



PRIVACY NOTICE

How AdaLexis collects, uses and protects personal data

Version 1.0 · Effective Date: 2026-06-08 · Data Controller: AdaLexis Ltd.
AIFC Data Protection Regulations 2017 and AIFC Data Protection Rules 2018 (each as amended as of 1 April 2025)
Public — may be published on adalexis.com

AdaLexis Ltd. (“AdaLexis”, “we”, “us”, “our”) is a company incorporated in the Astana International Financial Centre (AIFC). We respect your privacy and are committed to protecting your personal data. This Privacy Notice explains how we collect, use, share, store and protect personal data, and the rights available to you, under the AIFC Data Protection Regulations 2017 and AIFC Data Protection Rules 2018 (each as amended as of 1 April 2025). It is provided to you in accordance with our obligation under section 13 of the AIFC Data Protection Regulations to inform data subjects about the processing of their personal data.

1. Scope and Our Role

This Notice applies to all personal data we process about: visitors to our website adalexis.com; individuals who contact us, request a demonstration, or subscribe to our communications; representatives and contacts of our clients, suppliers and other organisations we work with; and job applicants. It explains our practices when we are the Data Controller — that is, when we, alone or jointly with others, determine the purposes and means of processing your personal data.

Where we process personal data on behalf of our clients in the course of providing our compliance platform (for example, transaction and customer data our clients upload to the platform), we act as a Data Processor and process that data only on the relevant client’s instructions, as required by section 15 of the AIFC Data Protection Regulations. That processing is governed by our service agreement with the client and the client’s own privacy notice, not by this Notice.

2. Personal Data We Collect

We collect personal data directly from you, automatically when you use our website, and in some cases from third-party sources. Depending on how you interact with us, this may include:

- Contact Details — first name, last name, business email address, phone number, and postal address;
- Business Data — company or organisation name, job title or role, country, and company website;
- Account and Log-In Data — the information you provide to set up and access an account, where applicable;
- Enquiry and Feedback Data — the content of your messages, demo requests, support tickets, and feedback;
- Marketing Preferences — your consent to receive communications and your preferred channels;
- Technical and Usage Data — IP address, browser type, device data, operating system, date and time of visit, and pages visited, collected automatically via cookies and similar technologies;
- Recruitment Data — where you apply for a role, your CV, work history, qualifications and related information.

We collect only data that is adequate, relevant and not excessive in relation to these purposes, as required by section 8 of the AIFC Data Protection Regulations. Please do not send us Sensitive Personal Data — that is, data revealing or concerning racial or ethnic origin, communal origin, political affiliations or opinions, religious or philosophical beliefs, criminal record, trade union membership, or health or sex life — unless we specifically request it and you provide your written consent.

3. How We Use Personal Data and Our Lawful Basis

We process personal data only where we have a lawful basis under section 9 of the AIFC Data Protection Regulations. We use your personal data to:

- respond to your enquiries and demo requests, and provide the products, services and information you request;
- create and administer accounts, and provide customer support;
- communicate with you about our products, services and updates;
- send marketing communications where you have consented, with the ability to opt out at any time;
- operate, secure, maintain and improve our website and services, and analyse how they are used;
- manage recruitment and assess job applications;
- comply with our legal, regulatory and contractual obligations, and establish, exercise or defend legal claims.

Our lawful bases under section 9 are: your written consent; the necessity of processing to perform a contract with you or to take steps at your request before entering a contract; the necessity of processing to comply with a legal obligation to which we are subject; and the necessity of processing for our legitimate interests, except where those interests are overridden by your compelling legitimate interests.

4. How We Share Personal Data

We do not sell your personal data. We may disclose it to the following categories of recipients:

- Service providers and processors acting on our behalf (such as cloud hosting, CRM, email, analytics and support providers), who process personal data only on our instructions and under appropriate security measures;
- Professional advisers, such as lawyers, auditors, accountants and consultants, where necessary;
- Regulators, courts, the police and other government agencies, where required by law or to establish, exercise or defend legal rights;
- A successor entity in connection with a merger, acquisition, reorganisation or sale of assets;
- Other third parties where you have consented or at your direction.

5. International Data Transfers

Some recipients may be located outside the AIFC. Under sections 11 and 12 of the AIFC Data Protection Regulations, we transfer personal data to a recipient in a jurisdiction outside the AIFC only where that jurisdiction has an adequate level of protection (as prescribed in Schedule 2 to the AIFC Data Protection Rules or approved in writing by the Commissioner of Data Protection), or where one of the conditions in section 12 applies.

Where a recipient is in a jurisdiction that does not have an adequate level of protection, we transfer your personal data only on a lawful basis under section 12 — for example, your written consent, the necessity of the transfer to perform a contract, or under a permit issued by the AIFC Commissioner of Data Protection. The Republic of Kazakhstan is not currently on the list of jurisdictions with an adequate level of protection, so transfers there are made only on one of these bases.

6. Storage Duration and Erasure

In line with section 8 of the AIFC Data Protection Regulations, we keep personal data in a form that permits identification for no longer than is necessary for the purposes for which it was collected, including to satisfy legal, accounting, regulatory or reporting requirements. When data is no longer required, we erase it or render it anonymous. Where an enquiry or demo request does not lead to a business relationship, we retain the related data for up to 24 months and then delete or anonymise it, unless a longer period is required by law.

7. Your Privacy Rights

Under sections 17 and 18 of the AIFC Data Protection Regulations, and subject to the conditions and exceptions in those Regulations, you have the right to:

- obtain written confirmation of whether we process personal data about you, and information about the purposes of processing, the categories of data processed, and the recipients to whom it is disclosed (section 17);
- have the personal data communicated to you in an intelligible form, together with any available information about its source (section 17);
- have inaccurate or unlawfully processed data rectified, erased or blocked (section 17);
- object at any time, on reasonable grounds relating to your particular situation, to the processing of your personal data (section 18);
- be informed before your data is first disclosed to a third party for direct marketing, and to object to such disclosure or use (section 18);
- withdraw your consent at any time, including unsubscribing from marketing communications.

To exercise any right, contact us using the details in Section 11. We may ask you to verify your identity before responding. If you believe we have contravened the AIFC Data Protection Regulations, you may also lodge a complaint with the AIFC Commissioner of Data Protection under section 32.

8. Cookies and Similar Technologies

Our website uses cookies and similar technologies to operate the site, remember your preferences, and analyse usage. You can manage non-essential cookies through the cookie banner or your browser settings. Disabling some cookies may affect the functionality of the website.

9. Security

As required by section 16 of the AIFC Data Protection Regulations, we implement appropriate technical and organisational measures to protect personal data against wilful, negligent, accidental or unlawful destruction, accidental loss, alteration, unauthorised disclosure or access, and other unlawful forms of processing. These measures include access controls, encryption in transit, and staff confidentiality obligations. If an unauthorised intrusion to a database containing personal data occurs, we will inform the AIFC Commissioner of Data Protection as soon as practicable. No method of transmission over the internet or electronic storage is completely secure.

10. Children's Personal Data

Our website and services are intended for business users and are not directed to children. We do not knowingly collect personal data from children. If you believe a child has provided us with personal data, please contact us and we will take appropriate steps.

11. How to Contact Us

For any privacy question, or to exercise your rights, please contact:

AdaLexis Ltd. — Data Protection

Email: privacy@adalexis.com

Address: Astana International Financial Centre (AIFC), Astana, Republic of Kazakhstan

Supervisory authority: Commissioner of Data Protection, AIFC. You have the right to lodge a complaint with the Commissioner under section 32 of the AIFC Data Protection Regulations.

12. Changes to This Notice

We may update this Notice from time to time. The current version and its effective date are shown at the top of this document. Where changes are material, we will provide notice through our website or by other appropriate means. We encourage you to review this Notice periodically.