First Trust

PRIVACY POLICY

Last updated: 15.04.2026

1. GENERAL PROVISIONS

First Trust Ltd. (the “Company”, “First Trust”, “we”, “us”, or “our”) is a private company incorporated under the laws of the Astana International Financial Centre (“AIFC”) and authorised and regulated by the Astana Financial Services Authority (“AFSA”) under Licence No. AFSA-A-LA-2024-0026.

This Privacy Policy (the “Policy”) describes the manner in which the Company collects, uses, processes, stores, transfers, and protects Personal Data in connection with the operation of its website and the provision of its services, including without limitation Trust Services, Fund Administration, Custody Services, and Deal Structuring (collectively, the “Services”).

This Policy is governed by and construed in accordance with the Acting Law of the AIFC and the AIFC Data Protection Regulations No. 10 of 2017 (the “DPR”).

By accessing or using our website or Services, or otherwise providing Personal Data to the Company, you acknowledge that your Personal Data will be processed in accordance with this Policy.

2. DEFINITIONS

For the purposes of this Policy:

- “Personal Data” means any information relating to an identified or identifiable natural person as defined under the DPR.

- “Processing” means any operation performed on Personal Data, including collection, recording, storage, use, disclosure, transfer, or deletion.
- “Data Subject” means the individual to whom the Personal Data relates.
- “Website” means the domain thefirsttrust.com and all associated pages, content, and functionality.

3. COLLECTION OF PERSONAL DATA

We may collect and process the following categories of Personal Data.

3.1 Information Provided Directly by You

Personal Data that you voluntarily provide when completing forms, corresponding with us, or engaging our Services, including:

- Identity Data – name, surname, and identifiers;
- Contact Data – email address, telephone number, employer, job title, and business contact details;
- Inquiry or Communication Data – information contained in messages or requests submitted to us;
- Client Due Diligence / KYC / AML Data – identification documents, proof of address, source of funds, and other information required to comply with regulatory or legal obligations.

Where required by law, certain sensitive or special categories of Personal Data may be processed strictly in accordance with Article 10 of the DPR and solely for compliance purposes.

3.2 Information Collected Automatically

When you use the Website, we may automatically collect technical and usage data, including:

- IP address and device identifiers;
- browser type and version, operating system, and platform;

- time zone and location data (where applicable);
- website usage information, page interactions, and visit duration;
- cookie-related information (see Section 9).

4. PURPOSES AND LAWFUL BASIS FOR PROCESSING

The Company shall process Personal Data only where permitted by the DPR and on one or more of the following lawful bases:

4.1 Performance of Services
To provide Services, respond to requests, manage relationships, and perform contractual or pre-contractual obligations.

4.2 Compliance with Legal and Regulatory Obligations
To comply with Applicable Law, including AML/CFT, reporting, regulatory, audit, and record-keeping obligations imposed by the AIFC, AFSA, or other competent authorities.

4.3 Communication
To respond to enquiries, correspondence, and service-related communications.

4.4 Legitimate Interests
To manage and improve our business operations, maintain network and information security, prevent fraud or misuse, and enhance the Website and Services, provided such interests do not override the rights and freedoms of Data Subjects.

4.5 Consent
Where required, to send marketing or informational communications, which may be withdrawn at any time.

5. DISCLOSURE OF PERSONAL DATA

The Company does not sell or rent Personal Data.

Personal Data may be disclosed strictly on a need-to-know basis to:

- Affiliates for internal administrative and operational purposes;
- Service Providers and Professional Advisers (including IT providers, cloud hosting services, auditors, and legal advisers) subject to contractual confidentiality and data protection obligations;
- Regulatory or Government Authorities, including the AFSA, AIFC Court, law enforcement agencies, or supervisory bodies, where required or permitted by law;
- Successors or Acquirers in connection with a merger, restructuring, or transfer of business assets.

6. INTERNATIONAL DATA TRANSFERS

Personal Data may be transferred to and processed outside the AIFC.

Any such transfer shall take place only in compliance with Sections 11 and 12 of the DPR and where:

- the receiving jurisdiction provides an adequate level of protection; or
- appropriate safeguards are implemented (including contractual safeguards); or
- the Data Subject has explicitly consented; or
- the transfer is otherwise permitted under Applicable Law.

7. DATA RETENTION

Personal Data shall be retained only for as long as necessary to fulfil the purposes for which it was collected or to comply with legal, regulatory, accounting, or reporting obligations.

Unless otherwise required by law, client and due diligence records are generally retained for a minimum of six (6) years following the termination of the business relationship or completion of the relevant transaction.

Upon expiry of the applicable retention period, Personal Data shall be securely deleted or anonymised.

8. RIGHTS OF DATA SUBJECTS

Subject to the DPR, Data Subjects may exercise the following rights:

- Right of Access – to obtain confirmation and access to Personal Data;
- Right to Rectification – to correct inaccurate or incomplete data;
- Right to Erasure – to request deletion where processing is no longer necessary or lawful;
- Right to Restriction – to limit processing in certain circumstances;
- Right to Object – to processing based on legitimate interests or direct marketing;
- Right to Withdraw Consent – at any time where processing is based on consent.

Where the exercise of these rights prevents the Company from complying with legal or contractual obligations, the Company may be unable to provide or continue providing Services.

Requests may be submitted using the contact details in Section 12.

9. COOKIES

The Website uses cookies and similar technologies to ensure proper functionality, improve user experience, and analyse usage.

Cookies may include:

- Essential Cookies – required for core functionality;
- Analytical or Performance Cookies – used to measure and improve Website performance.

Users may disable cookies through browser settings; however, certain Website features may become unavailable.

10. DATA SECURITY

The Company implements appropriate technical and organisational measures designed to protect Personal Data against unauthorised or unlawful processing, accidental loss, destruction, or damage.

Access to Personal Data is restricted to authorised personnel and service providers subject to confidentiality obligations.

In the event of a Personal Data breach, the Company shall comply with the notification requirements under the DPR and, where required, notify the AIFC Commissioner of Data Protection and affected Data Subjects without undue delay.

11. GOVERNING LAW AND DISPUTE RESOLUTION

This Policy shall be governed by and construed in accordance with the Acting Law of the AIFC.

Any dispute arising out of or in connection with this Policy shall be subject to the exclusive jurisdiction of the AIFC Court.

12. CONTACT DETAILS

If you have any questions regarding this Policy or wish to exercise your rights, please contact:

First Trust Ltd.

Address: 010000, Astana, Esil district, 1 Turar Ryskulov, office 143
Email: info@thefirsttrust.com