

APPROVED
decision of the Board of Directors
NJSC "Al-Farabi Kazakh National University"
(protocol No. 3 dated " _5_ " _December_ 2022)

INSTRUCTIONS
to ensure the safety of commercial and official secrets
NJSC "Al-Farabi Kazakh National University"

Almaty 2022

1. General provisions

1.1. This Instruction for ensuring the safety of information about NJSC "Al-Farabi Kazakh National University" (hereinafter referred to as the Company) constituting an official, commercial and other secret protected by law (hereinafter referred to as the Instruction) has been developed in accordance with the Civil and Labor Codes of the Republic of Kazakhstan, the Laws of the Republic of Kazakhstan "On Joint Stock Companies", "On Personal Data and Their Protection", "On Access to Information", "On Informatization", "On the Securities Market", "On State Secrets", "On Science", the Charter of the Company and other legal acts of the Republic of Kazakhstan and establishes general rules on information constituting official, commercial and other legally protected secrets of the Company, as well as measures aimed at protecting them from illegal disclosure.

1.2. The instructions use the following concepts and definitions:

1) Official secret of the Company - information that is not state secrets and is related to the personnel of the Company and its management, protected by the Company and not publicly available on equal terms to an unlimited number of persons.

2) Commercial secret of the Company to the extent permitted by the Charter of the Company - information that is not state secrets related to management, technological information, finances and other activities of the Company, which have real or potential commercial value for the Company, free access on a legal basis, to which has a limited circle of persons, disclosure, receipt, the use of which may damage the interests of the Company.

3) Confidential information - information that is not state secrets, related to the commercial and official secrets of the Company, as well as any undisclosed information that, to the extent permitted by the Charter of the Company, has actual or potential value due to its being unknown to third parties, the disclosure of which provides significant advantages to third parties or has significant adverse consequences for the Company or the interested party that provided the information, in connection with which, access to them is limited and protected in accordance with the legislation of the Republic of Kazakhstan, internal acts of the Company or agreements between the Company and third parties.

1.3. Generalized information that does not disclose information related to commercial and official secrets about the activities of the Company is publicly available.

1.4. The composition and volume of confidential information, including those constituting commercial and official secrets, are determined by the Board of Directors of the Company.

1.5. Trade and official secrets do not include:

- 1) constituent documents of the Company;
- 2) information about vacancies, their number and categories;
- 3) information subject to disclosure in accordance with the legislation of the Republic of Kazakhstan on the securities market;
- 4) other information, free access to which is provided for by the legislative acts of the Republic of Kazakhstan, the Charter and other internal documents of the Company.

2. List of information constituting official and commercial secrets of the Company

2.1. **The official secret** of the Company is the following information:

- 1) staffing of the Company;
- 2) personal data (information of a personal nature), information or data allowing to identify the identity of an employee / employee of the Company, with the exception of publicly available information;
- 3) personal information (information about private life, diseases) about employees/employees of the Company, with the exception of publicly available information;
- 4) documents and information on the amount and terms of remuneration, bonuses and other remuneration of the Company's employees, with the exception of information that is subject to disclosure in accordance with the norms of the current legislation of the Republic of Kazakhstan;

- 5) own assessment and ratings of the teaching staff, researchers and other employees / employees of the Company;
- 6) content of employment contracts of employees/employees of the Company;
- 7) accounting data reflected in the 1C system, Bank-client;
- 8) materials and results (acts/reports) of conducted/ongoing internal checks/investigations;
- 9) internal regulatory documents of the Company that are not classified as commercial secrets and are not subject to disclosure/publication;
- 10) keys of correct answers of the base of test tasks, generated examination materials (tickets, tasks, etc.) for all forms and educational platforms used by the Company for current and final control of students' progress;
- 11) organizational and administrative documents/acts (orders/instructions) for personnel and core activities.
- 12) work plans of the structural divisions of the Company and reports on their implementation.

2.2 . The commercial secret of the Company is the following information:

- 1) information on the preparation, adoption and execution by the Company's bodies of certain decisions on production, organizational and other issues: (decisions/minutes/absentee voting ballots) of the Company's bodies and officials and other materials and documents arising from them);
- 2) information placed in the information and telecommunications network at certain network addresses, together with a set of exclusive rights (for domain names, databases and computer programs), including logins / passwords for access to information systems and databases, the implementation of which provides access to such information;
- 3) information about the methods of information protection used;
- 4) information on the availability, balances and movement of money in the Company's bank accounts;
- 5) content of primary documents and accounting registers of the Company;
- 6) information that is confidential information of the Company's counterparties in accordance with the concluded contracts (agreements);
- 7) on economic and financial relations with the counterparties of the Company;
- 8) information on the procedure and status of the organization of security alarm systems and protection of the Company's facilities;
- 9) information relating to objects of intellectual property, know-how;
- 10) on the procedure, methods and pricing system adopted by the Company;
- 11) archival documents related to the commercial secret of the Company;
- 12) the public procurement plan of the Company (before its official publication);
- 13) development plans of the Company (prior to publication);
- 14) internal accounting management reporting of the Company;
- 15) a map of network communications and a scheme for organizing the storage of the Company's data.

3. Access to information related to official and commercial secrets and confidential information of the Company

3.1. Access to information constituting an official or commercial secret of the Company, confidential information of the Company have :

The Sole Shareholder , the Board of Directors, the Corporate Secretary, the Internal Audit Service, the Management Board, the Compliance Control Service and the Legal Department of the Department of Legal and Documentation Support of the Company.

Other employees of the Company have access to information and documents containing official or commercial secrets, confidential information only to the extent necessary for them to perform their official / official duties.

Responsibility for maintaining the list of the Company's employees who possess information constituting an official or commercial secret of the Company shall be borne by the Information Protection Sector. This list is approved by the Board on the proposal of the Head of the Information Protection Sector.

3.2. An employee of the Company has access to information constituting an official and commercial secret of the Company after signing a document on non-disclosure of this information, which is an integral part of the employment contract.

An employee who, by virtue of his official duties, has access to information constituting an official and/or commercial secret of the Company, as well as an employee who will be entrusted with such information, must be familiarized with this Instruction by the responsible employee of the Information Protection Sector.

3.3. Documents containing official and commercial secrets, confidential information are stored in the structural subdivisions of the Company, the competence of which includes the information reflected in these documents. Granting access to an employee of one structural unit to official and / or commercial secrets, confidential information stored in another structural unit, is carried out with the permission of the head of the latter.

3.4. Employees admitted to information constituting an official or commercial secret are personally responsible for compliance with the established procedure for accounting, use, reproduction, storage and destruction of documents containing official or commercial secrets, in accordance with applicable law, this Instruction and the terms of the employment contract.

3.5. From the date of employment until the expiration of three years from the date of termination of the employment contract, the employee is obliged to keep secret information constituting official and commercial secrets that became known to him at work, to stop the actions of other persons that may lead to the disclosure of such information.

3.6. The employee's personal data may be transferred to third parties with his written consent and (or) the consent of his representatives.

The Company may provide access to the employee's personal data to the following third parties without consent:

- law enforcement agencies in accordance with the requirements of the Criminal Procedure Code of the Republic of Kazakhstan;
- courts in accordance with the requirements of the civil procedural, administrative procedural and procedural codes of the Republic of Kazakhstan;
- bodies of enforcement proceedings within the framework of the Law of the Republic of Kazakhstan "On enforcement proceedings and the status of bailiffs";
- to state bodies for statistical purposes in accordance with the Law of the Republic of Kazakhstan "On State Statistics" with the obligatory condition of their depersonalization;
- state bodies that regulate, control and supervise the financial market and financial organizations in accordance with the legislation of the Republic of Kazakhstan;
- other persons in cases established by the Law of the Republic of Kazakhstan "On Personal Data and their Protection" and other laws of the Republic of Kazakhstan.

3.7. Employees of third-party organizations may be allowed to familiarize and work with documents containing official, commercial secrets or confidential information of the Company, if there is an agreement and / or a confidentiality agreement between these organizations and the Company, a motivated written request from those organizations in which they work, indicating topics of the task being performed and the last name, first name and patronymic of the employee.

4. Preservation and verification of documents

4.1. Documents containing official and commercial secrets of the Company must be stored in the office premises in securely locked safes or metal cabinets (boxes) that ensure their physical safety .

4.2. Computers containing confidential information and information constituting official and/or commercial secrets must be password protected without fail. In case of dismissal of an employee who has access to official and commercial secrets, the head of the department is obliged to ensure that logins / passwords for access to information systems, databases and computers that are in his area of responsibility are changed.

4.3. The originals or copies of documents containing official and / or commercial secrets may be kept by the contractor for the period necessary to complete the task, provided that they are fully preserved, under his personal responsibility.

4.4. It is not allowed for employees to leave originals and copies of documents containing official and/or commercial secrets on desktops, network printers and copiers.

4.5. About the facts of the loss of documents containing official and commercial secrets, or the disclosure of information contained in them, immediately notify the head of the structural unit and the head of the Information Protection Sector. At the same time, these persons must be informed about the circumstances of the loss of documents.

4.6. For an official investigation of the fact of the loss of documents containing commercial and official secrets, or the fact of disclosure of information contained in these materials, a commission may be created by order of the Chairman of the Board-Rector or a person replacing him. The materials collected by the commission during the investigation of such facts and the conclusion of the commission (act) on the results of the investigation are the basis for bringing the perpetrators to responsibility established by law.

5. Restrictions related to the use of information constituting official and commercial secrets

5.1. Employees who have access to the official and commercial secrets of the Company are obliged to:

5.1.1. keep official and commercial secrets that became known in connection with the performance of their job duties;

5.1.2. comply with the requirements of this Instruction, other provisions, orders to ensure the safety of official and commercial secrets;

5.1.3. not to use information containing official and commercial secrets to engage in activities that, as a result of a competitive action, may cause damage to the Company and its employees;

5.1.4. in case of dismissal, transfer all carriers of information constituting an official and / or commercial secret to his immediate supervisor or a person indicated by him, according to the act of acceptance and transfer.

5.2. Employees are prohibited from :

5.2.1. conduct conversations concerning the content of the official and / or commercial secrets of the Company in the presence of unauthorized persons or employees of the Company, whose competence does not include these issues;

5.2.2 . use information containing official and / or commercial secrets in documents, articles intended for publication in the open press, speeches, interviews, etc. without a corresponding order or permission from the management, taking into account the requirements described in clauses 3.6;

5.2.3. state in writing information containing commercial secrets in statements on personal issues, complaints, requests;

5.2.4. make notes, calculations, etc., revealing trade secrets, in personal notebooks, notebooks, personal computers;

5.2.5. take photographs, make copies of documents containing official and/or commercial secrets without appropriate permission;

5.2.6. accumulate in the desktops unnecessary for work documents containing official and / or commercial secrets;

5.2.7. remove from the premises, offices documents containing official and / or commercial secrets without the permission of the Company's managers supervising structural divisions;

5.2.8. place documents containing official and/or commercial secrets in global and local information networks.

6. Responsibility

6.1. In case of disclosure or illegal use of official or commercial secrets, the employee bears responsibility established by the legislation of the Republic of Kazakhstan.

7. Final provisions

7.1. This Instruction comes into force from the moment of its approval.

7.2. Changes, additions to this Instruction may be made on the basis of the relevant Decision of the Board of Directors of the Company.