
**PERSONAL DATA PRTECTION POLICY
OF JSC «DENIZBANK MOSCOW»**

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List of terms and definitions

Administrative and Economic Activity is the internal banking processes aimed at the current provision of the Bank with inventory items (procurement of office supplies, office equipment, consumables, household goods, communication services, etc.); on the organization of the operation of premises (maintenance, cleaning, decoration and repair of premises); on the organization of the workflow.

Bank (personal data processing operator) is JSC «Denizbank Moscow», which processes personal data, as well as defines the purposes for processing personal data, the composition of personal data to be processed, and actions performed with personal data.

Bank Employee is an individual who has entered into an employment contract with the Bank.

Close relatives are relatives in the direct ascending and descending lines (parents and children, grandfathers, grandmothers and grandchildren), full and half-full (having common father and mother) brothers and sisters..

Candidate is an individual applying for a vacant position in the Bank, whose personal data is accepted by the Bank.

Client is a term used to refer to a corporate client.

Corporate Client is a legal entity, an individual entrepreneur, as well as an individual engaged in private practice pursuant to the procedure established by the legislation of the Russian Federation, who has entered into or intends to conclude an agreement with the Bank for the provision of services.

Dissemination of Personal Data is actions aimed at disclosing personal data to unidentified persons.

Individual is a subject of personal data that acts as a subject of legal relations.

Processing of Personal Data is any action (operation) of the Bank or a set of actions (operations) performed with the use of automation tools or without using such means with personal data, including collection, recording, systematization, accumulation, storage, refinement (updating, changing) retrieval, use, transfer (Submitting, access), Depersonalization, Blocking, deleting and Destruction of personal data. In the framework of the Federal Law dated July 27, 2006 № 152-FZ “On Personal Data” the following definitions are established:

- Blocking of personal data is a temporary suspension of the processing of personal data (except when processing is necessary to clarify personal data).
- Depersonalization of personal data are actions that as a result make it impossible without using additional information to determine the identity of personal data to a specific Personal Data Subject.
- Submitting of personal data is actions aimed at disclosing personal data to a specific person or to certain persons.
- The Destruction of personal data is an action, as a result of which it becomes impossible to restore the content of personal data in the information system of personal data and (or) as a result of which the material carriers of personal data are destroyed.

Personal Data Subject (Subject of Personal Data) is an individual who is directly or indirectly determined by personal data.

Representative of the Corporate Client is an individual whose personal data is transferred to the Bank.

1. General provisions

1.1. The Personal Data Protection Policy of JSC "Denizbank Moscow" (hereinafter - the Policy) is developed in accordance with the requirements:

- Constitution of the Russian Federation;
- Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (ETS N 108, concluded in Strasbourg, January 28, 1981);
- Labor Code of the Russian Federation of December 30, 2001 № 197-FZ, including amendments and additions;
- Federal Law of July 27, 2006 № 152-FZ "On Personal Data", subject to changes and additions;
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);

Other federal laws and regulations of the Russian Federation defining cases and peculiarities of processing personal data and ensuring the security and confidentiality of such information (hereinafter - the Law on Personal Data).

1.2. The Policy was developed in order to implement the requirements of the legislation in the field of processing and ensuring the security of personal data and is aimed at ensuring the protection of the rights and freedoms of a person and citizen in the processing of his personal data in the Bank.

1.3. The Policy sets:

- purposes of processing personal data;
- classification of personal data from personal data subjects;
- general principles of personal data processing;
- main participants of the personal data processing management system;
- main approaches to the personal data processing management system.

1.4. The provisions of this Policy are the basis for organizing work on the processing of personal data in the Bank, including the development of internal regulatory documents of the 2nd and 3rd level (regulations, methods, instructions, etc.) governing the processing of personal data in the Bank.

1.5. The provisions of this Policy are binding for all Bank Employees who have access to personal data.

1.6. This Policy is placed on a publicly accessible internal corporate information resource for the general use of Bank Employees.

1.7. The Bank Employees are familiarized with the provisions of this Policy under the signature.

2. Purpose of processing personal data

2.1. As part of its core business, JSC «Denizbank Moscow» performs the processing of personal data in order to:

- banking operations and transactions in accordance with the Bank's Charter and licenses issued to the Bank for banking and other transactions;
- selection of Candidates for work in the Bank;
- conducting personnel work and organizing accounting of Bank Employees;
- implementation by the Bank of administrative and business activities;
- regulation of labor and other directly related relations;
- generating statistical reports;
- identifying cases of fraud, embezzlement of funds from the account, other illegal actions, preventing such illegal actions in the future and localizing the consequences of such actions.

2.2. In order to maintain business reputation and comply with federal laws, the Bank's task is to ensure the legitimacy of personal data processing in the Bank's business processes, as well as to ensure an adequate level of security of personal data processed at the Bank.

3. Classification of personal data and Personal Data Subjects

3.1. Personal data refers to any information relating to a directly or indirectly determined or designated individual (Personal Data Subject) processed by the Bank to achieve predetermined goals.

3.2. The Bank does not process special categories of personal data relating to race and nationality, political views, religious and philosophical beliefs, intimate life, criminal record of individuals, with exemptions expressly established by the current legislation of the Russian Federation. The Bank is entitled to process a special category of personal data relating to the health status of the Personal Data Subject (insured persons and other persons) only in cases stipulated by the current legislation).

3.3. The Bank processes personal data of the following categories of Personal Data Subjects:

- individuals who are Candidates for vacant positions;
- individuals who are employees of the Bank and their close relatives;
- individuals who are Corporate Clients of the Bank;

- individuals performing work on the provision of services and who have entered into a civil law agreement with the Bank;
- individuals representing the interests of the Bank's Corporate Client (Representatives of the Corporate client);
- individuals who are beneficiaries;
- individuals who are employees of the Bank's counterparty company;
- individuals who are a counterparty of the Bank's Corporate Client;
- individuals in respect of whom there is information about their participation in extremist activities.

4. General principles of personal data processing

4.1. The Bank processes personal data on the basis of general principles:

- the legality of predetermined specific goals and ways of processing personal data;
- ensure proper protection of personal data;
- compliance of the purposes of processing of personal data with the goals predetermined and declared when collecting personal data;
- correspondence of the volume, nature and methods of personal data processing with the purposes of personal data processing;
- the reliability of personal data, their adequacy for processing purposes, the inadmissibility of the processing of personal data redundant in relation to the goals stated in the collection of personal data;
- inadmissibility of combining databases containing personal data that are processed for purposes that are incompatible with each other;
- storage of personal data in a form that allows you to define the Personal Data Subject not longer than the purpose of processing it requires;
- the destruction or depersonalization of personal data upon the achievement of the purposes of their processing, if the storage period for personal data is not established by the legislation of the Russian Federation or the contract, and whose party, the beneficiary or surety is the Personal Data Subject;
- ensure the confidentiality and security of the personal data processed.

4.2. As part of the processing of personal data for the Personal Data Subject and the Bank, the following rights are defined.

4.2.1. The Subject of Personal Data has the right:

- receive information regarding the processing of his personal data in the manner, form and time established by the Law on Personal Data;
- require that their personal data be updated, blocked or destroyed if personal data are incomplete, outdated, inaccurate, illegally obtained, are not necessary for the stated purpose of

processing or are used for purposes not stated previously in the provision of personal data consent;

- take legal measures to protect their rights;
- withdraw your consent to the processing of personal data.

4.2.2. The Bank has the right:

- process personal data of the Personal Data Subject in accordance with the stated purpose;
- require the Subject of personal data to provide reliable personal data necessary for the execution of the contract, the provision of services, the identification of the Subject of personal data, as well as in other cases stipulated by the Law on Personal Data;
- to limit the access of the Personal Data Subject to his personal data in the event that the Processing of personal data is carried out in accordance with the legislation on countering the legalization (laundering) of criminal proceeds and the financing of terrorism; limit the access of the Personal Data Subject to his personal data if it violates the rights and legitimate interests of third parties, as well as in other cases stipulated by the legislation of the Russian Federation;
- process publicly available personal data of individuals;
- to process personal data subject to publication or mandatory disclosure in accordance with the legislation of the Russian Federation;
- entrust the processing of personal data to another person with the consent of the Personal Data Subject.

5. Organization of the management system for processing personal data

5.1. The Processing of personal data of the Subject of personal data is carried out with his consent to the processing of personal data, as well as without such, if: Processing of personal data is necessary for the execution of the contract to which the Subject of personal data is a beneficiary or guarantor; Processing of personal data is necessary for the execution of the contract, under which the Personal Data Subject will be a beneficiary or guarantor; Processing of personal data is necessary in other cases stipulated by the Law on Personal Data.

5.2. The processing of a special category of personal data relating to the health status of the Personal Data Subject is carried out with the consent of the Personal Data Subject to the processing of their personal data in writing, and without it, if the personal data is made publicly available by the Personal Data Subject.

5.3. The Bank is entitled to entrust the processing of personal data to another person (third party) with the consent of the Personal Data Subject, unless otherwise provided by federal law. Such processing of personal data is carried out only on the basis of an agreement concluded between the Bank and a third party, in which:

- a list of actions (operations) with personal data that will be performed by a third party processing personal data;
- purposes of processing personal data;

- the obligations of a third party to respect the confidentiality of personal data and to ensure their security during processing, as well as the requirements for the protection of processed personal data.

5.4. The Bank transfers personal data to state authorities within their authority in accordance with the legislation of the Russian Federation.

5.5. The Bank is liable to the Personal Data Subject for the actions of persons entrusted by the Bank with the processing of personal data of the Personal Data Subject.

5.6. Access to processed personal data is provided only to those Employees of the Bank who need it in connection with the performance of their official duties and in compliance with the principles of personal responsibility.

5.7. The processing of personal data is terminated upon the achievement of the objectives of such processing, as well as upon the expiration of the period stipulated by law, contract, or the consent of the Personal Data Subject to the processing of his personal data. Upon revocation by the Subject of Personal Data of consent to the processing of its personal data, the Bank is entitled to continue processing of personal data without the consent of the Subject of personal data, if such processing is provided for by an agreement whose party is a Beneficiary or Guarantor for which the Personal Data Subject is, other agreement between the Bank and the Personal Data Subject or if the Bank is entitled to process personal data without the consent of the Personal Data Subject on the grounds provided for s legislation on personal data, or other federal laws.

5.8. The Processing of personal data is subject to confidentiality, which means the obligation not to disclose to third parties and not to distribute personal data without the consent of the Personal Data Subject, unless otherwise provided by the legislation of the Russian Federation.

5.9. The Bank ensures the confidentiality of personal data of the Personal Data Subject on its part, on the part of its affiliated persons, on the part of its Employees who have access to personal data of individuals, and also ensures the use of personal data by the above-mentioned persons solely for purposes consistent with law, contract or other agreement concluded with the Personal Data Subject.

5.10. The security of the processed personal data is carried out by the Bank within the framework of a single integrated system of organizational, technical and legal measures for the protection of information constituting banking and commercial secrets, taking into account the requirements of the Law on Personal Data, adopted in accordance with the regulations. The information security system of the Bank is continuously developed and improved on the basis of the requirements of international and national information security standards.

5.11. The Bank has appointed persons responsible for organizing the processing and ensuring the security of personal data, and also identifies the main participants in the management of the personal data processing process.

5.12. The Bank carries out cross-border transfer of personal data (transfer of personal data to the territory of a foreign state, a foreign state authority, a foreign individual or a foreign legal entity) solely with the consent in writing of the Subject of Personal Data to the cross-border transfer of his personal data a contract to which the subject of personal data is a party.

6. Final provisions

6.1. The Bank, as well as its employees, bear civil, administrative and other responsibility for non-compliance with the principles and conditions of processing personal data of individuals, as well as for disclosing or illegal use of personal data in accordance with the legislation of the Russian Federation.

6.2. The Policy is publicly available and is to be posted on the official website of the Bank or otherwise provided unrestricted access to this document.

