

## **PRIVACY POLICY**

This Privacy Policy (hereinafter – the Policy) applies to personal data of users (hereinafter – the User, You, Your) received by JSC “BSB Bank” (hereinafter – the Bank, we, us, our) via BSB Bank Mobile Application (hereinafter – the Application).

“Personal data” means any information relating to an identified individual or an identifiable individual.

“Personal data processing” means any action or a series of actions done to personal data, including collection, systematization, storage, alteration, use, anonymization, blocking, distribution, provision, and removal of personal data.

The terms used in the Policy shall have the meanings as defined in the User Agreement concluded with the user.

### **1. WHAT DATA WE PROCESS AND THE SOURCE OF DATA**

1.1 When You create a profile (account) in the Application, You provide us with the following personal data: identification number or (in the absence thereof) identity document number, and mobile phone number. We use such personal data to identify You as the Application user, as well as for authentication procedure.

1.2 To go through identification procedure established by law, You have to provide the following personal data: surname, name, patronymic (if any), sex, date and place of birth, ID document series and number, identification number, residential and registration address, email, and mobile phone number. Such personal data is needed for internal procedures approved by the Bank in accordance with the provisions of legislation on prevention of money laundering, terrorist financing and financing of proliferation of weapons of mass destruction.

1.3 When You use the Application we may process the data on how You use the Application to improve quality of the Application.

1.4 If You contact us concerning technical support or any other issues, we process all the information You provide us with in Your message. We use Your personal data to provide a service You apply for.

*Personal data listed in clauses 1.2, 1.3, 1.4 and 1.5 are processed for the purposes of the agreement (User Agreement) or as part of pre-contractual relations.*

1.5 We can collect data about the device You use to access the Application, including its model, operating system and version, unique identifiers of the device, information about the mobile network and Your location (subject to Your consent).

1.6 We also use Your email and mobile phone number for sending You promotional materials, exclusively subject to the consents given by You.

## **2. PURPOSE AND GROUND FOR PERSONAL DATA PROCESSING**

2.1 We process personal data for the purposes of:

- compliance with the legal requirements for the identification (verification) of participants of financial transactions and updating their data;
- bank account opening and issue of the bank payment card (hereinafter – the card) (conclusion and performance of the Single Contract of Cash Management Services (hereinafter – SCCMS), card personalization and issue);
- informing (SMS and email notification, sending messages in messengers) on the issues related to the Bank’s services within SCCMS;
- provision of additional services (bonuses) to holders of special, including premium, cards (participation in loyalty programs, provision of taxi services, concierge services, issue of insurance policies for travels outside the Republic of Belarus, etc.);
- drawing up reports and formation of analytical data for internal use;
- sending promotional information, Bank’s news, including promotional games, campaigns and contests (SMS and email notification, sending messages in messengers) held by the Bank, participation in promotional events of the Bank, subject to the received consents.

2.2 The ground for data processing for sending promotional information is Your consent.

2.3 The ground for data processing for other purposes are SCCMS, User Agreement, or other contract concluded with You, as well as legislative acts of the Republic of Belarus.

## **3. DATA USE BY THIRD PARTIES AND DATA PROTECTION**

3.1 The Bank may provide Your personal data to third parties for the purposes of SCCMS, User Agreement, or other contract concluded with You, as well as for the purposes specified in the Appendix to JSC “BSB Bank” Personal Data Processing Policy, including to authorized persons, as well as telecom carriers, email messaging service providers, post offices, insurance companies, loyalty program operators, government authorities (organizations), subject to the existence of grounds established by law of the Republic of Belarus.

3.2 The Bank provides adequate protection of personal data of the User in accordance with applicable law and takes the necessary organizational and technical

measures to protect them. The protection methods used provide protection of personal data from unauthorized or accidental access, removal, alteration, blocking, copying, distribution and other unlawful acts of third parties.

3.3 The appendix may contain links to the websites of third parties (including promotional materials, loyalty programs, etc.). The Policy does not apply to the actions of such third parties. Third parties have their own personal data processing policies and process personal data in accordance with them. We are not responsible for their websites, functions, actions and policies. Please read respective personal data processing policies before providing any data to them.

## 4. METHODS OF YOUR PERSONAL DATA PROCESSING

4.1 While processing Your personal data, we perform the following actions with personal data, both with and without the use of automation means: collection, systematization, storage, alteration, use, anonymization, blocking, distribution, provision (including cross-border transmission to authorized persons), and removal.

4.2 We never provide Your personal data to third parties without a ground provided for by law of the Republic of Belarus.

## 5. YOUR RIGHTS TO MANAGE PERSONAL DATA

5.1 The Bank hereby informs You, that You are granted the following rights:

	<b>Right</b>	<b>Description</b>	<b>Actions of the Bank</b>
1	Right to withdraw the consent previously given to the Bank to personal data processing as regards promotional emailing.	If Your consent is a ground for Your personal data processing by the Bank, You may withdraw it at any time by sending respective request.	<p>Within 15 calendar days from the date of the request, the Bank will:</p> <ol style="list-style-type: none"> <li>1) stop Your personal data processing;</li> <li>2) remove it;</li> <li>3) notify You about it.</li> </ol> <p><b>Exception:</b> cases when the Bank may continue processing Your personal data, subject to the existence of the grounds established by law of the Republic of Belarus</p>
2	Right to receive information related to personal data processing	<p>You have the right to receive information related to the processing of Your personal data that contains:</p> <ul style="list-style-type: none"> <li>– name and location of the Bank;</li> </ul>	The Bank will provide You with the information requested or notify You of the reasons for refusal to provide it within 5 business days from the date of Your request.

		<ul style="list-style-type: none"> <li>– confirmation by the Bank of the fact of personal data processing;</li> <li>– Your personal data and source thereof;</li> <li>– legal grounds and purposes of Your personal data processing;</li> <li>– period of consent to the processing of personal data;</li> <li>– name and location of the authorized person the Bank transfers Your personal data for processing to.</li> </ul>	
3	Right to make changes to Your personal data	You may request that the Bank makes changes to Your personal data, when such data is incomplete, outdated or inaccurate, by submitting an application to the Bank	The Bank will make changes to Your incomplete, outdated or inaccurate personal data within 15 calendar days from the date of the application
4	Right to receive information about Your personal data disclosure to third parties	You may receive from the Bank the information about Your personal data provision to authorized persons once a calendar year free of charge by submitting an application to the Bank.	Within 15 calendar days from the date of Your request, the Bank will provide You with the information about which was provided and to whom it was provided in the year preceding the date of the application, or notify You of the reasons for refusal to provide such information.
5	Right to request that Your personal data is ceased to be processed and (or) is removed, as regards promotional emailing	You may request the Bank to stop processing Your personal data, including to delete it, in the absence of the grounds for personal data processing, by submitting an application to the Bank. Please note that termination of Your personal data processing by the Bank can make it impossible to provide You with further services.	<p>Within 15 calendar days from the date of the request, the Bank will stop processing Your personal data.</p> <p><b>Exception:</b> cases when the Bank may continue processing Your personal data, subject to the existence of the grounds established by law of the Republic of Belarus</p>

5.2 For explanations related to Your rights, please contact us by email [dpo@bsb.by](mailto:dpo@bsb.by).

5.3 To exercise the rights listed in clause 5.1 of the Policy, You may apply to us in writing or in the form of the electronic document. The application shall contain: Your full name, residential address, date of birth, identification number or (in the absence thereof) identity document number (if such information was provided when giving consent or personal data was processed without consent), statement of request, personal signature or electronic digital signature.

5.4 To exercise the right to withdraw the consent to personal data processing for the purposes of promotional emailing previously given to the Bank, You may

submit us an application in the electronic form to [dpo@bsb.by](mailto:dpo@bsb.by). The application shall contain: Your full name, identification number or (in the absence thereof) identity document number, and statement of request.

5.5 If You want to make a complaint in relation to Your personal data processing, please contact us first via [dpo@bsb.by](mailto:dpo@bsb.by) and will do our best to process Your request within the shortest time possible.

## **6. DATA STORAGE**

6.1 We only keep your personal data as long as we need it to achieve the purposes such personal data was received for, and remove or anonymize it (so that it cannot be linked to an individual, i.e. it is not considered personal data) after those purposes have been met.

6.2 Please note that we can keep certain personal data and other information for a longer period, when it is necessary to fulfill legal obligations, resolve disputes and enforce our agreements.

6.3 We keep personal data needed to maintain Your account and ensure the possibility to use the Application as long as You have an account. You can remove Your account from the Application.

6.4 We keep personal data needed to provide You with services in accordance with SCCMS, User Agreement or other contract with You, as well as for the purposes of compliance with law, within the periods specified in the Appendix to JSC “BSB Bank” Personal Data Processing Policy.

6.5 We keep Your personal data on servers located in the Republic of Belarus.

## **7. AMENDMENTS**

7.1 We may amend the Policy at any time and will notify You about any amendments by indication of the date of the Policy last update.

7.2 Any amendments shall enter into force on their posting date.

7.3 If You do not agree with the current personal data processing conditions, including with any amendments, You must stop using the Application. If necessary, contact us at [dpo@bsb.by](mailto:dpo@bsb.by), so that we could settle the issues related to Your termination of use of the Application, including removal of Your account.

## **8. CONTACT ADDRESS**

If You have any questions concerning Your personal data processing, please contact us at [dpo@bsb.by](mailto:dpo@bsb.by).