

PRIVACY POLICY

Version of 27 October 2026

Published at: <https://urbanmedia.kz/en/privacy-policy/>

This English version is provided for convenience. In case of any discrepancy between the English and Russian versions, the Russian version shall prevail.

1. General provisions

- 1.1. This Privacy Policy (the "Policy") sets out how personal data of users of the website <https://urbanmedia.kz> (the "Website") and of persons contacting Urban Media LLP (TOO «Urban Media») via the Website, e-mail or the phone numbers listed on the Website are collected, processed, stored and protected.
- 1.2. The owner and operator of personal data is Urban Media LLP (TOO «Urban Media»), BIN 050840004119, registered address: 17 Nauryzbai Batyr St., office 303, Almaty; office address: 135 Zhibek Zholy Ave., block 2, 10th floor, office 2104, Almaty (the "Company", "we").
- 1.3. The Policy has been prepared in accordance with the Constitution of the Republic of Kazakhstan, Law of the Republic of Kazakhstan No. 94-V of 21 May 2013 "On Personal Data and Their Protection" (as amended, the "Personal Data Law"), the Digital Code of the Republic of Kazakhstan No. 255-VIII of 9 January 2026 and other regulations of the Republic of Kazakhstan.
- 1.4. The Policy is a publicly available document. By using the Website, completing the enquiry form or providing us with information about yourself in any other way described in the Policy, the user confirms that they have read the Policy.
- 1.5. The Website is informational. It does not involve registration, user accounts or online payments.

2. Definitions

- 2.1. **Personal data** means information or a set of information about a data subject, supplemented with one or more personal data identifiers, as defined in the Personal Data Law.
- 2.2. **Data subject (User)** means the individual to whom the personal data relate, including a Website visitor, a representative of a client or partner, or a job applicant.
- 2.3. **Processing of personal data** means actions aimed at accumulating, storing, modifying, supplementing, using, disclosing, depersonalising, blocking and destroying personal data.
- 2.4. **Consent** means a freely given, specific and informed permission of the data subject to the collection and processing of their personal data, given in a form permitted by the laws of the Republic of Kazakhstan.
- 2.5. **Cookies** are small text files that the Website stores in the User's browser to ensure the Website works correctly.
- 2.6. Other terms are used as defined by the laws of the Republic of Kazakhstan.

3. Data we collect

- 3.1. **Enquiry form** on the Website: e-mail address (required), and also name, phone number, company name and description of the task, if provided by the User at their own initiative.
- 3.2. **E-mail and phone enquiries**: surname, first name, patronymic, position, organisation name, e-mail address, phone number, content of the enquiry and attachments.

- 3.3. **Job applications** (CVs sent to info@urbanmedia.kz): surname, first name, patronymic, date of birth, contact details, city of residence, education, work experience, skills and language proficiency, expected salary, photograph and any other information included by the applicant in the CV and cover letter.
- 3.4. **Technical data** collected automatically: IP address, browser and operating system type and version, device type, date and time of visit, pages viewed, referring source, cookie data.
- 3.5. The Company does not collect via the Website biometric data, health data, information on religious or political beliefs or other special categories of personal data. Please do not include such information in enquiries or CVs.
- 3.6. The Website is not intended for persons under 18. The Company does not knowingly collect personal data of minors without the consent of their legal representatives.

4. Purposes and legal grounds for processing

- 4.1. The Company processes personal data for the following purposes:
 - responding to enquiries, call-backs and advising on the Company's services;
 - preparing and sending commercial proposals, entering into and performing contracts with clients and partners;
 - considering job applications and recruitment;
 - ensuring the operation and security of the Website;
 - complying with the laws of the Republic of Kazakhstan.
- 4.2. The legal grounds for processing are:
 - the data subject's consent;
 - the need to enter into and perform a contract to which the data subject or the entity they represent is a party;
 - other cases provided for by the Personal Data Law.
- 4.3. The User gives consent to the collection and processing of personal data by ticking the relevant box in the Website form and/or submitting the form, sending a CV or enquiry to the Company's e-mail, or in any other way that allows the consent to be confirmed. By providing personal data of third parties (e.g. colleagues), the User confirms that they have obtained their consent.
- 4.4. The Company processes only personal data that are necessary and sufficient for the stated purposes and does not use them for purposes incompatible with the original ones.
- 4.5. The Company does not make decisions producing legal effects for Users based solely on automated processing of their personal data.

5. Cookies

- 5.1. The Website uses strictly necessary cookies without which the Website cannot work correctly (including to remember language settings).
- 5.2. The Website does not use web analytics services or advertising (marketing) cookies.
- 5.3. The User may delete cookies or block them at any time in the browser settings. Disabling strictly necessary cookies may affect how the Website works.

6. Storage and retention

- 6.1. Personal data are stored in databases located in the Republic of Kazakhstan, as required by Article 12(2) of the Personal Data Law.

- 6.2.** Personal data are kept no longer than required for the purposes of processing, unless a different period is set by the laws of the Republic of Kazakhstan or by a contract with the data subject:
- data from the enquiry form and enquiries that did not result in a contract — up to 1 (one) year from the last enquiry;
 - data of clients and partners under signed contracts — for the term of the contract and the document retention periods set by the laws of the Republic of Kazakhstan;
 - applicants' CVs — up to 1 (one) year from receipt, for consideration for current and future vacancies, unless the applicant requests earlier deletion;
 - technical data and cookie data — within the periods set by the Website settings, but no longer than 2 (two) years.
- 6.3.** Once the purposes of processing are achieved, the retention period expires or consent is withdrawn (unless otherwise provided by law), personal data are destroyed or depersonalised.

7. Transfer of personal data

- 7.1.** The Company does not sell personal data or transfer them to third parties for marketing purposes.
- 7.2.** Personal data may be transferred to:
- the hosting provider and contractors supporting the Website, e-mail and the Company's IT infrastructure — to the extent necessary for their services and subject to confidentiality;
 - the Company's clients — information about applicants engaged in a specific project, only with the applicant's consent;
 - government authorities and other persons — in the cases and manner provided by the laws of the Republic of Kazakhstan.
- 7.3.** Cross-border transfer of personal data is carried out only in accordance with Article 16 of the Personal Data Law: to foreign states that ensure the protection of personal data, or with the data subject's consent or on other grounds provided by law. The Company may prohibit or restrict cross-border transfer in cases provided by law.

8. Data protection

- 8.1.** The Company takes the necessary legal, organisational and technical measures to protect personal data against unlawful or accidental access, destruction, modification, blocking, copying, disclosure and other unlawful actions, in accordance with Article 22 of the Personal Data Law and the digital legislation of the Republic of Kazakhstan.
- 8.2.** Protection measures include, in particular: a secure (HTTPS) connection on the Website; restricting access to personal data to authorised employees; non-disclosure obligations of employees and contractors; logging and control of actions with personal data; backups and anti-virus protection.
- 8.3.** The person responsible for organising the processing of personal data at the Company is Livia Vyrlan, HR Manager, contact: info@urbanmedia.kz.
- 8.4.** In the event of a personal data security breach, the Company notifies the authorised body and, where necessary, the data subjects in the manner and within the time limits set by the laws of the Republic of Kazakhstan.

9. Rights of the data subject

- 9.1.** Under Article 24 of the Personal Data Law, the User has the right to:

- know whether the Company holds their personal data and receive information confirming the fact, purposes, sources and methods of collection and processing, the list of personal data and processing periods;
 - request amendment and supplementation of their personal data where there are grounds confirmed by documents;
 - request blocking of personal data if the conditions of their collection and processing are violated;
 - request destruction of personal data collected and processed in violation of the law;
 - withdraw consent to the collection and processing of personal data, except where this contradicts the laws of the Republic of Kazakhstan or where an obligation remains unfulfilled;
 - give or refuse consent to the disclosure of their personal data in publicly available sources;
 - protect their rights and legitimate interests, including compensation for moral and material damage;
 - appeal against the actions (inaction) of the Company to the authorised personal data protection body or to court;
 - exercise other rights provided by the Personal Data Law and the Digital Code of the Republic of Kazakhstan.
- 9.2.** To exercise these rights, the User sends a request to info@urbanmedia.kz (subject: "Personal data") or in writing to the Company's address. The request must include the applicant's name, contact details and the substance of the request; the Company may ask for information needed to identify the applicant.
- 9.3.** The Company considers requests and reports the results within the time limits set by the Personal Data Law.

10. Final provisions

- 10.1.** The Company may amend the Policy. A new version takes effect when published on the Website, unless the new version provides otherwise. The current version is always available at <https://urbanmedia.kz/en/privacy-policy/>.
- 10.2.** Matters not covered by the Policy are governed by the laws of the Republic of Kazakhstan.
- 10.3.** Operator details and contacts:

Urban Media LLP (TOO «Urban Media»)

BIN: 050840004119

Registered address: 17 Nauryzbai Batyr St., office 303, Almaty, A05F8Y4, Republic of Kazakhstan

Office address: 135 Zhibek Zholy Ave., block 2, 10th floor, office 2104, Almalinsky district, Almaty, Republic of Kazakhstan

Phone: +7 707 719 44 33

E-mail: info@urbanmedia.kz

Website: <https://urbanmedia.kz>