D-10

Policy on Cookies and Similar Technologies

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1.0	**01.10.2026**	**01.10.2026**

Operator	Original language	Publication URL
SteppeGate LLP, BIN 260140019690, Republic of Kazakhstan	**Russian**	**https://dalaway.kz/legal/cookies**

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1. General Provisions

1.1. This Policy describes the cookies and similar technologies used on the dalaway.kz website (the “Website”) and the Dalaway digital platform at app.dalaway.kz (the “Platform”), their purposes and how visitors control them.

1.2. The Operator of the website and Platform is SteppeGate LLP, BIN 260140019690.

1.3. This Policy supplements the Privacy and Personal Data Processing Policy. Where information obtained through the listed technologies constitutes personal data, the Privacy Policy applies to it.

1.4. This Policy applies to website visitors and Platform Users whether or not they have an account.

2. Cookies and Similar Technologies

2.1. A cookie is a small file stored by a visitor’s browser at a website’s request and sent back on subsequent requests.

2.2. Similar technologies include on-device browser storage (localStorage, sessionStorage), session identifiers, pixels and web beacons, and device identifiers in a mobile application.

2.3. This Policy applies to all the technologies listed, regardless of their names. Some information specified in section 4 is stored in local browser storage rather than cookies; this does not affect the applicable legal regime.

2.4. First-party and third-party technologies. First-party technologies are set by the Operator’s domains: dalaway.kz, app.dalaway.kz, api.dalaway.kz. Third-party technologies are set by the domains of providers engaged by the Operator and are listed in section 4.

3. Categories and Legal Regime

3.1. Categories:

Category	Purpose	Regime
Strictly necessary	Authentication, session maintenance, file access control, security, saving the visitor's choice in the consent panel and the selected Website language	Set without consent: logging in and operating the Platform are impossible without them
Functional	Saving the interface settings selected by the User	Set after login in connection with performance of the Agreement
Entries made before an account is created	Record of deferred review of a legal document	Created before login and before account creation. The regime is described in section 3-1
Analytics	Visit statistics, performance measurement and detection of display errors	Used only on the informational pages of the Dalaway website and only with visitor consent under section 5
Advertising and targeting	—	Not used. The Operator does not display third-party advertising, transfer information to advertising networks or create advertising profiles. Transmission of information to analytics providers' advertising systems is disabled in the settings of the relevant services

3.2. Before login, the Operator does not set cookies or write information to local browser storage, except for: entries listed in section 3-1; the entry recording the visitor's choice in the consent panel (`dalaway-cookie-choice`) and the Website language entry (`dalaway-locale`), listed in section 4 as strictly necessary, without which the visitor's choice cannot be

implemented and the Website cannot be shown in the language selected; the Platform browser session marker (`dalaway_browser_session`); and analytics entries set after consent under section 5.

3.2-1. Analytics technologies are used only on the informational pages of the Dalaway website. Third-party counters, analytics scripts, visitor activity recording and click heatmap tools are not loaded on registration, login or access recovery pages, or within the Platform.

3.3. Strictly necessary technologies cannot be refused: without them, login and delivery of files accessible only to the User do not work. Refusing them is equivalent to declining to use the Platform.

3.4. The User may delete functional entries at any time through the browser. Deletion resets the interface to its default settings. It does not restrict access to Platform functionality. Logging out deletes authorisation data but does not automatically delete all interface settings.

3-1. Entries Created Before Account Creation

3-1.1. Time of consent. Consent to the collection and processing of personal data is given through a separate action before the verification code request button is pressed. Sending a code to the email address provided by the visitor constitutes transfer of that address to the transactional email provider located outside the Republic of Kazakhstan and takes place only after consent is given. Without the checkbox being selected, the server rejects the code request and the address is not transferred to the provider.

3-1.2. The Consent text and this Policy are available before that time. Consent given at the final registration step is insufficient for an earlier code transmission. Requesting another code under the same consent does not require renewed acceptance of unchanged text.

3-1.3. The record of deferred review contains no personal data, is not linked to an account on the Operator’s side, and is retained until the tab session ends. It does not constitute acceptance of a document: mandatory documents are accepted through a separate action.

4. List of Technologies Used

The list reflects the technologies actually used on the publication date and is kept up to date.

4.1. Website dalaway.kz

Strictly necessary

Name	Storage location	Purpose	Data	Period
dalaway-cookie-choice	Browser local storage, dalaway.kz	Saving the visitor’s choice in the consent panel. Created without consent because the choice cannot be implemented without it	Selected categories, date and time of the choice, Policy version number	12 months; requested again when a new version of the Policy is published
dalaway-locale	Cookie, dalaway.kz, path `/`, SameSite=Lax, Secure	Showing the Website in the language selected by the visitor	Language code	12 months

Analytics — set only after consent

Provider	Tool	Purpose	Data	Where processed	Provider policy
Google	Google Analytics	Statistics on visits and behaviour on pages	Browser identifier, network address, addresses of pages viewed, device and browser type, approximate region	Outside the Republic of Kazakhstan	policies.google.com/privacy
Google	Google Tag Manager	Managing the loading of analytics tools	Technical information about tools being loaded	Outside the Republic of Kazakhstan	policies.google.com/privacy
Yandex LLC	Yandex Metrica	Visit statistics, performance measurement and detection of display errors	Browser identifier, network address, addresses of pages viewed, device and browser type, approximate region, clicks on external links	Outside the Republic of Kazakhstan	yandex.ru/legal/confidential

Yandex Metrica sets entries with the `_ym` prefix in cookies and browser storage, including `_ym_uid`, `_ym_d` and `_ym_isad`. Their periods are set by the provider. If the visitor declines analytics or withdraws consent, the Website deletes all entries with the `_ym` prefix.

If a tool sets several entries, all are included in the list. The Operator keeps the list up to date and updates it when the set of tools used changes.

Visitor activity recording, session replay and click heatmap tools are not used. Advertising networks and pixels are not loaded.

4.2. Platform app.dalaway.kz

Strictly necessary

Name	Storage location	Purpose	Data	Period
dalaway-access-token	Cookie, HttpOnly, Secure; host api.dalaway.kz only; path `/v1/files/resolve`; SameSite=Lax	Confirming the User's entitlement to receive a protected file	Access token	1 hour or until logout
dalaway_browser_session	Cookie, app.dalaway.kz, path `/`, SameSite=Strict, Secure	Browser session marker: if it is absent, saved tokens are deleted and the login does not survive closing the browser	Technical flag, contains no personal data	Until the browser is closed
accessToken	Browser local storage	User authentication and authorisation	Access token	1 hour; deleted on logout and when the browser is closed
refreshToken	Browser local storage	Extending the session without re-entering the password	Refresh token	The session ends after 2 hours of inactivity and no later than 12 hours after login; deleted on logout and when the browser is closed

Functional — created after login

Name	Storage location	Purpose	Data	Period
dalaway.locale	Browser local storage	Interface language	Language code	Until deleted by the User
dalaway.activeOrganizationId	Browser local storage	Selected company	Company identifier	Until logout
dalaway.tradeMode:⟨user and company identifiers⟩	Browser local storage	Active work section (selling / buying)	Section identifier	Until deleted by the User
dalaway.sidebar.expanded	Browser local storage	Sidebar state	“Expanded / collapsed” flag	Until deleted by the User
dalaway.dealFee.expanded	Browser local storage	State of the Fee block in a Transaction	“Expanded / collapsed” flag	Until deleted by the User
dalaway.market.viewCurrency	Browser local storage	Currency in which prices are shown in the marketplace	Currency code	Until deleted by the User
dalaway.notificationCenter.v2	Browser local storage	Tab and filter of the notification centre	Tab code, “unread only” flag	Until deleted by the User

Tab session entries

Name	Storage location	Purpose	Data	Period
dlw:legal-gate-dismissed	Browser session storage	Record of deferred review of a legal document	Document code and version number	Until the tab is closed
dlw:legal-gate-recoveries	Browser session storage	Counter of repeated displays of the consent window	Number	Until the tab is closed
sessionUserChanged	Browser session storage	Warning that another user has logged in in another tab	Flag	Until the next page load

Analytics and third-party technologies are not used within the Platform.

4.3. The current version of the list is published at this Policy's address. Before any analytics technology is enabled, the list is updated and consent is requested under section 5.

5. Consent to Analytics Technologies

5.1. This section applies to the analytics technologies listed in section 4. It does not affect consent to personal data processing given before requesting a verification code (section 3-1), or other consents provided for in the Operator's documents.

5.1-1. This section applies only to the informational pages of the Dalaway website.

5.2. On the first visit, a choice panel is displayed containing a brief description of the categories, names of the tools used, an indication that collected information may be processed outside the Republic of Kazakhstan, a link to this Policy and three equivalent actions: "Accept All", "Necessary Only" and access to category settings.

5.2-1. No analytics technology is loaded before the visitor makes a choice. Before that choice, no analytics scripts or tag manager are executed and no requests are sent to providers' servers. A panel displayed after such tools have loaded does not constitute consent.

5.3. Accept and reject buttons are equally accessible and appear on the first screen of the banner.

5.4. Silence, closing the panel and continuing to browse do not constitute consent and are equivalent to selecting "Necessary Only". Only strictly necessary technologies are set before the visitor's choice.

5.5. The visitor's choice is saved for twelve months, after which it is requested again.

5.6. The choice may be changed at any time under section 6. Changes apply prospectively; previously set files in disabled categories are deleted.

5.7. The visitor's choice is stored in their browser in the `dalaway-cookie-choice` entry with the date, time, selected categories and version number of this Policy. The choice is not transmitted to the Operator's servers.

5.8. Withdrawal of consent applies prospectively. Information collected before withdrawal is processed under the relevant providers' policies. The Operator considers requests for deletion in respect of processing it carries out itself and coordinates with the engaged provider. Requests are sent to privacy@dalaway.kz.

6. Settings Panel and Browser Controls

6.1. Cookie Settings. The “Cookie Settings” link appears at the bottom of every Website page and opens the choice panel under section 5. Analytics technologies are not used within the Platform, and the choice panel is not displayed there.

6.2. Visitors may also manage cookies and local browser storage through their browser by blocking them, deleting saved entries and setting notifications. Deleting website data may end the current session and reset interface settings. Blocking strictly necessary technologies makes login impossible.

7. Data Obtained Through the Listed Technologies

7.1. All the information listed in section 4 is processed: access and refresh tokens, interface settings selected by the User, the visitor’s saved choice in the consent panel, the selected Website language, the record of deferred review and, where the visitor consents to analytics technologies, the browser identifier, network address, addresses of pages viewed, device and browser type and approximate region.

7.2. Tokens relate to the User’s account and, to that extent, constitute personal data. Their processing is legally based on performance of the Accession Agreement and the Consent to the Collection and Processing of Personal Data.

7.3. Interface settings contain only technical identifiers of the account and the company and are used solely in the User’s browser. The record of deferred review contains no personal data.

7.4. Retention periods are specified in section 4 and do not exceed those established in section 13 of the Privacy Policy.

7.5. Profiling, tracking behaviour across websites and creating advertising profiles are not carried out.

8. Transfer to Third Parties

8.1. Information obtained through the analytics technologies listed in section 4 is transferred to their providers specified in that section and only after the visitor’s consent. The information transferred and each provider’s policy are specified in the list in section 4.

8.1-1. Information obtained through strictly necessary and functional technologies and through entries made before account creation is not transferred to third parties.

8.2. Where a service provider using its own storage technologies is engaged, the categories of recipients and, for cross-border transfers, the countries where they are located are

specified in sections 10 and 11 of the Privacy Policy, and the list in section 4 of this Policy is updated before use begins.

8.3. The Operator does not sell or transfer this information to advertising networks, data brokers or other third parties for their own purposes.

9. Visitor Rights

9.1. A visitor who is a personal data subject has the rights established in section 17 of the Privacy Policy, including the rights to information about processing, to its blocking and to withdrawal of consent.

9.2. Requests are sent to privacy@dalaway.kz.

10. Changes to This Policy

10.1. Changes are published at this Policy's address with the publication date and effective date.

10.2. Changes introducing analytics technologies trigger section 5 and require the visitor's choice to be requested before their use begins.

10.3. Each version is retained in the archive at a permanent address.

Version history. Current version — 1.0 of 01.10.2026, effective from 01.10.2026. No previous versions.