



PRIVACY POLICY

For the purposes of this Privacy Policy, Feel App LLP is the “data controller” for all Feel application Services.

This Privacy Policy describes the types of personal and non-personal data we collect and how we use such data. This Privacy Policy is part of our General Terms and Conditions and applies to all Feel App Services. Therefore, please make sure that you read and understand our Privacy Policy, as well as the General Terms and Conditions.

This Privacy Policy does not apply to any third-party websites, services or applications, even if they may be accessible through the Feel App Services.

By using any of the Feel App Services, you hereby warrant and represent that (i) you have read, understand and agree to this Privacy Policy, (ii) you are over 16 years of age (or are a parent or guardian with such authority to agree to this Privacy Policy for the benefit of an individual who is under 16 years of age). If you do not accept the terms set forth in this Privacy Policy and the consents associated therewith, please do not use our Services.

Version: 18 May 2023

1. Types and categories of data we collect, process and use

We collect, process and use personal and non-personal data.

1.1 Personal and non-personal data

The term “personal data” is defined by the Law of the Republic of Kazakhstan «On personal data and its protection» dated 21 May 2013 № 94-V (hereinafter “PDPL”), as well as International Treaties ratified by the Republic of Kazakhstan. You can think of your personal data as any data that allow you to be identified or that can be correlated to you.

On the other hand, “non-personal” data cannot be correlated to any specific person. By removing identifiable parts from and anonymizing personal data, personal data may be converted into “non-personal data.”

1.2 Data we collect, process and use

We collect, process and use the following types of data:

- data you provide to us voluntarily,
- data we receive when you use our Services

Typically, we collect, process and use the following categories of data:

1. your name;
2. your personal contact information (email);
3. your username and password;
4. your user profile data (e.g., goals and results);
5. your user preferences (e.g., preferred language settings);
6. your IP address, operating system, browser type, browser version, browser configuration, name of Internet provider, and any other relevant information regarding your computer and Internet connection in order to identify the type of your device, to exchange data with your (mobile) terminal device, or to ensure proper use of Feel application;
7. your service inquiries and your orders;
8. your transaction history, including open and completed transactions;
9. search terms you input in relation to or within our Services;
10. information regarding your orders and payments;
11. information collected by cookies or similar technologies (as explained below);
12. your survey answers, critiques, evaluations, or other responses;
13. the content of all messages sent through Feel application, including information uploaded to social networks through Feel application or otherwise shared with us and/or other users;
14. information about workouts you upload or download using the Feel application;
15. any consents you have given us;
16. any other information input or uploaded by you through Feel application (e.g., information you provide when completing an online form, photos you upload); or

2. How is data collected?

Personal data is collected by us only if you provide such data to us on your own initiative by choosing to use our Services. To be able to use our Services, you must register your account with us.

2.1 Login

You may create the Feel user account through our login system. Following registration, you will be able to use your user account to subscribe to all Feel App Services. To register, you must provide us with at least the following information:

- first name,
- e-mail address, and
- password

Before completing the registration process, you must confirm that you have read our Privacy Policy and accept our General Terms and Conditions.

2.2 Adding information to your user profile

The Feel application also enables you to provide us with additional information, such as your gender, activity level, and wellness goals. After registering, you can add more information to your profile (e.g., a profile photo). If you do so, you will once again provide us with personal data. We will also receive data (including personal data) from you when you communicate with us or other users through the Feel application. We will also receive information about how you use the Feel application. In that case, too, you will provide us with personal data.

2.3 Enabling access rights to your device

For you to be able to use the Feel application to the full extent, we will also need certain access rights to your smartphone. For example, we need access to your camera or your photos if you upload or want to change a profile photo. We use push messages to send you workout reminders or to notify you of new followers or comments. When you want to use such a function for the first time, we will ask you whether you grant us such access rights or we will ask you to grant us access by selecting the appropriate settings. Generally, you may revoke such access rights at any time by changing the appropriate settings.

2.4 Other possible instances of data collection

Collection of data also happens, for example, when you contact us or other users, i.e., when you open your Feel user account, sign up for a subscription, upload a profile photo, or use our Services to send messages.

3. What are our legal bases for processing your data?

We will collect, process, and use your personal data and other data to support the delivery of the Feel App Services in accordance with our General Terms and Conditions. In this section we provide information on the legal basis for our processing of your Personal Data as required by the PDPL, as well as provide detailed information about the purposes of collection, processing and use of your data.

We process your data based on the requirements of the PDPL relying on the following legal bases:

- performance of our Services
- legitimate interest relating to our Services
- if you have given us your consent to process your data

We may also process the data if it is necessary to protect vital interests of our users and/or other people, or for the performance of an obligation to carry out in the public interest.

4. About use of your data for (purposes of processing)

We will use personal data you have provided to us only if and to the extent necessary for providing our Services and handling of the contract or if you have consented that we may use your data for the purposes described in this Privacy Policy.

We process and use data (including personal data) you make available to us voluntarily through the Feel application in various situations (e.g., when you send us an email). We also use data that are collected automatically through the Feel application. Finally, we may also receive data about you from third parties, for example when another user provides us with information about you.

We collect, process and use data for the following purposes:

- to administer, operate, maintain, and improve the Feel application;
- to allow and process orders for services placed by you through Feel application;
- to customize your experience in relation to the Feel application (e.g., by tailoring content and offers to your personal preferences);
- to assess your right to receive certain types of offers or services;
- to support the improvement and customization of the Feel App Services;
- to analyze and research customer behavior;
- to respond to your questions and inquiries;
- to provide you with information about services that may be of interest to you;
- to communicate with you about certain concerns;
- to manage awards, surveys, winning games, lotteries, or other promotional activities or events;
- to comply with our legal obligations to prevent any unlawful use of the Feel application, to protect the security of our Service, to detect and prevent fraud or abuse, to settle disputes, and to enforce our contracts;

5. About data storage

Your personal data will be stored for as long as this is necessary for achieving the defined purposes of processing. If you cancel your user account, we will also erase within reasonable time or archive your personal data, i.e. restrict processing. An exception applies only if we have a legal obligation to archive data for a certain time period.

6. Transfer of data to third parties

Your personal data will be transferred to third parties only if we have a legal obligation to do so, if the data transfer is necessary for performance of the contract, or if you have consented to the transfer of your data. Third-party service providers and partner companies will receive your data only if and to the extent necessary for performance of the contract or with your consent. In such cases, the extent

to which data are transferred will however be kept to the absolute minimum. To the extent that our service providers come into contact with your personal data, we will make sure that they too will comply with all applicable data protection laws. Please also read the data privacy policies of such third-party providers.

We use cloud services. This means we will transfer your data to a third party – the local cloud services provider – and store data on the servers of that provider. We only use providers that are Privacy Shield certified.

7. Data processing – third-party services and partners

To be able to offer you all functions and services of Feel application in the most convenient way possible and to be able to continuously improve our Services, we use third-party services and partners. We also use the assistance of third parties to improve our application.

8. Changes to this Privacy Policy

We may need to make changes to this Privacy Policy, for example if we add new functions or services to the application. Such Policy becomes effective from the moment it is published in the Feel application and may be located via User profile/ Menu/About Us.

In case of any changes to the Privacy Policy with which you may or do not agree, you are obliged to stop using the Feel application. The fact of non-termination of use of the Feel application is the confirmation of consent and acceptance by you of the corresponding version of this Privacy policy.

9. Contact details of the Data Controller

Please contact us at any time by letter to the legal address or preferably by e-mail.

Full name: Feel App LLP

Legal address: Akhmet Baitursinuly 9 Office 904

010000 Astana, Kazakhstan

Customer support service email: customersupport@feelapp.org

Business Identification Number: 201140019365