consent where such consent is required by law.

5. Legal basis

- the user's consent;
- performance of a contract with the user or steps taken at the user's request before entering into a contract;
- compliance with legal obligations;
- the Operator's legitimate interests, where they are not overridden by the user's rights;
- other grounds provided by applicable law.

6. How we process personal data

6.1. Personal data is collected directly from users of the Site, including through contact, order and request forms.

6.2. Processing may be carried out with or without automated means.

6.3. The Operator may engage third parties to process personal data on its behalf, provided they ensure confidentiality and security of the data.

6.4. The Operator does not disclose personal data to an unlimited number of persons without a lawful basis.

6.5. Personal data is kept no longer than necessary for the purposes of processing, unless a longer period is required by law or a contract.

6.6. When the purposes are achieved, or on other lawful grounds, personal data is deleted or destroyed unless there is another legal basis for keeping it.

7. Storage

The Operator stores personal data using databases and infrastructure that meet the requirements of applicable law and takes measures to keep the data accurate and up to date.

8. Sharing with third parties

- with the user's consent;
- with processors engaged by the Operator;
- with public authorities where required by law;

- in other cases expressly provided by law.

9. Cookies and technical data

The Site may use cookies and similar technologies needed for its operation, saving user preferences, security and usage analysis. The browser may automatically transmit technical data such as IP address, browser and device type, operating system, date and time of visit and the requested page.

For its own traffic statistics the Site may store an analytics cookie in the user's browser containing a random identifier and the date and source of the first visit. It is set only after the user gives consent in the cookie settings window, contains no personal data and is used solely to count new and returning visits and to evaluate acquisition channels.

Where third-party analytics services are used, the Operator lists them according to the services actually connected. The user can restrict or disable cookies in the browser settings; disabling essential cookies may affect some functions of the Site.

10. User rights

- to obtain information about the processing of their personal data;
- to have inaccurate or outdated data corrected;
- to request restriction or erasure of their data where the law allows;
- to withdraw consent;
- to object to processing in the cases provided by law;
- to lodge a complaint with the supervisory authority or a court;
- to exercise other rights provided by applicable law.

11. Withdrawal of consent

The user may withdraw consent by sending a request to the Operator:

E-mail: info@deoscms.com

or by post to:

6/2 Saken Seifullin St., Saryarka District, Astana 010000, Kazakhstan

Withdrawal of consent does not affect processing that the Operator carries out on another legal basis.

12. Security

The Operator takes the necessary legal, organisational and technical measures to protect personal data against unauthorised or accidental access, destruction, alteration, blocking, copying, disclosure and other unlawful actions. Access is granted only to persons who need it to perform their duties.

13. Changes to the Policy

The Operator may amend this Policy. The current version is published on the Site at: **https://deoscms.com/privacy-policy.html**. A new version takes effect when it is

published, unless it states otherwise.

14. Operator details

Operator: Denovels LLC
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