

MatPo

Privacy Policy

Version 1.3.1

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Platform: <https://matpo.kz>

This Privacy Policy describes how MatPo collects, uses, stores, shares, and protects personal information when users access or use the Platform. It is intended to provide transparent information to users and to support the lawful and responsible operation of MatPo as a Kazakhstan-based technology platform primarily designed to connect businesses while also allowing individual users to discover suppliers, design service providers, and submit business-related requests.

1. Introduction

Welcome to MatPo.

MatPo is a technology platform primarily designed to connect businesses while also allowing individual users to discover suppliers and design service providers and to submit business-related requests within the construction and finishing materials industry. Through the Platform, Users can discover suppliers and service providers, publish Material Tenders and Design Tenders, post construction-related Projects, showcase products and services, send Direct Requests, receive responses, use CompareBoard and Moodboard, and access membership-based and advertising-related business features.

This Privacy Policy explains what personal information we collect, how we use it, when it may be shared, how long it may be retained, how we protect it, and what choices and rights may be available to you.

By accessing or using MatPo, creating an account, submitting information, publishing content, or otherwise interacting with the Platform, you acknowledge that you have read and understood this Privacy Policy.

2. About MatPo and the Data Operator

MatPo is operated by Limited Liability Partnership "Matpoint" (TOO "Matpoint"), a company registered in the Republic of Kazakhstan.

For the purposes of this Policy, TOO "Matpoint" is the owner and operator of the personal data handled through the MatPo Platform. Third-party providers may also have independent responsibilities under applicable law and their own terms and privacy policies.

In this Privacy Policy:

- "MatPo", "Platform", "we", "our", and "us" refer to Matpoint LLP and the MatPo digital platform.
- "User", "you", and "your" refer to any person or organization accessing or using MatPo.
- "General User" refers to a User primarily using buyer-oriented Platform features.
- "Supplier" refers to companies or business users who create supplier profiles, publish products, and respond to relevant opportunities.
- "Design Service Provider" refers to users who create design service profiles and respond to design-related requests or tenders.
- "Administrator" refers to authorized MatPo personnel who manage the Platform and perform operational, moderation, compliance, and support functions.
- "Personal Information" means information relating to an identified or identifiable natural person, including information that may identify a person directly or indirectly under applicable law.

- "CompareBoard" means the Platform feature allowing registered Users to compare products.
- "Moodboard" means the Platform feature allowing registered Users to collect and organise products for project planning.
- "Advertising Services" means promotional and visibility services offered by MatPo.

Capitalized terms not defined in this Privacy Policy have the meanings assigned to them in the MatPo Terms of Service.

3. Scope of this Policy

This Privacy Policy applies to information processed through the MatPo Platform, including:

- the MatPo website and related pages;
- account registration and authentication;
- supplier company profiles;
- design service provider profiles;
- product listings and product images;
- Material Tenders, Design Tenders, and Projects;
- direct requests and responses between users;
- reviews, ratings, and other user-generated content;
- CompareBoard and Moodboard functionality available to registered Users;
- Advertising Services and related paid promotional features;
- membership and subscription administration;
- customer support and operational communications;
- technical logs, analytics, security, and fraud-prevention processes;
- integrations with hosting, storage, email, payment, customer support, and similar service providers.

This Policy applies regardless of the device, browser, or technology used to access the Platform.

4. Privacy Principles

MatPo is designed around the following privacy principles:

- We collect personal information only where reasonably necessary for the operation of the Platform, the provision of services, security, legal compliance, customer support, and legitimate business purposes.
- We do not sell personal information.
- We aim to provide users with clear information about how their data is used and shared.
- Access to personal information is limited according to role, feature, permission model, and legitimate operational need.
- We use reasonable technical and organizational measures to protect information against unauthorized access, misuse, alteration, disclosure, or destruction.
- We expect users to publish only information they are authorized to share, especially when posting company details, images, documents, product information, portfolio materials, reviews, or tender content.

5. Account Types and Platform Roles

5.1 Visitors

Visitors may access certain public parts of the Platform without creating an account. Public content may include selected supplier profiles, product listings, design service profiles, categories, publicly visible Projects, selected tender information, reviews, and general informational pages.

Visitors cannot use account-based features such as publishing tenders, posting Projects, managing dashboards, responding to opportunities, or accessing private account information.

5.2 General Users

General Users may publish and manage Material Tenders, Design Tenders, Projects, and related requests. They may communicate with Suppliers and Design Service Providers through the Platform where the relevant feature allows it.

5.3 Suppliers

Suppliers may create and manage company profiles, select business categories, publish product listings, upload product images, respond to relevant Material Tenders, receive direct requests, use membership-based features, and access supplier dashboard tools.

5.4 Design Service Providers

Design Service Providers may create and manage service profiles, upload portfolio materials and documents, receive design service requests, respond to Design Tenders, and access design-service dashboard tools.

5.5 Administrators

Administrators operate, secure, moderate, and support the Platform. Administrator access is intended for legitimate operational, compliance, security, support, and moderation purposes. It is not intended for routine review of private user communications without an appropriate reason.

6. Information We Collect

The information we collect depends on how you interact with MatPo and which account type or Platform features you use.

6.1 Account Information

When you register or manage an account, we may collect:

- full name or contact person name and username;
- email address;
- phone number;
- password, stored in hashed form;
- account role and occupation or professional activity, where provided;
- account status and verification status;
- city, country, or business location;
- account preferences and communication settings.

6.2 Supplier Information

Supplier accounts may provide company and business information such as:

- company, trading and legal names, business address, and registration type, where applicable;
- company description;
- business categories;
- company logo;
- business website;
- phone and email contact details;
- product names, descriptions, specifications, categories, images, and variants;
- membership plan, membership status, and subscription-related records;
- company analytics such as product and profile views, website clicks, and CompareBoard or Moodboard interactions.

Supplier profile and product information may be displayed publicly or to relevant users in order to allow business discovery and Platform functionality.

For Kazakhstan company Supplier applications, the submitted BIN or IIN and relevant business-verification information are used for administrative review and duplicate-account prevention. While review is pending,

MatPo stores the full number in encrypted form, its last four digits and a protected comparison value; the full number is not published. On approval, the recoverable number and stored last four digits are removed from active verification fields; only the protected comparison value remains to prevent duplicate approved accounts. On rejection, all three representations are removed from those fields, so the rejected application does not reserve the number. A match alone does not establish fraud or authority to represent a business. Historical copies are addressed in Section 14.1.

6.3 Design Service Provider Information

Design Service Providers may provide:

- company or service provider name;
- contact person details;
- service categories and specializations;
- professional description;
- portfolio files or project examples;
- certificates or supporting documents;
- logo, images, and other profile materials;
- contact information and service request history.

Certain profile information may be displayed publicly to allow users to evaluate available design services.

6.4 Material Tenders, Design Tenders, and Projects

General Users may submit and manage content through Material Tenders, Design Tenders, and construction-related Project postings. Depending on the feature used, this information may include:

- tender or project title;
- description of requested materials, services, or work;
- quantity and unit information;
- delivery or project location;
- estimated budget or budget range;
- deadlines and status information;
- images, drawings, files, and supporting documents;
- contact information necessary to process the request.

Information submitted through these features may be visible to Suppliers, Design Service Providers, Administrators, or other authorised Users according to the Platform access rules and the purpose of the relevant feature. Some tender or Project information may be public or semi-public to allow relevant Users to discover, review, and respond to opportunities. Tender owner contact details are not disclosed to responding Suppliers or Design Service Providers unless the tender owner chooses to share them through the applicable Platform workflow.

6.5 Communications and Requests

When you communicate through MatPo, we may process Direct Requests, tender responses, Project inquiries, design service requests, support requests, and related metadata such as date, sender, recipient, status, and response information. When a User submits a Direct Request, the contact details submitted with that request are shared with the selected Supplier or Design Service Provider solely for the purpose of responding to that request.

6.6 User-Generated Content

We may process content that users voluntarily submit or publish, including profile descriptions, product descriptions, images, reviews, ratings, comments, tender documents, project attachments, portfolios, certificates, and other materials.

6.7 Payment and Subscription Information

MatPo may offer paid Memberships, Advertising Services, or other paid services. Payment transactions may be processed by independent third-party payment providers. MatPo does not store complete payment card

numbers, CVV codes, or other sensitive payment credentials on its own servers. We may receive limited transaction-related information necessary to verify payment status, activate Memberships or Advertising Services, issue invoices where applicable, prevent fraud, and maintain business records.

6.8 Technical and Usage Information

When you use the Platform, technical and usage information may include IP address, browser and device information, language preferences, session identifiers, relevant page and feature interactions, timestamps, error reports and security logs. Supplier Analytics uses protected identifiers to limit repeat counting and produce activity statistics. These identifiers remain subject to the safeguards described in this Policy.

6.9 Cookies and Similar Technologies

We may use cookies, local storage, session storage, scripts and similar technologies to maintain sessions, remember preferences, improve security, provide support tools, understand usage and improve the Platform. Further details are set out in Section 13 and the MatPo Cookie Policy.

7. How We Use Information

We process information only where reasonably necessary for legitimate Platform, contractual, legal, security, operational, or user-requested purposes.

7.1 Account Creation and Management

We use information to create accounts, authenticate users, verify account ownership, manage account preferences, provide access to role-specific features, and maintain the integrity of user accounts.

7.2 Providing Platform Services

We use information to publish and manage company profiles, product listings, service profiles, Material Tenders, Design Tenders, Projects, Direct Requests, responses, Reviews, Memberships, Advertising Services, CompareBoard, Moodboard, and related Platform features.

7.3 Communications

We may use information to send account-related messages, verification messages, security notices, membership updates, support responses, service announcements, legal updates, and other transactional communications. We do not send marketing communications unless permitted by applicable law or where you have chosen to receive them.

7.4 Security, Fraud Prevention, and Moderation

We may process information to detect fraud, prevent abuse, investigate suspicious activity, enforce Platform rules, protect users, maintain security, and respond to violations of our Terms of Service or other applicable policies.

7.5 Platform Improvement

We may use aggregated, statistical, or non-identifiable information to improve user experience, search, performance, reliability, usability, and future Platform functionality. Where reasonably possible, analytics are performed using information that does not directly identify individual users.

7.6 Legal and Business Operations

We may process information to comply with legal obligations, maintain accounting and business records, respond to lawful requests, resolve disputes, establish or defend legal claims, conduct internal reporting, and support business continuity.

8. Legal Basis and Consent Principles

Personal data collection and processing require your consent or the consent of your lawful representative, except where Kazakhstan law permits or requires processing without consent. The purposes described in this Policy do not themselves replace that legal requirement. Publication, disclosure to other users or service providers, and cross-border transfers are subject to the applicable consent requirements and statutory exceptions.

You may send a consent-withdrawal request to info@matpo.kz. MatPo will stop the relevant processing within fifteen (15) working days or provide a reasoned refusal where the law permits continued processing. Statutory restrictions, including those concerning unperformed obligations, remain applicable. Withdrawal may make the affected account or feature unavailable where it depends on that processing.

Submitting a Direct Request instructs MatPo to share the contact details supplied with the selected recipient for that request, as described in Section 9.3. This Policy does not, by itself, constitute consent to unrelated processing or marketing.

9. Visibility and Sharing of Information

MatPo is designed to facilitate business communication and discovery. Certain information is therefore shared with other users where necessary for the operation of the Platform. We do not sell personal information.

9.1 Public Information

Some information is intentionally made publicly visible, such as selected company profile information, product listings, business descriptions, categories, design service profiles, portfolio information, selected Project or tender information, reviews, ratings, and other content that users choose to publish.

Users should not publish confidential, unlawful, or unauthorized information in public or semi-public Platform areas.

9.2 Information Shared Between Users

Information submitted through Material Tenders, Design Tenders, Projects, Direct Requests, responses, CompareBoard, Moodboard, and similar collaboration or evaluation features may be shared with or displayed to Users participating in the relevant workflow. In particular, Supplier Content displayed through CompareBoard and Moodboard may be viewed, compared, saved, or exported by registered Users in accordance with the Platform functionality and the Terms of Service. The exact information shared depends on the feature, account type, Membership status, and access rules applicable to that workflow.

9.3 Contact Information

By submitting a Direct Request, a User expressly authorises MatPo to disclose the contact details submitted with that request to the selected Supplier or Design Service Provider solely for the purpose of responding to that request. Recipients must not use such contact information for unrelated marketing, resale, or unlawful purposes. Tender owner contact details are not disclosed to responding Suppliers or Design Service Providers unless the tender owner chooses to share them through the applicable Platform workflow.

9.4 Administrative Access

Authorized MatPo personnel may access certain user information, including communications submitted through the Platform, only where reasonably necessary to investigate suspected fraud or abuse, investigate violations of Platform policies, respond to user reports or support requests, protect the security or reliability of the Platform, comply with legal obligations or lawful requests, or resolve disputes involving the Platform or its users.

Administrative access is limited to personnel with appropriate authorization and is intended solely for operational, security, legal, moderation, and customer support purposes. MatPo does not routinely monitor or review private user communications without an appropriate operational, legal, security, moderation, or support-related reason.

9.5 Service Providers

We may share information with trusted service providers that assist us with hosting, databases, file storage, email delivery, payment processing, customer support, analytics, security, fraud prevention, and similar operational services. These providers receive only the information reasonably necessary to perform services on our behalf and are expected to protect such information in accordance with applicable law and contractual obligations.

9.6 Legal Disclosure

We may disclose information where reasonably necessary to comply with applicable laws or regulations, respond to lawful requests from competent authorities, enforce our agreements, investigate suspected unlawful activity, protect rights and safety, or establish, exercise, or defend legal claims.

10. User Communications and Moderation

MatPo provides communication features to support legitimate business interaction between users. Users are responsible for the accuracy, legality, and appropriateness of the communications and materials they submit.

MatPo may review communications or related records where reasonably necessary for security, support, fraud prevention, abuse investigation, legal compliance, dispute resolution, or policy enforcement. MatPo may restrict, remove, disable, or preserve content where necessary to protect users, comply with law, or enforce Platform rules.

11. Payments, Memberships, and Billing

MatPo may provide paid Memberships, Advertising Services, or other paid business features. Payment processing may be handled by independent third-party payment providers. Such providers may collect and process payment information under their own terms, privacy policies, security standards, and legal compliance obligations. MatPo does not store complete payment card numbers, CVV codes, or other sensitive payment credentials on its own servers.

MatPo may process limited billing, Membership, Advertising Services, invoice, payment status, plan, subscription, and administrative records to activate services, manage paid features, prevent abuse, maintain accounting records, comply with legal obligations, and resolve payment-related support or dispute matters.

12. Third-Party Services

To operate the Platform, MatPo may use third-party service providers. These may include cloud hosting providers, database providers, file storage providers, payment service providers, email and notification providers, customer support tools, analytics tools, security tools, and fraud-prevention providers.

Third-party services may process information under their own privacy policies where they act independently. Users should review the relevant third-party terms where applicable.

12.1 Hosting, Database, and File Storage

Platform data and uploaded files may be stored with infrastructure and storage providers. Uploaded files such as images, documents, portfolios, certificates, and tender attachments may be stored using external file-storage infrastructure. MatPo uses Vercel for website infrastructure, Neon for database services, and Cloudflare R2 for uploaded-file storage and delivery. Data location and transfers are addressed in Section 18.

12.2 Payment Providers

Payment providers process payments and may handle payment credentials directly. Payment providers operate independently and are responsible for their own compliance obligations relating to payment processing, payment security, card data handling, refunds, chargebacks, and transaction monitoring. MatPo does not control provider-side processing of complete payment card data.

12.3 Communication and Support Providers

MatPo may use providers to send emails, verification messages, notifications, and customer support communications, and to provide chat or support functionality. Such providers may process contact details, message content, device information, IP address, or other information necessary to deliver those services. These services include Infobip email delivery and JivoChat support. When the configured support widget loads, the signed-in user's name, email and phone may be supplied to JivoChat to identify the support conversation, including before the user sends a chat message.

13. Cookies and Similar Technologies

MatPo may use cookies, local storage, session storage, scripts, and similar technologies to maintain authenticated sessions, remember preferences, improve website performance, enhance security, provide support functionality, analyze usage trends, and improve user experience.

Cookies and similar technologies used on the Platform may include:

- essential cookies and session technologies required for authentication, account access, security, and core Platform functionality;
- functional cookies or local storage used to remember preferences and improve usability;
- performance and analytics technologies used to understand how the Platform is used, diagnose technical issues, and improve reliability;
- support and communication technologies used to provide customer support, chat, notifications, or related assistance;
- security technologies used to detect abuse, protect accounts, prevent fraud, and maintain Platform integrity.

Certain technologies are essential for the operation of the Platform and may remain active while you use our services. Other cookies or similar technologies may be used where permitted by applicable law. Where required by applicable law, users may be provided with choices regarding non-essential cookies.

Users may be able to control cookies through browser settings. Disabling certain cookies may affect authentication, security, preferences, support tools, or other Platform functionality.

14. Data Retention

MatPo retains personal information only for as long as reasonably necessary to fulfill the purposes described in this Policy, comply with legal obligations, resolve disputes, enforce agreements, maintain security, prevent fraud, and protect legitimate interests.

14.1 Account Records

Account information may be retained while the account remains active and, after account closure, for a period reasonably necessary for legal, accounting, security, dispute-resolution, or fraud-prevention purposes.

The BIN/IIN removal described in Section 6.2 concerns active verification fields. Historical copies may remain in restricted backups or recovery history until their applicable retention cycles expire, or in records that must independently be retained by law. These copies are not used for ordinary Supplier review. The protected comparison value remains subject to this Policy and applicable personal-data requirements.

14.2 User Content

User-generated content may remain available for as long as needed to operate the relevant feature. Supplier products made non-public because of Membership expiry or plan limits may be retained in an archived account area for the period described in the Payment and Subscription Policy so that eligible Users can manage or reactivate them. After the applicable archive period, MatPo may delete the content from active systems. Removed or deleted content may remain for a limited period in backups, logs, security records, or legal and business records, or longer where required by law or reasonably necessary for security, fraud prevention, accounting, dispute resolution, enforcement, or legal claims. Archived content is not intended to remain publicly visible merely because it is retained.

14.3 Technical Logs

Technical logs, security logs, access logs, and diagnostic information may be retained for a reasonable period to investigate incidents, maintain system stability, detect abuse, and comply with legal obligations.

15. Data Security

MatPo uses reasonable administrative, technical, and organizational safeguards designed to protect personal information against unauthorized access, misuse, alteration, disclosure, or destruction.

These safeguards may include password hashing, authenticated access controls, role-based authorization, secure communications, monitoring, logging, backup procedures, security maintenance, and operational controls. No method of electronic storage or Internet transmission can be guaranteed to be completely secure. Users should protect their own account credentials and devices.

16. User Rights

Under Kazakhstan law, you have the right to information about the personal data held about you, its sources, purposes and processing and storage periods; access to your data free of charge; correction or supplementation; blocking, anonymisation, deletion or destruction in the cases provided by law; withdrawal of consent as described in Section 8; and consent to or refusal of publication. You may seek protection of your rights from the competent authority or a court.

Requests may be sent to info@matpo.kz. MatPo may request proportionate information to confirm the requester's identity or authority and will respond within the applicable statutory period. Continued retention requires an applicable legal ground; this Policy does not override a right to deletion or a mandatory response deadline.

17. Publicly Available Information

Some information published through MatPo may be considered publicly available or intentionally disclosed for business discovery purposes. Users should carefully consider what information they publish in company profiles, product listings, portfolios, tenders, Projects, reviews, and other public or semi-public areas.

Where applicable law requires consent for publication or dissemination of personal data in publicly available sources, users are responsible for ensuring they have the necessary rights and permissions to publish information about themselves, their company, employees, representatives, products, projects, or third parties. This responsibility does not replace MatPo's own obligations concerning publication and consent.

18. International Transfers and Data Location

MatPo uses international infrastructure and service providers. Relevant account, profile, technical and service information is therefore stored or processed outside Kazakhstan, and may be accessed by the providers described in Section 12 for their respective services.

Cross-border transfers are subject to Kazakhstan law, including applicable consent, protection and storage requirements. Consent must be obtained where required, unless a statutory exception applies. You may request information about the recipients and processing of your data or withdraw consent as described in Sections 8 and 16.

19. Account Suspension, Restriction, and Termination

MatPo may restrict, suspend, or terminate accounts or access to Platform features where reasonably necessary to protect the Platform, enforce the Terms of Service, investigate abuse, prevent fraud, comply with legal obligations, or protect other users.

Information related to restricted, suspended, or terminated accounts may be retained where necessary for legal, security, fraud-prevention, audit, or dispute-resolution purposes.

20. Children and Business Use

MatPo is intended for business and professional use. The Platform is not directed to children, and we do not knowingly collect personal information from persons who are not legally permitted to use the Platform. If we become aware that information has been collected in violation of this Policy or applicable law, we may take reasonable steps to delete or restrict the relevant information and account. Account registration is limited to persons aged eighteen (18) or older.

21. User Responsibilities

Users are responsible for ensuring that information they submit to MatPo is accurate, lawful, and submitted with the necessary authority. This is especially important where a user submits company information, employee or representative contact details, product images, portfolio materials, certificates, tender documents, Project attachments, reviews, or information relating to third parties.

Users should not submit confidential, unlawful, misleading, infringing, or unauthorized personal information through public or semi-public Platform areas. If a user submits information about another person or organization, the user is responsible for ensuring that such disclosure is permitted under applicable law and any relevant contractual or professional obligations.

22. Third-Party Links and External Websites

The Platform may contain links to third-party websites, business websites, payment pages, customer support tools, or external resources. MatPo is not responsible for the privacy practices, security, content, or terms of third-party websites or services that are not controlled by MatPo. Users should review the applicable privacy policies and terms of those third parties before submitting information to them.

23. Security Incidents

If MatPo becomes aware of a security incident involving personal information, we will take reasonable steps to investigate, mitigate and respond. Notifications to competent authorities and affected persons will be made where required by law and within the applicable statutory deadlines.

24. Automated Systems

MatPo may use automated systems to support search, ranking, content organization, spam prevention, fraud detection, security monitoring, and Platform performance. These systems are intended to support Platform operation and are not intended to make solely automated decisions producing legal or similarly significant effects on users without appropriate human oversight where required by applicable law.

25. Changes to This Policy

MatPo may update this Privacy Policy from time to time to reflect changes in applicable law, Platform functionality, business operations, third-party service providers, security practices, or operational requirements.

When material changes are made, we may provide notice through the Platform, by email, or by other reasonable means. The Last Updated date indicates the most recent revision. Continued use of the Platform after an update constitutes acknowledgment of the revised Policy unless applicable law requires additional consent. Where a change requires new consent, an updated Policy or continued use alone does not supply that consent.

26. Contact Information

If you have questions about this Privacy Policy or the way MatPo processes personal information, you may contact us using the details below:

Limited Liability Partnership "Matpoint" (TOO "Matpoint")

BIN: 260640001001

Registered Address: Prospekt Dostyk 89A, Office 20, Medeu District, Almaty 050010, Republic of Kazakhstan

Website: <https://matpo.kz>

General Enquiries: info@matpo.kz

Privacy Enquiries: info@matpo.kz

27. Governing Law

This Privacy Policy is governed by and interpreted in accordance with the laws of the Republic of Kazakhstan, without limiting any mandatory rights or remedies that users may have under applicable law.

Nothing in this Policy limits any mandatory data protection rights or the right to submit a complaint to a competent public authority. Subject to any mandatory forum, procedure, or remedy required by applicable law, disputes arising out of or relating to this Policy or the processing of personal information are governed by the dispute-resolution provisions of the MatPo Terms of Service.

This Privacy Policy is published in English and Russian. In the event of any inconsistency or conflict between the language versions, the Russian version shall prevail.