



**PHGTL**

PHYGITAL  
**GAMES OF  
THE FUTURE**  
ASTANA 2026

**PERSONAL DATA COLLECTION,  
PROCESSING AND TRANSFER  
POLICY  
OF THE INTERNATIONAL  
MULTISPORT TOURNAMENT  
“GAMES OF THE FUTURE” IN  
ASTANA IN 2026**

Astana, 2026



## 1. General Provisions

1.1. This Personal Data Processing Policy (hereinafter – the Policy) has been developed in accordance with the requirements of the Law of the Republic of Kazakhstan dated 21 May 2013 No. 94-V “On Personal Data and Their Protection” (hereinafter – the Law on Personal Data), the Law of the Republic of Kazakhstan dated 24 November 2015 No. 418-V “On Informatization” (hereinafter – the Law on Informatization), and other regulatory legal acts of the Republic of Kazakhstan. The Policy defines the procedure for the collection, processing, and transfer of personal data, as well as measures to ensure the security of personal data.

1.2. This Policy is a publicly available document of “Kazsportinvest” Joint-Stock Company (hereinafter – the Company) and is subject to publication on the official website of the Company.

1.3. The purpose of this Policy is the collection and processing of personal data of persons participating in the international multisport tournament “Games of the Future” (hereinafter – the Tournament) to be held in the city of Astana in 2026.

## 2. Principles of Personal Data Processing

2.1. Personal data shall be processed on a lawful and fair basis.

2.2. The processing of personal data is limited to the achievement of specific, pre-determined, and lawful purposes. Processing of personal data that is incompatible with the purposes of collecting personal data is not permitted.

2.3. It is not permitted to combine databases containing personal data where such data is processed for purposes that are incompatible with each other.

2.4. Only personal data that is relevant to the purposes of its processing shall be subject to processing.

2.5. The content and scope of the personal data processed shall correspond to the stated purposes of processing. Excessive processing of personal data in relation to the stated purposes is not permitted.

2.6. When processing personal data, the accuracy, sufficiency, and, where necessary, relevance of personal data in relation to the purposes of processing shall be ensured. The Operator shall take necessary measures and/or ensure that such measures are taken to delete or rectify incomplete or inaccurate data.

2.7. Personal data shall be stored in a form that makes it possible to identify the subject of personal data for no longer than is required for the purposes of processing personal data, unless the storage period is established by law or by an agreement to which the subject of personal data is a party, beneficiary, or guarantor. Processed personal data shall be destroyed or anonymized upon achievement of the purposes of processing or if the need to achieve such purposes is lost, unless otherwise provided by the Law on Personal Data.

### 3. Key Terms Used

**3.1. Automated processing of personal data** - processing of personal data using computer technology.

**3.2. Personal data** - information relating to an identified or identifiable subject of personal data, recorded on electronic, paper and/or other material media.

**3.3. Biometric data** - personal data that characterize the physiological and biological features of the subject of personal data, on the basis of which his/her identity can be established.

**3.4. Blocking of personal data** - actions to temporarily cease the collection, accumulation, modification, supplementation, use, dissemination, anonymization, and destruction of personal data.

**3.5. Accumulation of personal data** - actions to systematize personal data by entering them into a database containing personal data.

**3.6. Collection of personal data** - actions aimed at obtaining personal data.

**3.7. Destruction of personal data** - actions as a result of which personal data cannot be restored.

**3.8. Anonymization of personal data** - actions as a result of which it becomes impossible to determine the affiliation of personal data to a specific subject of personal data.

**3.9. Database containing personal data** (hereinafter - the Database) - a set of ordered personal data.

**3.10. Owner of a database containing personal data** (hereinafter - the Owner) - a state body, individual and/or legal entity that, in accordance with the laws of the Republic of Kazakhstan, exercises the rights of possession, use and disposal of a database containing personal data.

**3.11. Operator of a database containing personal data** (hereinafter - the Operator) - a state body, individual and/or legal entity that carries out the collection, processing and protection of personal data.

**3.12. Protection of personal data** - a set of measures, including legal, organizational and technical measures, carried out in order to prevent leakage.

**3.13. Processing of personal data** - actions aimed at accumulation, storage, modification, supplementation, use, dissemination, anonymization, blocking and destruction of personal data.

**3.14. Use of personal data** - actions with personal data aimed at achieving the purposes of activity of the Owner, Operator and a third party.

**3.15. Storage of personal data** - actions to ensure the integrity, confidentiality and availability of personal data.

**3.16. Dissemination of personal data** - actions as a result of which personal data are transferred, including through mass media, or access to personal data is provided in any other way.

**3.17. Personal data security breach** - a breach of personal data protection that resulted in unlawful dissemination, modification or destruction, unauthorized dissemination of transmitted, stored or otherwise processed personal data, or unauthorized access to them.

3.18. **Subject of personal data** (hereinafter - the Subject) - an individual to whom the personal data relate.

3.19. **Third party** - a person who is not the Subject, Owner and/or Operator, but is connected with them by circumstances or legal relations regarding the collection, processing and protection of personal data.

3.20. **Cross-border transfer of personal data** - transfer of personal data to the territory of a foreign state to a foreign state authority, foreign individual or foreign legal entity.

3.21. **Operator** - a state body, municipal body, legal entity or individual that independently or jointly with others organizes and/or carries out the processing of personal data, and also determines the purposes of processing personal data, the composition of personal data to be processed, and the actions (operations) performed with personal data.

3.22. **Destruction of personal data** - any actions as a result of which personal data are irreversibly destroyed with the impossibility of further restoration of the content of personal data in the personal data information system and/or material carriers of personal data are destroyed.

#### 4. Main Rights and Obligations of the Operator

4.1. The Operator has the right to process the following personal data with the consent of the Subject:

- Last name, first name, patronymic;
- phone numbers;
- information specified in identity documents.

4.2. The Operator has the right to obtain from the Subject of personal data accurate information and/or documents containing personal data in the event the Subject withdraws consent for personal data processing.

4.3. The Operator has the right to collect and process personal data without the consent of the Subject if there are grounds specified in the Law on Personal Data.

4.4. The Operator has the right to independently determine the composition and list of measures necessary and sufficient to ensure compliance with the obligations provided by the Law on Personal Data and normative legal acts adopted in accordance therewith, unless otherwise provided by the Law on Personal Data or other applicable laws of the Republic of Kazakhstan.

4.5. The Operator shall, upon request of the Subject of personal data, provide information regarding the processing of their personal data, organize the processing of personal data in accordance with the procedure established by the current legislation of the Republic of Kazakhstan, respond to appeals and requests from Subjects of personal data and their legal representatives in accordance with the requirements of the Law on Personal Data, and provide necessary information to the authorized body for the protection of personal data

subjects within 30 calendar days from the date of receiving such a request.

4.6. Within fifteen working days from the receipt of a notification from the Subject of personal data regarding the withdrawal of consent for the collection and processing of personal data, the Operator shall cease processing the personal data if their storage or processing is not required under the legislation of the Republic of Kazakhstan, or provide a reasoned refusal.

4.7. The Operator shall publish or otherwise ensure unrestricted access to this Policy regarding the processing of personal data, take legal, organizational, and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, copying, provision, dissemination, as well as other unlawful actions with respect to personal data, stop the transfer (dissemination, provision, access) of personal data, cease processing and destroy personal data in the manner and cases provided by the Law on Personal Data, and perform other duties established by the Law on Personal Data.

## **5. Main Rights and Obligations of Subjects of Personal Data**

5.1. Subjects of personal data have the right to receive information regarding the processing of their personal data, except in cases provided by law. Information shall be provided by the Operator in an accessible form and shall not contain personal data relating to other Subjects of personal data, except when there are lawful grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Law on Personal Data.

5.2. Subjects of personal data have the right to demand from the Operator the clarification, blocking, or destruction of their personal data if the personal data are incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary for the declared purpose of processing, as well as to take measures provided by law to protect their rights.

5.3. Subjects of personal data have the right to require prior consent for the processing of personal data for the purpose of promoting goods, works, and services in the market.

5.4. The Subject of personal data has the right to withdraw consent to the processing of personal data.

5.5. Subjects of personal data have the right to appeal to the authorized body for the protection of personal data subjects or to a court against unlawful actions or inaction of the Operator in processing their personal data.

5.6. Subjects of personal data are obliged to provide the Operator with accurate data about themselves and notify the Operator of any updates, changes, or corrections to their personal data.

5.7. Persons who provide the Operator with false information about themselves or information about another Subject of personal data without the latter's consent bear responsibility in accordance with the legislation of the Republic of Kazakhstan.

## 6. Legal Grounds for Processing Personal Data

6.1. The legal grounds for the Operator to process personal data are the consent of participants to the processing of their personal data, including processing of personal data permitted for dissemination.

6.2. The Operator processes the personal data of the Subject only if they are filled out and/or sent by the Subject independently through special forms located on the website or sent to the Operator via email. By completing the respective forms and/or sending personal data to the Operator, the Subject expresses their consent to this Policy.

6.3. The Subject of personal data independently decides whether to provide their personal data and gives consent freely, voluntarily, and in their own interest.

## 7. Procedure for Collection, Storage, Transfer, and Other Types of Personal Data Processing

7.1. The security of personal data processed by the Operator is ensured through the implementation of legal, organizational, and technical measures necessary to fully comply with the requirements of the current legislation on personal data protection.

7.2. The Operator ensures the preservation of personal data and takes all possible measures to prevent unauthorized access to personal data.

7.3. The User's personal data shall never be transferred to third parties under any circumstances, except in cases related to compliance with applicable law or if the Subject of personal data has given consent to the Operator to transfer data to a third party for the fulfillment of obligations under a civil law agreement. The Personal Data Subject hereby unconditionally confirms and gives consent to the transfer of all collected personal data to PHYGITAL INTERNATIONAL FZCO, a company registered in accordance with the Companies Regulations 2020 of the Dubai Multi Commodities Centre Authority (DMCC) under registration number DMCC194758, which shall be used solely for the agreed purposes and in compliance with the necessary security measures set forth in this Policy.

7.4. In case of inaccuracies in personal data, the Subject of personal data may update them independently by sending a notice to the Operator's email address marked "Personal Data Update."

7.5. The period of personal data processing is determined by the achievement of the purposes for which the personal data were collected, unless otherwise provided by a contract or applicable law. The Subject of personal data may withdraw consent to the processing of personal data at any time by sending a notice to the Operator's email address marked "Withdrawal of Consent to Personal Data Processing."

7.6. All information collected by third-party services, including payment systems, communication tools, and other service providers, is stored and processed by those entities (Operators) in accordance with their User Agreements and Privacy Policies. The Subject of personal data and/or User is obliged to review these documents independently and in a

timely manner. The Operator is not responsible for the actions of third parties, including the service providers mentioned in this paragraph.

7.7. Restrictions imposed by the Subject of personal data on the transfer (except providing access) and processing or conditions of processing (except obtaining access) of personal data permitted for dissemination do not apply in cases of processing personal data in the public, governmental, or other interests as determined by the Legislation of the Republic of Kazakhstan.

7.8. The Operator ensures the confidentiality of personal data during processing.

7.9. The Operator stores personal data in a form that allows identification of the personal data subject no longer than required for the purposes of processing, unless the retention period is established by Law or by a contract to which the subject of personal data is a party, beneficiary, or guarantor.

7.10. The cessation of personal data processing may occur upon achievement of the purposes of processing, expiration of the consent of the Subject of personal data, withdrawal of consent by the Subject, or detection of unlawful processing of personal data.

## **8. List of Actions Performed by the Operator with Received Personal Data**

8.1. The Operator performs collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (dissemination, provision, access), anonymization, blocking, deletion, and destruction of personal data.

8.2. The Operator performs automated processing of personal data with receipt and/or transmission of the obtained information through information and telecommunication networks or without such networks.

## **9. Cross-Border Transfer of Personal Data**

9.1. Before carrying out cross-border transfer of personal data, the Operator must ensure that the foreign state to which the personal data is to be transferred provides reliable protection of the rights of personal data subjects.

9.2. Cross-border transfer of personal data to foreign states that do not meet the above requirements may only be carried out if there is written consent of the Subject of personal data for cross-border transfer of their personal data and/or for the fulfillment of an agreement to which the personal data subject is a party.

## **10. Confidentiality**

10.1. The Operator and other persons who have gained access to personal data must maintain the confidentiality of personal data, not disclose or distribute personal data to third parties without the consent of the Subject of personal data, unless otherwise provided by the Law on Personal Data.

## 11. Final Provisions

11.1. The Subject of personal data may obtain any clarifications on issues related to the processing of their personal data by contacting the Operator via email.

11.2. Any changes to the personal data processing policy by the Operator will be reflected in this document. The Policy remains in effect until the conclusion of the Tournament.