

PRIVACY POLICY

(effective from 15 of June, 2018)

This Privacy Policy is developed in accordance with the requirements of the Constitution of Ukraine, Law of Ukraine No. 2297-VI as of June 01, 2010 “On Protection of Personal Data” (with amendments and additions) and other regulatory acts of Ukrainian legislation regulating legal relations related to the processing of personal data, the right of citizens to non-interference in private life, and the right to self-expression. In the event that the User is subject to the requirements of the EU Regulation on the protection of personal data (hereinafter referred to as the Regulations), this Privacy Policy is subject to the requirements of the Regulations and the User has all the rights provided for in the Regulations.

1. GENERAL PROVISIONS

1.1. The confidentiality policy is an official standard public document of SBERBANK JSC¹ (hereinafter referred to as the Bank) and determines the procedure for processing and protecting the personal data of each customer, the user of the Bank’s services, and providing his / her personal data when using these services (hereinafter referred to as the User).

1.2. The purpose of this Privacy Policy is to ensure proper protection of information about the User, including his / her personal data from unauthorized access and disclosure. With the help of this Policy, the Bank informs the User about the composition and content of the collected personal data, the rights of the User determined by the legislation of Ukraine, the purposes of collecting personal data and the persons to whom his / her personal data are transferred.

1.3. Relationships related to the collection, storage, dissemination, and protection of information about Users (Users’ personal data) are governed by this Privacy Policy and the current legislation of Ukraine, as well as the Regulations.

1.4. The current version of the Privacy Policy is a public document developed by the Bank and available to any Internet user on the site <https://www.sberbank.ua> (hereinafter referred to as the Site) when clicking on the hypertext link “Privacy Policy”.

1.5. The Bank is entitled to amend this Privacy Policy.

1.6. When making changes to the Privacy Policy, the Bank places a new version of the Privacy Policy on the Site.

1.7. By agreeing to the terms of this Privacy Policy, the User hereby agrees to the processing of his / her personal data for the purposes specified in paragraphs 2.4 and 2.6 this Privacy Policy.

1.8. The owner of personal data is SBERBANK JSC (OKPO code 25959784, legal address: Kiev, 46 Vladimirskaiia Str.).

2. CONDITIONS AND OBJECTIVES OF THE COLLECTION AND PROCESSING OF USERS’ PERSONAL DATA

2.1. Personal data is information or a collection of information about an individual who is identified or can be specifically identified. The regulation defines personal data as “any information relating to an identified or identifiable individual (“data subject”)”.

2.2. With the explicit consent of the User, the Bank receives the following personal data:

- name, surname, and patronymic;
- date of birth;
- passport data (series and number of the passport, date of issue, authority issuing the passport);
- tax identification number;
- telephone (fixed and / or mobile);

¹ SBERBANK JSC carries out its activity on the basis of the Banking License No. 198 issued on December 18, 2015 issued by the National Bank of Ukraine and the General License No. 198-3 as of December 22, 2015 for the implementation of currency transactions (with attachment).

- address of registration and / or actual residence;
- the address of the electronic mail box (e-mail).

2.3. The transfer of some personal data (cookies, technical data - Internet browser, operating system, access time to the website, IP-address) by the User is performed automatically according to the individual settings of the User's browsers, through which the User of the Bank accesses the Bank's Site. Visiting by the User of the Bank's Site is the User's consent to the transfer and processing of his / her personal data specified in paragraph 2.3 of this Policy.

2.4. The Bank carries out processing of information about the User, including his / her personal data specified in paragraph 2.2 of this Privacy Policy, as well as other additional information about the User provided by the User to the Bank at his / her own will, for purposes according to paragraph 2.6 of this Privacy Policy and / or to provide the User with services, and / or fulfil the obligations to the User.

2.5. Processing by the Bank of personal data is carried out on the basis of the following principles:

- a) legitimacy of the purposes and methods of processing personal data and good faith;
- b) the correspondence of the purposes of processing personal data to the purposes predetermined and claimed in the collection of personal data;
- c) correspondence of the volume and nature of the processed personal data to the methods of processing personal data and the purposes of processing personal data;
- d) inadmissibility of combining the databases created for incompatible purposes of the database containing personal data.

2.6. The Bank performs the processing of the personal data of each User with his / her consent in order to:

- 2.6.1. identify the User for communication and possible further cooperation and provision of services by the Bank;
- 2.6.2. contact the User, including the directions of notifications, requests, and information regarding the use of services, as well as processing requests and information from the User;
- 2.6.3. improve the quality of the Bank's services, the convenience of their use;
- 2.6.4. target newsletters and information;
- 2.6.5. carry out statistical and other studies by the Bank on the basis of impersonal data.

3. STORAGE AND USE OF PERSONAL DATA

3.1. The personal data of each User is stored in electronic and written form and is used strictly for the purpose specified in Section 2 of this Privacy Policy.

3.2. With respect to the personal information of each User, its confidentiality is retained, except in cases stipulated by the laws of Ukraine, or voluntary provision by the User of information about him- / herself for general access to an unlimited number of persons.

4. TRANSFER OF PERSONAL DATA

4.1. Personal data of each User is not transferred to any third parties, except for the cases:

- 4.1.1. if the User has expressed his / her consent to such actions;
- 4.1.2. provided for by the laws of Ukraine.

4.2. The user agrees to the transfer of his / her personal data to any third parties, if such transfer is necessary in the context of the User's use of a certain service provided by the Bank to the User.

4.3. The volume of personal data transmitted by the User when transferred to a third party does not exceed the amount of personal data required for the provision of the service by the Bank and is made only with the User's direct consent to such a transfer, which may be expressed, including in the User's consent to use the relevant service of the Bank (which is provided by the Bank with the involvement of such third party), unless otherwise is stipulated by the legislation of Ukraine.

5. STORAGE, DELETION, AND DESTRUCTION OF PERSONAL DATA

5.1. The personal data of each User is stored in the Bank's information systems indefinitely; however, no longer than necessary for the lawful purposes in which they were collected or further processed.

5.2. The user has the right to correct, block or delete personal data if they are not up-to-date or contain errors.

5.3. The personal data of each User is deleted or destroyed in the cases and in the order provided by the current legislation of Ukraine.

6. RIGHTS AND OBLIGATIONS OF USERS

6.1. Each User, as a subject of personal data, has the rights provided for in Section 8, Paragraph 2 of the Law of Ukraine "On Protection of Personal Data" (or other norm adopted for it):

- to know about the sources of collection, the location of his / her personal data, the purpose of their processing, the location or place of residence (stay) of the owner or manager of personal data or to provide an appropriate instruction to receive such information to persons authorized by him / her, except as provided by law;

- to receive information on the conditions for granting access to personal data, in particular information about third parties to whom his / her personal data are transferred;

- to access his / her personal data;

- to receive no later than thirty calendar days from the date of receipt of the request, except for cases provided for by law, the answer as to whether his / her personal data is processed, and to receive the contents of such personal data;

- to submit a motivated demand to the owner of personal data with an objection to the processing of his / her personal data;

- to present a motivated requirement to change or destroy his / her personal data by any owner and manager of personal data, if such data are processed illegally or are unreliable;

- to protect his / her personal data from illegal processing and accidental loss, destruction, damage in connection with wilful concealment, not granting or untimely provision thereof, as well as to protect against the provision of information that is unreliable or disgrace the honour, dignity, and business reputation of an individual;

- to complain about the processing of his / her personal data to the Commissioner for Human Rights of the Supreme Council of Ukraine, or to the court;

- to apply remedies in case of violation of legislation on protection of personal data;

- to make reservations regarding the restriction of the right to process his / her personal data during the granting of consent;

- to withdraw consent to the processing of personal data;

- to know the mechanism of automatic processing of personal data;

- on protection from the automated decision which has legal consequences for him / her.

6.2. The user is obliged to make changes (provide information for making changes), if the personal data he / she provides are not up-to-date or contain errors.

7. MEASURES TO PROTECT INFORMATION ABOUT USERS

7.1. The Bank takes technical and organizational and legal measures to ensure the protection of the personal data of each User from unauthorized access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions with them.

8. USERS' APPEALS

8.1. The User has the right to send to the Bank his / her inquiries, in addition to the use / removal of his / her personal data, provided for in Section 3 of this Privacy Policy, in accordance with the procedure provided for in the Law of Ukraine "On the Users' Appeals".

8.2. All correspondence received by the Bank from the User (calls in written / electronic form) refers to information of limited access and without the written consent of the User is not subject to disclosure, except in cases provided by the current legislation of Ukraine. The personal data of the User who sent the request cannot be used without the consent of the User in any other way than to respond to the subject of the received request or in cases provided for in this Privacy Policy or Ukrainian legislation.

9. CONCLUDING PROVISIONS

9.1. Other rights and obligations of Users regarding their personal data or the Bank in respect of the User's personal data are regulated by the legislation of Ukraine in the field of personal data.

9.2. Everything that is not provided for in this Privacy Policy regarding the processing of personal data is governed by the legislation of Ukraine in the field of personal data.