



NOTIFICATION

regarding the procedure for the processing and protection of personal data

JOINT-STOCK COMPANY "KREDOBANK(hereinafter referred to as the "Bank"), in compliance with the requirements of Article 12 of the Law of Ukraine " On Personal Data Protection" hereby informs You—as personal personal data subjects (hereinafter referred to as the "PD")—regarding the personal data controller, the composition and content of the personal data, the purpose, legal grounds, and procedure for processing personal data, the rights of the personal data subject, and the parties to whom personal data is transferred in connection with the establishment of a legal relationship with the Bank.

The Bank processes and protects personal data in accordance with the requirements of the Constitution of Ukraine, the Law of Ukraine "On Personal Data Protection" and other regulatory acts of Ukrainian legislation regulating legal relations related to personal data processing; it also takes into account international practices regarding personal data protection and the requirements of the Convention for the Protection of Individuals with Regard to Automatic Processing of Personal Data.

The personal data controller is JOINT-STOCK COMPANY "KREDOBANK" (hereinafter referred to as the "**Bank**") – a banking institution registered in Ukraine, the EDRPOU code 09807862, with its registered office at: 78 Sakharova St., Lviv, 79026, Ukraine.

For matters related to the processing and protection of personal data at the Bank, the personal personal data subject should contact the Bank in writing at the following address: 78 Sakharova St., Lviv, 79026, Ukraine, or via email at, office@kredobank.com.ua.

Elements of personal data

The Bank processes the personal data of the following individuals: clients, counterparties, shareholders, employees, suppliers, supplier employees, and other individuals.

Elements of personal data of individuals that may be processed by the Bank: surname, first name, patronymic; date and place of birth; passport issuing authority and date of issue; passport series and number; ID card number; residential address; registered address; citizenship; gender; taxpayer's account card number (identification number); social security number; phone number; personal email address; specimen signature; electronic signatures; photography images; tax status; membership in political parties and trade unions; information regarding conviction for a criminal offense; voice recordings; video images; payment account/payment card information; information on personal assets; location data and online identifier data: IP address, cookies, internet browser parameters and settings (data used when accessing the Bank's website, as well as data from your device), and other data depending on the nature of the relationship between the personal data subject and the Bank.

The elements and nature of the personal data processing performed by the Bank depend on the type of relationship existing between the personal personal data subject and the Bank; specifically, for the Bank's clients, the elements and nature of processing depend on the products and services provided by the Bank.

The personal data processed by the Bank correspond to information obtained from the individuals who are the subjects of such data, or information lawfully obtained from their representatives or third

parties—including credit bureaus, the NBU Credit Register, the NBU BankID System, other lawful sources, and persons represented by the personal data subjects.

Purpose of personal data processing:

- provision of banking (financial) services; establishment of business and contractual relationships (conclusion, amendment and termination of contracts; performance of contracts; as well as actions related to the conclusion, amendment, termination, and/or performance of contracts, including through direct contact with the personal data subject via means of communication); sending informational and promotional messages and offers regarding the services of the Bank and its partners, and for participation in programs of the Bank and its partners; preparation of financial and statistical reports in accordance with the requirements of Ukrainian legislation; enforcement of court rulings, decisions of the Bank's governing bodies, and the Bank's internal documents;
- facilitating the implementation of employment and related relationships (organizing business trips, cultural and educational events, internal communications, etc.), relationships arising from contracts for the performance of works/ provision of services, relationships in the field of human resource management, including personnel management governed by the Labor Code of Ukraine, the Civil Code of Ukraine, the Law of Ukraine "On Banks and Banking," and the Bank's internal documents, as well as the exercise of rights and fulfillment of obligations under the collective agreement, and the organization—by the Bank and/or third parties—of medical care, health improvement and recreation, pension provision, or other forms of social protection for the personal data subject or their relatives;
- protection by the Bank of its rights and interests in the course of relationships governed by the Civil Code of Ukraine, the Commercial Code of Ukraine, the Laws of Ukraine "On Banks and Banking", "On Joint-Stock Companies" "On Business Entities," "On State Registration of Legal Entities and Individual Entrepreneurs", "On Prevention and Counteraction to Legalization (Laundering) of the Proceeds from Crime or Terrorism Financing, as well as Financing Proliferation of Weapons of Mass Destruction", "On Payment Systems and Funds Transfer in Ukraine", "On Organization, Formation and Circulation of Credit Histories" and other regulatory legal acts.

Grounds for processing personal data:

- consent of the personal data subject;
- permission granted to the Bank as the personal data controller in accordance with the requirements of Ukrainian legislation, exclusively for the exercise of its powers;
- conclusion and performance of a transaction to which the personal data subject is a party, or which is concluded for the benefit of the personal data subject, or the implementation of measures preceding the conclusion of a transaction at the request of the personal data subject;
- protection of the vital interests of the personal data subject;
- necessity of fulfilling the Bank's obligation as the personal data controller, as prescribed by legislation;
- the need to protect the legitimate interests of the Bank, third parties, except where the data subject requests the cessation of the processing of their personal data and the need to protect the data subject outweighs such interest.

As an entity subject to primary financial monitoring, the Bank processes personal data during client identification—without obtaining the personal data subject's consent—for the purposes of preventing and combating the legalization (laundering) of proceeds obtained through criminal means, in accordance with the requirements of the Law of Ukraine "On Prevention and Counteraction to Legalization (Laundering) of the Proceeds from Crime or Terrorism Financing, as well as Financing Proliferation of Weapons of Mass Destruction" No. 361-IX dated December 6, 2019.

Consent of the personal data subject

Consent is obtained from all personal data subjects—including individuals, representatives of legal entities (who are individuals), and sole proprietors—except in cases where other grounds for processing personal data exist.

Consent is the voluntary expression of will by an individual (provided they are informed) granting permission for the processing of their personal data in accordance with the stated purpose of such processing, expressed in writing or in a form that allows one to conclude that consent has been given.

The consent of the PD subject may be provided to the Bank in the form of:

- a paper-based document containing details that allow for its identification, including the consent of the personal data subject contained in the text of a contract, application, questionnaire, application-contract, or other documents signed by the personal data subject;
- performance of actions available to the personal data subject during registration in the Bank's information and communication system by marking the consent to the processing of their personal data in accordance with the stated purpose of such processing;
- in electronic form through actions performed by the personal data subject within the relevant communication network/system and recorded by the equipment of the communications service operator/provider, specifically by selecting a relevant mark/indicator, choosing technical settings, or using touch-tone signals;
- in oral form, through the real-time exchange of information by voice using communication networks during a conversation between the data subject and an authorized representative of the Bank via the Bank's contact center.

Any form of consent confirms that the client or potential client has familiarized themselves with the information set forth in this notification—specifically regarding the sources and location of personal data, the purpose of its processing, the conditions for access and transfer (including the third parties to whom data may be transferred), and the location of the personal data controller—and acknowledges awareness of the personal data processing.

An individual's objection to the processing of personal data required for the Bank to fulfill its obligations—including the withdrawal of consent for data processing—may constitute grounds for the Bank to cease performance under concluded agreements.

In the event that an individual withdraws their consent to the processing of personal data without completing the procedures required to terminate contractual or other relationships with the Bank, the Bank shall continue to process personal data to the extent and within the scope necessitated by the existing legal relationship and the legislation of Ukraine, including for the purpose of protecting the Bank's rights and legitimate interests under contracts.

Processing of personal data

Personal data at the Bank may be processed in both electronic and paper formats.

The Bank does not employ fully automated decision-making when processing personal data.

To ensure the quality and security of service, and in compliance with the requirements of Ukrainian legislation and internal procedures, the Bank records telephone conversations between individuals and Bank employees, as well as captures images/video of individuals within Bank premises and at ATMs (on magnetic and/or electronic media), and utilizes the resulting recordings and footage, including as evidence. Data from the Bank's video surveillance system (images/video captured on Bank premises and at ATMs) and recordings of telephone conversations with Bank employees may be used in specific instances—both by the Bank to protect its rights and legitimate interests and by competent state authorities or other entities—provided there are appropriate legal grounds established by the current legislation of Ukraine.

The Bank may process personal data using the NBU BankID System (including during remote identification). During identification, the Bank may transmit the following data to the service provider:

- surname, first name, patronymic, and gender;
- passport series and number, issuing authority and date of issue, and address of registration and/or actual residence;
- place and date of birth;
- contact telephone number;
- email address;
- taxpayer registration number (RNOKPP / IPN).

The final list of data to be transmitted is determined individually by each service provider. You, as the client, initiate the transfer—authorization via BankID takes place only with your consent and confirmation.

Information regarding the terms and procedures for the provision of services—for which personal data is processed using the NBU BankID System—is available on the Bank's website.

Specifics of personal data processing on the Internet and in mobile applications

By using the Bank's website, the websites of the Bank's Partners, or the online banking service, the data subject consents to the Bank's use of data such as cookies, login credentials (usernames and passwords), IP addresses, mobile network numbers, and internet browser parameters and settings for the purpose of providing services, as well as for analyzing statistical data or the effectiveness of advertising campaigns. The Bank may also process device information (operating system version, hardware model, IMEI, and other unique device identifiers—though the Bank does not collect information regarding call history, SMS messages, etc.) as well as data concerning connections, traffic, and the date, time, and duration of network activity.

The Client authorizes the Bank to use phone numbers, contact names, and contact images stored on the Client's mobile device for the purpose of facilitating rapid fund transfers via the online banking web service.

The Bank also collects and stores information provided directly by the Client, as well as data regarding the Client as a user—specifically, information used to register the Client and/or their device within the mobile application for the purpose of processing the Client's payments.

The Bank uses the information it collects (and may combine it with other information collected about the Bank's client) for the following purposes:

- registering the Bank's client and/or their device within the Services;
- providing a service or function within the Services requested by the Bank's client;
- providing personalized content and recommendations regarding the use of the mobile application;
- advertising, including presenting personalized offers to the Bank's client and sending promotional messages;
- assessment and analysis of the market, customers, products, and services provided via the mobile application;
- conducting research on the Bank's customers' use of the provided Services to improve service quality;
- ensuring updates and technical support for the Services on the Bank clients's device;
- determination of the consumer's communication behavior coefficient and communication parameters in the context of using mobile communication services;

- other purposes at the Bank's discretion.

The personal data subject bears direct responsibility for controlling access to their computer, mobile phone, tablet, or other mobile device and any mobile application installed thereon, as well as for safeguarding their passwords and/or PINs and for disclosing (sharing) this information to third parties.

If the personal data subject voluntarily provides their computer, mobile phone, tablet, or other device and/or the aforementioned information to third parties, such third parties will have access to the Bank client's account and the personal data subject's personal information; the Bank bears no liability for such instances.

The personal data subject is required to immediately notify the Bank if they believe that their personal information within the mobile application has been compromised.

Retention, modification and deletion of personal data

Retention of personal data entails measures to ensure its integrity and the appropriate access regime. Personal data is retained for no longer than is necessary for its processing in compliance with the requirements of Ukrainian legislation.

Actions involving the modification of personal data are carried out based on a substantiated written request from the personal personal data subject, or upon the request of other parties involved in personal data-related relations—provided the personal personal data subject has consented, or the modification is mandated by an order from the Ukrainian Parliament Commissioner for Human Rights (or designated officials of the Commissioner's Secretariat) or by a court decision that has entered into legal force. Personal data that are inaccurate must be modified immediately upon the discrepancy being established.

The Bank carries out the deletion or destruction of personal data in accordance with the requirements and procedures established by the legislation of Ukraine and the Bank's internal documents.

The Bank processes personal data as necessary throughout the entire duration of its business relationships with the respective personal data subjects (starting from the conclusion of a contract or the ordering of a service and their performance, through to the termination of the relevant contract or the conclusion of the Bank's customer service), as well as until the expiration of the retention periods for such information (or documents containing such information) established by the terms of concluded contracts or the legislation of Ukraine.

Procedure for access to personal data

Access to personal data by third parties is permitted only where there are legal grounds, subject to the terms of concluded agreements, the consent of the personal data subject (in cases where such consent is required), and the requirements of applicable Ukrainian legislation.

In particular, personal data may be transferred or disclosed to:

- third parties performing functions for or providing services to the Bank, including auditors, appraisers, insurance companies, payment systems, institutions involved in the identification, authorization, and processing of transactions, counterparty banks, credit bureaus, telecommunications operators, the Bank's partners, shareholders, and other persons, where this relates to the Bank's operations or is necessary for the conclusion or performance of contracts and the provision of services to the client;

- parties in cases where grounds arise for the transfer of information constituting banking secrecy to third parties, in accordance with the legislation of Ukraine or the terms of concluded contracts;
- to communications operators providing mobile (cellular) services, for the purpose of determining the consumer's communication behavior coefficient and communication parameters, as well as for the use of the obtained information by the Bank or third parties to provide banking services to the client;
- in other cases provided for by the legislation of Ukraine and the terms of agreements concluded by the Bank, the disclosure or transfer of personal data is permitted if necessary in view of the Bank's functions, powers, and obligations within the relevant legal relationships.

Recipients of the Bank's clients' personal data may include, in particular:

- any persons to whom the Bank is required to transfer (disclose) clients' personal data based on and in accordance with the terms of the duly executed consent (permission) for such transfer provided by said clients to the Bank;
- public authorities, other state bodies, local self-government bodies, law enforcement agencies, courts, enforcement authorities, state and private notaries, foreign consular institutions, as well as other persons—in the cases, manner, and scope prescribed by law—to whom the Bank is obliged or entitled to transfer or disclose personal data in accordance with the requirements of the legislation of Ukraine;
- The National Bank of Ukraine, including the NBU BankID System, and other banks;
- PKO Bank Polski SA and any other entities that, by virtue of corporate ties, belong to the banking group of which the Bank in Ukraine is a part, or to the PKO Bank Polski SA Capital Group;
- Bank Gospodarstwa Krajowego and other foreign financial institutions, for the purpose of implementing European Commission programs to cover potential losses incurred by the Bank in connection with lending to small, medium, and corporate businesses in Ukraine.
- beneficiaries of escrow accounts; holders of encumbrances on property rights to funds held in clients' bank accounts (provided the encumbrance holder's right to receive such information is stipulated in the transaction giving rise to the encumbrance); as well as other credit or financial institutions or similar entities—in the cases, manner, and scope determined by the legislation of Ukraine, the terms of relevant transactions, or agreements concluded by the Bank;
- within the framework of the "ePidtrymka" Program, recipients of the Bank's clients' personal data may include: the Ministry of Digital Transformation of Ukraine (Mintsyfyry), the Ministry of Economy of Ukraine (Mineconomy), and JSC "Oschadbank";
- Under other state programs, the recipients of Bank clients' PD may include: the Ministry of Digital Transformation of Ukraine (Mintsyfyry), the Ministry of Economy of Ukraine (Mineconomy), and the State Enterprise "Diia";
- Within the framework of the "National Cashback" Program, recipients of the Bank's clients' personal data may include: the Ministry of Digital Transformation of Ukraine (Mintsyfyry), the Ministry of Economy of Ukraine (Mineconomy), the State Enterprise "Diia", and the Joint-Stock Company "Made in Ukraine" Industrial Development Agency.

In all the aforementioned cases, the transfer of personal data to third parties is carried out without obtaining additional written consent or providing separate notification to the individual who is the personal personal data subject.

The Bank discloses to recipients only those personal data that are necessary for maintaining contractual or business relationships with clients—the personal data subjects—or that the Bank is required to transfer or disclose in compliance with the requirements of Ukrainian legislation.

Personal Data Protection

The Bank ensures the protection of personal data in accordance with requirements for handling information with restricted access and the Bank's internal documents.

As the personal data controller, the Bank implements organizational and technical measures designed to ensure the confidentiality, integrity, and availability of such data.

Access rights to personal data are granted to Bank employees only to the extent necessary for the performance of their official duties.

Personal data processing within the information (automated) system is carried out using network and antivirus information protection systems.

To ensure the security of personal data processing, the Bank employs specific technical and organizational protection measures, including measures aimed at preventing unauthorized access to personal data processed within the Bank's hardware and software systems.

Rights of the personal personal data subject

- to be informed about the sources of collection and the location of their personal data, the purpose of their processing, the personal data retention period, and the location or place of residence (stay) of the personal data controller/processor, or to authorize persons designated by them to obtain this information, except in cases established by law;
- to receive information regarding the conditions for granting access to personal data, including information about third parties to whom their personal data is transferred;
- to access their personal data;
- to receive, no later than thirty calendar days from the date the request is received—except in cases provided for by law—a response as to whether their personal data are being processed, as well as the content of such data;
- to submit a reasoned request to the personal data controller objecting to the processing of their personal data;
- to submit a reasoned request for the modification or deletion of their personal data to any personal data controller or personal data processor if such data is being processed unlawfully or is inaccurate;
- to the protection of their personal data against unlawful processing and accidental loss, deletion, or damage resulting from intentional concealment, failure to provide, or untimely submission of such data, as well as protection against the submission of information that is inaccurate or disgrace the honor, dignity, and business reputation of an individual;
- to lodge complaints regarding the processing of their personal data with the Ukrainian Parliament Commissioner for Human Rights or with a court;
- to exercise legal remedies in the event of a violation of legislation on personal data protection;
- to make reservations regarding the restriction of the right to process their personal data;
- to withdraw consent for the processing of personal data;
- to know the mechanism of automated processing of personal data;
- to protection against an automated decision that produces legal effects for him/her.