

DRCQ

# Digital Rating 2023

Digital Rights Compliance Ranking 2023  
of popular digital platforms in Kazakhstan



# Purpose

2023

This research aims to assess policies and practices of 5 popular digital platforms in Kazakhstan:

- on disclosing data in the context of relationships with state authorities;
- on complying with the standards for the protection of digital human rights;
- on making efforts to ensure users' rights to freedom of information and privacy.

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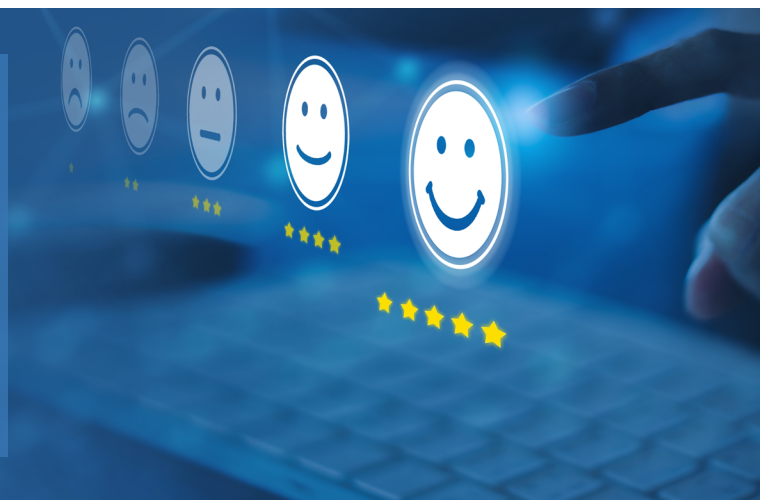
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# About Us

**D**igital Rating 2023 (The Digital Rights Compliance Ranking of popular digital platforms in Kazakhstan) has been compiled by experts from the law firm Digital Rights Center Qazaqstan (DRCQ) in cooperation with Ranking Digital Rights (RDR).



This research project was launched by DRCQ to conduct an independent study aimed at assessing policies and practices of the most popular platforms in Kazakhstan. The research focuses on the disclosure of information in the context of relations with government agencies, compliance with the standards for the protection of digital human rights, and measures to ensure users' rights to freedom of information and personal privacy.

Based on the RDR methodology, the experts examined the policies and practices of Kazakhstan's popular digital platforms, along with their services, for their compliance with the standards for the protection of digital human rights as well as their efforts to ensure users' rights to freedom of information and privacy.

The DRCQ team includes professional cyberlawyers (IT & IP), attorneys, telecom and communications experts, media lawyers, fintech and e-commerce lawyers, and also technical specialists, programmers and financial analysts, covering a wide range of issues for our clients.

# Introduction

Expanding opportunities of the Internet requires an increased level of protection of digital rights and freedoms of users. In the last decade, Kazakhstan has seen the emergence of its own digital platforms, which have become trending among the population, and as a result, Kazakhstan's leading companies have a wide range of responsibilities: not only must they comply with the minimum list of laws, but they are also expected to be drivers for the implementation of international standards, as well as develop their own policies that improve the standing of users in terms of corporate responsibility, access to information, and privacy.

The DRCQ team's goal in the report resides in providing specific steps for the companies covered by the research to ensure their compliance with international standards in the field of digital rights of users, which will first of all contribute to increasing the loyalty and trust in web services by their users.

This report is somewhat of a roadmap for digital platforms in Kazakhstan to improve and change for the better.

Moreover, by looking at themselves through the prism of the indicators of Ranking Digital Rights and following the recommendations given, the companies in question will have confidence in their reputation and open up opportunities to provide their services not only in Kazakhstan's digital market, but also internationally.

We sincerely believe that the Digital Rights Compliance Ranking 2023 of popular digital platforms in Kazakhstan will enable companies to move to the next level of corporate responsibility and understand what additional efforts should be made to improve the level of respect and protection of users' digital rights.

All of the above is particularly timely and relevant, since Kazakhstan at the moment is actively integrating into the global digital space and developing its infrastructure, legislation and competencies.

For the purpose of our assessment, we have selected a number of advanced and most popular digital platforms in Kazakhstan, namely:

# Selected Kazakhstan's Digital Platforms

**Kolesa Group** with **Kolesa.kz** and **Krisha.kz** services, which specialize in placing and searching ads for sale and purchase of cars and real estate, respectively. Today, **Kolesa.kz** and **Krisha.kz** are leaders in their segments with millions of visitors and ads on their websites.

**Chocolife Family**, a major holding company that unites several online services in Kazakhstan, such as **Chocolife.me**, **Chocotravel.com**, **Chocofood.kz**, **Lensmark.kz** and **iDoctor.kz**. These services provide users with the opportunity to buy and sell goods and services in various spheres: from tourism and entertainment to health and beauty. Today **Chocolife Family** is one of the largest holdings in the field of e-commerce in Kazakhstan. It is actively developing its projects, introducing new technologies and features, and expanding its presence in the Central Asian market.

**Kaspi.kz**, one of the most high-profile and fastest-growing technology companies in Eurasia. The company is also a leader in financial inclusion and digital transformation in the country, partnering with government agencies in the framework of its section of Public Services.

In 2019, the bank conducted its initial public offering (IPO) on the London Stock Exchange (LSE) and the Kazakhstan Stock Exchange (KASE), becoming the first Kazakhstani bank to enter the international capital market. **Kaspi.kz** was considered with a breakdown of its internal services such as **Kaspi Pay**, **Kaspi Shop** and **Kaspi Travel**.

**Onay**, a system of electronic ticketing in public transportation in Kazakhstan, which also provides an opportunity to pay for various services using an **Onay card** or mobile application. **Onay** is one of the most popular and sought-after systems in Kazakhstan, with over 3 million active users and more than 30,000 partners across the country (as of October 2021). The **Onay** system is also a leader in ensuring digital transformation and sustainable development of the transportation sector in the country.

**Aitu** is a super app that provides various services in the areas of communication, entertainment, payments and music. This report covered such projects as **Aitu Messenger**, **Aitu City**, **Aitu Pay** and **Aitu Music**. That said, **Aitu.io** has over 4.5 million active users across the country. The company also continues to develop and improve its projects by introducing new technologies and features.

# Participants

**Kolesa Group**

Choco**Family**

 **Kaspi.kz**

 **ONAY!**

 **aitu**

➤ KOLESA GROUP – KOLESA.KZ AND KRISHA.KZ

➤ CHCOLIFE FAMILY – CHCOLIFE.ME,  
CHCOTRAVEL.COM, CHCOFOOD.KZ,  
LENSMARK.KZ AND IDOCTOR.KZ

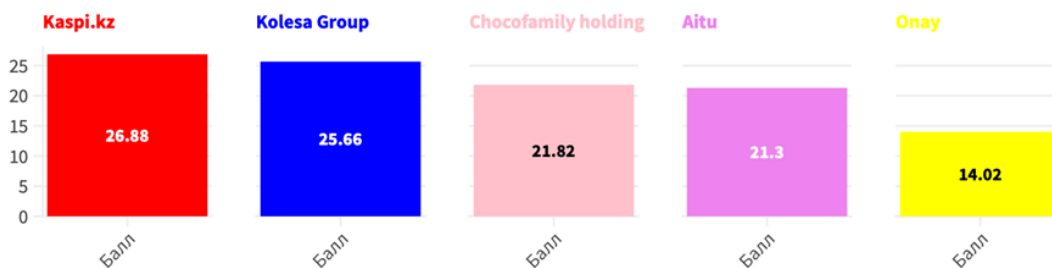
➤ KASPI.KZ – KASPI PAY,  
KASPI SHOP AND KASPI TRAVEL

➤ ONAY – A SYSTEM OF ELECTRONIC  
TICKETING IN PUBLIC TRANSPORTATION  
IN KAZAKHSTAN

➤ AITU APP – AITU MESSENGER, AITU CITY,  
AITU PAY AND AITU MUSIC

# Total Score by Company and Its Services

## Total Score by Company



## Total Score by Services





# Methodology

For this study, we identified and selected the most popular digital platforms in Kazakhstan. We considered not only the companies themselves, but also their individual products and services, including in the sphere of mobile ecosystems.

A digital platform is an integrated software and hardware solution that provides digital infrastructure and functionality for the interaction of various actors, applications and data in a digital ecosystem.

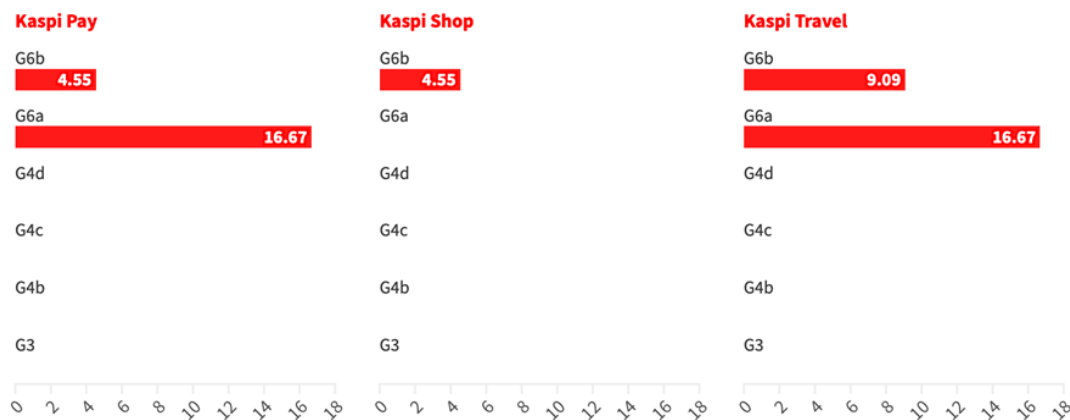
To investigate public standpoints and policies of the companies on human rights compliance, we used their official websites as well as web resources of parent companies/corporate groups.

The issues under research were grouped according to three indicators.

## G. Corporate Governance

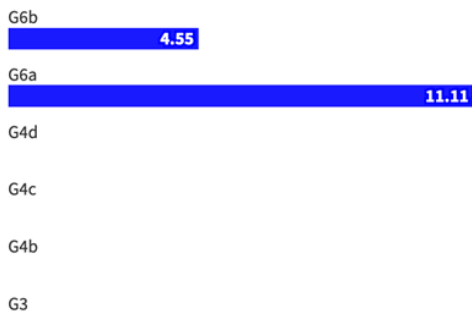
The indicators in this category are intended to demonstrate that the company has governance processes in place that honor human rights to freedom of expression and privacy. For a company to perform well in this category, its business disclosures should, as a minimum, reflect and preferably exceed the UN Guiding Principles on Business and Human Rights and other human rights standards on freedom of expression and privacy adopted by the Global Network Initiative.

### G-indicators. Kaspi.kz

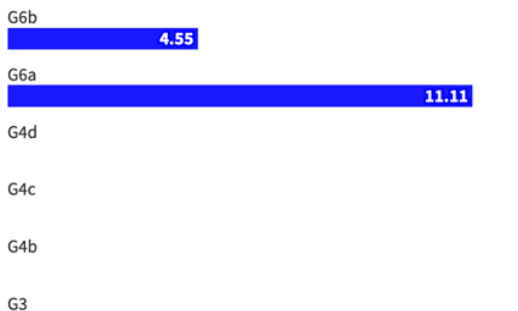


### G-indicators. Kolesa Group

#### Kolesa.kz



#### Krishna.kz



### G-indicators. Choco

#### Chocolife.me



#### Chocotravel.com



#### Lensmark.kz



#### Chocofood.kz



#### iDoctor.kz

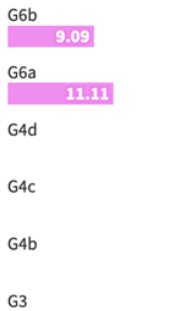


### G-indicators. Aitu

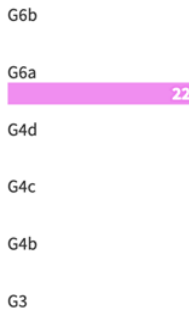
#### Messenger Aitu



#### Aitu City



#### Aitu Pay



#### Aitu Music



### G-indicators. Onay

onay.kz

G6b

G6a

G4d

G4c

G4b

G3



### F. Freedom of Expression and Information

Indicators in this category help in determining if the company has demonstrated respect for the rights to freedom of expression and information in accordance with international human rights standards. The company's published policies and practices clearly demonstrate what actions are taken to address human rights abuses, unless such actions are lawful, proportionate and for a justifiable purpose. Companies that perform well on this indicator show their commitment to the principle of openness not only in how they respond to demands from the government and other stakeholders, but also in how they establish, explain and comply with their own business rules and principles that affect users' fundamental right to freedom of expression and information.

### F-indicators. Kaspi.kz

**Kaspi Pay**

F12

10

F11

F8

12.5

F7

F6

F5b

F5a

28.57

F1d

100

F1c

F1b

100

F1a

100

0

10

20

30

40

50

60

70

80

90

100

**Kaspi Shop**

F12

10

F11

F8

12.5

F7

F6

F5b

F5a

28.57

F1d

100

F1c

F1b

100

F1a

100

0

10

20

30

40

50

60

70

80

90

100

**Kaspi Travel**

F12

10

F11

F8

12.5

F7

F6

F5b

F5a

28.57

F1d

100

F1c

F1b

100

F1a

100

0

10

20

30

40

50

60

70

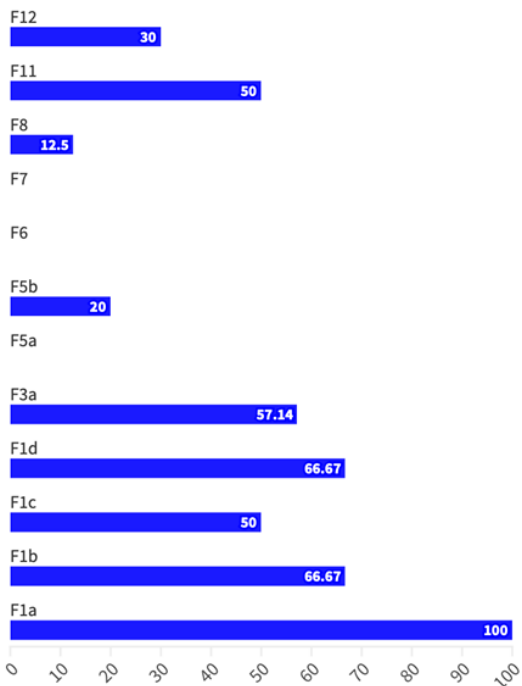
80

90

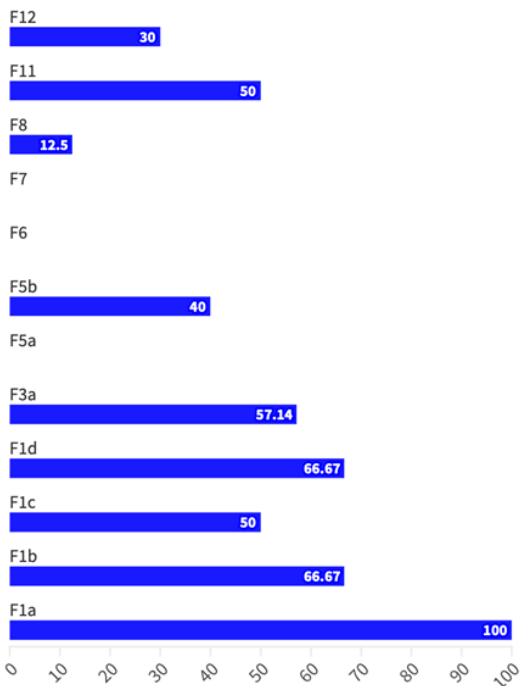
100

### F-indicators. Kolesa Group

#### Kolesa.kz



#### Krisha.kz



### F-indicators. Choco

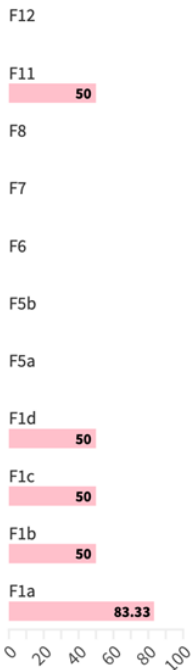
#### Chocolife.me



#### Chocotravel.com



#### Lensmark.kz



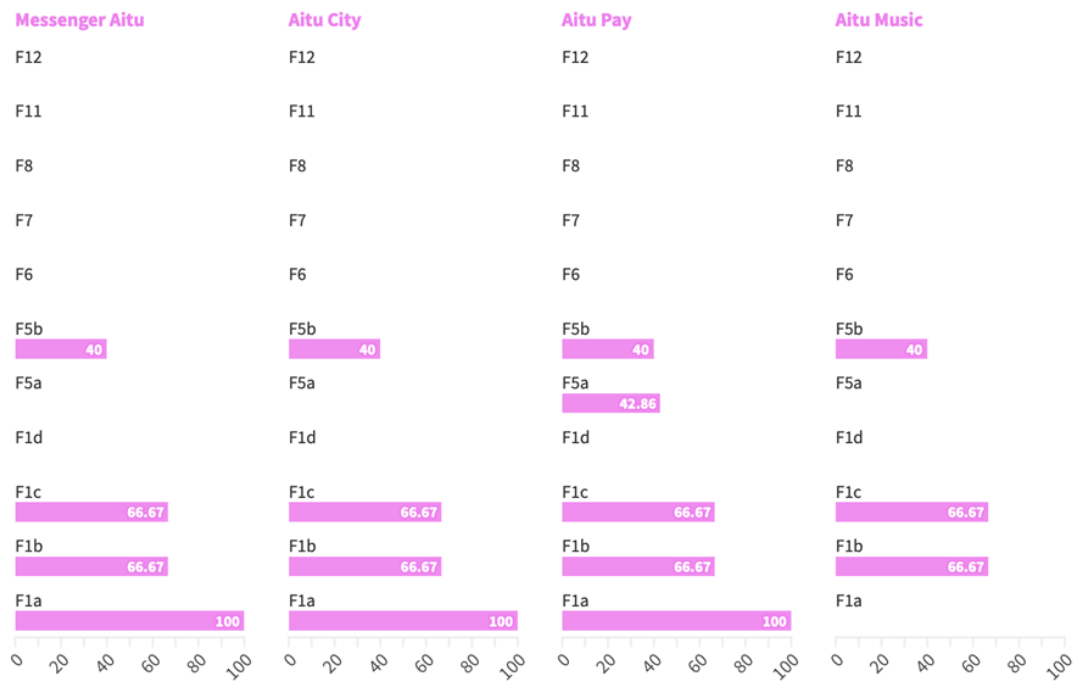
#### Chocofood.kz



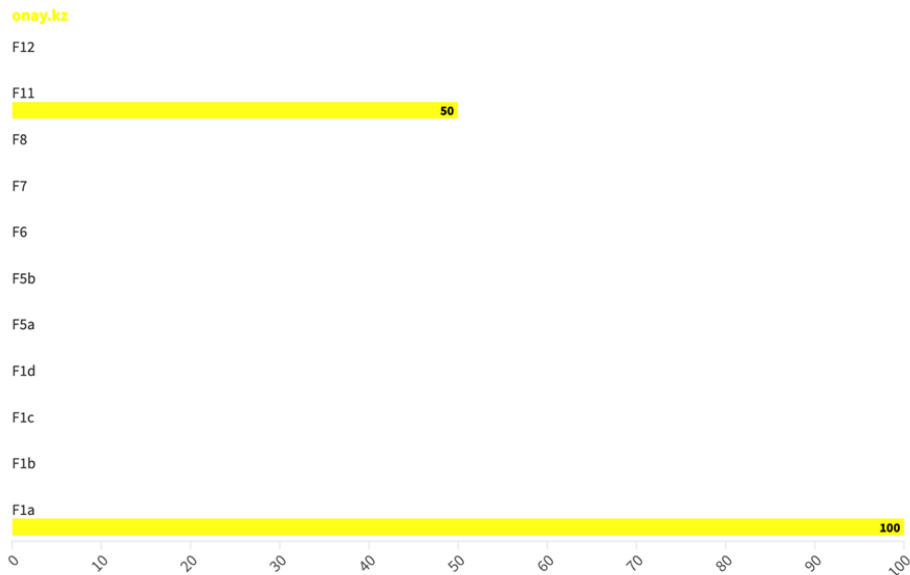
#### iDoctor.kz



### F-indicators. Aitu



### F-indicators. Onay

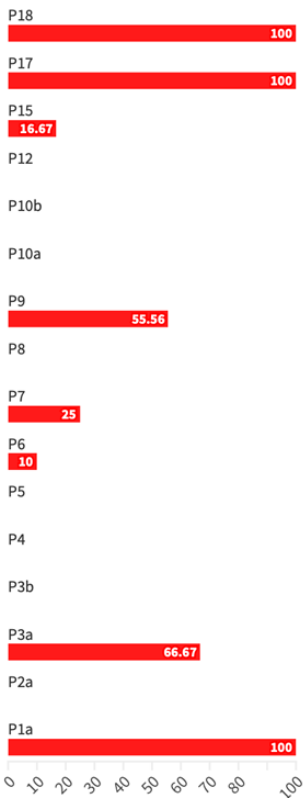


### P. Privacy

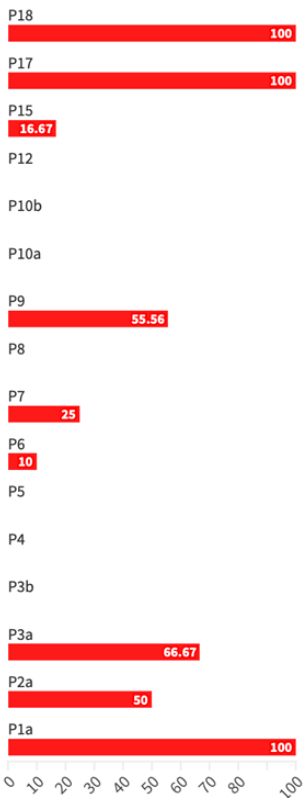
Indicators in this category reflect that companies strive to communicate their commitment to users' right to privacy in an accessible way, through examples of their policies and practices, in line with international human rights standards. Open corporate policies and practices demonstrate how companies are careful not to facilitate actions that may violate users' privacy, unless such actions are lawful, proportionate and for a justifiable purpose. They also demonstrate their strong dedication to protecting and safeguarding users' digital security. Companies that perform well on these indicators demonstrate their steadfast commitment to transparency not only in how they respond to the needs of the state authorities and other players, but also in how they define, communicate, and enforce their own policies and industry practices that affect user privacy.

**P-indicators. Kaspi.kz**

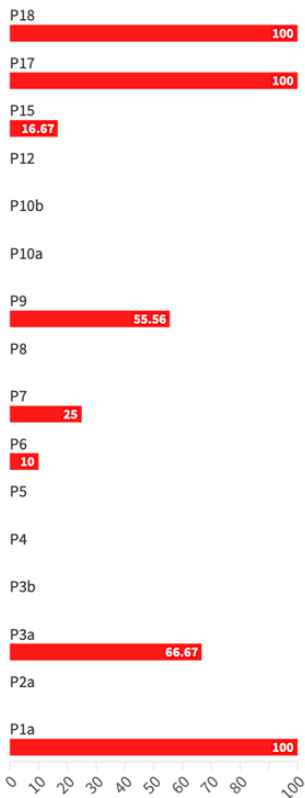
**Kaspi Pay**



**Kaspi Shop**

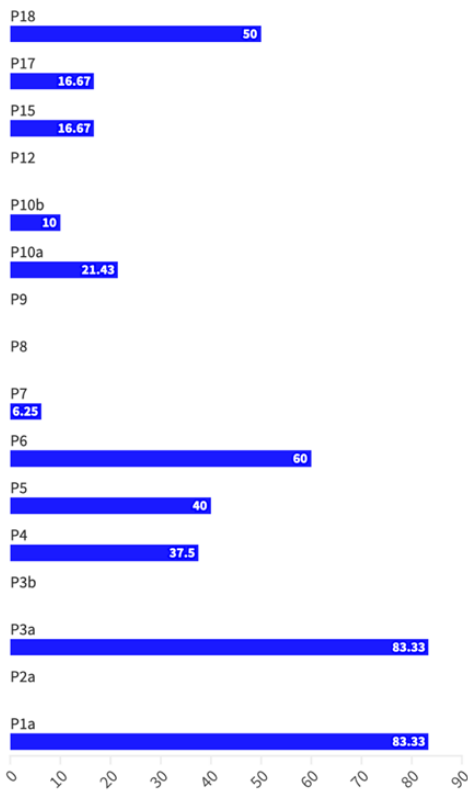


**Kaspi Travel**

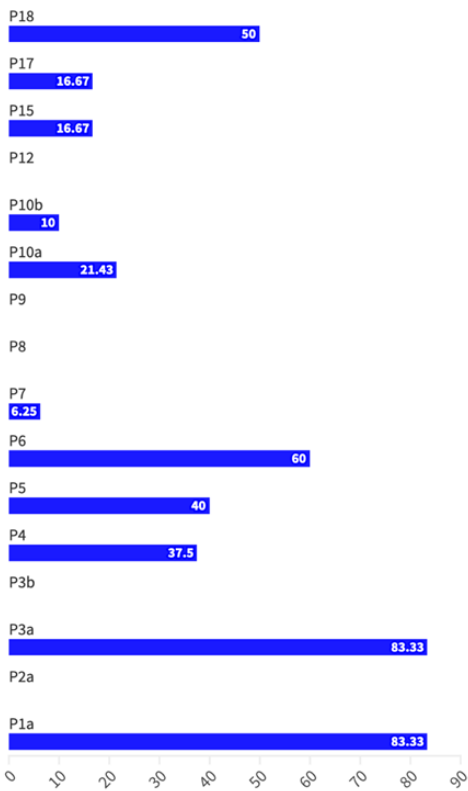


**P-indicators. Kolesa Group**

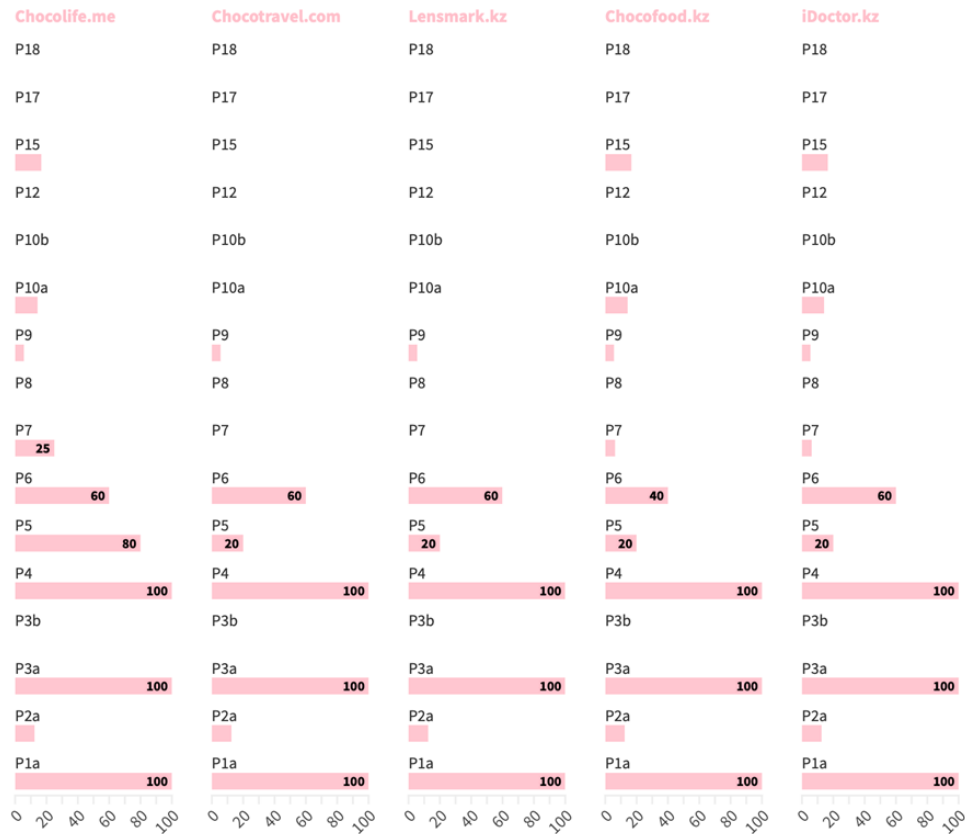
**Kolesa.kz**



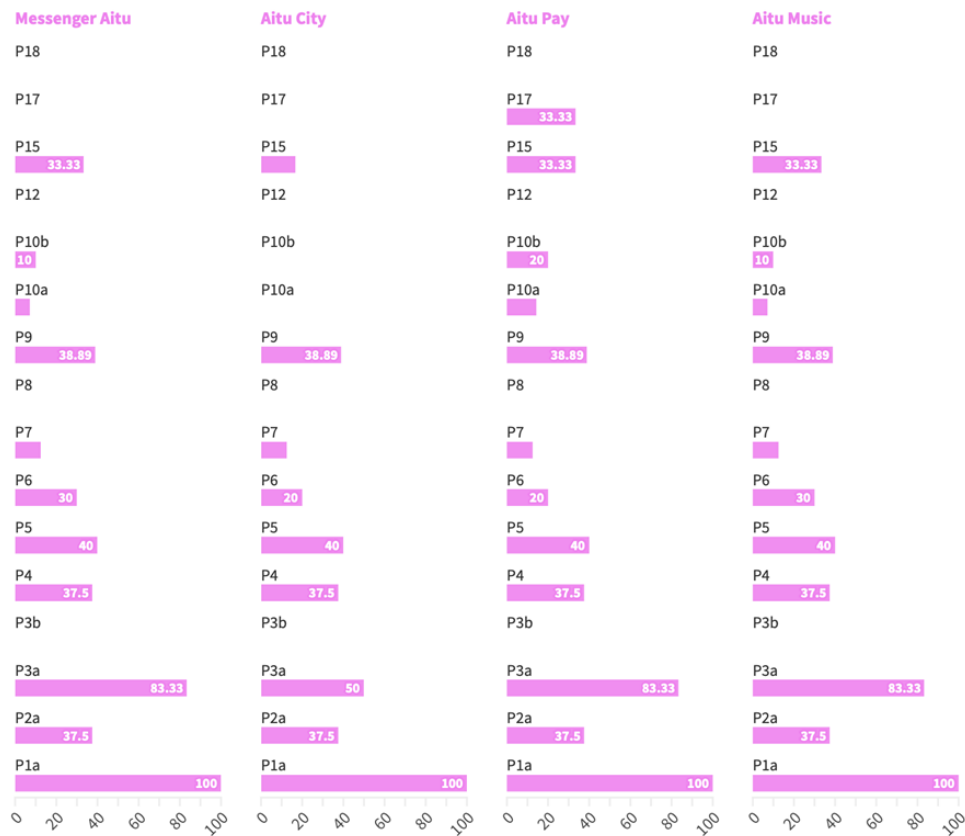
**Krisha.kz**



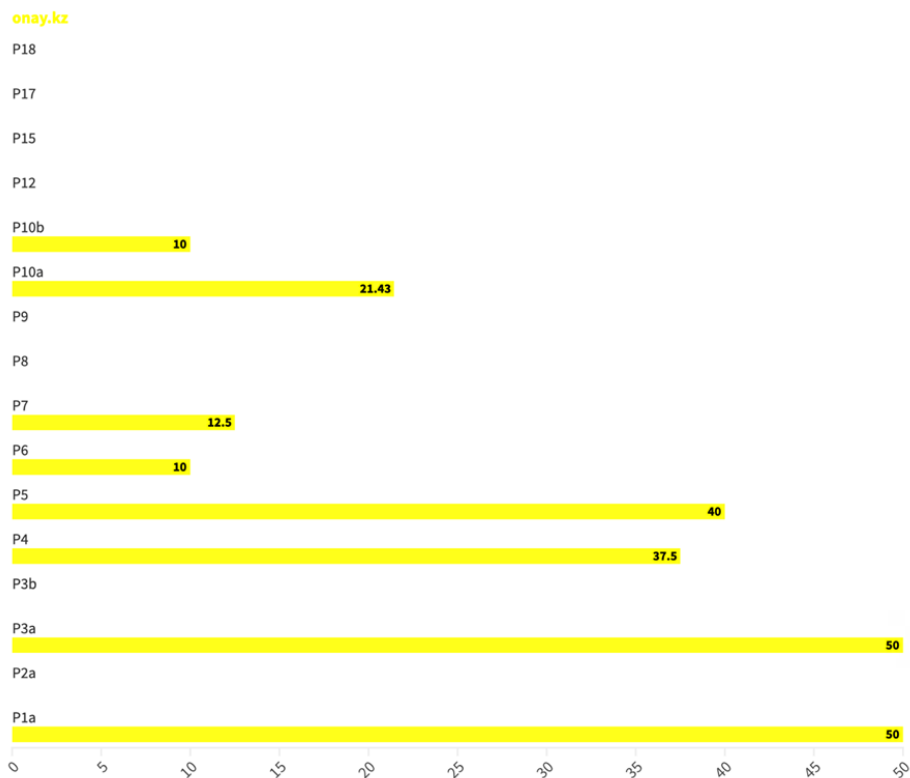
### P-indicators. Choco



### P-indicators. Aitu



**P-indicators. Onay**



The research process consisted of the following stages:

1. Compiling an inventory of publicly available documents of each service by the first expert;
2. Scoring each indicator by the first expert;
3. Validating obtained results by the second and third experts;
4. The process of interaction with the companies under consideration and their digital platforms, called "Company Engagement";
5. Performing the "horizontal verification": comparing the companies' results with each other in order to maintain a unified and objective approach and coordinating the final scores with the Ranking Digital Rights team.

Each indicator has a list of parameters, and companies receive a score (full, partial or zero) for each parameter met. The score takes into account the degree of disclosure for each indicator parameter based on one of the following possible answers:

- "Yes" (full disclosure): the information disclosure complies with the indicator requirements.
- "Partial": the company has disclosed some but not all aspects of the indicator, or the disclosure is not complete enough to meet all the requirements of the indicator.
- "No data on disclosure": researchers could not find information on the company's website that answers the element's question.
- "No": information exists, but it does not specifically disclose the subject matter of the query on the parameter. This option is different from "No disclosure found," although both do not score favorably.
- "Not Applicable": the element is not relevant to the company or service. Items marked as "Not Applicable" will not be counted in the scoring for or against the parameter.

**Points**

- Yes/full disclosure = 100
- Partial disclosure = 50
- No disclosure = 0
- No data on the disclosure = 0
- Not applicable - data are not included in scoring and averaging.



# Interaction with Digital Platforms (Company Engagement)

As part of the research project, the Digital Rating team contacted the selected digital platforms and suggested that they review the preliminary findings of the report and provide feedback. The process of engaging with the companies in question and their digital platforms, called the Company Engagement, without exaggeration, is a key to the Ranking Digital Rights methodology. [We aim for our research to be not only an assessment, but also a tool to encourage companies to comply with international standards](#) regarding respect for digital human rights, including users' rights to information and privacy.

We believe that an open and constructive dialog with the companies can contribute to increasing trust and transparency between companies and users.

We offered digital platforms the opportunity to disclose any additional information that could improve their assessments. [Kaspi.kz](#), [Kolesa Group](#) and [Chocolife Family](#) responded by providing feedback and expressing interest in updating and improving their public policies and practices.

[Kaspi.kz](#) expressed its willingness to engage with the Digital Rating team to analyze its policies and practices in the field of digital rights compliance. In the course of meetings with the decision makers of [Kaspi.kz](#), and also on the basis of the sent questionnaire, the company provided its substantiated answers on the assessed indicators, taking into account that a number of open policies could be improved in accordance with the international standards in the field of data disclosure in the framework of relationships with state authorities..

At the same time, the [Kaspi.kz](#) team indicated that comments and ratings on the indicators related to supporting its users on a wide range of issues, including data security and information to users about potential risks, should be reviewed using the Kaspi Guide, which is available both in the mobile app and on the company's website, as a source. Having taken this source into account, we have updated certain indicators in the Privacy Section. According to the aggregate of the scores received, [Kaspi.kz](#) has appeared on the first place among all companies assessed.

[Kolesa Group](#) expressed interest in studying the results of our digital rights rating report. In particular, a meeting was held with [Kolesa Group](#) representatives for a detailed analysis of the indicators assessed, and we presented our questionnaire. The representatives of the company referred to the points of their policies, where the necessary data on the indicators under consideration are displayed, namely "Content Moderation Appeals Process", as well as other indicators on data privacy, which has led to the better evaluation of the company's digital services.

Interaction with the representatives of [Kolesa Group](#) and additional verification helped to improve the companies' performance in providing information on policies and practices in a number of areas, including the mechanism for appealing content moderation actions, as well as user information processing and protection.

As a result, [Krisha.kz](#), which is a digital service from [Kolesa Group](#), ranks first among all services under assessment.

We also recognize Chocofamily Holding's involvement in the Company Engagement process to obtain feedback on the Digital Rating research. As a result of those meetings, Chocofamily Holding has updated the public package of documents on selected digital services, namely the privacy policy, user agreement, data usage rules, etc.

We acknowledge that this is a lot of work and express our gratitude for their efforts and being open. We believe this is an indicator of a responsible approach to protecting the digital rights of their users and improving the quality of their services. Consequently, Chocofamily Holding took an honorable third place in the list of leaders among digital platforms.

It is worth noting that the privacy policies of Aitu's services explicitly state the company's commitment to human rights. Aitu representatives also responded to our request for feedback, but we did not receive a full-fledged feedback on the indicators.

We hope that after reviewing the indicators and assessments of its services, Aitu will continue working on improving its standards of security, transparency and accountability.

The Onay system, unfortunately, has not responded to our request for feedback.

By means of its rating, the Digital Rating team offers roadmaps for the creation and operation of online platforms and digital services in line with the UN Guiding Principles on Business and Human Rights to companies that prioritize the respect and protection of human rights.

# General Conclusions

1. Most of digital platforms in Kazakhstan have failed to sufficiently disclose their obligations to respect human rights to privacy and freedom of information.
2. The companies under analysis and their services do not disclose adequate information about their policies and practices regarding the processing of personal data, content moderation, and responding to requests from the government or third parties.
3. Of all the companies, only Aitu's privacy policies clearly express a commitment to human rights.
4. At the same time, Aitu's policies, as well as the public documents of other companies and services under review, do not indicate a commitment to freedom of expression and information.
5. In addition, it is worth noting that none of the companies assessed have a practice of monitoring and oversight by their senior management of how corporate policies and practices affect freedom of expression and information, as well as privacy.
6. Almost all services under review received the highest score "Yes" (full disclosure) in the indicator "Access to the Terms of Service". Thus, Aitu, Kaspi.kz, Kolesa Group and Onay.kz have user agreements openly posted on the main pages of their web resources and in mobile applications. It should also be emphasized that user agreements of all the above companies are available both in the state language and in Russian.

Most of the services of Chocofamily Holding also have user agreements readily available, except for Chocofamily.kz, for there is no separate user agreement on the Chocofamily website. However, the mobile application of Chocofamily for iOS and Android contains the user agreement.

We would also like to draw attention to the fact that at the time of review by the RDR specialists the user agreement and other documents of the chocolate service were available only in Russian. Later on, the company remedied the omission and currently the documents are available in the state language as well.

7. None of the services provides the possibility to use the service anonymously. Most services require verification by a phone number or ID card to register and create a personal account.

8. None of the companies have documented maintaining a regular practice of assessing risks related to the freedom of expression and violation of user privacy.

9. We would also point out that none of the companies we assessed maintain a public register of changes or leave the opportunity to review previous versions of the user agreement or privacy policy.

10. Most companies at least partially disclose what data they collect about users and how they obtain such data.

For example, the "Kaspi.kz Mobile Application Privacy and Personal Data Processing Policy" states that the application may collect diagnostic data including: device model, operating system information, browser data, IP address, and also unique user and device identifiers. In addition, when interacting with third parties, Kaspi.kz mobile application may transfer to them such information as: full name, cell phone number, date and/or year of birth, profile picture, etc.

11. Digital platforms of the companies under review do not provide users with the ability to control the receipt of targeted advertising. Nevertheless, most companies explicitly specify in their documents about the collection of data for advertising purposes, including the use of targeted advertising.

For instance, the "Kolesa.kz User Agreement" clearly declares: the purpose of processing the User's data is to enable the latter to use the Services and grant rights to use additional functional (software) features of the Internet resource, conduct advertising campaigns, [provide targeted advertising](#) and Services, carry out statistical research and analyze the statistics obtained, as well as perform other actions described in the User Agreement.

12. None of the companies assessed in Kazakhstan publishes information on the number of requests for restriction of access to information by state authorities or individuals.

13. A special mention should be made of the fact that almost all companies scored no points on the "Informing and Educating Users About Potential Risks" indicator. According to this indicator from Ranking Digital Rights, companies should post information aimed at supporting the protection of users from cybersecurity threats. For example, educational guides on digital hygiene and how to recognize cyber fraud. Kolesa Group in its services Kolesa and Krisha have sections "Kolesa/Krisha Guide" that contain some information on types of fraud and how to detect fraudsters. However, no other practical materials were found to inform users about ways to protect themselves from cybersecurity threats. Information on digital hygiene and preventive methods used by fraudsters is also partially disclosed in the "[Kaspi Guide](#)" service from [Kaspi.kz](#).

# Recommendations

In an attempt to improve the transparency of the companies and to raise the high standards of compliance with digital rights of users, DRCQ experts have prepared the following general recommendations for web services based on the data and results obtained. By reviewing these recommendations, the companies will be able to check for themselves how compliant they are with the given recommendations and what aspects can be changed or improved:

## TRANSPARENCY



1. Show the company's commitment to respecting human rights to privacy and freedom of information (in documents, on the website, in public speeches)
- 



2. Publish Transparency Reports on an ongoing basis
-

2.1 With the indication and breakdown of requests for user data, including:

- by the number of requests
- by disputed requests
- by data category
- by source of request
- by demand
- by decision

2.2 On the number of requests to restrict access to information by public authorities and private persons, including the number of received and satisfied requests, in accordance with the specifics of the service, namely:

- by the number of accounts
- by the number of groups
- by the number of posts
- by the number of comments
- by the number of downloaded videos
- by the number of downloaded pictures
- by the number of downloaded audio files

2.3 Disclose the procedure for handling requests from public authorities and private individuals to users:

- by responses to requests for information about users
- by the types of requests that cannot be publicly disclosed
- verification of requests for information restriction
- notification of the user who is the subject of the request

2.4 Develop and publish an easy-to-understand and clear policy for handling user grievances.

2.5 Disclose information about unlawful requests of state authorities that have been challenged by the company.

## PRIVACY

1. Provide users with the ability to control how their data are used in targeted advertising
2. Maintain a register of changes to the Privacy Policy and User Agreement
3. Disclose detailed information on the type of user data collected and method of collection
4. Disclose details of the retention period and the procedure for destroying user data
5. Ensure that users can request and receive a copy of their personal data
6. Provide for the possibility to use the service anonymously
7. Promptly notify users of the fact of leakage
8. Publish practical materials to educate users on how to protect themselves from cybersecurity risks associated with the company's products or services.

## FREEDOM OF INFORMATION

1. Disclose how the company performs due diligence on requests to restrict access to information (groups, accounts, posts, comments, publications) from individuals and government authorities before enforcing them
2. When a user attempts to access information blocked on the basis of a legitimate request from individuals or government agencies, indicate for what reason (category of unlawful information) and by the decision of which authority or person (including the date of the request and the number of the decision) access to the information was restricted

# Legislation

In working on the project we were guided by the following regulations, standards and laws:

- The UN Guiding Principles on Business.
- The Universal Declaration of Human Rights.
- The International Covenant on Civil and Political Rights (ICCPR)
- The International Covenant on Economic, Social and Cultural Rights.
- Law of the Republic of Kazakhstan dated May 21, 2013, No. 94-V "On Personal Data and Their Protection".
- Law of the Republic of Kazakhstan dated November 16, 2015, No. 401-V of the Law of the Republic of Kazakhstan "On Access to Information".
- Law of the Republic of Kazakhstan dated November 24, 2015, No. 418-V ZRK "On Informatization".
- Law of the Republic of Kazakhstan dated May 16, 2014, No. 202-V of the Law of the Republic of Kazakhstan "On Permits and Notifications".
- Law of the Republic of Kazakhstan dated July 5, 2004, No. 567 "On Communications".
- Law of the Republic of Kazakhstan dated December 30, 2016, No. 40-VI ZRK "On Dactyloscopic and Genomic Registration".
- Order of the Minister of Digital Development, Innovation and Aerospace Industry of the Republic of Kazakhstan dated April 2, 2021, No. 114/NK "On Approving the Rules of Information Content of Internet Resources of State Bodies and Requirements to Their Content".
- Article 79 "Violation of the Legislation of the Republic of Kazakhstan on Personal Data and Their Protection" of the Code of Administrative Offenses of the Republic of Kazakhstan.
- Article 147 "Violation of Privacy and Legislation of the Republic of Kazakhstan on Personal Data and Their Protection" of the Criminal Code of the Republic of Kazakhstan.

- Resolution of the Government of the Republic of Kazakhstan dated December 20, 2016 No. 832. "On Approval of Unified Requirements in the Field of Information and Communication Technologies and Ensuring Information Security."
- Law of the Republic of Kazakhstan dated December 28, 2017, No. 128-VI ZRK "On Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan on Information and Communications".
- Law of the Republic of Kazakhstan dated July 14, 2022, No. 141-VII ZRK "On Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan on Stimulation of Innovations, Development of Digitalization, Information Security and Education".
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- Law of the Republic of Kazakhstan dated March 18, 2019, No. 237-VI ZRK "On Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan on Defense and Aerospace Industry and Information Security in the Sphere of Informatization".
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# Digital Rating 2023

Digital Rights  
Compliance Ranking 2023  
of popular digital platforms  
in Kazakhstan

**DRCQ**

## CONTACTS

PLEASE CONTACT DRCQ TEAM EXPERTS FOR A DETAILED AUDIT AND CUSTOMIZED RECOMMENDATIONS TO IMPROVE THE COMPANIES' TRANSPARENCY, RAISE THE HIGH STANDARDS OF DIGITAL RIGHTS OF USERS, AND INCREASE THE LOYALTY AND TRUST OF WEB SERVICES BY THEIR USERS.

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