

PRIVACY AND PERSONAL DATA PROCESSING POLICY

GENERAL PROVISIONS

Demir Kyrgyz International Bank Closed Joint-Stock Company (hereinafter referred to as the Bank) would like to thank you for your interest in the services of the Bank. Protection of your personal data is very important to us, so we pay special attention to the protection of personal data collected and processed while providing services, products and services.

The Bank's Services include the Internet-Banking/Mobile-Banking system, mobile applications, service of creating/changing access codes to the Internet-Banking/Mobile-Banking system, as well as other services, products, services posted on the website www.demirbank.kg, enabling You to interact with the Bank within the General bank account agreement and/or other agreement, as well as without conclusion of such agreements.

The Privacy and Personal Data Processing Policy (hereinafter - the Policy) is developed in accordance with the requirements of the legislation of the Kyrgyz Republic and establishes requirements for ensuring security of your personal data, as well as what personal data the Bank receives, how it uses and exchanges them with other persons.

Gaining access to services, products, the Bank's Services means your unconditional consent to the provisions of this Policy.

This Policy also specifies the basic precautions that you must take to ensure that your personal data remains confidential.

This Policy applies to personal data that has been or will be received by the Bank as a result of providing you with the Bank Services, products, and offerings, as well as in connection with the conclusion and execution of agreements, including data of guarantors, pledge givers, representatives, beneficiaries, and other individuals whose personal data is processed by the Bank in relation to providing you with services, products, and offerings.

This Policy also applies to the personal data of individuals acting on behalf of the Bank's Customer, which is a legal entity, including members of the executive bodies, managers, representatives, employees, as well as the beneficial owners of the Customer.

CONSENT FOR THE COLLECTION AND PROCESSING OF PERSONAL DATA

The Bank collects and processes your personal data and information about you solely with your consent and/or in cases provided by law.

PURPOSES OF PERSONAL DATA COLLECTION AND PROCESSING

The purposes of personal data processing are:

- consideration by the Bank of the possibility of entering into any contracts and agreements with the Customer, and making decisions on offering services and products;
- provision to the Customer of any banking services and products, including, but not limited to, opening and maintaining bank accounts, executing money transfers and payments, cash services, attracting deposits, providing any credit products to the Customer or to a person for whom the Customer

acts as a guarantor, as well as the provision by the Customer of property or property rights to the Bank as collateral;

- receipt/use of state (municipal), payment, and other services;
- identification and verification of the Customer and beneficiaries in the course of banking activities, as well as authorization and authentication of the Customer for access to banking services and/or products.
- receipt of services and products, including those provided by third parties, available through the Bank's Internet Banking and Mobile Banking systems, including integrated applications (tools);
- submission of reports to state supervisory authorities;
- conducting marketing and advertising campaigns/promotions;
- receipt of notifications and personalized information from the Bank;
- development of new services and products;
- exercise by the Bank of any rights and fulfillment of any obligations related to compliance with the legislation of the Kyrgyz Republic, agreements, provisions of the Bank's internal documents, and the conduct of proper due diligence of the Customer.
- verification of the accuracy of the information provided by the Customer, including obtaining the Customer's personal data from other permitted sources;
- assessment and evaluation of creditworthiness and solvency for the purpose of making a decision on entering into a loan (credit product) agreement and/or agreements securing the repayment obligations, as well as for the further performance of such agreement(s), including obtaining the results of such assessment, credit evaluations (scoring), and score (individual rating);
- provision of information on the performance of agreements and transactions carried out via accounts and bank cards;
- provision of information on the Customer's transactions to payment systems and correspondent banks;
- provision to payment systems, correspondent banks, as well as other banks, financial institutions, payment infrastructure operators, processing centers, and other parties directly or indirectly involved in the execution of a transaction, of information on the Customer's transactions to the extent necessary for their initiation, processing, completion, and support;
- execution of payments by the Customer for goods, works, and services of third parties through the Bank's branches, using Internet Banking, Mobile Banking, peripheral devices, and other remote/distance service systems;
- analysis and improvement of customer experience, the quality of the Bank's services, and enhancement of the Bank's software;
- collection of overdue debt owed to the Bank under any contract or agreement;
- investigation of disputed transactions;
- promotion of the Bank's products and services, including the delivery of informational and advertising messages about the Bank's services through direct communication channels, as well as the conduct of marketing activities;
- ensuring the security of services;
- provision by the Bank to the Customer's employer, educational institution, the Social Fund of the Kyrgyz Republic, of information about the Customer, including the bank account number opened in the Customer's name and information on the movement of funds for the purpose of crediting salaries, scholarships, or other remuneration, or for receiving pensions and benefits from the Social Fund authorities, where the Customer is serviced by the Bank under salary projects, the "pensioner card" project, or the "campus project";

- prevention of fraudulent activities related to the use of the Bank's services, products, and offerings;
- operation and maintenance of the Bank's official website and digital applications;
- handling of inquiries from customers and other interested parties;
- other purposes not prohibited by the legislation of the Kyrgyz Republic and necessary for the Bank to carry out its activities, protect its interests, fulfill contractual obligations, and comply with applicable legal requirements.

LIST OF PERSONAL DATA COLLECTED

In this Policy, your personal data means:

- Full name (former surname, first name, patronymic, date, place and reason of change), maiden name, year, month, date and place of birth, citizenship, gender, nationality;
- data of the identity document (type, series, number of the document, name of the issuing authority and its code, date of issue, validity period);
- data of the document confirming the right of a foreign citizen to stay /reside in the Kyrgyz Republic (type, series (if available) and number of the document, the date of commencement of the period of validity of the right of stay (residence), the date of expiration of the period of validity of the right of stay (residence);
- address: place of residence, place of registration, place of stay, place of work.
- personal number, taxpayer identification number and other information constituting a tax secrecy in accordance with the Tax Code of the Kyrgyz Republic;
- information about the Customer's representatives and beneficiaries;
- information about the debt owed to the tax authorities and the social fund of the Kyrgyz Republic;
- information about employment, work activity (including information about work experience, income and expenses), marital status, property status (including information about the availability of movable/immovable property and property obligations), education, profession, family composition;
- information about conducting business as a private entrepreneur and/or membership in the management bodies of legal entities;
- information about registration as a private entrepreneur (date of registration, state registration number, name of the registering authority, place of registration);
- information about the patent or license (type of patent or license, patent or license number, date of issue of the patent or license, issuing body, validity period of the patent or license, list of types of permitted or licensed activities;
- details of the pension certificate, military ID, marriage certificate, birth certificate;
- driver's license information;
- vehicle registration information;
- information about the telephone and fax numbers of which the Customer is a subscriber and/or user, as well as information about other communication methods;
- information about the Customer's e-mail addresses, the Internet user name, information about the account (record entry) created on the Bank's website or mobile application; metadata, cookie data, cookie identifiers, IP addresses, information about the browser, operating system, and device used by the Customer;

- information about the Customer's bank accounts and cards, and operations performed on them;
- the amount of debt owed to the Bank and other creditors;
- information from the credit history, other information previously provided to the Bank (including information containing bank secrecy);
 - photographic image and video image;
 - audio recording of voice;
 - information provided by the Customer to the Bank, including through communication channels, information obtained from the Internet and/or other publicly available sources of personal data, and/or from third parties, including government agencies, state information systems, the unified identification System, the Social Fund of the Kyrgyz Republic, including through the interagency electronic interaction system (hereinafter – IEIS);
 - information about information and established restrictions in the framework of criminal, administrative, civil, notarial, enforcement proceedings;
 - information about participation in incentive programs, marketing events (bonus programs);
 - copies (including paper and electronic, scanned images, photocopies) of all the above-mentioned documents and information, as well as copies of documents and materials submitted by the Customer or received by the Bank in accordance with the procedure established by law;
 - other personal data as defined in the legislation of the Kyrgyz Republic on personal data protection, which are transferred or will be transferred by the Customer to the Bank, as well as which are received or will be received by the Bank from official sources or from any third parties in accordance with the procedure established by law.

When using the Bank Services, the following personal data may be requested and received:

- Information about You. When creating an account and/or registering and/or using the Bank Services, the Bank requests information about you, such as your full name, gender, date of birth, residence address, email address, phone number, and bank card details or other electronic means of payment. The bank may also ask for additional information. With your separate consent, the Bank can get access to information about your contact information (phone and / or address book, contacts in your mobile device, for example, to make money transfers), to the photo gallery (only if you intend to choose a photo when using the Bank Services), to the camera of your mobile device (access, for example, will allow you to take a photo, scan a QR-code or a bar-code to pay for a service or transfer).
- Information about your mobile device. The bank collects data about your mobile devices, such as mobile device model, operating system version, unique device identifiers, as well as mobile network data and mobile phone number. In addition, the device ID and mobile phone number may be linked to your account.
- Location information. The Bank services that support your mobile device's geographic location feature allow the Bank to receive information about your actual location, including GPS data sent by your mobile device.
- Information about transactions performed. When making payments for goods and services, money transfers and other transactions, the Bank collects information about the place, time and amount of transactions made, form of payment, data about the merchant and/or service provider, descriptions of the reason for the transaction, if any, as well as other information related to making the above transactions.
- Information received when visiting the site: the Bank uses your data in order to allow you to use the Bank Services.

- Information received from third parties. Such information is necessary for the proper provision of services, fulfillment of contractual obligations to you and third parties. The Bank receives information provided by third parties, which may contain data about you, other persons specified by you.
- Your other data available to the Bank, which you have agreed to provide and / or received by the Bank from official sources or from any third parties to provide services to you through the Bank services.

PERIOD FOR RETAINING PERSONAL DATA

The Bank keeps your personal data for the period necessary for the Bank to achieve the purposes of their collection and processing, taking into account the retention periods regulated by the legislation of the Kyrgyz Republic.

PROVIDING YOUR PERSONAL DATA TO THIRD PARTIES

By receiving the Bank's services, products, and services, you authorize the Bank to transfer all or part of any personal data to any state, municipal authorities, enterprises, institutions, and organizations of the Kyrgyz Republic (including the Ministry of Digital Development, the State Tax Service, the Social Fund, the Ministries of Internal Affairs, the Ministry of Justice, and the state registration authorities for real estate property, bodies of state registration, re-registration of vehicles, installations and equipment, population registration authorities and civil status acts, the National Bank of the Kyrgyz Republic, the State Financial Intelligence Service, law enforcement agencies, judicial authorities, prosecutor's offices, a division of the bailiff service, customs authorities, statistical authorities, state information systems and registers, including through the IEIS, credit bureaus, payment systems, correspondent banks, as well as transfer to other banks, financial and credit organizations, and other legal entities, supervised by the National Bank of the Kyrgyz Republic, payment system operators, payment organizations, processing centers, mobile operators, insurance organizations, electronic money operators, notaries, valuation companies, auditing organizations, Bank's partners in bonus/marketing programs, as well as other third parties involved by the Bank in providing you with the services, products and services necessary to achieve the goals specified in this Policy, and also to receive from the specified bodies and organizations, in whole or in part, personal data and other information about you for the purposes specified in this section, including the purposes of identification, verification, conducting and supporting operations, fulfilling obligations and complying with the requirements of the legislation of the Kyrgyz Republic.

YOUR RIGHTS

The Bank takes reasonable measures to keep your personal data available to the Bank accurate and up-to-date, and to delete outdated and other inaccurate or unnecessary personal data. Nevertheless, you are responsible for providing accurate information, as well as for updating the provided data in case of any changes.

You may at any time change (update, add) the personal information you have provided or any part of it. Changes of your personal data kept by us shall be made upon your written application with the submission of the documents, confirming changes in your data, or by you through the Bank Services (if technically possible).

Withdrawal of your consent. You have the right to withdraw your consent at any time by submitting a written application to the Bank. However, please be aware that we need your personal data in order to provide services, products and offerings. In this case, withdrawal of your consent will result in

termination of any services, products, and offerings provided to you by the Bank. At the same time, withdrawal of your consent does not entail termination of obligations arising for you under any banking services agreements of the Bank, including agreements on issue and service of payment cards, agreements on opening bank accounts and deposits, credit agreements.

Data rights. You have the right to receive information about the data we have on you. You can exercise your rights by contacting us in writing.

BANK'S RIGHTS

The Bank has right:

- Receive from you information and/or documents containing your personal data;
- Clarify the personal data provided by you;
- In case you withdraw your consent for processing of personal data, continue processing of your personal data in accordance with the requirements of the legislation of the Kyrgyz Republic;
- Block access to the Bank Services if, in the opinion of the Bank, there is a violation or attempts to violate the security procedure of the Bank Services, including in case of suspicion of fraudulent operations by third parties using your personal data using the Bank Services, as well as in other cases stipulated by the legislation of the Kyrgyz Republic;

SECURITY MEASURES USED TO MAINTAIN THE CONFIDENTIALITY OF PERSONAL DATA

The Bank takes all possible measures to ensure the security and protection of your personal data from unauthorized attempts to access, modify, disclose or destroy it, as well as other types of improper use. In particular, the Bank is constantly improving methods of data collection, storage and processing, including physical security measures to prevent unauthorized access to the Bank Services for the purpose of property theft, phishing and other types of fraud. The Bank also restricts access to your personal data to employees, contractors and agents, with strict contractual confidentiality obligations, for violation of which strict liability is provided.

When processing personal data, the Bank takes the necessary legal, organizational and technical measures to protect the Customer's personal data from unlawful or accidental access to them, unfair processing, destruction, modification, blocking, copying, provision, dissemination of personal data, prevention of harm to the Customer, as well as from other unlawful actions with respect to the Customer's personal data.

The Bank ensures protection of information at all stages of its "life cycle", including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), anonymization, blocking, removal, destruction of personal data and forbids violation of confidentiality of received information.

To ensure safe storage of personal data in information systems in accordance with the requirements of legislation, the Bank uses the following methods (including, but not limited to): delimitation of user access to information resources, software means of processing (transmission) and protection of information; data encryption; use of secure communication channels; use of information protection tools, etc.

The terms of data storage in the Bank shall be determined in accordance with the requirements of the legislation of the Kyrgyz Republic, documents fixing the contractual relations of the Bank with subjects of personal data, and consent of subjects to the processing of personal data.

POLICY CHANGES

The Bank may update and amend the provisions of this Policy at any time. A new version of this Policy becomes effective as of its posting, unless otherwise stipulated by the provisions of the new version of the Policy. The Bank recommends you regularly refer to this Policy for the most up-to-date version.

FEEDBACK

All suggestions or questions regarding this Policy should be reported to the Bank at the e-mail address customercare@demirbank.kg, or send a written request to the address: 720001, Kyrgyz Republic, Bishkek, 245 Chui Avenue to "Demir Kyrgyz International Bank" Closed Joint-Stock Company with a note "Questions and proposals on the Privacy and Personal Data Processing Policy".

If you want to make a complaint about the processing of your data, please contact the Bank at the above addresses and the Bank will try to respond to your request as soon as possible.