

DATA PROTECTION POLICY

JSC OTP BANK (hereinafter Bank), as the leading financial institution in Ukraine, is committed to developing, operating and applying such a regulatory, executive and control system which ensures the safekeeping and protection of bank secrets, securities secrets as well as personal data in accordance with the criteria specified in relevant legal acts and its fundamental business interests.

The personal data processed by JSC OTP BANK. include in particular data required for identifying and liaising with customers, data required for the provision of a given service and/or data generated and processed in the course of the provision of the given service (including data related to debt collection), conclusions drawn, data derived from data processed by means of analysis, the data of the communication – performed on any communication channel – between Bank and the data subject, certain data of the individual devices used for accessing the services provided by JSC OTP BANK. by the data subject and – if relevant – publicly accessible data.

JSC OTP BANK treats all data, facts, information, solutions relating to its customers' persons, data, financial situation, business activity, management, ownership and business relations, the balance and turnover on customers' accounts it holds.

The legal framework for the protection of personal data is determined by the Law of Ukraine "On personal data protection" and other national legal acts governing Bank's activity.

When processing personal data and transferring it to third parties, Bank respects fundamental rights and fully ensures the principles of data protection all the time. Accordingly, it ensures

- that personal data shall be processed lawfully, fairly and in a transparent manner for data subjects. According to this principle Bank takes care of obtaining data subjects' consent, when consent is the legal basis of data processing;
- that personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- that personal data processed shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- that personal data processed shall be accurate and, where necessary, kept up to date and Bank takes every reasonable step to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified;
- that personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- that personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;
- Bank as data controller requires 3rd parties (joint controllers, data processors, independent controllers) with whom the data is shared to comply with the principles and requirements laid down in the Law of Ukraine "On personal data protection".

The detailed rules of data processing are contained in Regulations on processing and protection of personal data owned by OTP BANK JSC, in the business rules relating to

certain business services (including ancillary business services) and investment services (including ancillary investment services) of business divisions.

These documents contain details on the following:

- data subjects concerned by the given services of JSC OTP BANK (customers, potential customers and other data subjects concerned);
- data kept in records of data subjects in relation to the given service,
- purpose(s) of data processing;
- legal ground(s) for data processing;
- retention period of data processed;
- cases where personal data is processed using the automated decision-making method and used for profiling by OTP Bank Plc.;
- the recipients of the transfer of the personal data processed and the legal ground for data transfer;
- data processors used during the data processing;

JSC OTP BANK and members of the OTP group concerned process data, facts and information which are personal data, bank, securities and fund secrets, which they receive, ensuring high level of protection. Using these data OTP group members concerned can draw the attention of clients to the best and widest possible offers.

JSC OTP BANK can use the data of its clients available for the purpose of analysis, data will be used for tailoring and offering personalized offers if the client consented to it and uses data on legitimate interest for product developing and analysis aimed at making business decision.

Data subjects may request information with regard to the processing of their personal data and may submit their requests and complaints as well at the following contact details:

JOINT-STOCK COMPANY OTP BANK (OTP BANK JSC)

43 Zhylyanska str., Kyiv-33, Ukraine, 01033

E-mail address: info@otpbank.com.ua

Phone number: +38 044 490 05 00

Data subjects may submit their written comments in respect of data processing to JSC OTP BANK Compliance Unit as well:

Compliance Unit

43 Zhylyanska str., Kyiv-33, Ukraine, 01033

E-mail address: compliance@otpbank.com.ua

JSC OTP BANK treats all data transferred to it over the Internet using the same level of protection as if they were transferred to it using any other channel.