

## PRIVACY POLICY

Veritas Mobile Limited ("we", "us", "our") is committed to protecting your personal data and ensuring transparency in the way we collect, use, and store it. This Privacy Policy sets out how we handle your information in accordance with the legal requirements of the Astana International Financial Centre (AIFC), applicable AML policies, and international standards for data protection and privacy, including the General Data Protection Regulation (GDPR) where relevant.

This Policy applies to users ("you", "your") of the Veritas Mobile services, accessible through our official web platforms (v-mobile.com and finch.app), mobile application, and Telegram mini-app. Please read it carefully before registering or using any of our services.

### 1. Introduction and Scope

This section explains our approach to privacy and our responsibilities in line with international regulatory practices. Our goal is to ensure that your rights are respected and your data is handled with the utmost care and lawfulness.

We recognize the importance of confidentiality and the right to privacy. Therefore, we collect and process personal data strictly in accordance with the AIFC's Data Protection Regulations, AML/CFT policies, and applicable KYC requirements through our trusted verification partner Sumsub.

By using our services, you confirm that you have read and understood this Policy and agree to the terms set forth herein.

### 2. What Data We Collect and Why

We collect your data to deliver our mobile operator and identification services, fulfill legal obligations, and improve the quality and security of our services. This section describes what personal data is collected and the rationale behind each category.

#### Data Collected During KYC

As part of our KYC onboarding process, we collect the following information via Sumsub, in compliance with AML/CFT requirements:

- Full name (first name, surname, patronymic if applicable)
- Passport or national ID (including ID number, expiry date, and issuing authority)
- Selfie (biometric facial verification)
- Date and place of birth
- Citizenship and residency
- Email address

We do not collect or store your residential address or any tax-related data (e.g., tax identification numbers), in accordance with the principle of data minimization.

## Device Information

To ensure secure and seamless access to our services, we collect limited device-related data during the registration and usage phases, including:

- Device model and operating system
- Mobile carrier/subscriber number
- IP address and approximate geolocation
- Metadata for fraud prevention

These data help us maintain platform security, detect anomalies, and meet regulatory obligations related to user authentication and fraud detection.

## 3. How We Collect and Process Your Data

This section describes the technical and legal means by which we collect and manage your personal data in accordance with international standards and the laws of the AIFC.

We collect your data via:

- The registration process through our website, mobile app, or Telegram mini-app
- The KYC verification process conducted by Sumsb
- Device interactions and logs generated during your use of our services

We ensure that all data processing activities are conducted using certified software, encrypted communication protocols, and secure data centers. Our systems implement robust access control, logging, and monitoring to prevent unauthorized access and data leaks.

We do not transfer your personal data to third parties except:

1. As required by applicable law or court order;
2. To our service providers (such as Sumsb) strictly for the purpose of service delivery;
3. In the event of corporate restructuring, such as a merger or acquisition.

## 4. Purpose and Legal Basis for Data Processing

We only collect and process your data when we have a lawful basis under international standards and AIFC regulations. This section outlines our purposes in clear and compliant terms.

We process your data for the following purposes:

- To provide mobile connectivity and eSIM services
- To comply with AML/KYC obligations under the Kazakhstan and AIFC's regulatory framework
- To prevent fraud and ensure platform security
- To contact you for service-related notifications or incident alerts
- To improve and personalize user experience
- To develop new features and functionalities

The legal basis for data processing includes:

- Compliance with legal obligations (e.g., KYC/AML)
- Performance of a contract (provision of services)
- Legitimate interests (e.g., fraud prevention)
- Your consent (where applicable)

## 5. Data Retention

We retain your data only as long as necessary to fulfill legal obligations or provide you with services. This aligns with international data retention standards and the Kazakhstani and AIFC's data protection requirements.

User data is stored securely for a period consistent with AML regulations and other legal requirements, after which it is anonymized or deleted.

## 6. Security Measures

We apply globally recognized security standards to safeguard your data and maintain system integrity.

Our security practices include:

- End-to-end encryption during transmission
- Secure data storage environments with access controls
- Internal policies on data access, training, and accountability
- Ongoing monitoring and vulnerability management
- Isolation of roles among staff and service providers

All Veritas Mobile personnel undergo compliance training and are bound by confidentiality obligations.

## 7. Your Rights

To comply with international data protection standards, this section outlines your rights and how to exercise them.

You have the right to:

- Request access to your personal data
- Request correction or deletion of your data
- Withdraw consent at any time
- Object to processing on legitimate grounds
- Lodge a complaint with the AIFC Data Protection Commissioner

You can exercise your rights by contacting us via the channels listed in Section 9.

## **8. Changes to the Policy**

We may update this Policy to reflect changes in our services or legal obligations. Any changes will be posted on our website and app. We recommend reviewing the Policy periodically.

## **9. Contact Information**

For inquiries related to this Policy or your personal data, please contact us at:

Veritas Mobile Limited

Address: 55/23 Mangilik El Avenue, Office 133, Yesil District, Astana, Kazakhstan  
Email: [info@v-mobile.com](mailto:info@v-mobile.com), website: [v-mobile.com](http://v-mobile.com) and [finch.app](http://finch.app)

## **10. Jurisdiction and Dispute Resolution**

To provide legal clarity and protect both the company and users under a recognized legal system.

Any disputes or claims arising from or related to this Policy shall be resolved exclusively under the jurisdiction of the Astana International Financial Centre (AIFC) Court.

This choice of jurisdiction ensures that all legal matters are resolved in accordance with international financial and legal standards, providing robust protection for users and service providers.