APPROVED
By the Management Board of AO Mizuho Bank (Moscow)
(Minutes dated 13.08.2026 #15/26)

AO Mizuho Bank (Moscow)

PERSONAL DATA PROCESSING POLICY

13.08.2026 /Version 4

1. General provisions

1. This Personal Data Processing Policy (hereinafter - the Policy) is established in accordance with the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data.", current legislation of the Russian Federation on personal data (hereinafter - PD) and regulatory and methodological documents of the executive bodies of state power on PD security including when processing them in PD information systems (hereinafter - ISPD).

2. This Policy applies to all processes for PD collection, recording, systematization, accumulation, storage, refinement (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, removal, destruction carried out using automation tools and without using such funds within AO Mizuho Bank (Moscow) (hereinafter - the Bank).

3. In accordance with the Federal Law of 27.07.2006 No. 152 "On Personal Data," this Policy provides unlimited access to PD owners, including by publishing on the subsection of the website Mizuho Bank, Ltd. on the Internet - https://www.mizuhogroup.com/emea/russia.

1.1. Key terms and abbreviations

Automated processing of personal data - processing of personal data using computer equipment.

Biometric personal data - information that characterizes the physiological and biological features of a person, on the basis of which it is possible to establish his identity and which are used by the operator to establish the identity of the personal data owner.

Personal data blocking - temporary termination of processing of personal data (except if processing is necessary to clarify personal data).

Document - information recorded on a material medium with details that allow it to be identified.

Information - information (messages, data) regardless of the form of their presentation.

Personal Data Information System – ISPD - a set of personal data contained in databases and providing their processing of information technologies and technical means.

Depersonalization of personal data - actions that make it impossible without the use of additional information to determine the belonging of personal data to a particular owner of personal data.

Personal data processing - any action (operation) or a set of actions (operations) performed using automation means or without the use of such means with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Operator, Bank – AO Mizuho Bank (Moscow), which independently or jointly with other persons organizes and (or) performs personal data processing, as well as determines the purposes of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data.

Personal data - PD - any information relating to directly or indirectly to the defined or defined natural person (owner of personal data).

Personal data allowed by the personal data owner for distribution - personal data, access of an unlimited number of persons to which is provided by the personal data owner by giving consent to the processing of personal data allowed by the personal data owner for distribution in the manner provided by the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data."

Provision of personal data - actions aimed at revealing personal data to a certain person or a certain circle of persons.

Dissemination of personal data - actions aimed at revealing personal data to an indefinite circle of persons.

Cross-border transfer of personal data - transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign natural person or a foreign legal entity.

Destruction of personal data - actions that make it impossible to restore the content of personal data in the personal data information system.

2. Personal Data Processing Principles

2.1. PD processing at the Bank shall be carried out in accordance with the following principles:

– PD processing is lawful and fair;

– PD processing is limited to achieving specific, predetermined and legitimate goals. PD processing incompatible with the purpose of collecting PD is not allowed;

– Databases containing PD that are processed for incompatible purposes cannot be merged;

– only those PD that their processing objectives are processed;

– content and volume of processed PD correspond to declared purposes of processing;

– The PD that are being processed are not redundant to the stated processing objectives;

– when processing PD, accuracy of PD, their adequacy, and, if necessary, relevance to declared purposes of their processing are ensured;

– PD are stored in a form that allows determining the owner of PD no longer than the purpose of processing PD requires, if the PD retention period is not established by federal law or a agreement to which the beneficiary or guarantor under which the PD owner is a party. Processed PD are subject to destruction, or depersonalization upon achievement of the processing goals or in case of loss of the necessity to achieve these goals, if it is impossible for the Bank to eliminate the violations during processing of PD, unless otherwise provided by federal law.

3. Personal Data Processing Legal Basis

3.1. The Bank processes PD based on:

– The Civil Code of the Russian Federation;

– The Labor Code of the Russian Federation;

– The Tax Code of the Russian Federation;

– Federal Law "On Banks and Banking" of 02.12.1990 № 395-1;

– The federal law "About Counteraction of Legalization (Laundering) of Income Gained in the Criminal Way and to Terrorism Financing" of 07.08.2001 No. 115 there is a Federal Law;

- Federal Law "On Joint Stock Companies" of 26.12.1995 NO. 208-FZ
- Federal Law "On Credit Histories" of 30.12.2004 NO. 218-FZ
- Act of the Russian Federation of 07.02.1992 No. 2300-1 "About Consumer Protection";
- Federal law of 28.03.1998 No. 53-FZ "About a Conscription and Military Service";
- Federal law of 29.11.2010 No. 326-FZ "About Obligatory Health Insurance in the Russian Federation";
- Federal law of 29.12.2006 No. 255-FZ "About Obligatory Social Insurance in case of Temporary Disability and in connection with Maternity";
- Federal law of 15.12.2001 No. 167-FZ "About Mandatory Pension Insurance in the Russian Federation";
- Federal law of 01.04.1996 No. 27-FZ "About the Individual (Personified) Account in the System of Mandatory Pension Insurance";
- Federal law of 06.12.2011 No. 402-FZ "About Accounting";
- Federal law of 10.12.2003 No. 173-FZ "On Currency Regulation and Currency Control";
- Federal law of 22.10.2004 No. 125-FZ "About Archiving in the Russian Federation";
- Federal law of 27.07.2006 No. 149-FZ "About Information, Information Technologies and on Information Security";
- Regulations of the Bank of Russia "On identification by credit institutions of clients, client representatives, beneficiaries and beneficial owners in order to counter the legalization (laundering) of proceeds of crime and the financing of terrorism" dated 15.10.2015 No. 499-P;
- Instructions of the Bank of Russia "On opening and closing bank accounts, deposit accounts (deposits), deposit accounts" dated 30.05.2014 No. 153-I
- Order of the Rosarchive dated 20.12.2019 No. 236 "On Approval of the List of Standard Management Archival Documents Formed during the Activities of State Bodies, Local Governments and Organizations, Indicating the Terms of Their Storage";
- other laws and regulations;
- License of the Bank of Russia No. 3337
- the Bank's constituent documents;
- Bank's statutory documents;
- an agreement concluded between the Bank and the PD entity;
- this Policy;
- consent to PD processing
- PD processing orders;
- other legal grounds.

4. Conditions of Personal Data processing

4.1. PD processing is carried out in compliance with the principles and rules established by the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data." PD processing by the Bank is allowed in the following cases:

– PD processing is performed with the consent of the PD owner to its PD processing;

– PD processing is necessary to achieve the goals stipulated by the international agreement of the Russian Federation or the law, to carry out and fulfill the functions, powers and duties assigned by the legislation of the Russian Federation to the operator;

– PD processing of is necessary for the execution of justice, judicial act, act of another body or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;

– PD processing is necessary for the execution of the agreement to which the PD entity is a party or beneficiary or guarantor, as well as for the conclusion of the agreement at the initiative of the PD owner or the agreement under which the PD owner will be a beneficiary or guarantor;

– processing of the PD is necessary for exercising the rights and legitimate interests of the operator or third parties, or for achieving socially significant goals, provided that the rights and freedoms of the PD owner are not violated;

– the processing of PD subject to publication or mandatory disclosure in accordance with federal law;

– Databases used to record, systematize, accumulate, store, refine (update, modify) and extract PD of citizens of the Russian Federation are located on the territory of the Russian Federation.

4.2. In case the PD are processed by the Bank for the purpose of performance of the agreement, either the beneficiary or the guarantor of which is the PD owner, and for the conclusion of an agreement at the initiative of the PD owner or the agreement, according to which the PD owner will be a beneficiary or guarantor, the agreement concluded with the PD owner cannot contain provisions, restricting the rights and freedoms of the PD owner, establishing cases of processing PD of minors, unless otherwise provided by the legislation of the Russian Federation, as well as provisions allowing, as a condition for concluding a agreement, the omission of the PD owner.

4.3. The Bank and other persons who have gained access to the PD shall not disclose or distribute the PD to third parties without the consent of the PD owner, unless otherwise provided by law.

4.4. For the purpose of information support, the Bank may create internal (closed) sources of PD of entities, including directories and address books. The internal (closed) sources of PD, with the written consent of the owner, may include his name, first name, patronymic, date and place of birth, position, contact telephone numbers, email address and other PD communicated by the PD owner.

4.5. At the request of the PD owner or by decision of the court or other authorized state bodies, information about the PD owner is excluded from publicly available sources of PD Bank.

4.6. PD processing authorized by the PD owner for distribution may be performed by the Bank only with the consent in writing of the PD owner. The processing of PD allowed by the PD owner for distribution is carried out in compliance with the prohibitions and conditions provided for in Article 10.1 of the Federal Law of 27.07.2006 No. 152-FZ "On PD."

4.7. The Bank's processing of special categories of PD relating to race, nationality, political opinion, religious or philosophical beliefs, state of health, intimate life may be carried out if:

- The PD owner has agreed in writing to process its PD;
- The processing of personal income is carried out in accordance with the legislation on state social assistance, labor legislation, the legislation of the Russian Federation on pensions for state pension provision, on labor pensions;
- the processing of PD is necessary to establish or exercise the rights of the PD owner of third parties, as well as in relation to the administration of justice;
- PD processing is carried out in accordance with the legislation on compulsory types of insurance, with insurance legislation.

4.8. Processing of special categories of PD shall be stopped immediately if the reasons for their processing are eliminated, unless otherwise established by federal law.

4.9. The processing of a criminal record may be carried out by the Bank only in cases and in the manner determined in accordance with federal laws.

4.10. Information that characterizes the physiological and biological characteristics of a person, on the basis of which it is possible to establish his identity (biometric PD) and which is used by the operator to establish the identity of the PD subject, can be processed by the Bank only if there is consent in writing of the PD subject.

4.11. The provision by the PD subject of his biometric PD may not be mandatory, except in cases provided for in Part 2 of Art. 11 of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data." The Operator shall not have the right to refuse service in case of refusal of the PDN subject to provide biometric PD and (or) consent to the PD processing, if in accordance with the legislation of the Russian Federation it is not mandatory for an operator to obtain consent to the PD processing

4.12. The Bank has the right to entrust the processing of PD to another person with the consent of the PD subject, unless otherwise provided by federal law, on the basis of the agreement concluded with this person (hereinafter - the operator's order). The person which is carrying out processing of PD at the request of Bank is obliged to follow the principles and rules of processing of PD provided by the real Policy and the Federal law of 27.07.2006 No. 152-FZ "About Personal Data".

4.13. In case the Bank assigns processing of the PD to another person, the Bank shall be responsible to the PD subject for the actions of the specified person. The person who processes PD on behalf of the Bank shall be liable to the Bank.

4.14. In case the Bank assigns processing of PD to a foreign natural person or a foreign legal entity, the operator and the person performing processing of PD on behalf of the operator shall be responsible to the PD subject for the actions of the specified persons.

4.15. Lists of third parties to whom the Bank transfers/instructs to process PD shall be approved by the Internal Order of the President and published on the Bank's website for clients and counterparties and in the internal information system for Bank's employees. A person responsible for processing PD at the Bank is a responsible person for updating the list of third parties as well.

4.16. In case of cross-border transfer, the Bank shall ensure that the rights of PD owners are protected by the foreign state to whose territory the PD transfer is to be carried out, prior to the start of such transfer.

4.17. In the event of new PD processing involving the cross-border PD transfer, the Bank shall notify Roskomnadzor of its intention to carry out cross-border PD transfer prior to the start of such cross-border transfer.

4.18. After sending a Notification of intention to cross-border PD transfer, the Bank has the right to cross-border PD transfer in the territory of foreign states specified in such a notification that are parties to the Council of Europe Convention on the Protection of Natural Persons in Automated PD processing or provide adequate protection of the rights of PD owners, until a decision is made by Roskomnadzor.

4.19. Cross-border PD transfer in the territory of foreign states that do not adequately protect the rights of PD owners may be carried out in cases of:

- taking a decision within 10 working days from the date of receipt of the Notification of intention to carry out transboundary PD transfer by Roskomnadzor on the possibility of cross-border PD transfer;
- the need for cross-border transfer of PD to protect the life, health, other vital interests of the PD owner or other persons;
- performance of the agreement to which the PD owner is a party.

5. Categories of Owners Whose Personal Data are Processed by the Bank

5.1. The PD of the following categories of individuals are processed by the Bank:

- candidates (applicants) for filling vacant positions in the Bank - personal data subjects applying for filling vacant positions in the Bank;
- Bank's employees are the subjects of personal income tax, with whom the Bank has concluded employment contracts, as well as the subjects of personal income tax, whose labor relations with the Bank have been terminated (dismissed employees);
- relatives of Bank employees - close relatives of employees, including husband, wife, son, daughter, mother, father, sibling, sister;
- members of management bodies of the Bank (including candidates for members of the Board of Directors) and other individuals that are affiliates of the Bank - individuals and representatives of legal entities that are beneficial owners, founders (participants), members of the Board of Directors (supervisory board) (including candidates for members of the Board of Directors)members of the collegiate executive body acting as the sole executive body, having a material (direct or indirect) influence on the decisions of the Bank's management bodies;
- counterparties - managers, representatives and employees of a legal entity, IP having contractual relations with the Bank, which is at the stage of pre-contractual relations with the Bank or is included in the Bank's business processes, and is not a client of the Bank, as well as individuals providing services under civil law agreements, IP, self-employed, employees of affiliates;
- clients - managers (including affiliates), representatives, employees, counterparties of a legal entity, individuals who have contractual relations with the Bank or are at the stage of pre-contractual relations with the Bank, in the framework of which the Bank provides services, as well as individuals who want to register with ESIA and EBS;
- beneficiaries of transactions performed by the Bank's clients - individuals who have contractual relations with the Bank's client, in the direction of which the client makes payments of fundsbeneficial owners;
- visitors to the premises in which the Bank is located - individuals visiting the premises of the Bank who are not employees of the Bank.

5.2. The Bank shall process the PD to the extent necessary to achieve the stated processing purposes.

6. Personal Data Collection and Processing Purposes

6.1. The Bank processes PD for various purposes.

6.2. List of purposes for collection and processing of PD at the Bank:

– Consideration and evaluation of the possibility of entering into an employment contract at the initiative of the subject, assessment of the professional and business qualities of the candidate, implementation of a confidence check of the candidate;

– Enforcement of laws and other regulatory legal acts; implementation of salary projects, opening accounts for crediting wages and other payments to Bank's employees, implementation of such credits; Life and health insurance; organization of training; issuing business cards to employees; exchange of correspondence, communication for transmitting instructions to personnel and sending internal regulatory documents; Assessment of working conditions; conducting audits of the Bank; ensuring the safety of employees, physical security and checkpoint at the Bank's facilities, ensuring the safety of the employee's and Bank's property; control of quantity and quality of performed work, prevention of information leaks; Issuance/renewal of electronic signature keys; issuance of machine-readable power of attorney; corporate travel arrangements; conducting corporate events; notarisation of documents; fulfillment of mandatory requirements stipulated by the contract concluded with the counterparty (the purpose of processing personal data depends on the object of the contract, for example, training of the employee); provision of necessary support to Bank's employees in emergency situations and on employee leave; notice on changes: when reception / dismissal / translating / change family composition / education of the worker who stays on the military registry; responding to formal requests; formation of internal (closed) sources of personal data (directories, address books, etc.);

– Payment of material assistance;

– Health insurance under the voluntary health insurance programme (VHI);

– Organization of corporate travel (organization of corporate taxi);

– Organization of business trips (organization of business trips);

– Provision of a corporate mobile number;

– Execution of a salary project (issuing bank cards);

– Registration of Clients with ESIA and EBS (including regular check for technical faults to confirm readiness of specified equipment for operation with EBS (in accordance with the Information Letter on Recommendations for Bank Actions under Article 7, paragraph 56, of Federal Law No. 115-FZ of 7 August 2001 "On Combating the Legalization (Laundering) of Proceeds from Crime and the Financing of Terrorism");

– Preparation, conclusion and execution of contractual relations, including exclusion of conflicts of interest, exercise of due diligence, fulfillment of requirements of the Civil Code of the Russian Federation and other regulatory legal acts of the Russian Federation;

– Ensuring the personal safety of employees, physical protection and checkpoint at the Bank's facilities, ensuring the safety of the employee's and Bank's property;

– Ensuring the safety of life and health of the subjects of the Personal Data Bank, preventing violation of the legislation of the Russian Federation, checking compliance of the Employee with the legislation of the Russian Federation and internal rules of the Bank to protect the

Bank's interests (control of information leakage prevention, monitoring of the Bank's employees "activities);

- Conclusion and execution of contractual relations (quality control of services provided, minimization of Bank's risks associated with breach of obligations under the loan agreement, compliance with the requirements of the Federal Law of 07.08.2001 No. 115-FZ "On countering legalization (laundering) of proceeds of crime and financing of terrorism, "responding to requests for the provision of services by the Bank, interaction between the Bank and the Bank's clients using the relevant Bank's IP (remote banking services), including information exchange, individual transactions, organization of seminars for customers, sending gifts to customers, taking into account the requirements of the Regulation of July 15, 2021 N 764-P (On the procedure, time and scope for the Bank of Russia to communicate to organizations carrying out transactions with funds or other property specified in Article 5 of the Federal Law "On Countering Legalization (laundering) of proceeds of crime and the financing of terrorism, "the regulation, control and supervision of which, in accordance with the legislation of the Russian Federation, is carried out by the Bank of Russia, information received from the authorized body in accordance with paragraph 13.2 of article 7 of the said federal law), implementation of the requirements of the Standard for international automatic exchange of financial information with competent authorities of foreign countries (CRS) (identification of controlling persons (beneficial owners) with clients of legal entities with a certain status
- Provision of mandatory reporting to public authorities, responses to official requests of public authorities;
- Perform external and internal audits at the Bank;
    - Ensuring regular activity of the Bank and compliance with requirements of federal laws, regulations of the Bank of Russia and other regulatory legal acts: - execution by Bank of the duties provided by the Federal law of 10.07.2002 No. 86-FZ "About the Central Bank of the Russian Federation (Bank of Russia) "; - execution of Regulation of the Bank of Russia dated December 27, 2017 No. 625-P" On the Procedure for Approval by the Bank of Russia of the Appointment (election) of candidates for positions in a financial institution, notice of election of the Bank of Russia (termination of powers), appointment (dismissal) of persons who are members of management bodies, other officials in financial organizations, assessment of compliance with qualification requirements, and (or) requirements for the business reputation of persons who are members of management bodies, other officials and founders (shareholders, participants) of financial organizations, sending information on voting to the Bank of Russia by a member of the board of directors (supervisory board) of the financial organization (on non-voting) against the decision of the Board of Directors (Supervisory Board) a financial institution, a request for information from the Bank of Russia and a response from the Bank of Russia (absence) of information in the databases provided for in articles 75 and 76.7 of Federal Law No. 86-FZ of July 10, 2002 "On the Central Bank of the Russian Federation" (Bank of Russia), "as well as on the procedure for maintaining such bases"; - execution of Regulation of the Bank of Russia dated December 26, 2017 No. 622-P "On the Procedure for Disclosure of Information on Persons Under Control or Significant Influence of which are Banks Participating in the System of Compulsory Insurance of Deposits of Individuals in Banks of the Russian Federation, as well as on the Procedure for Disclosure and Submission to the Bank of Russia of Information on the structure and composition of shareholders (participants) of non-state pension funds, insurance organizations,

management companies, microfinance companies, including persons under the control or significant influence of which they are; "- compliance with the requirements of the Federal Law of 02.12.1990 No. 395-1" On Banks and Banking "as part of the election of persons to the board of directors (supervisory board) of a credit institution and as chairman of the board of directors (supervisory board) of a credit institution

- Execution of agreements, the beneficiaries of which are subjects of personal data, fulfillment of requirements of the legislation of the Russian Federation;
- Ensuring archival storage and confidential destruction of documents.

7. Personal Data Owner's Rights

7.1. The PD owner decides to grant their PD and agrees to process it freely, by its will and in its interest. Consent to the PD processing may be given by the PD owner or its representative in any form that can confirm that it has been received, unless otherwise established by federal law. Consent to the PD processing shall be executed separately from other information and/or documents confirmed and/or signed by the personal data subject.

7.2. The Bank is obliged to provide proof of obtaining the consent of the PD owner to processing his PD or proof of the existence of the grounds specified in the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data."

7.3. The PD owner may require the Bank (by means of a written request) to clarify their PD, block it or destroy it in cases where the PD are incomplete, obsolete, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as take legal measures to protect its rights.

7.4. The PD owner is entitled to receive, upon written request, information relating to the processing of their PD (unless such right is restricted in accordance with federal laws), including:

- confirmation of PD processing by the Bank;
- legal grounds and purposes of PD processing;
- objectives and methods used by the Bank for processing PD;
- the name and the location of Bank, the information about persons (except for employees of Bank) which have access to PD or by which PD on the basis of the agreement with Bank or on the basis of the Federal law of 27.07.2006 No. 152-FZ "About Personal Data" can be opened;
- The processed personal data relating to the relevant personal data owner, the source of their receipt, if a different procedure for submitting such data is not provided for by the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data";
- PD processing terms, including terms of their storage;
- the procedure for implementation by the personal data owner of the rights stipulated by the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data";
- Information on past or suspected cross-border data transfer;
- the name or surname, first name, patronymic and address of the person processing personal data on behalf of the Bank, if processing is or will be entrusted to such person;
- other information provided by the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data" or other federal laws

7.5. Requests of PD owners are made in writing and sent to AO Mizuho Bank (Moscow) (115035, Moscow, Ovchinnikovskaya embankment, 20, building 1, 5th floor).

7.6. The PD owner has the right to send a request to the Bank to stop processing their PD by sending a written request to the Bank (115035, Moscow, Ovchinnikovskaya embankment, 20, building 1, 5th floor) by mail with a notification of delivery. Within the period established by the current legislation, the Bank shall stop processing PD, except in cases provided by law.

7.7. The processing of PD for the purpose of promoting goods, works, services in the market by making direct contacts with a potential consumer by means of communication is allowed only with the prior consent of the PD owner. The Bank shall immediately terminate, at the written request of the PD owner, the processing of their PD for the above purposes.

7.8. In the consent to the processing of PD allowed by the PD owner for distribution, the PD owner has the right to establish prohibitions on the transfer (except for granting access) of these PD by the operator to an unlimited circle of persons, as well as prohibitions on the processing or processing conditions (except for access) of these PD by an unlimited circle of persons. Failure of the operator to establish prohibitions and conditions by the PD owner is not allowed.

7.9. The PD owner has the right to request to stop the transfer (distribution, provision, access) of their PD previously authorized by the PD owner for distribution to any person processing their PD, in case of non-compliance with the provisions of Article 10.1 of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data" or to apply such a requirement to the court

7.10. In accordance with article 16 of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data," it is prohibited to make decisions on the basis of exclusively automated processing of PD that give rise to legal consequences in relation to the owner of PD or otherwise affecting his rights and legitimate interests, except in cases provided for by federal laws, or with the consent in writing of the owner of PD.

7.11. If the PD owner believes that the Bank is processing their PD in violation of the requirements of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data" or otherwise violates its rights and freedoms, the PD owner has the right to appeal the Bank's actions or inaction to the Authorized Body for the Protection of the Rights of PD owners or in court proceedings

7.12. The PD owner has the right to protect its rights and legitimate interests.

8. The Bank’s Obligations

8.1. In accordance with the requirements of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data," the Bank is obliged to

- Provide the PD owner, upon its written request, with information relating to the processing of their PD or lawfully provide a waiver;
- In relation to PD permitted by the PD owner for distribution:
    - to enable a PD owner to determine a list of PD for each category of PD specified in consent to processing PD authorized by the PD owner for distribution;
    - working days from the receipt of the relevant consent of the PD owner to publish information on the processing conditions and on the existence of prohibitions and conditions for processing by an unlimited number of PD of the persons allowed by the PD owner for distribution;

- to carry out PD processing allowed by the PD owner for distribution with observance of the bans and conditions provided by Article 10.1 of the Federal law of 27.07.2006 No. 152-FZ "About Personal Data";

– upon the request of the PDN owner to clarify the processed PD, block or delete if the PD are incomplete, obsolete, inaccurate, illegally obtained or are not necessary for the stated processing purpose. Or provide blocking, removal, in case the PD processing is carried out by another person acting on behalf of the operator;

– at the request of the PD owner or authorized bodies to provide evidence of obtaining the consent of the PD owner to process his PD or evidence of the existence of the grounds specified in the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data";

– Keep a journal of complaints of PD owners, which records requests of PD owners to receive PD, as well as the facts of providing PD on these requests;

– Notify the PD owner of the PD processing if the PD were not received from the PD owner, unless:

  - The PD owner has already been notified that their PD has been processed by the relevant operator;
  - The PD are obtained by the operator on the basis of the Federal Law or in connection with the execution of an agreement to which either the beneficiary or the guarantor under which the PD owner is a party;
  - processing of PD permitted by the PD owner for distribution is carried out in compliance with the prohibitions and conditions stipulated by Art. 10.1 of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data");

– If the purpose of PD processing is achieved, immediately stop PD processing and destroy or anonymize the corresponding PD within thirty days from the date of reaching the purpose of PD processing, unless otherwise provided by the legislation of the Russian Federation. Or ensure destruction, depersonalization, in case the PD processing is carried out by another person acting on behalf of the operator. Notify the PD owner or its legal representative and, if the application or request has been sent by the authorized body for the protection of the PD owners' rights, also the designated body;

– event that the PD owner withdraws its consent to process their PD, cease processing the PD and destroy the PD within thirty days from the date of receipt of the said revocation, unless otherwise provided by the agreement between the Operator and the PD owner. Or ensure the termination of PD processing and their destruction if PD processing is carried out by another person acting on behalf of the operator. On the destruction of PDN, the Bank shall notify the PD owner. The operator may continue processing PD if there are requirements of the legislation of the Russian Federation;

– in case of a request by a PD owner to the Bank to stop processing PD within the period not exceeding ten working days from the date of receipt of the relevant request by the Bank, to stop processing them or to ensure the termination of such processing (if such processing is carried out by the person processing PD), with the exception of cases provided for in paragraphs 2 - 11 of Part 1 of Article 6, Part 2 of Article 10 and Part 2 of Article 11 of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data." The operator may continue processing PD if there are requirements of the legislation of the Russian Federation

- in case of request of a owner to stop processing PD for the purpose of promotion of goods, works, services in the market immediately stop processing PD. Or ensure termination of PD processing if PD processing is carried out by another person acting on behalf of the operator;
- any time at the request of the PD owner to stop transmitting (distributing, granting, accessing) PD authorized by the PD owner for distribution;
- when collecting PD, including through the Internet information and telecommunication network, recording, systematization, accumulation, storage, refinement (updating, change), extraction of PD of citizens of the Russian Federation with use of the databases which are outside the territory of the Russian Federation are not allowed, except for the cases specified in Paragraphs 2, 3, 4, the 8th Part 1 of Article 6 of the present Federal law (according to the Federal law of 28.02.2025 No. 23-FZ);
- fact of unlawful or accidental transfer (provision, distribution, access) of PD, which resulted in violation of the rights of the PD owners, to notify the authorized body for the protection of the rights of the PD owners;
- ensure interaction with the state system for detecting, preventing and eliminating the consequences of computer attacks on information resources of the Russian Federation, including informing it about computer incidents that led to illegal transfer (provision, distribution, access) of PD.

9. Measures to Ensure the Security of Personal Data During its Processing

9.1. When processing PD, the Bank shall take the necessary legal, organizational and technical measures to protect PD from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, distribution of PD, as well as from other unlawful actions in relation to PD.

9.2. The safety of PD is ensured, in particular:

- the appointment of officials responsible for organizing the processing and protection of PD;
- limiting the composition of persons with access to PD;
- identification of PD security threats during their processing in the PD System;
- application of organizational and technical measures to ensure the safety of PD during their processing in PD, necessary to fulfill the requirements for the protection of PD, the execution of which ensures the levels of protection of PD established by the Government of the Russian Federation;
- assessment of the effectiveness of the measures taken to ensure the safety of PD before the commissioning of PD;
- organization of recording, storage and circulation of information carriers;
- detection of unauthorized access to PD and taking measures;
- restoration of PD, modified or destroyed due to unauthorized access to them;
- Establishing rules for access to PD processed by PD, as well as ensuring that actions taken from PD to PD are recorded and recorded;
- control of access to premises where PD is processed;
- monitoring of the effectiveness of the applied measures and means to ensure the safety of PD, as well as control of the level of protection of PD.

10.Final provisions

10.1. This Policy shall be implemented from the date of Management Board approval and shall be valid until the relevant amendments are made to it or until termination.

10.2. Other rights and obligations of the Bank as a PD operator are determined by the legislation of the Russian Federation in the field of PD.

10.3. Bank officials guilty of violating the rules governing the processing and protection of PD shall bear material, disciplinary, administrative, civil or criminal liability in accordance with the procedure established by federal laws.

10.4. This Policy should be reviewed and improved on a regular basis at least once every three years, or in cases of changes in the requirements of the legislation of the Russian Federation on PD and regulatory and methodological documents of the executive authorities on the safety of PD.

10.5. Changes to this document may be initiated by the Head of the Information Security Department or the Internal Audit Department.

10.6. The person responsible for processing of PD at the Bank shall be responsible for general monitoring of compliance with the requirements of this document, provision of recommendations on their implementation, keeping the document up-to-date taking into account the requirements of international and national standards, as well as the legislation of the Russian Federation.