

POLICY
for Personal Data Confidentiality in Bank Globus (JSC)

Moscow, 2019

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GENERAL PROVISIONS

This Policy for Personal Data Confidentiality in Globus Bank (JSC) (hereinafter referred to as the Policy) applies to all personal data that Globus Bank (JSC) (hereinafter referred to as the Bank) may receive from the user during the use by users of the Bank's website – www.globus-coins.ru (hereinafter referred to as the Website), Internet services, services, participation in advertising and marketing campaigns or promotions and/or other interactions with the Bank (hereinafter referred to as the Services).

This Policy is mandatory for review and execution by all persons authorized to process personal data in the Bank and persons involved in organizing the procedures of processing and ensuring the security of personal data in the Bank.

This Policy applies to all processes of collecting, recording, systematizing, accumulating, storing, validation (updating, changing), extracting, using, transferring (providing, accessing), blocking, deleting, destroying personal data, carried out using automation tools.

The Bank processes personal data in compliance with the principles and rules established by Federal Law of the Russian Federation No. 152-FZ dated 27.06.2006 "On Personal Data".

The Bank does not control and is not responsible for third-party websites to which the User can follow the links available on the Bank's Website. Third party websites may have their own Confidentiality Policy and may collect or request other personal information from the user.

This Policy explains how the Bank processes and protects personal data and other information of users.

By using the Services and providing the Bank with the information necessary to initiate further interaction, the user expresses consent to its use in accordance with this Policy.

For specific Services, the Bank may publish provisions that supplement this Policy.

This Policy is subject to update in the event of changes in the legislation of the Russian Federation on personal data.

1. Personal Data of Users That the Bank Receives and Processes

1.1. By providing their personal data, the Client agrees to their processing (until the Client withdraws their Consent to the processing of personal data) by the Bank for the purpose of the Bank and/or its partners fulfilling their obligations to the client, selling goods and providing services, providing reference information, as well as for the purpose of promoting goods, works and services.

1.2. For the purposes of this Policy, "user's personal data" means:

1.2.1. Personal data that the user provides about himself/herself on the Website or in the process of using the Services. Information required for the provision (rendering) of Services is clearly indicated.

1.2.2. For visitors to the Website – persons viewing the Website, such information includes: last name, first name, patronymic, date of birth, delivery address; contact telephone number, email address, information about the country, city, region of residence.

1.2.3. Other information about the user, the collection and/or provision of which is determined by the Bank for the provision of individual Services additionally, which is clearly indicated when ordering individual Services.

1.3. The user's personal data provided to the Bank are considered inaccurate and may be blocked until the user or his/her legal representative gives consent to process the user's personal data in any form additionally designated by the Bank, apart from that provided on the Website.

1.4. The Bank does not make decisions that generate legal consequences in relation to the user or otherwise affect his/her rights and legitimate interests based solely on the automated processing of personal data.

1.5. The Bank does not delegate the processing of personal data to other persons.

2. Purposes of Processing Personal Data of Users

2.1. The Bank only processes the personal data required to deliver and improve the quality of Services.

2.2. The Bank may use the user's personal data for the following purposes:

2.2.1. Identification of the party in the provision of Services.

2.2.2. Providing the user with personalized Services.

2.2.3. Improvement of Services quality and development of new ones.

2.2.4. Conducting statistical and other studies based on anonymized data.

2.2.5. Providing users of the Website with safe and convenient functionality for its use, and effective display of information.

2.2.6. Effective execution of orders, contracts and other obligations accepted by the Bank as binding before the user.

2.2.7. Processing requests from Website users.

2.2.8. Registration of Website users for events.

2.2.9. Implementation and/or performance of functions, powers and duties imposed on the Bank by the laws of the Russian Federation.

3. Transfer of User's Personal Data to Third Parties

3.1. The user's personal data is kept confidential, except in cases of processing personal data, access to which is granted to an unlimited number of persons by the user or at his/her request.

3.2. The Bank has the right to transfer the user's personal data to third parties in the following cases:

3.2.1. Transfer is required for achieving the objectives, implementation and performance of functions, powers and duties assigned to the Bank by the laws of the Russian Federation.

3.3. The Bank does not carry out cross-border transfer of users' personal data.

4. Measures Taken to Protect Users' Personal Data

4.1. In order to ensure the fulfillment of obligations stipulated by Federal Law of the Russian Federation No. 152-FZ dated 27.06.2006 "On Personal Data" and the regulatory legal acts adopted in accordance with it, the Bank has taken the following measures to protect the personal data of users:

4.1.1. A person responsible for organizing the processing of personal data has been appointed.

4.1.2. Local acts on processing and protection of personal data have been issued, as well as local acts establishing procedures aimed at preventing and identifying violations of the legislation of the Russian Federation, eliminating the consequences of such violations;

4.1.3. Legal, organizational and technical measures have been taken to ensure security of personal data.

4.1.4. Rules for access to personal data processed in personal data information systems have been established.

4.1.5. Registration and accounting of all actions performed with personal data in personal data information systems are carried out.

4.1.6. Rules for backup and recovery of information and personal data have been established.

5. Rights and Obligations of the User

5.1. The Bank shall take reasonable steps to maintain the accuracy and relevance of the personal data held by the Bank, as well as to delete outdated and other inaccurate or unnecessary personal data. However, the User is responsible for providing accurate information, as well as for updating the provided data in the event of any changes.

5.2. The user may at any time change (update, amend) the provided personal data or part thereof, as well as parameters of their confidentiality.

5.3. The User has the right to revoke consent to the processing of personal data by the Bank at any time by sending a written notice to the address: 10 Bakhrushina Street, Block 1, Moscow, 115184 Russian Federation, with the note “revocation of consent to the processing of personal data”, given that the user’s revocation of consent to the processing of personal data entails the deletion of the user’s account from the Website, as well as the destruction of records containing personal data in the Bank’s personal data processing systems, which may make it impossible to use the Bank’s Internet services.

5.4. The User has the right to receive information regarding the processing of his/her personal data in the Bank, for which purpose he/she has the right to send a written request to the address: 10 Bakhrushina Street, Block 1, Moscow, 115184 Russian Federation, with the note “request for information on the procedure for processing personal data”.

5.5. In order to comply with the provisions of paragraphs 5.2 – 5.4 of this Policy, the Bank may require confirmation of the user’s identity by requesting the provision of such confirmation in any form that does not contradict the law.

6. Feedback. Questions and Suggestions

All suggestions or questions regarding this Policy should be communicated to the Bank by telephone at +7(495) 644-00-11 or by email [at info@bankglobus.ru](mailto:info@bankglobus.ru).