



**Policies and procedures for the collection, processing and protection of personal data in the autonomous organization of education “Nazarbayev University”**

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## **Section 1. Purpose and application**

1.1. These Regulations and Procedures for the collection, processing, and protection of personal data in the autonomous organization of education “Nazarbayev University” (hereinafter – the Rules and Procedures) establish unified requirements and approaches for ensuring the rights and freedoms of data subjects, as defined in subparagraph 6) of paragraph 2.1 of these Policies and Procedures, during the collection and processing of their personal data, as well as the measures for their protection.

1.2. The purpose of these Policies and Procedures is to ensure compliance with the legislation of the Republic of Kazakhstan in the collection, processing, and protection of personal data at the autonomous organization of education “Nazarbayev University” (hereinafter – the University).

1.3. These Policies and Procedures apply to all subjects of the University.

## **Section 2. Terms / Definitions**

2.1. The following terms and definitions are used in these Policies and Procedures:

1) Law – the Law of the Republic of Kazakhstan dated May 21, 2013 No. 94-V “On personal data and their protection”;

2) Responsible person – an employee appointed by the University who is responsible for organizing the collection and processing of personal data;

3) Personal data – information related to an identified or identifiable personal data subject, recorded on electronic, paper, and/or other physical media, in information and telecommunication networks, and other information systems;

4) Clean desk policy – a set of measures ensuring the absence of confidential documents, including those containing personal data, on the desk after the end of work with them;

5) Clean screen policy – a set of measures ensuring protection against unauthorized viewing of information on a computer screen, including locking the computer when leaving the workplace;

6) Subject – applicant / candidate / prospective student, student / trainee, graduate / former student, University employee, and other individuals who enter into relations with the University, including under civil law contracts, as well as other persons whose personal data are owned by and accessible to the University.

Other terms and definitions not specified in paragraph 2.1 of these Policies and Procedures shall have the meanings defined by the legislation of the Republic of Kazakhstan, as well as other internal regulatory documents of the University.

## **Section 3. Main provisions**

### **3.1. General information**

3.1.1. The objectives of these Policies and procedures are:



- 1) determination of the principles of work in the collection, processing, and protection of personal data;
- 2) definition of the conditions for the collection and processing of personal data, as well as the methods of their protection;
- 3) definition of rights, duties and responsibilities in the collection and processing of personal data.

3.1.2. The collection and processing of personal data of data subjects, as well as ensuring their protection, shall be carried out by the University in compliance with the provisions and requirements established by these Policies and Procedures and the legislation of the Republic of Kazakhstan on personal data.

3.1.3. Personal data processed by the University may be stored on any media and processed by any methods that do not contradict the legislation of the Republic of Kazakhstan, for the purposes specified in clause 3.2.1 and Appendices 2, 3, and 4 to these Policies and Procedures.

### **3.2. Collection and processing of personal data**

3.2.1. The collection and processing of personal data at the University are carried out on paper and/or electronic media to ensure the functioning and statutory activities of the University (the global purpose).

Within the framework of the “global purpose,” the University collects and processes personal data of data subjects to achieve the following objectives (including but not limited to):

- 1) organization of the selection of applicants/candidates/admitted students for pre-university preparatory programs and University educational programs with or without the award of a degree;
- 2) organization of the selection of candidates for vacant positions at the University;
- 3) organization of training of students/listeners in pre-university preparatory programs and educational programs of all levels with or without the award of a degree;
- 4) formalization of labor relations in accordance with the labor legislation of the Republic of Kazakhstan;
- 5) creation and updating of the “Phonebook” directory containing full names, photographs, positions, corporate emails, work phone numbers, and personal mobile phone numbers (if available) of University employees;
- 6) creation and updating of the “Find a Student” directory containing full names, photographs, personal mobile phone numbers (if available), gender, date of birth, corporate email, marital status, and student card numbers of University students;
- 7) organization and facilitation of the participation of data subjects in events held by the University;
- 8) drafting, concluding, and executing contracts, memoranda, non-disclosure agreements, and other agreements with third parties involving the transfer of personal data of data subjects;



9) provision of information upon request of the data subject, private bailiffs, law enforcement and judicial authorities, as well as other state bodies of the Republic of Kazakhstan and authorized organizations in accordance with the legislation of the Republic of Kazakhstan;

10) monitoring the professional development and labor performance of University employees;

11) fulfillment of contractual obligations by the University (e.g., provision of employees' personal data for professional development services under agreements between the University and service providers);

12) issuance of powers of attorney for representing the interests of the University;

13) provision of access to premises/buildings/offices/information systems through the issuance of ID cards, Face ID registration, and creation of user accounts as stipulated by the internal regulatory documents of the University;

14) verification of compliance and fitness for work and study, including identity verification;

15) payment of salaries, scholarships, grants, and other payments to data subjects, as well as maintenance of payment records;

16) provision and accounting of employee leaves and benefits related to temporary disability, maternity leave, and other employment-related actions of the University;

17) calculation, withholding, and remittance of individual income tax, pension contributions, and mandatory social health insurance contributions;

18) ensuring security on the University premises;

19) identification and resolution of conflicts of interest;

20) monitoring compliance by data subjects with the legislation of the Republic of Kazakhstan and internal regulatory documents of the University within internal investigations concerning compliance issues and violations of the University Code of Ethics;

21) conducting marketing activities (mentions in interviews and publications in mass media, social networks, websites, and printed materials);

22) implementation of the University's scientific research projects;

23) collection of statistical and operational reports in accordance with the University's internal documents;

24) creation, maintenance, and updating of databases of applicants/candidates/admitted students, students/listeners, and academic affairs databases;

25) creation, maintenance, and updating of the graduate career development database;

26) exchange of documents and information with graduates;

27) fulfillment by the University of contractual obligations related to medical and other insurance of data subjects (e.g., provision of personal data of data subjects and their family members/dependents for the purpose of providing medical services);

28) provision of access to the University's electronic document management system;



29) verification of medical documents (medical certificate, temporary disability certificate, medical advisory commission certificate, vaccination card, consultation sheet, discharge epicrisis, certificates from psychoneurological and narcological dispensaries) of data subjects whose data are processed in the course of the University's activities;

30) notification of the data subject's emergency contacts regarding his/her health status in case of emergency or urgent medical care needs;

31) provision of documents and/or information, as well as exchange of documents and/or information with the relevant authorized bodies of the Republic of Kazakhstan within the framework of fulfilling the obligation of three-year work commitment for persons trained under the state educational order;

32) monitoring the attachment to the University Health Center outpatient and polyclinic care site, and, if necessary, facilitating detachment from it;

33) replenishment and updating of the national educational database (or other similar state platforms and/or websites) of the authorized body in the field of science and higher education of the Republic of Kazakhstan with information about University students (including personal data of students, decisions on admission, expulsion, transfer from other universities, transfer from scholarship to paid education / from paid education to scholarship, reinstatement, graduation, as well as decisions on academic leaves, etc.) and for the purpose of assigning the status of "graduate";

34) conducting audits and inspections to improve the efficiency of the internal control system and risk management;

35) provision of statistical data and informational materials for the University's website and printed materials;

36) provision of lists containing data of applicants/candidates/admitted students to service providers for entrance examinations, including organizations located outside the Republic of Kazakhstan, for organizing and conducting competitive selection, obtaining, and analyzing test results;

37) provision of lists containing data of applicants/candidates/admitted students, students/listeners for academic processes, assessment, degree awarding, and other purposes;

38) exchange of documents and/or information between structural subdivisions of the University to fulfill official tasks and/or assignments;

39) accounting and management of training, personal development, and academic performance indicators;

40) accounting and management of admissions and admission/competition indicators;

41) provision of information on personal data upon request of government authorities and other authorized organizations in accordance with the legislation of the Republic of Kazakhstan;

42) quality selection of applicants/candidates/admitted students, students/listeners for participation in educational, social, cultural, and sports activities of the University;

43) monitoring compliance with the principles of equality, generally accepted ethics, and the rights and freedoms of the data subject;



44) provision to the applicant/candidate/admitted student, student/listener and their close relatives, as well as their official representatives whose contact information was provided to the University, of any informational materials, including information about the services of the University and its organizations, and other notifications via telephone, facsimile, and other communication means, including open channels (such as SMS, email, fax, etc.);

45) provision of individual counseling by University psychologists;

46) other purposes as may be established by the legislation of the Republic of Kazakhstan.

3.2.2. The list of personal data necessary and sufficient for the implementation of the purposes specified in clause 3.2.1 of these Policies and Procedures is defined in Appendix 1 to these Policies and Procedures.

3.2.3. The collection and processing of a data subject's personal data is allowed only upon the receipt of written consent or other form of consent allowing verification of receipt.

The consent for the collection and processing of personal data must contain the following information:

- 1) name and business identification number (BIN) of the University;
- 2) last name, first name, and patronymic (if applicable), as well as individual identification number (IIN) of the data subject;
- 3) term or period of validity of the consent;
- 4) authorization for the University to transfer the personal data to third parties, including outside the Republic of Kazakhstan, and to publish such data in publicly accessible sources;
- 5) the list of personal data to be provided;
- 6) other information (if necessary).

3.2.4. The consent forms for the collection and processing of personal data are provided in Appendices 2–4 to these Policies and Procedures.

The head of the respective structural unit responsible for collecting and processing personal data must ensure the receipt of consent from the data subject in accordance with clause 3.2.3 of these Policies and Procedures in the following cases:

- 1) if there is a need to collect and process personal data from data subjects not specified in Appendices 2–4 to these Policies and Procedures; and/or
- 2) if the relevant purpose of collection and processing is not specified in the consent forms provided in Appendices 2–4 to these Policies and Procedures.

The collection and processing of personal data not listed in the personal data list (Appendix 1 to these Policies and Procedures) is not allowed.

3.2.5. In cases where, at the time of providing consent for the collection and processing of personal data, the data subject is a minor, consent for the collection and processing of personal data of the applicant/candidate/admitted student or student/listener shall be provided by his or her legal representative.

3.2.6. The responsibility for obtaining consent from data subjects for the collection and processing of personal data by the University lies with the following:

- 1) HR personnel – from University employees;
- 2) Admissions Office personnel – from applicants/candidates/admitted students (if applicable);



3) School personnel – from students/listeners of the University (if not previously provided by the subject), as well as from individuals providing services or performing work under civil-law contracts;

4) Career and Counseling Center personnel – from graduates (if not previously provided by the subject);

5) Employees of other structural units, upon instruction of the heads of such structural units, within the functions of that unit – from individuals providing services or performing work under civil-law contracts, as well as from other data subjects.

Consent for the collection and processing of personal data may also be provided independently by the subject to the University in electronic form when entering personal data into the University's information system.

3.2.7. When the University enters into a contract for the provision of services (performance of work), or a procurement/supply agreement with an individual or legal entity, the initiator of the contract must ensure that the contract contains provisions granting the University the right to collect and process the personal data of the individual, and confirming the individual's consent to such collection and processing.

### **3.3. Access to personal data**

3.3.1. University employees who have access to personal data are required to take and observe necessary measures to protect personal data from unlawful or accidental access, modification, blocking, copying, dissemination, destruction, as well as from other unlawful actions in relation to such information.

3.3.2. Employees of other structural units not specified in Clause 3.3.1 of these Policies and Procedures may be granted access to the personal data of data subjects for the purpose of fulfilling official duties and/or assignments.

3.3.3. Individuals who do not have authorized access to personal data are not permitted to work with such data.

3.3.4. Other employees and students of the University have the right to full access only to their own personal data and the processing thereof.

### **3.4. Accumulation and storage of personal data**

3.4.1. The accumulation of personal data is carried out to ensure the integrity, confidentiality, and availability of personal data. Accumulation is performed through the collection of personal data that is necessary and sufficient to fulfill the tasks carried out by the University.

3.4.2. The storage of personal data is carried out in compliance with conditions that ensure the security of personal data and prevent unauthorized access.

3.4.3. Personal data shall be stored for a period established by the requirements of the legislation of the Republic of Kazakhstan and in accordance with the University's internal regulatory documents.



### **3.5. Transfer of personal data**

3.5.1. The transfer of personal data shall be carried out subject to the availability of the data subject's or their legal representative's consent.

3.5.2. Personal data may be transferred from one structural unit of the University to another solely for the purposes specified in Clause 3.2.1 of these Rules and Procedures.

3.5.3. The transfer of personal data to the territory of foreign states (cross-border transfer of personal data) shall be carried out in accordance with the Law, provided that the data subject or their legal representative has given consent to such cross-border transfer, and only if these foreign states ensure the protection of personal data.

3.5.4. Cross-border transfer of personal data to foreign states that do not ensure the protection of personal data may be carried out with the consent of the data subject or their legal representative to the transfer of personal data to such states, as well as in cases provided for by international treaties ratified by the Republic of Kazakhstan or in other cases provided for by the legislation of the Republic of Kazakhstan.

### **3.6. Anonymization of personal data**

3.6.1. When collecting and processing personal data for statistical, sociological, scientific, marketing, and other research purposes, the University is obligated to anonymize such data in accordance with the requirements of the Law.

3.6.2. Anonymization of personal data shall be carried out by the University prior to its dissemination, using any method of anonymization that does not contradict the legislation of the Republic of Kazakhstan and that allows achieving the objectives of personal data processing.

3.6.3. As a result of the anonymization of personal data, the possibility of identifying the subject of personal data or establishing any connection between the anonymized information and this subject is completely excluded.

### **3.7. Blocking and Destruction of Personal Data**

3.7.1. Blocking of personal data is carried out by the University upon the request of the data subject or their legal representative, as well as upon the request of the authorized body in the field of personal data protection in case of identifying violations of the conditions for collecting and processing personal data.

3.7.2. Unblocking of personal data is carried out if the fact of violation of the conditions for collecting and processing personal data is not confirmed.

3.7.3. Personal data shall be destroyed in the following cases:  
upon expiration of the storage period. The storage period of personal data is determined by the date of achieving the purposes of their collection and processing;  
upon termination of legal relations between the data subject and the University;  
upon the entry into legal force of a court decision;  
upon identification of collection and processing of personal data without the consent of the data subject or their legal representative;





if the collection and processing of personal data by the University were carried out in violation of the requirements of the legislation of the Republic of Kazakhstan; in other cases established by the legislation of the Republic of Kazakhstan.

3.7.4. Destruction of personal data shall be carried out in a manner that excludes further processing, reading, and restoration of such data recorded and stored on physical and electronic media, as well as in information systems.

### **3.8. Protection of personal data**

3.8.1. When working with personal data, all possible measures must be taken to ensure:

- 1) confidentiality of personal data;
- 2) storage conditions of personal data that prevent loss or unauthorized access;
- 3) storage of physical media in service rooms, cabinets, safes (repositories) with secure and controlled access;
- 4) prevention of unauthorized removal of equipment containing personal data from University premises, as well as prevention of unauthorized deletion, installation, or configuration of software by personnel not authorized to perform such work in order to gain access to personal data;
- 5) prevention of physical impact on technical means of automated personal data processing that may impair their functioning.

3.8.2. The University ensures the necessary legal, organizational, administrative, and technical measures for the protection of personal data of data subjects.

### **3.9. Responsibility and Roles in working with personal data**

3.9.1. The responsible person organizing the collection and processing of personal data at the University (hereinafter referred to as the Responsible Person) is obliged to:

- 1) exercise internal control over the University and its employees' compliance with the provisions of the Law and requirements on personal data protection;
- 2) inform University employees about the provisions of the Law regarding personal data processing and personal data protection requirements;
- 3) monitor the reception and processing of requests from data subjects or their legal representatives.

3.9.2. The head of the structural unit responsible for processing personal data:

- 1) ensures the availability of the data subject's consent for processing personal data for the respective purpose, and obtains consent if necessary;
- 2) is responsible for organizing the work on collecting and processing personal data within the activities of their structural unit;
- 3) controls the safety of personal data and takes measures to prevent unauthorized access;
- 4) informs individuals processing personal data about the List of personal data (Appendix 1) and the processing requirements within the structural unit;



5) ensures storage of physical media containing personal data of the data subject, as well as their consent for collection and processing of personal data, in official premises, cabinets, safes (storages) with protected and controlled access (if applicable).

3.9.3. An employee or any other person working with personal data is obliged to:

- 1) comply with the requirements of these Rules and Procedures;
- 2) ensure the integrity and accuracy of information when collecting and processing personal data, both on paper and in information systems;
- 3) ensure confidentiality during the collection, processing, and storage of personal data;
- 4) immediately report to their direct supervisor for further submission to the Responsible Person any cases of unauthorized access by third parties to personal data, including information about:
  - 5) attempts to gain access to personal data;
  - 6) loss or shortage of information carriers containing personal data, identification cards, passes, keys to safes (storages), electronic keys;
  - 7) other facts that may lead to unauthorized access to personal data, as well as the causes and conditions of possible data leakage.

3.9.4. The private institution "Nazarbayev University IT Support," under a separate agreement with the University, is obliged to:

- 1) exercise control over the protection of personal data;
- 2) conduct inspections of business processes related to the collection, processing, and protection of personal data as necessary;
- 3) keep records of incidents in the field of information security;
- 4) provide recommendations and conduct internal investigations regarding personal data protection;
- 5) control access to personal data information systems.

3.9.5. Data subjects are obliged to:

- 1) provide the Operator with accurate personal data;
- 2) promptly and as soon as possible notify about any changes in their personal data.

3.9.6. When working with personal data, persons handling personal data must comply with the “clean desk” and “clean screen” policies.

3.9.7. Responsibility for the collection and processing of personal data in accordance with the legislation of the Republic of Kazakhstan and these Rules and Procedures lies individually with each person working with personal data.

3.9.8. Persons guilty of violating these Rules and Procedures regulating the collection, processing, and protection of personal data bear responsibility in accordance with the legislation of the Republic of Kazakhstan, as well as the internal documents of the University.

## **Section 4. Waiver**

4.1. Not applicable.



## **Section 5. Temporary Provisions**

5.1. Not applicable.

## **Section 6. Revision.**

6.1. These Policies and Procedures should be reviewed annually and revised as necessary.

## **Section 7. Related documents**

7.1. Policies and Procedures on the management of documents and information containing confidential information in the autonomous organization of education “Nazarbayev University”.



Appendix 1  
to the Policy and procedures for the collection,  
processing and protection of personal data  
in the autonomous organization of education  
“Nazarbayev University”

**The list of personal data necessary and sufficient to perform the tasks carried out in the  
autonomous organization of education “Nazarbayev University”**

No. Ser. No.	Name of personal data
1.	Surname, first name, patronymic (if any)
2.	Individual Identification Number (IIN)
3.	Information about the change of surname, first name, patronymic (if any)
4.	Transcription of surname and first name
5.	Birth data: date of birth; place of birth
6.	Nationality
7.	Gender
8.	Data of the identity document: name of the document; document number; date of issue of the document; validity period of the document; the authority that issued the document
9.	Data on citizenship: citizenship (former citizenship); date of acquisition of citizenship of the Republic of Kazakhstan; grounds for acquisition of citizenship of the Republic of Kazakhstan; date of loss of citizenship of the Republic of Kazakhstan; grounds for loss of citizenship of the Republic of Kazakhstan; date of restoration of citizenship of the Republic of Kazakhstan; grounds for restoration of citizenship of the Republic of Kazakhstan
10.	Address of the place of residence, registration address
11.	Contact information (work, home, mobile phone numbers)
12.	Emergency contact details (last name, first name, patronymic (if applicable), phone number, email address, relationship to the individual)
13.	Email address
14.	Portrait image in hard copy (digitized photograph), electronic photo for Face ID verification
15.	Signature (including digital signature (if available))
16.	Information about education, qualifications and availability of special knowledge or special training: date of admission to the educational institution (deductions from the educational institution); series, number, date of issue of a diploma, certificate, certificate or other document on graduation from an educational institution; name and location of the educational institution; faculty or department, qualification and specialty upon graduation from an educational institution; academic degree; academic title; knowledge of foreign languages
17.	Information about marital status: marital status; data of the marriage certificate; data of the certificate of dissolution of marriage;



	Surname, first name, patronymic (if any) data of the identity document and the spouse's IIN; degree of kinship; surnames, first names, patronymics (if any) and dates of birth, place of work, place of study, home address, mobile phone numbers and office phone numbers of other family members, dependents; the presence of children (including adopted children in care) and their age; data of the birth certificate and the child's IIN; data of the death certificate of close relatives
18.	Information on social benefits and social status: (series, number, date of issue, name of the authority that issued the document serving as the basis for granting benefits and status)
19.	Employment information (current employment data): full job title, structural unit, and name of the organization; total and continuous length of service; addresses and phone numbers, as well as the names of other organizations, with full titles of previously held positions and the periods of employment in those organizations.
20.	Information on the presence (or absence) of a criminal record
21.	Information about professional development and retraining: series, number, date of issue of the document on professional development or retraining; name and location of the educational institution; qualification and specialty after graduation from an educational institution
22.	Information about state and departmental awards, diplomas, letters of thanks, honorary and special titles, promotions, certificates; name or title of the award, title or promotion; date and type of the regulatory act on awarding or date of promotion
23.	Information about immediate family members (parents, siblings, guardians): full name (surname, first name, patronymic if applicable) of the relative; place of employment; place of study; home address; mobile phone number and work phone number.
24.	Information on disability: disability category; disability group code; disability group; cause of disability; date of determination and duration of the disability status.
25.	Health information, including data on medical examination results, diagnosis, and outcomes of medical care (medical certificate, temporary disability certificate, medical advisory commission certificate, vaccination record, consultation sheet, discharge summary, certificates from psychoneurological and narcological dispensaries).
26.	Information on military registration of conscripted individuals and those subject to military service: Information on the citizen's status regarding military service, reflected in the citizen's "personal account" on the "electronic government" portal; Series, number, and date of issuance (or surrender) of the military ID card, certificate of registration at the draft office; Name of the authority that issued the military ID card or certificate of registration at the draft office; Military occupational specialty; Military rank, class; Category, registration group; Branch of service; Data on registration or deregistration; Grounds for exemption from military service.
27.	Information on the imposition of disciplinary/administrative penalties
28.	Information about persons entitled to alimony
29.	The field of activity of parents/guardians.



30.	Information about the submission of the declaration on individual income tax and property
31	Information related to research activities (if applicable)



Appendix 2  
to the Policy and procedures for the collection,  
processing and protection of personal data  
in the autonomous organization of education  
“Nazarbayev University”

To \_\_\_\_\_  
from Full name \_\_\_\_\_  
IIN \_\_\_\_\_  
identity card, passport No. \_\_\_\_\_  
date \_\_\_\_\_  
state issuing authority \_\_\_\_\_

**Agreement**

**to process the employee's personal data**

To comply with the Labour Code and the Law of the Republic of Kazakhstan "On personal data and their protection," the **Employee** hereby grants permission to the autonomous organization of education "Nazarbayev University," located at: 53 Kabanbay Batyr Avenue, Astana, 010000, Republic of Kazakhstan, BIN 090740002542 (hereinafter – the **Employer**), to collect and process (accumulate, store, modify, supplement, use, distribute, depersonalize, block, destroy), including transfer to third parties, cross-border transfer, as well as dissemination in publicly available sources, of personal data recorded on electronic and/or paper medium(ia), and/or other material carriers, which may include (including but not limited to):

**1. Information required for proper identification**

1. Surname, first name, patronymic (if applicable), and transcription of surname and first name.
2. Information on changes to surname, first name, patronymic.
3. Birth details: place of birth, date of birth, nationality, gender.
4. Information on marital status: marital state; details of the marriage certificate; details of the divorce certificate; surname, first name, patronymic of the spouse; details of the spouse's identity document and their Individual Identification Number (IIN); degree of kinship; surnames, first names, patronymics, dates of birth, place of employment, place of study, home address, mobile phone numbers of other family members; information about children (including adopted or under guardianship) and their ages; birth certificate data and IIN of the child; details of death certificates of close relatives.
5. Citizenship information: current citizenship (previous citizenship, if applicable);  
Date of acquisition of citizenship of the Republic of Kazakhstan; grounds for acquiring citizenship of the Republic of Kazakhstan; date of loss of citizenship of the Republic of Kazakhstan; grounds for the loss of citizenship; date of restoration of citizenship of the Republic of Kazakhstan; grounds for restoration of citizenship of the Republic of Kazakhstan (if applicable).
6. Identity document details: document type; document number; date of issue; validity period; issuing authority.
7. Individual Identification Number (IIN).
8. Signature (including electronic digital signature, if available).
9. Portrait image on a paper medium (digitized photograph) for documents, electronic photograph for Face ID verification.

**2. Information on Education, Professional Activity, and Employment Status**

1. Employment information (current employment data): full job title, structural unit, name of the organization; total and continuous work experience; addresses and phone numbers, as well as the names of other organizations, with full titles of previously held positions and periods of employment



in those organizations.

2. Education, qualifications, and special skills or training: date of enrollment (or expulsion) from the educational institution; series, number, and date of issue of diploma, certificate, school certificate, or other educational credential; name and location of the educational institution; faculty or department, qualification, and specialty upon graduation; academic degree; academic title; foreign language proficiency.

3. Information on professional development and retraining: series, number, and date of the professional development or retraining certificate; name and location of the educational institution; qualification and specialty upon completion.

4. Information on state and departmental awards, certificates of merit, letters of appreciation, honorary and special titles, commendations, certificates: name or title of the award, title, or commendation; date and type of regulatory act on the award or the date of the commendation.

### **3. Information Required to Maintain Contact**

1. Contact details: work, home, and mobile phone numbers.

2. Email address.

3. Residential address, registration address.

4. Emergency contact information: full name (surname, first name, patronymic (if applicable)), phone number, email address, relationship.

### **4. Other Information Required by the Employer**

1. Health information, including data on undergoing pre-employment, periodic, pre-shift, and other medical examinations (assessments), and documents confirming such information; information on the results of medical examinations, diagnoses, and medical treatment received (medical certificate, certificate of temporary disability, certificate from the medical advisory commission, immunization card, consultation sheet, discharge summary, certificates from psychiatric and narcological dispensaries).

2. Information on military registration of individuals liable for military service and those subject to conscription: details of the individual's military status as reflected in their personal account on the "e-government" portal; series, number, and date of issue (or return) of military ID or registration certificate; name of the authority that issued the military ID or registration certificate; military occupational specialty; military rank, qualification class; category and registration group; branch of service; data on enlistment/discharge from the register; grounds for exemption from military service.

Information on individuals entitled to receive alimony.

3. Information on social benefits and social status: name of the authority that issued the document serving as the basis for granting benefits and status; series, number, and date of issue of the document; cause of disability, disability group; certificate confirming the right to benefits for victims of nuclear tests at the Semipalatinsk nuclear test site; certificate confirming the right to benefits for victims of the environmental disaster in the Aral Sea region.

4. Information on disability: disability category; disability group code; disability group; cause of disability; date of establishment and duration of the disability.

5. Information on criminal record (presence or absence of conviction).

6. Information on the imposition/removal of disciplinary or administrative sanctions.

7. Information on the submission of a declaration of individual income and property.

8. Information related to research activities (if applicable).

The provided information will be used in accordance with the Employer's activities, including but not limited to, the fulfillment of the following purposes:

1. Organization of recruitment for vacant positions at the University;

2. Formalization of labor relations in accordance with the labor legislation of the Republic of Kazakhstan;

3. Creation and updating of the "Phonebook" directory, which includes the full name, photograph, and personal mobile phone number (if available) of the University employee;

4. Organization and facilitation of the employee's participation in events held by the





University;

5. Execution, conclusion, and fulfillment of contracts, memoranda, non-disclosure agreements, and other agreements with third parties, within the framework of which the subject's personal data is transferred;

6. Provision of information upon request of the employee, private bailiffs, law enforcement and judicial authorities, as well as other state bodies of the Republic of Kazakhstan and authorized organizations in accordance with the legislation of the Republic of Kazakhstan;

7. Monitoring the professional development and work performance of the University employee;

8. Fulfillment of contractual obligations by the University (e.g., provision of employee personal data for the purpose of training services under a contract between the University and the service provider);

9. Issuance of a power of attorney to represent the interests of the University;

10. Provision of access to premises/buildings/offices/information systems by issuing ID cards, registering Face ID, and creating user accounts in accordance with internal University documents;

11. Verification of eligibility and suitability for employment or education, including identity verification;

12. Payment of salaries and other compensations, as well as maintenance of records for such payments;

13. Provision and accounting of leaves, sick leaves, maternity leaves, and execution of other related employer actions;

14. Calculation, withholding, and remittance of individual income tax, pension contributions, and mandatory social health insurance contributions;

15. Ensuring safety and security on the territory of the University;

16. Identification and resolution of conflicts of interest;

17. Monitoring employee compliance with the legislation of the Republic of Kazakhstan and internal University regulations, within the framework of internal investigations related to compliance and violations of the University's Code of Ethics;

18. Conducting marketing activities (mentions in interviews and publications in the media, social networks, websites, and printed materials);

19. Implementation of the University's research projects.

20. Collection of statistical and official reports in accordance with the internal documents of the University;

21. Fulfillment by the University of its contractual obligations regarding the employee's medical and other insurance (e.g., provision of personal data of the employee and/or their family members/dependents for the purpose of receiving medical services);

22. Granting access to the University's electronic document management system;

23. Verification of medical documents (medical certificate, certificate of temporary incapacity for work, medical advisory commission certificate, vaccination record, consultation sheet, discharge summary, certificates from neuropsychiatric and narcological dispensaries) of the employee, whose data is processed in the course of the University's activities;

24. Notification of the employee's emergency contacts regarding their health condition in case of the need for emergency or urgent medical assistance;

25. Submission of documents and/or information, as well as exchange of documents and/or information with the relevant authorized bodies of the Republic of Kazakhstan in the framework of the obligation for a three-year mandatory employment period for persons trained under the state educational grant;

26. Monitoring the attachment of the employee to the outpatient clinic at the University Health Center and, if necessary, ensuring detachment from it;

27. Provision of statistical data and informational materials for the University website and printed materials;

28. Conducting audits and inspections to improve the effectiveness of the internal control and risk management system;



29. Exchange of documents and/or information between the University's structural units to carry out official duties and/or assignments;
30. Monitoring compliance with the principles of equality, general ethics, and the rights and freedoms of the employee;
31. Provision of individual psychological counseling;
32. Other purposes that may be established by the legislation of the Republic of Kazakhstan.

**Employee Confirmation:**

I hereby give my consent to the Employer for the collection, processing (accumulation, storage, alteration, supplementation, use, dissemination, anonymization, blocking, destruction), including the transfer to third parties, cross-border transfer, as well as dissemination in publicly accessible sources of my personal data for the purposes specified in this consent.

I hereby also give my consent for the collection and processing of my personal data, including the personal data of my family members / dependents provided in the application for inclusion in the medical insurance program, with their subsequent transfer to the insurance organization for the purposes of insurance and receipt of medical services. I hereby guarantee that I use the personal data of the said family members / dependents on a legal basis and have the right to collect and process such data. I bear responsibility for the legality and accuracy of the personal data provided regarding the said family members / dependents, as well as for obtaining their consent to transfer their personal data for the above-mentioned purposes.

I hereby undertake to promptly notify the Employer in writing of any changes and/or additions to my personal data by submitting the relevant supporting documents to the Employer.

This consent shall remain valid until the purposes of personal data processing are achieved or until other circumstances arise as provided by the legislation of the Republic of Kazakhstan, and may be withdrawn by submitting a written statement.

I (We) have read the text of this consent, and have no additions, comments, or objections.

Full name (in full) \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_



## Appendix 3

to the Policy and procedures for the collection,  
processing and protection of personal data  
in the autonomous organization of education  
“Nazarbayev University”

To \_\_\_\_\_  
from Full name \_\_\_\_\_  
IIN \_\_\_\_\_  
identity card, passport No. \_\_\_\_\_  
date \_\_\_\_\_  
state issuing authority \_\_\_\_\_

**Agreement  
for the processing of personal data of the Applicant / Candidate / Entrant,  
Student / Attendee, Alumni**

In order to comply with the Law of the Republic of Kazakhstan "On Personal Data and Its Protection," the Applicant / Candidate / Entrant, Student / Attendee, Alumni (the appropriate category shall be underlined / highlighted) (hereinafter referred to as the Data Subject) hereby gives consent / permission to the autonomous educational organization "Nazarbayev University" (hereinafter referred to as the University), located at: Republic of Kazakhstan, 010000, Astana, Kabanbai Batyr Ave., 53, BIN 090740002542, for the collection and processing (accumulation, storage, modification, supplementation, use, dissemination, anonymization, blocking, destruction), including transfer to third parties, cross-border transfer, as well as dissemination in publicly available sources of personal data recorded on electronic and/or paper media and/or other tangible media, which may include (but are not limited to):

**1. Information Required for Proper Identification**

1. Last name, first name, patronymic, transcription of last name and first name.
2. Information on changes of last name, first name, patronymic.
3. Birth data: place of birth, date of birth, nationality, gender.
4. Citizenship data: citizenship (previous citizenship); date of acquisition of the citizenship of the Republic of Kazakhstan; grounds for acquisition of the citizenship of the Republic of Kazakhstan; date of loss of citizenship of the Republic of Kazakhstan; grounds for loss of citizenship of the Republic of Kazakhstan; date of restoration of citizenship of the Republic of Kazakhstan; grounds for restoration of citizenship of the Republic of Kazakhstan (if applicable).
5. Information about close relatives (parents, brothers, sisters, guardians): last name, first name, patronymic of the relative; place of work; place of study; home address; mobile and work phone numbers.
6. Identity document data: name of the document; document number; date of issue; validity period; issuing authority.
7. Individual Identification Number.
8. Signature (including electronic-digital signature, if available).
9. Portrait image on paper medium (digitized photo) for documents, electronic photo for Face ID verification.

**2. Education Information**

Information about education, qualifications, and presence of special knowledge or specialized training: date of admission to the educational institution (date of expulsion); series, number, and date of issue of diploma, certificate, attestation, or other document confirming graduation from the educational institution; name and location of the educational institution; faculty or department; qualification and specialty upon graduation; academic degree; academic title; proficiency in foreign



languages.

### **3. Information Required for Maintaining Contact**

1. Contact details (work, home, mobile phone numbers), contact details of emergency contacts (last name, first name, patronymic (if any), phone number, email address, relationship to the subject).
2. Email address.
3. Residential address, registered address (registration).

### **4. Information about Participation in the Competitive Admission Process to the University**

1. Names of exams.
2. Date and place of the exams.
3. Exam results.
4. Results of the stages of the competitive selection.

### **5. Other Information Required by the University**

1. Information about health status, including results of medical examinations, diagnoses, and medical care received (medical certificate, sick leave certificate, certificate from the medical advisory commission, vaccination record, consultation sheet, discharge summary, certificates from psychoneurological and narcological dispensaries).
2. Information about social benefits and social status: name of the authority issuing the document granting benefits and status; series, number, and date of issuance of the document; reason for disability, disability group; certificate confirming the right to benefits for those affected by nuclear tests at the Semipalatinsk nuclear test site; certificate confirming the right to benefits for those affected by the ecological disaster in the Aral Sea region.
3. Information about disability: category of disability; disability group code; disability group; reason for disability; date of establishment and duration of disability.
4. Information about military registration of conscripted persons and persons liable for military service: series, number, and date of issuance (submission) of military ID; name of the issuing authority; military occupational specialty; military rank; data on registration/deregistration; grounds for exemption from military service.
5. Field of activity of parents/guardians (if applicable).
6. Information about ownership or absence of real estate, including that of parents or guardians, in the city of Astana.
7. Information about extracurricular activities, work experience, and career development.
8. Information about the presence or absence of a criminal record.

The specified information will be used in accordance with the activities of the University, including but not limited to the fulfillment of the following purposes:

#### **Subject - Applicant / Candidate / Entrant, Student / Listener**

1. Organization of selection of applicants / candidates / entrants to the pre-university preparation program and other educational programs of all levels, with or without the awarding of a degree;
2. Organization of training for students / listeners under the pre-university preparation program and other educational programs of all levels, with or without the awarding of a degree;
3. Creation and updating of the "Find a student" catalog, which includes full name, photograph, personal mobile number (if available), gender, date of birth, corporate email, marital status, student card number;
4. Organization and provision of the subject's participation in events held by the University;
5. Preparation, conclusion, and execution of contracts, memoranda, and non-disclosure agreements and other agreements with third parties within which the subject's personal data is transferred;
6. Providing information upon request of the subject, private bailiffs, law enforcement



and judicial authorities, as well as other government bodies of the Republic of Kazakhstan and authorized organizations in accordance with the legislation of the Republic of Kazakhstan;

7. Providing access to premises/buildings/offices/information systems by issuing ID cards, registering Face ID, and creating user accounts in accordance with the internal documents of the University;
8. Verification of compliance and fitness for study, including identity verification;
9. Processing payments of scholarships, grants, and other payments, as well as maintaining records of such payments;
10. Ensuring security on the University's premises;
11. Identification and resolution of conflicts of interest;
12. Monitoring compliance by subjects with the legislation of the Republic of Kazakhstan and internal regulatory documents of the University within the framework of internal investigations concerning compliance issues and violations of the University's Code of Ethics;
13. Conducting marketing activities (mentions in interviews and publications in mass media, social networks, websites, as well as printed materials);
14. Implementation of the University's research projects;
15. Collection of statistical reports in accordance with the internal documents of the University;
16. Creation, maintenance, and updating of databases of applicants / candidates / entrants, students / listeners on academic matters;
17. Fulfillment by the University of contractual obligations related to medical and other insurance of the subject (for example, providing the personal data of the subject and their close relatives for the purpose of medical services);
18. Verification of the subject's medical documents (medical certificate, certificate of temporary disability, certificate of the medical advisory commission, vaccination card, consultation sheet, discharge summary, certificates from psychiatric and narcological dispensaries) whose data are processed during the University's activities;
19. Notification of the subject's emergency contacts regarding his/her health condition in case of emergency or urgent medical care;
20. Provision of documents and/or information, as well as exchange of documents and/or information with relevant authorized bodies of the Republic of Kazakhstan within the framework of fulfilling the obligation of a three-year work commitment for individuals trained under the state educational order;
21. Monitoring attachment to the University Health Center outpatient clinic, as well as ensuring detachment from it if necessary;
22. Updating and replenishing the national educational database (or other similar government platforms and/or websites) of the authorized body in the field of science and higher education of the Republic of Kazakhstan with information about University students (including personal data, enrollment decisions, dismissal, transfers from other universities, transfer from scholarship to paid tuition / from paid tuition to scholarship, reinstatement, graduation, as well as decisions on academic leave, etc.);
23. Conducting audits and inspections to improve the efficiency of the internal control system and risk management;
24. Providing statistical data and informational materials for the University website and printed materials;
25. Providing lists with data of applicants/candidates/admitted persons to service providers for conducting entrance examinations, including organizations located outside the Republic of Kazakhstan, for organizing and conducting competitive selection, receiving and analyzing test results;
26. Accounting and management of training, personal development, and academic performance;
27. Accounting and management of admission, admission indicators/competition results;
28. Exchange of documents and/or information between the University's structural units for the fulfillment of official tasks and/or assignments;



29. Providing information on personal data upon requests from government authorities and other authorized organizations in accordance with the legislation of the Republic of Kazakhstan;
30. Qualitative selection of applicants/candidates/admitted persons, students/attendees for participation in the educational, social, cultural, and sports activities of the University;
31. Monitoring compliance with the principles of equality, generally accepted ethics, rights, and freedoms of the subject;
32. Providing applicants/candidates/admitted persons, students/attendees and their close relatives, as well as official representatives whose contact details were provided to the University, with any informational materials, including about the services of the University and its organizations, as well as other notifications via telephone, fax, other means of communication, and open communication channels (including SMS, email, fax, etc.);
33. Providing individual consultations by University psychologists;
34. Providing lists with data of applicants/candidates/admitted persons, students/attendees for academic processes, assessment, degree awarding, and others;
35. For other purposes which may be established by the legislation of the Republic of Kazakhstan.

**Subject – Alumni**

1. Organization and facilitation of Alumni participation in events held by the University;
2. Preparation, conclusion, and execution of contracts, memorandums, non-disclosure agreements, and other agreements with third parties within which Alumni personal data is transferred;
3. Providing information upon request of the Alumni, private bailiffs, law enforcement and judicial authorities, as well as other government bodies of the Republic of Kazakhstan and authorized organizations in accordance with the legislation of the Republic of Kazakhstan;
4. Granting access to premises/buildings/offices/information systems by issuing ID cards, registering Face ID, and creating user accounts in accordance with the internal documents of the University;
5. Ensuring security on the University premises;
6. Conducting marketing activities (mentions in interviews and publications in mass media, social networks, websites, as well as printed materials);
7. Collecting statistical and official reports in accordance with the University's internal documents;
8. Creating, maintaining, and updating the database on the career development of Alumni.
9. Providing documents and/or information, as well as exchanging documents and/or information with the relevant authorized bodies of the Republic of Kazakhstan within the framework of fulfilling the obligation for a three-year work commitment by persons trained under the state educational order;
10. Exchange of documents and information with the Alumni;
11. Monitoring attachment to the University Health Center outpatient clinic and, if necessary, ensuring detachment from it;
12. Updating and replenishing the national educational database (or other similar government platforms and/or websites) of the authorized body in the field of science and higher education of the Republic of Kazakhstan with information about University students for the assignment of the status of "Alumni";
13. Monitoring Alumni compliance with the legislation of the Republic of Kazakhstan and internal regulatory documents of the University within internal investigations concerning compliance and violations of the University Code of Ethics;
14. Conducting audits and inspections to improve the effectiveness of the internal control system and risk management;
15. Exchange of documents and/or information between structural units of the University to perform official tasks and/or assignments;
16. For other purposes that may be established by the legislation of the Republic of Kazakhstan.

**Consent of the Applicant / Candidate / Entrant, Student / Listener, Alumni:**

I hereby give my consent to the University for the collection, processing (accumulation, storage, modification, supplementation, use, dissemination, anonymization, blocking, destruction), including transfer to third parties, cross-border transfer, as well as publication in publicly available sources of my personal data for the purposes specified in this consent.

I hereby undertake to promptly notify the University in writing of any changes and/or additions to my personal data (about me), providing the University with the relevant supporting documents. This consent is valid until the purposes of personal data processing are achieved or other cases established by the legislation of the Republic of Kazakhstan occur, and may be withdrawn by submitting a written statement.

The text of this consent has been read by me (us), and I (we) have no additions, comments, or objections.

Full name of the applicant:

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Full name of the legal representative:

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*(to be filled in if the applicant is under the age of 18)*

Applicant's signature:

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Signature of the legal representative:

---

*(signed if the applicant is under the age of 18)*

Date: \_\_\_\_\_



Appendix 4  
to the Policy and procedures for the collection,  
processing and protection of personal data  
in the autonomous organization of education  
“Nazarbayev University”

**Agreement  
to the collection and processing of personal data  
for subjects participating in the electronic document management system  
of the autonomous organization of education "Nazarbayev University"  
who are not authorized users of the autonomous organization of education "Nazarbayev  
University"**

In order to comply with the Law of the Republic of Kazakhstan “On Personal Data and Their Protection,” the user of the system hereby gives Agreement to the autonomous organization of education “Nazarbayev University” (hereinafter referred to as the University), located at: Republic of Kazakhstan, 010000, Astana, Kabanbai Batyr Ave., 53, BIN 090740002542, for the collection and processing (accumulation, storage, modification, supplementation, use, dissemination, anonymization, blocking, destruction), including transfer to third parties, cross-border transfer, as well as publication in publicly accessible sources of personal data recorded on electronic and paper media, and/or other material carriers, which may contain (including but not limited to):

**1. Information required for proper identification**

1. Last name, first name, patronymic, transcription of last name and first name.
2. Address/home address; mobile phone number and office phone number.
3. The data of the identity document: the name of the document; the document number; the date of issue of the document; the validity period of the document; the authority that issued the document.

4. Individual identification number.

**2. Information necessary to maintain communication**

1. Phone numbers, mobile, home, additional emergency contact number.
2. Email address.
3. The address of the place of residence (if necessary).

**3. Other information required by the University**

The provided information will be used in accordance with the activities of the University, including but not limited to the following purposes:

1. Conclusion of contracts, memoranda, and other agreements with the University;
2. Exchange of documents and information with the University;
3. Providing access to the University's electronic document management system;
4. For other purposes that may be established by the legislation of the Republic of Kazakhstan.

**Confirmation:**

I hereby give my agreement to the University for the collection, processing (accumulation, storage, modification, supplementation, use, dissemination, anonymization, blocking, destruction), including transfer to third parties, cross-border transfer, as well as dissemination in publicly available sources of my personal data, for the purposes specified in this Agreement.





I hereby undertake to promptly notify the University in writing of any changes and/or additions to my personal data (about me) with the provision of relevant supporting documents to the University.

This Agreement is valid until the purposes of personal data processing are achieved or other cases established by the legislation of the Republic of Kazakhstan occur, and may be revoked by submitting a written statement.

☐ I confirm that I have completed and signed this Agreement myself on the portal edms.nu.edu.kz, using the unique login and password assigned to me.