

# Privacy Policy

**Last updated:** 12.04.2026 **Effective date:** 13.04.2026

This Privacy Policy explains how Sole Proprietor Rozmaznin M. S, registration/tax number 890308954697 ("Mirsi", "we", "us", or "our") collects, uses, stores, and shares personal data when you visit or interact with the website <https://mirsi.hair> and any related pages (collectively, the "Website").

We are committed to protecting your privacy and processing your personal data lawfully, fairly, and transparently in accordance with applicable data-protection laws, including Law of the Republic of Kazakhstan No. 94-V "On Personal Data and its Protection".

If you do not agree with this Privacy Policy, please do not use the Website.

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## 1. Data Controller

The data controller responsible for your personal data is:

**Sole Proprietor Rozmaznin M. S**, Registration / Tax No.: 890308954697 Email: [mirsi@mirsi.hair](mailto:mirsi@mirsi.hair)  
Website: <https://mirsi.hair>

## 2. What Personal Data We Collect

We only collect personal data that is necessary for the purposes described in this Privacy Policy. The categories of data we may collect are:

### 2.1 Data you provide to us directly

- **Newsletter subscription:** your email address.
- **Contact and communication:** your name, email address, phone number, messenger handle (e.g., Instagram, Telegram, WhatsApp), and any information you choose to include in your message when you contact us.
- **User-submitted content:** any feedback, reviews, photos, or other content you voluntarily share with us through the Website, email, or social channels.

### 2.2 Data we collect automatically when you visit the Website

- **Technical data:** IP address, browser type and version, operating system, device type, screen resolution, language settings, time zone.
- **Usage data:** pages viewed, time spent on pages, referring URL, links clicked, scroll depth, navigation paths, and similar interaction data.

- **Cookies and similar technologies:** see Section 7 below.

### 2.3 Data we receive from third parties

- Aggregated, anonymized, or pseudonymized analytics data from analytics providers.
- Information from social media platforms when you interact with our official accounts (subject to those platforms' own privacy policies).

We do **not** knowingly collect special categories of personal data (such as data about health, religion, political views, biometric data, or sexual orientation), and we ask that you do not submit such data to us.

## 3. Why We Process Your Personal Data and the Legal Basis

We process your personal data only for specific, legitimate purposes and only when we have a valid legal basis to do so:

<b>Purpose</b>	<b>Categories of data</b>	<b>Legal basis</b>
To send you our newsletter, brand updates, tutorials, and promotional content	Email address	Your consent
To respond to your inquiries, requests, and feedback	Contact details, message content	Performance of pre-contractual steps / our legitimate interest in supporting customers / your consent
To operate, maintain, secure, and improve the Website	Technical data, usage data	Our legitimate interest in operating a functional and secure website
To analyze how visitors use the Website and improve our content and product offering	Usage data, cookies	Your consent (where required) / our legitimate interest
To prevent fraud, abuse, and unauthorized access	Technical data, usage data	Our legitimate interest in protecting the Website and our users / legal obligation
To comply with legal obligations (e.g., tax, accounting, responses to lawful requests from authorities)	As required by law	Compliance with legal obligation

Purpose	Categories of data	Legal basis
To establish, exercise, or defend legal claims	As required	Our legitimate interest

Where we rely on **consent**, you may withdraw your consent at any time without affecting the lawfulness of processing carried out before withdrawal (see Section 9).

#### 4. How We Collect Personal Data

We collect personal data:

- directly from you, when you submit it through forms, by email, or via our social channels;
- automatically, through cookies and similar technologies when you use the Website;
- from third-party services we use (such as analytics or email-delivery providers), strictly within the scope they make available to us.

#### 5. How We Share Your Personal Data

We do **not** sell your personal data. We share personal data only with the following categories of recipients, and only to the extent necessary:

- **Service providers (data processors)** that help us operate the Website and our business, including:
  - hosting and infrastructure providers;
  - email-delivery and newsletter providers;
  - analytics providers;
  - customer-support tools;
  - communication platforms (Instagram, Telegram, WhatsApp) when you contact us through them. These processors act on our instructions under written agreements that include appropriate confidentiality and data-protection obligations.
- **Marketplaces and authorized retailers:** we do **not** transfer your personal data to marketplaces. When you purchase Mirsi products through a marketplace, your transaction is processed by that marketplace under its own privacy policy. We may receive aggregated, non-personal information about sales performance.
- **Public authorities, regulators, and law-enforcement bodies** when we are legally required to disclose data, or when disclosure is necessary to protect our rights, the rights of others, or the security of the Website.

- **Professional advisors** (lawyers, accountants, auditors) under confidentiality obligations, where necessary.
- **Successors in interest** in the event of a merger, acquisition, reorganization, or sale of assets, in which case personal data may be transferred to the acquirer subject to this Privacy Policy or a notice to you.

## 6. International Transfers of Personal Data

Some of our service providers may be located outside Kazakhstan. When we transfer personal data internationally, we take appropriate safeguards to ensure that your data is protected in accordance with applicable law, which may include:

- transferring data to countries recognized as providing an adequate level of protection;
- entering into standard contractual clauses or other approved data-transfer mechanisms;
- obtaining your explicit consent where required.

You may request more information about the safeguards in place by contacting us at the address in Section 13.

## 7. Cookies and Similar Technologies

The Website uses cookies and similar technologies (such as pixels, local storage, and SDKs) to function correctly, to remember your preferences, and to understand how visitors use the site.

The categories of cookies we use are:

- **Strictly necessary cookies** — required for the Website to function. These cannot be disabled.
- **Functional cookies** — remember your preferences and settings (such as language).
- **Marketing cookies** — used to measure the effectiveness of advertising and, where applicable, to deliver relevant ads.

Where required by applicable law, we will request your consent before placing non-essential cookies through a cookie banner or similar mechanism. You can manage your cookie preferences at any time through the cookie settings on the Website or through your browser settings. Please note that disabling certain cookies may affect the functionality of the Website.

## 8. Data Retention

We keep your personal data only for as long as necessary for the purposes for which it was collected, or as required by applicable law:

- **Newsletter data:** until you unsubscribe, or until we determine the data is no longer needed for the purpose of sending communications.
- **Inquiry and contact data:** for the duration of the conversation and for a reasonable period afterward (typically up to 24 months) for follow-up and reference, unless a longer period is required by law.
- **Analytics and technical logs:** typically retained in identifiable form for up to 26 months, after which they are anonymized or deleted.
- **Data required for legal, tax, or accounting compliance:** for the period required by applicable law.
- **Data needed to establish, exercise, or defend legal claims:** until the relevant limitation period expires.

When personal data is no longer needed, we securely delete or anonymize it.

## 9. Your Rights

Subject to applicable law, you have the following rights regarding your personal data:

- **Right of access** — to obtain confirmation of whether we process your personal data and to request a copy of it.
- **Right to rectification** — to request that inaccurate or incomplete data be corrected or completed.
- **Right to erasure ("right to be forgotten")** — to request deletion of your personal data, subject to certain legal exceptions.
- **Right to restriction of processing** — to request that we limit the processing of your data in certain circumstances.
- **Right to object** — to object to processing based on our legitimate interests, including direct marketing.
- **Right to data portability** — to receive your data in a structured, commonly used, machine-readable format and to transmit it to another controller, where technically feasible.
- **Right to withdraw consent** — where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of processing carried out before withdrawal.
- **Right to lodge a complaint** — to file a complaint with the competent data-protection supervisory authority in your country (see Section 13).

To exercise any of these rights, please contact us using the details in Section 13. We will respond to your request within the timeframe required by applicable law (generally within 30 calendar days). We may need to verify your identity before fulfilling certain requests.

There is no fee for exercising your rights, except where the law allows us to charge for manifestly unfounded or excessive requests.

## 10. Children's Privacy

The Website is not intended for children under the age of 16, or the minimum age of digital consent in your country, whichever is higher. We do not knowingly collect personal data from children below this age without verifiable parental consent.

If you believe a child has provided us with personal data without appropriate consent, please contact us at the address in Section 13, and we will take steps to delete the data promptly.

## 11. Third-Party Services and Links

The Website contains links to third-party services (such as Wildberries, Instagram, Telegram, and WhatsApp) and may include embedded content from third parties. These third parties are independent controllers and operate under their own privacy policies. We are not responsible for the privacy practices of these third parties, and we encourage you to review their privacy policies before using their services.

## 12. Security of Your Personal Data

We implement appropriate technical and organizational measures to protect your personal data against unauthorized access, accidental loss, alteration, disclosure, or destruction. These measures include encrypted connections (HTTPS), access controls, secure hosting, and regular review of our security practices.

However, no method of transmission over the internet or method of electronic storage is completely secure, and we cannot guarantee absolute security. You are responsible for keeping your own credentials (such as email passwords) secure.

In the event of a personal-data breach that is likely to result in a risk to your rights and freedoms, we will notify you and the competent supervisory authority in accordance with applicable law.

## 13. Contact and Complaints

If you have any questions, concerns, or requests regarding this Privacy Policy or our processing of your personal data, please contact us at:

**Sole Proprietor Rozmazzin M. S,** Email: [mirsi@mirsi.hair](mailto:mirsi@mirsi.hair)

## 14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. The updated version will be posted on the Website with a revised "Last

updated" date. Where the changes are material, we will provide additional notice (for example, by email or a prominent notice on the Website) before the changes take effect.

We encourage you to review this Privacy Policy periodically.

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*By using the Website, you acknowledge that you have read and understood this Privacy Policy.*