

Annex No. 5
To the Procedure for Personal Data Processing in
KREDOBANK JOINT STOCK COMPANY

NOTIFICATION

On the Procedure for Personal Data Processing

KREDOBANK Joint Stock Company (hereinafter referred to as the Bank), in compliance with the requirements of Article 12 of the Law of Ukraine On Personal Data Protection dated June 01, 2010 No. 2297-VI, hereby informs you, as party of personal data (hereinafter referred to as PD), about the purpose, the grounds and the procedure for PD processing, as well as about the rights of the party of PD with regard to the establishment of legal relations with the Bank.

To ensure proper protection of PD, the Bank within its activities is guided and adheres to the current legislation of Ukraine, namely: Law of Ukraine On Personal Data Protection, Law of Ukraine On Access to Public Information, Law of Ukraine On Banks and Banking, the Constitution of Ukraine and other laws and regulations of Ukraine. In addition, the Bank takes into account the requirements of the Convention on the protection of natural persons with regard to the processing of personal data and the requirements of the Regulation of the European Parliament and of the Council 2016/679 of 27.04.2016 and on the free movement of such data (General Data Protection Regulation).

Purpose and grounds for PD processing

The purpose of PD processing in the Bank is to provide banking (financial) services, establish business, labour and contractual relations, preparation of financial and statistical reports in accordance with the requirements of the Ukrainian legislation, internal regulatory documents of the Bank.

The grounds for PD processing are:

- Consent of the PD party;
- Permit granted to the Bank as the Owner of the PD in accordance with the requirements of the legislation of Ukraine exclusively for the exercise of its powers;
- Conclusion and fulfilment of the terms of transaction which the PD party is a party to or which is concluded in favour of the PD party or for the implementation of measures preceding the conclusion of the transaction at the request of the PD party;
- Protection of vital interests of the PD party;
- The need to fulfil the Bank's obligation as the Owner of the PD, which is provided for by law;
- The need to protect the legitimate interests of the Bank and third parties, unless the PD Party requires stopping the processing of its PD and the need to preserve the PD surpasses such interest.

The Bank (as a party of primary financial monitoring) during identification shall process personal data for the purposes of preventing and countering the legalization (laundering) of proceeds from crime, in accordance with the requirements of the Law of Ukraine On Prevention and Counteraction to Legalisation (Laundering) of Criminal Proceeds, Terrorist Financing and Financing of Proliferation of Weapons of Mass Destruction No. 361-IX as of 06.12.2019.

PD Composition and Sources of Their Receipt

If provided for by the legislation of Ukraine, the Bank processes PD received from third parties, or if they can guarantee that the transfer will be carried out by a third party in accordance with Ukrainian law and won't violate the rights of persons whose PD is being transferred to the Bank.

The bank processes the PD of the following natural persons:

- Clients;
- Counterparties;
- Shareholders;
- Employees;
- Suppliers, employees of the supplier;
- Other natural persons.

The natural persons' PD that can be processed in the Bank may include: surname, first name, patronymic; date and place of birth; passport's issue data and authority; passport's series and number; ID-card number; residential address; registration address, citizenship; gender; registration number of the taxpayer's account card (identification number), social insurance number, phone number; personal email address; photo image; tax status; membership in political parties and trade unions; information on criminal conviction; voice recordings; video images; information about the payment account/payment card; information about personal information property location data and online identifier data (IP-address, cookies, radio frequency identification tags or other identifiers that can leave traces and can be used for profiling and identification), parameters and settings of internet browsers and other data depending on the nature of the relationship between the PD party and the Bank.

Consent of the PD Party

All natural persons, representatives of legal entities, and individual entrepreneurs who are the PD parties are asked for their consent for PD processing, except for situations where there are other legal justifications for the PD processing.

The consent shall be given through a clear and affirmative action that establishes a free, specific, justified and unambiguous indication of the consent of the personal data party to the processing of these personal data.

The consent of the PD party can be provided to the Bank in the form of:

- A hard copy document with details that allow identifying this document, including the consent of the PD party contained in the text of the contract, application, questionnaire, application-agreement, an internal-bank power of attorney, or the other documents signed by the PD party;

- Performing actions available to the PD party during registration in the Bank's information and communication system by marking the granting of permission to process personal data in accordance with the stated purpose of their processing, as long as such a system does not create opportunities for processing personal data prior to the marking, only in terms of transactions made in electronic form;

- In electronic form, by performing actions available to the PD party in the relevant telecommunications network/system, recorded by the equipment of the operator/provider of telecommunications services during the registration of the PD party in the relevant information and telecommunications network/system and/or during a visit to the website on the Internet, namely: by

putting the appropriate mark/tick and/or by selecting the appropriate technical settings and/or by using dial tones;

- Verbally, by exchanging information by voice in real time using telecommunications networks during a conversation between the PD party and an authorized representative of the Bank through the Bank's contact centre.

Any type of consent attests to the client's or potential client's being well-informed with the details provided in this communication, specifically those pertaining to the sources of personal data collection, the location of personal data, the purpose of their processing, the requirements for granting access to personal data, their transfer as well as the information about third parties to whom personal data may be transferred, the location of the owner and administrator of personal data, and awareness of the procedure.

Documents (information) confirming that the party's permission to the processing of his PD are stored by the Bank for no longer than is required to carry out that processing in accordance with Ukrainian law.

Personal data processing in compliance with the requirements of the Law of Ukraine On Prevention and Counteraction of Legalization (Laundering) of Criminal Proceeds, Financing of Terrorism and Financing of Proliferation of Weapons of Mass Destruction is carried out without obtaining the consent of the personal data party and shall not be considered as a violation of the Law of Ukraine On Personal Data Protection.

The Bank processes PD, which belongs to public information in the form of open data and obtained from publicly available sources, without obtaining the consent of the PD party.

A natural person's request to the Bank or the use of the Bank's services indicates that such person shall agree to the Bank's processing of PD with regard to such a request or the use of the Bank's services.

A person's denial of the PD processing needed for the Bank to fulfil its obligations, including the withdrawal of the person's consent to data processing, may become the grounds for the Bank to terminate the terms of the concluded agreements.

If a natural person withdraws consent to the PD processing without performing the procedures necessary for the termination of contractual or the other relations with the Bank, the Bank will continue processing PD within the limits and volumes stipulated by the implementation of existing legal relations and the legislation of Ukraine, including to protect the Bank's rights and legitimate interests under contracts.

PD Processing

PD can be processed in the Bank in an electronic and a paper form.

Regarding the personal information of the PD party, its confidentiality shall be preserved, except in cases stipulated by the legislation of Ukraine, or except for the cases when PD party voluntarily provides own information for general access to an unlimited number of persons.

PD processing in an information (automated) system shall be carried out using an information security system (network and antivirus).

The Bank does not use fully automated decision-making when performing PD processing.

In order to ensure the quality and safety of the service, the Bank performs audio recording/telephone conversations recording of natural persons with employees of the Bank, photo/video recording of natural persons in the premises and ATMs of the Bank on magnetic and/or

electronic media and the use by the Bank of the results of recordings/filming, including as evidence. The data from the Bank's video surveillance system (photo/video recording in the Bank's premises and ATMs), audio recording/telephone conversations recording with Bank employees can be used in each specific case, both by the Bank itself and by the competent state authorities, including the court (as evidence in criminal proceedings), law enforcement agencies (for security purposes), courts (to provide evidence in civil and economic cases), Bank employees, witnesses of offences, victims of offences (in compliance with their requirements), insurance (exclusively for the settlement of insurance claims), lawyers and other bodies to perform the functions of law enforcement purposes bodies).

Features of PD Processing on the Internet and Mobile Applications

Using the Bank's website or the website of the Bank's Partners, as well as the online banking web service, the PD party shall agree to the Bank's use of such data as cookies, access logins and passwords, IP addresses, mobile communication network numbers, parameters and settings of internet browsers for the provision of services by the Bank, evaluation of statistical data or the effectiveness of advertising campaigns. The Bank can also process information about the device (operating system version, hardware model, IMEI and other unique device identifiers, the Bank does not collect information about call history, SMS messages, etc.), connection data, traffic, date, time, network operation timeframe.

The client grants the Bank permission to use phone numbers, contact names and their images contained in the client's mobile device in order to make a fast funds transfer using the online banking web service.

The Bank also collects and stores information that the Bank's client provides directly to the Bank, as well as data of the Bank's client as a user, which are used for its registration and/or registration of its device in the mobile application to process payments of this Bank's client.

The Bank utilizes the information collected (can be combined with the other collected information of the Bank's client) for the following purposes:

- Registration of the Bank's client and/or device in the Services;
- Provision of a service or a function in the Services that the Bank's client has ordered;
- Providing personalized content and recommendations to use the mobile app;
- For advertising (e.g. providing a Bank's client with a personalized offer, sending them advertising messages);
- Evaluation and analysis of the market, customers, products and services provided through the mobile app (including customer surveys about services provided through the mobile app);
- Conducting research on how the Bank's clients/users utilize the Services provided to improve the quality of services;
- Providing updates and technical support for the Services on the device of the Bank's client;
- Defining the coefficient (result of evaluating the telecommunications behaviour and telecommunications parameters of the consumer) in the framework of using mobile communication services;
- Other purposes at the discretion of the Bank.

The PD party is directly responsible for the access control to its computer, mobile phone, tablet, or the other mobile device, mobile application that can be installed on its mobile device; the

party is also responsible for storing its passwords and/or PIN and for distributing this information to the third parties

If a PD party voluntarily provides third parties with its computer, mobile phone, tablet, or other device and/or the above information, the third party will have access to the Bank's customer account and personal information of this party, and the Bank is not responsible for such cases.

If the PD party suspects that the security of its personal data in the mobile application has been compromised, it shall inform the Bank of this as soon as possible.

Storing, Modifying, and Deleting PD

PD storage involves actions to ensure their integrity and the appropriate mode of access to them. The storage period for the PD shall not be longer than it is necessary for processing such data in compliance with the requirements of the legislation of Ukraine.

Actions related to the change in the PD shall be carried out on the basis of a reasoned written request of the PD party, at the request of the other parties of relations related to the PD, if there is the consent of the PD party otherwise the corresponding change shall be carried out by a court decision that has entered into legal force. Changes to PD that do not correspond to reality shall be made immediately from the moment the discrepancy is established.

PD is subject to deletion/destruction in the event of:

- Expiration of the data storage period, which is determined based on the nomenclature of cases of a particular category of PD party and shall be established in accordance with the requirements of the current legislation of Ukraine;
- Termination of legal relations between the PD party and the PD owner/administrator, unless otherwise provided by the requirements of the legislation;
- Issuing a corresponding order to the Commissioner or designated officials of the Commissioner's secretariat;
- Entry into force of a court decision on the deletion or destruction of data about a natural person;
- At the reasoned request of the PD party, if it does not contradict the requirements of the legislation of Ukraine.

The Bank processes personal data as necessary, throughout the entire duration of all business relations with the relevant personal data parties (starting from the conclusion of the contract/ordering the service, their execution and ending up with the termination of the relevant agreement, completion of customer service of the Bank), as well as before the end of terms for the Bank's information storage (documents with such information) defined by the terms and conditions of concluded contracts or the legislation of Ukraine, including the Law of Ukraine On Prevention and Counteraction of Legalization (Laundering) of Criminal Proceeds, Financing of Terrorism and Financing of Proliferation of Weapons of Mass Destruction, Rules for Applying the List of Documents Generated in the Activities of the National Bank of Ukraine and the banks of Ukraine approved by the resolution of the Board of the National Bank of Ukraine as of November 27, 2018 No. 130, internal regulatory documents of the Bank.

Procedure for Accessing the PD

Within the Bank, the access to personal data is provided to the divisions and/or individual employees of the Bank to fulfil their official (labour) duties related to the fulfilment of contractual, legal and/or regulatory obligations of the Bank and the realization of the Bank's legitimate interests.

Each employee of the Bank shall sign an obligation promising not to share the information they have access to.

The access to the PD of third parties shall be carried out on the basis and on the terms of agreements concluded with these persons, within the limits stipulated by the consent of the PD party and taking into account the requirements of the current legislation.

If there are grounds for processing PD, the Bank has the right to distribute PD, carry out their transfer to administrators or third parties, including those outside of Ukraine, to foreign entities, or provide access to them to third parties, if they can ensure compliance with the requirements of the law, and they have the appropriate technical and organizational means to protect the PD, in particular:

- To ensure that third parties perform their functions or provide services to the Bank, in particular to auditors, appraisers, insurance companies, payment systems, institutions that carry out identification, authorization and processing operations, counterparty banks and other persons, including to telecommunications operators providing mobile communication services, if such functions and services relate to the Bank's activities, operations carried out by the Bank, payment and other instruments issued by the Bank, or if these are necessary for the Bank's conclusion and execution of contracts (transactions), provision of relevant services the Bank's client, as well as the Bank's partners;
- PKO Bank Polski SA and any other persons who, by the nature of corporate relations, belong to the Banking Group, which includes a Bank in Ukraine, or the Capital Group of PKO Bank Polski SA;
- Bank Gospodarstwa Krajowego and other foreign financial institutions to implement programs of the European Commission to cover possible losses incurred by the Bank with regard to lending to small, medium and corporate businesses in Ukraine.
- Credit bureaus;
- If there are grounds for transferring bank secrets to third parties in accordance with the legislation of Ukraine or in accordance with the terms of concluded agreements;
- Persons who provide the Bank with services for storing or sending documents, formation and storage of their electronic copies (archives, databases);
- Persons representing the Bank's interests or providing services/ providing other activities of the Bank that do not contradict the legislation of Ukraine;
- Telecommunications operators providing mobile communication services in order to determine the coefficient (result of evaluating the telecommunications behaviour and telecommunications parameters of the consumer) and the use by the Bank/third parties of information received from telecommunications operators in order to provide banking services to the client;
- In other cases stipulated by the legislation of Ukraine and the terms of agreements concluded by the Bank, and when the distribution/transfer of PD is necessary, taking into account the functions, powers and obligations of the Bank in the relevant legal relations.

The transfer of PD to third parties shall be carried out by the Bank in these cases without obtaining additional written consent and separate notification of the natural person - PD party. The PD-related party shall submit a request for access to the PD of the Bank.

The recipients of the Bank's PD of clients (which is a bank secrecy) may involve:

- Any persons to whom the Bank shall transfer (disclose) the clients' PD on the basis and in accordance with the terms of a duly executed consent (permission) for such transfer provided by these clients to the Bank;
- Courts;

- Prosecutor's offices of Ukraine;
 - State Migration Service of Ukraine;
 - Security Service of Ukraine;
 - State Bureau of Investigation;
 - National Police Agencies;
 - National Anti-Corruption Bureau of Ukraine;
 - Anti-monopoly Committee of Ukraine;
 - Central executive authority implementing state tax policy;
 - Central executive authority that implements the state policy in the field of preventing and countering the legalization (laundering) of proceeds from crime, the financing of terrorism and the financing of the proliferation of weapons of mass destruction;
 - State Enforcement Service;
 - Private executors;
 - National Securities and Stock Market Commission;
 - National Agency for the Prevention of Corruption;
 - National Agency of Ukraine for Finding, Tracing and Management of Assets Obtained from Corruption and Other Crimes;
 - Central executive authority ensuring the formation of state financial policy;
 - Economic Security Bureau of Ukraine;
 - State notary offices;
 - Private notaries;
 - Foreign consular offices;
 - National Bank of Ukraine;
 - Other banks;
 - Bank Gospodarstwa Krajowego and other foreign financial institutions to implement programs of the European Commission to cover possible losses incurred by the Bank with regard to lending to small, medium and corporate businesses in Ukraine.
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- Beneficiary of a conditional custody order(escrow);
 - Encumbrancer under the terms of the encumbrance, the subject of which is the property rights to the funds in the client's bank account, if the right of the encumbrancer to receive the relevant information is stipulated by the deed on the basis of which such an encumbrance arises;
 - Other credit and financial institutions or similar entities;
 - Within the framework of the ESsupport program, the recipients of the PD of the Bank's clients may include: Ministry of Digital Transformation of Ukraine (Mincyfry), Ministry of Economy of Ukraine (Minceconomics) and Oschadbank JSC.

The Bank discloses to recipients only those data that the Bank needs to perform contractual (conduct business) relations with the clients - the PD parties or which the Bank is obliged to transfer (disclose) in compliance with the obligation provided for by the legislation of Ukraine.

PD Protection

PD protection shall be carried out according to the requirements of working with confidential information, in accordance with the Bank's internal regulatory documents.

The Bank (as the owner of the PD) is obliged to take organizational and technical measures to ensure their confidentiality, integrity, and accessibility.

The PD administrators are obliged to prevent the disclosure of PD that became known to them with regard to the performance of contractual relations (on the basis of signing confidentiality agreements).

The access rights to PD shall be granted to Bank employees within the limits defined by their official duties. All the other employees have the right to get full information only in relation to their own PD.

In order to ensure the security of PD processing, the special technical protection measures are taken, including to exclude unauthorized access to the processed PD and the operation of the technical and software package used to process the PD.

The Bank's PD protection tools include:

- Access control;
- Measures taken to create backups;
- Antivirus and network protection;
- Protection of data transmission channels (cryptographic, physical) from unauthorized interference;
- Access differentiation to the premises and file cabinets;
- Storage in metal fireproof cabinets.

In order to obtain access to personal data, as well as to clarify the issues related to the processing and protection of personal data in the Bank, the personal data party shall apply in writing at the address: 79 026, Ukraine, Lviv city, Sakharova St., 78, Commissioner for Personal Data Protection (Data Protection Officer): Horokhivskyi Bohdan Tarasovych.

The control over compliance with the legislation on the personal data protection within the limits of the powers provided for by the legislation of Ukraine is carried out by the Parliament Commissioner for Human Rights, Ukraine, 01008, Kyiv city, Instytutaska St., 21/8, Tel.: (044) 253 - 75-89; 0800-50-17-20.

Rights and Obligations of the PD Party

The PD party has the right to:

- Know about the sources of collection, the location of its PD, the purpose of their processing, the period of storage of the PD, the location or place of residence (operation) of the PD owner /administrator, or give appropriate instructions to obtain this information to persons authorized, except in cases established by law;
- Receive information about the conditions for granting access to the PD, in particular information about third parties to whom the PD is transferred;
- Access to their PD;
- Receive (no later than thirty calendar days from the date of receipt of the request), except in cases provided for by law, a response on whether its PD is being processed, as well as receive the content of such data;
- Submit a reasoned claim to the PD owner with an objection to the processing of their PD;
- Submit a reasoned request for modification or destruction of PD by any PD owner/administrator, if this data is processed illegally or is unreliable;
- Protect the PD from illegal processing and accidental loss, destruction, damage due to deliberate concealment, failure to provide or untimely provision of them, as well as to protect them from providing information that is unreliable or discredits the honour, dignity and business reputation of an individual;
- Submit complaints on PD processing to the Commissioner, or to the court;
- Apply legal remedies in case of violation of the legislation on the PD protection;

- Make reservations about restricting the right to process own PD;
- Revoke the consent to PD processing;
- Be informed about the automatic PD processing mechanism;
- To be protected against an automated decision that has legal consequences.

The PD party is obliged to make changes (provide information for making changes) if the PD provided is not up-to-date or contains errors.