

APPROVED

**by the Decision of the Director
of the International Research Hub Public Foundation
10.12.2025**



**PRIVACY AND PERSONAL DATA PROTECTION POLICY
of the International Research Hub Public Foundation**

Astana, 2025

1. General Provisions

1.1. This Privacy and Personal Data Protection Policy (the Policy) establishes the legal, organizational, and technical framework governing the processing, storage, use, disclosure, transfer, protection, retention, anonymization, and destruction of personal data by the International Research Hub Public Foundation (the Foundation).

1.2. This Policy has been developed in accordance with the legislation of the Republic of Kazakhstan, including the Law of the Republic of Kazakhstan "On Personal Data and Their Protection", and takes into account internationally recognized data protection standards and best practices, including the principles established under the General Data Protection Regulation (EU) 2016/679 (GDPR), to the extent that they do not conflict with the legislation of the Republic of Kazakhstan.

1.3. This Policy establishes uniform requirements for the processing of personal data and applies to all processing operations, whether carried out by automated, non-automated, or mixed means.

1.4. This Policy applies to all individuals participating in the Foundation's activities who have access to personal data, including employees, experts, consultants, contractors, volunteers, researchers, and any other persons engaged by the Foundation, to the extent of their involvement in the relevant processing activities.

1.5. Personal data shall be processed solely for purposes related to the Foundation's statutory activities, contractual obligations, and applicable legal requirements, while respecting the rights and legitimate interests of data subjects.

2. Principles of Personal Data Processing

2.1. Personal data shall be processed lawfully, fairly, and on the basis of a valid legal ground established under the legislation of the Republic of Kazakhstan.

2.2. Personal data shall be collected and processed solely for specified, explicit, and legitimate purposes consistent with the Foundation's activities. Any subsequent processing shall remain compatible with those purposes.

2.3. The scope and categories of personal data processed shall be limited to what is necessary for achieving the intended processing purposes. Excessive or unnecessary collection of personal data shall not be permitted.

2.4. The Foundation shall take reasonable measures to ensure that personal data remain accurate, complete, and up to date.

2.5. Personal data shall be retained only for as long as necessary to fulfil the purposes of processing or for the retention periods established by the legislation of the Republic of Kazakhstan.

2.6. Personal data shall be processed in accordance with the principles of confidentiality and integrity and shall be protected through appropriate technical and organizational measures designed to prevent unauthorized access, loss, alteration, disclosure, or destruction.

2.7. The Foundation shall maintain appropriate documentation and records demonstrating compliance with this Policy and applicable data protection legislation.

3. Legal Grounds for Processing Personal Data

3.1. Personal data shall be processed on the basis of the data subject's consent unless another lawful basis is provided by the legislation of the Republic of Kazakhstan.

3.2. Personal data may be processed without obtaining separate consent where such processing is expressly permitted or required by law, including where necessary for the performance of contractual obligations or compliance with legal requirements.

3.3. In implementing projects involving international donors and partners, the Foundation shall take into account applicable contractual and international requirements relating to personal data protection, provided that such requirements are consistent with the legislation of the Republic of Kazakhstan.

4. Purposes of Processing Personal Data

4.1. The Foundation processes personal data for the purposes of carrying out its statutory activities, implementing projects and programmes, entering into and performing contracts, cooperating with public authorities, donors, and partners, administering grants, and complying with applicable legal obligations.

4.2. Personal data relating to experts, consultants, contractors, researchers, volunteers, and other individuals engaged by the Foundation shall be processed only to the extent necessary for assessing qualifications, administering contractual relationships, maintaining records, and fulfilling reporting obligations.

4.3. Personal data relating to beneficiaries shall be processed only to the extent necessary for project implementation while ensuring confidentiality, proportionality, and compliance with the principle of data minimization.

5. Processing and Retention of Personal Data

5.1. Personal data may be processed by automated and non-automated means in accordance with applicable legislation.

5.2. Personal data shall be stored in secure environments designed to protect them against unauthorized access, accidental loss, destruction, alteration, or disclosure.

5.3. Access to personal data shall be granted solely to authorized individuals who require such access for the performance of their professional or contractual duties.

5.4. Personal data contained in accounting, human resources, contractual, and project documentation shall be retained for the periods prescribed by applicable legislation.

5.5. The Foundation shall organize the storage of personal data so as to ensure their integrity, availability for legitimate verification, and protection against unauthorized access or loss.

6. Disclosure and Cross-Border Transfers of Personal Data

6.1. Personal data may be disclosed to third parties only where a lawful basis exists and only to the extent necessary to achieve the purposes of processing.

6.2. Personal data may be disclosed to public authorities in the cases and according to the procedures established by the legislation of the Republic of Kazakhstan.

6.3. Where personal data are shared with donors, international organizations, or project partners, the Foundation shall ensure appropriate safeguards to maintain confidentiality and protect the transferred data.

6.4. Cross-border transfers of personal data may be carried out where an adequate level of protection is ensured or where the data subject has provided valid consent, unless otherwise provided by the legislation of the Republic of Kazakhstan.



APPENDIX 1 to the Privacy and Personal Data Protection Policy

CONSENT TO THE PROCESSING OF PERSONAL DATA

I, _____,
(Full Name)

hereby confirm that I voluntarily give my consent to the International Research Hub Public Foundation (the Foundation) to process my personal data to the extent necessary for the Foundation's statutory activities, including participation in projects and programmes, the conclusion and performance of contracts, administrative record-keeping, financial administration, and the preparation of reports.

This consent covers the processing of the following categories of personal data:

- full name;
- contact details;
- information relating to education, qualifications, professional experience, and expertise;
- banking and payment details required for the performance of contractual or statutory obligations;
- any other personal data voluntarily provided by me for the purposes specified above.

I hereby confirm that:

1. I have read and understood the Foundation's Privacy and Personal Data Protection Policy;
2. I have been informed of the purposes, legal basis, methods, and retention period applicable to the processing of my personal data;
3. I have been informed of my rights under the legislation of the Republic of Kazakhstan and, where applicable, internationally recognized data protection standards.

This consent shall remain valid until the purposes of processing have been fulfilled or until it is withdrawn, unless otherwise required by the legislation of the Republic of Kazakhstan.

I understand that I may withdraw this consent at any time by submitting a written request to the Foundation, subject to any legal obligations requiring the continued processing or retention of personal data.

Full Name: _____

Status / Position: _____

Signature: _____

Date: _____

PRIVACY NOTICE

The International Research Hub Public Foundation (the Foundation) hereby informs you that your personal data are processed for the purposes of carrying out the Foundation's statutory activities, implementing projects and programmes, performing contractual obligations, cooperating with public authorities, donors, partners, and other stakeholders, and complying with the applicable legislation of the Republic of Kazakhstan.

The processing of personal data may include, where applicable:

- collection;
- recording;
- organization;
- storage;
- updating and correction;
- use;
- disclosure and transfer;
- anonymization;
- restriction of processing;
- retention; and
- secure destruction of personal data.

The Foundation processes only those personal data that are necessary for the specified purposes and applies the principles of lawfulness, fairness, transparency, confidentiality, data minimization, and data security.

The Foundation implements appropriate technical and organizational measures to protect personal data against unauthorized or unlawful processing, accidental loss, destruction, alteration, disclosure, or unauthorized access.

Rights of the Data Subject

Subject to the applicable legislation of the Republic of Kazakhstan, the data subject has the right to:

1. obtain information regarding the processing of his or her personal data;
2. request access to, correction, updating, restriction of processing, anonymization, or deletion of personal data where permitted by law;
3. withdraw consent to the processing of personal data where processing is based on consent and such withdrawal is permitted by applicable law;
4. submit requests or complaints regarding the processing of personal data in accordance with the procedures established by applicable legislation.

International Research Hub Public Foundation

Contact Details: _____

PERSONAL DATA DESTRUCTION RECORD

Astana

The International Research Hub Public Foundation (the Foundation), represented by

_____, acting pursuant to
_____, hereby certifies that the following personal
data:

(please specify the category and description of the personal data)

have been securely destroyed on the following legal basis:

- ☐ the purposes of processing have been fulfilled;
- ☐ the applicable retention period has expired;
- ☐ the data subject has lawfully withdrawn consent;
- ☐ deletion is required under applicable legislation;
- ☐ other: _____

Method of Destruction

The personal data were destroyed using a method that permanently prevents their recovery or reconstruction, as follows:

- ☐ Secure deletion from electronic information systems
- ☐ Physical destruction of paper records
- ☐ Secure destruction of electronic storage media
- ☐ Anonymization resulting in irreversible de-identification
- ☐ Other: _____

This Record has been prepared to document compliance with the legislation of the Republic of Kazakhstan and the Foundation's Privacy and Personal Data Protection Policy.

Responsible Officer: _____

Position: _____

Signature: _____

Date: _____

PERSONAL DATA INCIDENT REGISTER

The Register shall be maintained for the purpose of documenting personal data security incidents, facilitating their assessment and investigation, identifying root causes, and implementing corrective and preventive measures to reduce the risk of similar incidents occurring in the future.

No.	Date of Incident	Description of the Incident	Category of Personal Data Affected	Corrective Measures Taken	Responsible Person	Status