Data Protection in Kazakhstan: Overview

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A Q&A guide to data protection in Kazakhstan.

This Q&A guide gives a high-level overview of the data protection laws, regulations, and principles in Kazakhstan, including the main obligations and processing requirements for data controllers, data processors, and other third parties. It also covers data subject rights, the supervisory authority's enforcement powers, and potential sanctions and remedies. It briefly covers rules applicable to cookies and spam.

To compare answers across multiple jurisdictions, visit the Data protection Country Q&A tool.

Regulation

Legislation

1. What national laws regulate the collection, use, and disclosure of personal data?

General Laws

Kazakhstan's comprehensive data protection law is the Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law), and its governmental decrees, including the following:

- Decree of the Government of Republic of Kazakhstan No. 117 dated 26 February 2016, On Approval of the List of Individuals Personal Data to be Included into State Electronic Information Resources (in Kazakh).
- Decree of the Government of Republic of Kazakhstan No. 909 dated 3 September 2013, On Approval of Rules on Accomplishment of Measures for Personal Data Protection by the Owner and/or Operator, and by Third Party (in Kazakh).
- Decree of the Government of Republic of Kazakhstan No. 1214 dated 12 November 2013, On Approval of Rules on Determination of List of Personal Data Necessary and Sufficient for Performance of Objectives by the Owner and/or Operator (in Kazakh).
- Order of the Minister of Digital Development, Innovation and Aerospace Industry of Republic of Kazakhstan No. 395/NK dated 21 October 2021, On Approval of Rules on Collection, Processing of Personal Data (in Kazakh).

Article 18 of the Constitution of Republic of Kazakhstan dated 30 August 1995 guarantees the right to personal and family privacy and the right to confidentiality of personal deposits and savings and privacy in telephone and written communications.

Sectoral Laws

The following sectoral laws regulate data protection in the Republic of Kazakhstan:

- The Civil Code of Republic of Kazakhstan (Special part) No. 409-I dated 1 July 1999.
- The Civil Procedural Code of Republic of Kazakhstan No. 377-V dated 31 October 2015.
- The Labour Code of Republic of Kazakhstan No. 414-V dated 23 November 2015.
- The Code of Republic of Kazakhstan, On Public Health and Health Care System No. 193-IV dated 18 September 2009.
- The Law of Republic of Kazakhstan, On State Legal Statistics and Special Accounts No.510-II dated 22 December 2003.
- The Law of Republic of Kazakhstan, On Banks and Banking Activity No. 2444 dated 31 August 1995.
- The Law of Republic of Kazakhstan, On Law Enforcement Service No. 380-IV dated 6 January 2011.
- The Law of Republic of Kazakhstan, On Informatization No. 418-V dated 24 November 2015.
- The Law of Republic of Kazakhstan, Concerning Communications No. 567-II dated 5 July 2004.
- The Law of Republic of Kazakhstan, On State Statistics No. 257-IV dated 19 March 2010.

This Q&A focuses on the PDP Law.

Scope of Legislation

2. To whom do the laws apply?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) protects the personal data of data subjects, which the PDP Law defines as individuals to whom the personal data relates (Article 1(16), PDP Law). The PDP Law applies to data subjects, database owners, and database operators (similar to data controllers), including:

- Individuals and legal entities in Kazakhstan.
- Foreign individuals and legal entities located in Kazakhstan, unless Kazakhstan laws and international treaties that Kazakhstan ratified provide otherwise.

(Articles 1 and 4, PDP Law.)

The PDP Law defines:

- A database as a set of ordered personal data.
- Database owners as individuals or entities that own the database containing the personal data and exercise control over the possession, use, and disposition of the database.
- Database operators as individuals or entities that collect, process, and protect the database containing the personal data.

(Article 1(8) to (10), PDP Law.)

3. What personal data does the law regulate?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) defines personal data as data stored on electronic, paper, or other physical media that relates to a data subject (Article 1(2), PDP Law).

Personal data includes, but is not limited to:

- · First, last, or patronymic name.
- A year and place of birth.
- Nationality.
- Address or place of registration.
- Individual identification number.
- Identification document details.

The PDP Law further classifies personal data as either:

- Publicly available data, which may be made public with the data subject's consent.
- Restricted data, to which another Kazakhstan law restricts access.

(Article 6, PDP Law; see Question 11.)

4. What acts are regulated?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) regulates:

- Collecting or obtaining personal data.
- · Processing personal data, including its:
 - accumulation;
 - · storage;
 - · amendment;
 - · supplementation;
 - · usage;
 - distribution (including cross-border distribution or via mass media);
 - · depersonalization;
 - · blocking; and

- · destruction.
- Protecting personal data.

(Articles 1 and 3, PDP Law.)

5. What is the jurisdictional scope of the rules?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) applies to:

- Individuals and legal entities in Kazakhstan.
- Foreign individuals and legal entities located in Kazakhstan, unless Kazakhstan laws and international treaties that Kazakhstan ratified provide otherwise.

(Articles 1 and 4, PDP Law.)

6. What are the main exemptions (if any)?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) does not apply to:

- The collection, processing, and protection of personal data exclusively for personal and family needs, if it
 does not violate the laws of the Republic of Kazakhstan or rights of other individuals or legal entities.
- The organization, storage, and usage of documents of the National Archive Fund of Kazakhstan and other archived documents containing personal data.
- The collection, processing, and protection of personal data referring to state secrets.
- The collection, processing, and protection of personal data for intelligence, counterintelligence, operational, and investigative activities, and protective measures within limits that Kazakhstan laws provide.

(Article 3, PDP Law.)

Notification

7. Is notification or registration with a supervisory authority required before processing data?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) does not require any notification or registration to the Digital Development, Innovations, and Aerospace Industry of Kazakhstan (MDD) or another government agency before processing personal data. For the MIDD's contact information, see **Error! Hyperlink reference not valid.**

However, there is an exception when personal data databases interact with the databases of state bodies. In this case, personal data database owners, operators, and third parties must integrate their databases with the databases of state authorities using a state service. (Article 8-1, PDP Law).

Main Data Protection Rules and Principles

Main Obligations and Processing Requirements

8. What are the main obligations imposed on data controllers to ensure data is processed properly?

Under the Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law), database owners and database operators must:

- Comply with certain principles when collecting, processing, and protecting personal data, including:
 - respecting the constitutional rights and freedoms of person and citizens;
 - · legality;
 - · confidentiality of restricted personal data;
 - equality of data subjects', database owners', and database operators' rights; and
 - ensuring the safety of persons, society, and the state.
- (Article 5, PDP Law.)
- Obtain data subject consent or establish another lawful basis for processing personal data (Articles 7(1) and 9, PDP Law; see Question 9 and Question 10).
- State the personal data's collection purpose and only process personal data consistent with the collection purpose (Article 14, PDP Law).
- Obtain specific data subject consent before disclosing personal data (Article 15, PDP Law).
- Notify data subjects within ten business days if their personal data is disclosed to a third party, if the text of the consent requires the notification (Article 19, PDP Law).
- Ensure the confidentiality of personal data they hold (Article 11, PDP Law).
- Only accumulate personal data by collecting that which is necessary and sufficient for the database owner, database operator, or third party to fulfil their tasks (Article 12(1), PDP Law).
- Store personal data in a database located in Kazakhstan (Article 12(2), PDP Law; see Question 21).
- Ensure certain protections for personal data before transferring it outside of Kazakhstan (Article 16, PDP Law; see Question 20).
- Anonymize personal data that they collect and use for statistical, sociological, marketing, or scientific surveys before they transfer it (Article 17, PDP Law).
- Destroy personal data when:
 - the organization achieves the collection and processing purposes;
 - the relationship between involved parties terminates;
 - the collection or processing occurred without the data subject's legally required consent;

- · a court decision requires it; or
- · a law requires it.
- (Article 18, PDP Law.)
- Facilitate the exercise of data subjects' rights (Articles 24(1) and 25(2), PDP Law; see Question 12 and Question 13).
- Take the necessary legal, organizational, and technical measures to protect personal data (Articles 22 and 25(2), PDP Law).
- Comply with the legislation related to personal data and its protection (Article 25(2), PDP Law).
- Approve a list of personal data required for their activities (Article 25(2), PDP Law).
- Approve documents setting out the operator's policy on the collection, processing, and protection of personal data (Article 25(2), PDP Law).
- Provide the data subject an opportunity to see their personal data on request, free of charge (Article 25(2), PDP Law).
- Appoint a person responsible for personal data processing if the database owner or operator is a legal entity (Article 25(2), PDP Law).
- Be able to demonstrate their compliance with the PDP Law on request from the supervisory authority (Article 25(2), PDP Law).

9. Is the consent of data subjects required before processing personal data?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) requires organizations to obtain data subjects' consent before collecting and processing personal data (Article 7(1), PDP Law). Organizations may obtain consent in writing, via a state service, a non-state service, or in another manner that allows confirmation of consent, and data subjects may withdraw consent in the same ways unless Kazakhstan law prohibits it (Article 8(1), PDP Law).

The PDP law requires the consent to contain certain information, including:

- The database operator's name, business identification number, or individual identification number, depending on whether the operator is a person or entity.
- The data subject's first, last, and patronymic name.
- The term or period for which the consent is valid.
- Whether the operator can transfer personal data to third parties.
- Whether the operator will transfer the personal data outside of Kazakhstan.
- Whether the operator will disclose the personal data in public resources.
- A list of personal data the operator will collect about the data subject.
- Other information that the operator chooses to provide.

(Article 8(4), PDP Law.)

For more on other legal bases for processing personal data, see Question 10.

10. If consent is not given, on what other grounds (if any) can processing be justified?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law), permits organizations to collect and process personal data without an individual's consent in certain situations, including:

- To conduct the activities of law enforcement, courts, administrative offense cases, and enforcement proceedings.
- To carry out state statistical activity.
- For state bodies to use anonymized personal data for statistical purposes.
- To fulfil international treaties that Kazakhstan has ratified.
- To protect persons' and citizens' constitutional rights and freedoms if obtaining a data subject's or their legal representative's consent is impossible.
- · To carry out legitimate journalistic, mass media, scientific, literary, or other creative activities.
- To publish personal data consistent with Kazakhstan law, including that of candidates for elected government positions.
- If a data subject fails to provide personal data when legally required.
- When state authorities regulating and supervising financial markets and organizations collect information from legal entities and individuals consistent with law.
- · By state tax authorities for tax and customs administration consistent with law.
- When backup copying electronic resources containing personal data to the unified national backup storage platform.
- Usage of entrepreneurs' personal data related to their entrepreneurial activity in circumstances the law provides.
- For the purposes of a Kazakhstan citizen's personal bankruptcy, from the day they submit the relevant application.
- In other cases as Kazakhstan law permits.

(Article 9, PDP Law.)

For more on consent as a legal basis to process data, see Question 9.

Special Rules

11. Do special rules apply for certain types of personal data, such as sensitive data?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) classifies personal data as either:

- Publicly available data, which may be made public with the data subject's consent. Confidentiality requirements do not generally apply to public personal data.
- Restricted data, to which another Kazakhstan law restricts access.

(Article 6, PDP Law.)

The PDP Law defines biometric data as personal data that characterizes the physiological and biological features of a data subject and can establish their identity (Article 1(1), PDP Law). The PDP Law does not contain provisions on processing biometric data, but states that Kazakhstan law should establish confidentiality requirements for biometric data. (Article 11(3), PDP Law).

For more on the definition of personal data, see Question 4.

Rights of Individuals

12. What information rights do data subjects have?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) does not specify information that data controllers should provide to data subjects when collecting personal data. However, when obtaining data subject consent to collect and process personal data, the consent must contain certain information, including:

- The database operator's name, business identification number, or individual identification number, depending on whether the operator is a person or entity.
- The data subject's first, last, and patronymic name.
- The term or period for which the consent is valid.
- Whether the operator can transfer personal data to third parties.
- Whether the operator will transfer the personal data outside of Kazakhstan.
- Whether the operator will disclose the personal data in public resources.
- A list of personal data the operator will collect about the data subject.
- Other information that the operator chooses to provide.

(Article 8(4), PDP Law.)

For more on:

- Consent, see Question 9.
- Data subjects' rights, see Question 13 and Question 14.

13. Other than information rights, what other specific rights are granted to data subjects?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) grants data subjects the right to:

- · Know whether a database owner, database operator, or third party holds their personal data.
- Request and receive information within three business days of the request:
 - confirming the fact, purpose, sources, and methods for collecting and processing their personal data;
 - about the personal data the database owner, database operator or the third party requires for their activities; and
 - containing the terms of the personal data processing, including storage.
- Request the database owner or database operator to amend their personal data, if a sufficient basis for amendment exists.
- Request the database owner, database operator, or third party to block or destroy their personal data if the
 personal data collection or processing violates Kazakhstan law.
- Revoke consent for their personal data collection, processing, disclosure, or publication in public resources, transfer to third parties, or transfer outside of Kazakhstan, except as set out in the PDP Law.
- Protect their rights and legal interests and receive compensation for moral and material damage.
- Exercise other rights as provided by Kazakhstan law.

(Article 24(1), PDP Law.)

For more on

14. Do data subjects have a right to request the deletion of their data?

See Question 13.

Security Requirements

15. What security requirements are imposed in relation to personal data?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) requires database owners, database operators, and third parties to adopt legal, organizational, and technical measures to protect personal data, including:

- Preventing unauthorized access to personal data.
- Detecting unauthorized access to personal data in a timely manner.
- Minimizing adverse effects resulting from the unauthorized access to personal data.
- Providing the state technical service with access to the software that manages restricted personal data so it can conduct a security assessment.
- Registering and recording certain actions for obtaining data subject consent under PDP Law Article 8(4).

(Articles 21 and 22(1), PDP Law.)

The database owner, database operator, and third party must follow these foregoing requirements from the moment it collects personal data until the moment of its destruction or anonymization (Article 22(2), PDP Law).

16. Is there a requirement to notify data subjects or the supervisory authority about personal data security breaches?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) does not contain a requirement to notify data subjects or the supervisory authority of personal data security breaches. However, sectoral breach notification requirements may apply depending on the industry and details of the breach.

For more on sectoral laws in Kazakhstan, see Question 1.

Processing by Third Parties

17. What additional requirements (if any) apply where a third party processes the data on behalf of the data controller?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) does not contain additional rules for third parties processing personal data on behalf of database owners controllers. The general rule states that the data subject's consent must indicate whether they agree to third parties collecting or processing personal data (Article 8(4), PDP Law; see Question 9).

Electronic Communications

18. Under what conditions can data controllers store cookies or equivalent devices on the data subject's terminal equipment?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 does not contain specific provisions on cookies or equivalent devices, but its personal data collection and processing requirements generally apply to the use of cookies, including but not limited to the requirement to obtain data subject consent.

For more on data subject consent, see Question 9.

19. What rules regulate sending commercial or direct marketing communications?

In addition to the Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law), the Law of the Republic of Kazakhstan, On Advertising No. 508 dated 19 December 2003 (Advertising Law) applies to sending unsolicited electronic commercial communications and contains specific limitations and restrictions. For example, the Advertising Law only permits advertising when providing certain information-related services with the client's consent (Article 10(3), Advertising Law). In addition, the Rules on Provision of Cellular Services prohibit spamming via the cellular networks without the mobile user's consent (Clause 29, Rules on Provision of Cellular Services).

International Transfer of Data

Transfer of Data Outside the Jurisdiction

20. What rules regulate the transfer of data outside the jurisdiction?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) permits the transfer of personal data outside of Kazakhstan without the data subject's prior consent only to countries that provide an adequate level of personal data protection (Article 16(2), PDP Law).

The PDP Law permits cross-border personal data transfers to counties that do not provide an adequate level of personal data protection if:

- The data subject consents to the transfer.
- The international treaties that Kazakhstan has ratified permits the transfer.
- Kazakhstan laws permit the transfer to protect:
 - the constitutional system;
 - public order;
 - · human and citizen rights and liberties; or
 - the health and morale of the people.
- The transfer is necessary to protect human and citizen constitutional rights and liberties and the person or entity transferring the personal data could not obtain data subject consent.

(Article 16(3), PDP Law.)

21. Is there a requirement to store any type of personal data inside the jurisdiction?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) requires database owners, database operators, and third parties to store personal data in a database

located in Kazakhstan (Article 12(2), PDP Law). The scope of this restriction is somewhat vague. According to state authorities' unofficial clarifications in March 2016, organizations may store personal data in a database located outside of Kazakhstan if they also already store the relevant personal data in a database located in Kazakhstan.

For more information on data localization requirements in Kazakhstan, see Country Q&A, Data Localization Laws: Overview (Kazakhstan).

Data Transfer Agreements

22. Are data transfer agreements contemplated or in use? Has the supervisory authority approved any standard forms or precedents for cross-border transfers?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) does not contemplate data transfer agreements, and the supervisory authority has not approved any standard forms or precedents for cross-border transfers.

For more information on cross-border data transfers, see Question 20.

23. For cross-border transfers, is a data transfer agreement sufficient, by itself, to legitimize transfer?

See Question 20 and Question 22.

24. Must the relevant supervisory authority approve the data transfer agreement for cross-border transfers?

No, the supervisory authority does not need to approve data transfer agreements.

Enforcement and Sanctions

25. What are the enforcement powers of the supervisory authority?

The Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) tasks the Government of Republic of Kazakhstan with:

- Developing the main direction of the state personal data protection policy.
- Managing activities of Kazakhstan central executive bodies and local executive bodies in the data protection field.
- Approving procedures for database owners and database operators to determine the list of personal data necessary and sufficient to perform their tasks.
- Approving procedures for database owners, database operators, and third parties to take measures to protect personal data.

Exercising other functions that the Kazakhstan Constitution, law, and President impose.

(Article 26, PDP Law.)

The PDP law grants relevant government bodies within their competence the power to:

- Develop and approve personal data protection regulations and laws.
- Review individuals' and entities' applications and complaints regarding personal data protection issues.
- Take action against and impose liability for PDP Law violations.
- Exercise other powers that Kazakhstan laws, acts of the Kazakhstan President, and the Kazakhstan Government provide.

(Article 27, PDP Law.)

The Ministry for Digital Development, Innovations, and Aerospace Industry of Kazakhstan (MDD) is a sectoral national regulator that concentrates on aerospace and electronics industries, innovation activity, and scientific and technical development, informational security in the field of informatization, and personal data and its security (see **Error! Hyperlink reference not valid.**). The PDP Law tasks the MDD with:

- Implementing state policy on personal data protection.
- Developing procedures for database owners, database operators, and third parties to implement personal data protection measures.
- Developing rules for database owner and operators to determine the list of personal data necessary and sufficient to perform their objectives.
- Considering and deciding requests of individuals or their legal representatives on compliance with the content of personal data and the means of processing it consistent with its processing purposes.
- Taking measures to bring persons who have violated Kazakhstan law on personal data and its protection to justice consistent with Kazakhstan law.
- Requiring database owners, database operators, and third parties to clarify, block, or destroy unreliable or illegally obtained personal data.
- Implementing measures to improve the protection of individuals' rights.
- Establishing a personal data protection advisory council and outlining the procedure for its formation and operation.
- Approving rules for collecting and processing personal data.
- Approving the rules for assessing the security of restricted personal data contained in electronic information resources, including its storage, processing, and dissemination in coordination with the Kazakhstan National Security Committee.
- Endorsing the operating rules of the state service for control of access to personal data.
- Agreeing on the integration of non-state information entities with public authority information entities and state legal entities, where personal data is transferred and accessed.
- Adopting regulations for integration with the government's personal data access control service;

• Exercising other powers stipulated by the PDP Law, other Kazakhstan laws, and acts of the Kazakhstan President or Government.

(Article 27-1, PDP Law.)

In addition, the PDP Law grants the general prosecutor office supervisory powers over its uniform application and that of other Kazakhstan personal data protection laws (Article 28, PDP Law). The general prosecutor's office may impose administrative liability for violations of personal data regulations.

26. What are the sanctions and remedies for non-compliance with data protection laws?

In addition to civil liability, non-compliance with the Law of Republic of Kazakhstan, On Personal Data and Its Protection No. 94-V dated 21 May 2013 (PDP Law) may result in administrative or criminal liability consistent with the laws of Kazakhstan (Article 79, Kazakhstan Administrative Code and Article 29, PDP Law). The PDP Law is not yet widely enforced in Kazakhstan, but there is a body of judicial precedent developing from court enforcement of the PDP Law and protection of personal data subjects' rights.

Regulator Details

Ministry for Digital Development, Innovations, and Aerospace Industry of Kazakhstan (MDD) (Министерство цифрового развития, инноваций и аэрокосмической промышленности Республики Казахстан)

W https://www.gov.kz/memleket/entities/mdai?lang=en

Main areas of responsibility. The MDD:

- Performs and implements state policy in regulated fields, develops aerospace industry and ensures
 security in the field of informatization, realizes state policy in the field of data and its protection, forms and
 develops information and communication values, geodesy, cartography and surface data, scientific and
 technological development of the country, rapid development and influence of the communication services
 market.
- Participates in the implementation of state policy in the field of personal data and its protection.

Online Resources

W http://adilet.zan.kz/eng

Description. This website is an online resource containing official publications of Kazakhstan laws and orders of Ministers and other chiefs of central government agencies. Published information is generally up-to-date. English translations are for guidance purposes only.

W http://mic.gov.kz

Description. This website is an official website of the Ministry for Information and Communication of Kazakhstan, where English versions of certain Regulations and Decrees may be found. Published information is generally up-to-date. English translations are for guidance purposes only.

W http://cis-legislation.com/index.fwx

Description. This website is an unofficial resource containing legislative documents of CIS countries. Published information may be out-of-date. English translations may be used for guidance purposes only.

W www.legislationline.org

Description. This website provides access to international norms and standards, as well as to domestic legislation and other documents of the countries from the OSCE region. Legislation and other documents related to Kazakhstan may be out-of-date. English translations may be used for guidance purposes only.

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