

## Personal Data Protection Policy

### Objectives of the Personal Data Protection Policy

The purpose and basis of the proposed policy based on the internationally recognized fundamental principles of data protection, the best international practices and Georgian legislation is to protect and respect the rights and interests of the data subjects.

The data protection policy ensures the implementation of the necessary conditions at the bank and its subsidiaries, while with regard to the relation with the affiliated persons etc. partners to providing the appropriate recommendations. This policy ensures observance of the international and EU data protection directives and the standards and regulations under the Laws of Georgia, the aim of which is effective protect of the rights of the personal data subjects.

The Bank complies with all the applicable laws and regulations regarding personal data processing.

This policy may be updated from time to time. Therefore, we recommend you to familiarize yourself with it regularly. The latest version of this policy is available on the Bank's website.

### Principles of Data Processing

The data shall be processed legitimately, fairly, transparently and with due respect to the dignity of the data subject.

The data shall be collected/obtained for the specific, clearly defined and legitimate purposes solely. Further processing of data for other purposes different from the original purpose shall be unacceptable.

The data shall be processed to the extent necessary to achieve the relevant legitimate purpose and shall be proportionate to the purpose for which they are processed.

The data shall be true, accurate and updated if required. With the purposes of data processing taken into account, inaccurate data shall be corrected, deleted or destroyed without undue delay.

The data shall be stored for the period required for achievement of the relevant legitimate purpose of processing thereof. As the purpose for which the data are processed has been achieved, they shall be deleted, destroyed or stored in a depersonalized form, unless the data processing is determined by law and/or by a bylaw and the data storage is a necessary and proportionate measure for protection of the overriding interests of a democratic society.

### Basis of Data Processing

The data processing is permitted in case of existence of one the following grounds:

- the data subject consented to processing of its personal data for one or more specific purposes;
- the data processing is necessary to fulfill the obligation under a transaction concluded with the data subject or to effect a transaction requested by the data subject;
- the data processing is prescribed by the law;
- the data processing is required for the fulfillment of duties by the person in charge thereof as determined by the Georgian legislation;

- according to the law, the data is in the public domain or the data subject made it publicly available;
- the data processing is necessary to protect important legitimate interests of the person in charge thereof or those of a third person, unless there is an overriding interest where protection of the rights of the data subject (including a minor) is concerned; the data processing is required for consideration of the data subject's application (rendering services);
- the data processing is necessary to ensure the information and cyber security;
- the data processing is necessary subject to the nature of the labor obligations and relationship, including decision for employment or evaluation of the employee skills;
- the data subject made its data public without an explicit prohibition of its use;
- if agreed by the parties and/or there are other legitimate grounds for information processing;
- the data of a 16-year-old shall be processed on its consent, while those of the under 16 shall be processed, if approved by a parent or its legal representative, except for the cases expressly determined by the law, including the case where approval of a 16-18-year-old person and its parent or etc. legal representative is required.

### **Rights of the Data Subject**

You are entitled to:

- receive information on your data being processed, as well as the basis and purpose of procession, the source of data collection/retrieval, the data storage period or, if required, the criteria of defining the said period, etc.
- request correction, updating and/or completion of false, inaccurate and/or incomplete data;
- request blocking and termination of the processing or deletion or destruction of your data;
- at any time, withdraw your consent without any explanation or substantiation;
- request the right to transfer the data;
- request a copy of the data being processed;
- in case of violation of the rights provided by the law and established rules, apply to the personal data protection service, the court and/or the higher administrative body in the way established by the law.

The requests of the data subject specified in the sections above shall be met no later than 10 business days upon submission thereof (unless another term is specified by the legislation of Georgia, or the term is determined by the person in charge).

### **Personal Data Obtainment Sources**

The personal data above can be obtained from the sources you provide to the Bank and/or in the cases below:

- while using our products or services;
- during a telephone communication or a visit to a service center;
- use of our website, mobile application and online consulting functionality (online chat);
- letters sent by post or e-mail;
- subscription to our news, alerts or etc. services;
- etc. legitimate sources and grounds;

On the legitimate grounds, your data may be collected from the organizations, such as: the National Agency of Public Registry (LEPL), the State Services Development Agency (LEPL), payment service providers, Credit-Information Bureau, etc. financial institutions.

## **How Do We Use Your Data**

The bank shall use your personal data:

- to duly render the banking services;
- to improve and develop the Bank services, to which end the Bank analyzes the available information on the data subject, including credit and transaction histories, statistical data, etc.;
- for appropriate implementation of the rights and obligations under the contracts;
- in cases under the legislation in order to make the information available to a state and/or a supervisory body;
- to transfer the information to an external auditor or collector;
- to prepare and submit various reports and surveys;
- to ensure security and to comply with legal requirements for the detection and/or prevention of fraud, money laundering etc. crimes;
- within the framework of the existing credit, in order to offer increase of the credit sum and/or change etc. conditions of the credit (including, without limitation, its maturity period and interest rate);
- in order to offer a new and/or additional credit or non-credit products, the desirable and/or necessary prerequisite of which is the verification of the data subject's credit and/or transaction history and/or behavioral characteristics at the time of the offer;
- for marketing purposes, which means periodic offer of the bank etc. products/services;
- on etc. legal grounds.

## **Safety Measures**

The Bank introduced the appropriate organizational and technical measures to ensure data protection against loss, illegal processing, as well as destruction, deletion, alteration, disclosure or use.

Also, from 1 June 2024, the personal data protection officer shall be appointed by the Bank, whose contact information shall be posted on the Bank website.

## **Personal Data Processing for Direct Marketing Purposes**

As a result of processing the personal data for marketing purposes, we can offer you customized products and offers. For marketing purposes, we shall process the information you supply and approved processing of. You can revoke your consent at any time, in the same way/channel it was given by or by visiting a service center or by texting "INFO OFF" to 90199.

## **Cookies**

A cookie is a small text file that your browser or application stores on your device (computer, smartphone or tablet). These files help the website to run smoothly and improve performance. By the Cookie files the use of the website is monitored,

user experience personalized and the website improved. We also use Cookies files to provide marketing offers tailored to your interests.

### **Who Do We Share Your Personal Data with?**

Under the Georgian legislation, for appropriate and complete service of the data subject, the Bank may share your personal data with the other banks, payment system providers and the organizations providing us with the product or service you selected. We may need to share your personal data if you are a holder of the Cartu Bank debit, credit and payment cards or are in a contractual relationship with the Bank that allows us to do so.

If you use the services of our Bank, we supply your personal data, including details of your closed and overdue loans to the Credit-Information Bureau. If you are a borrower, we also share with the Credit Bureau the information about your loan installments - on time, full or overdue. On its part, the said Agency shall share the information with other financial institutions.

Unless determined by the Laws, the Bank shall be authorized to transfer or/and receive from the third parties (including, but not limited to, state agencies, controlling/supervisory bodies, auditors, collectors, potential assignees etc. persons) the data (including the personal data) on the data subject required by the Bank.

The personal information shall be supplied to law enforcement agencies if provided for by the law and/or required for investigation and prevention of a crime.

The Bank may need to transfer your personal information to other companies and service providers abroad. This is necessary when the service providers are outside Georgia in which case the Bank shall act in accordance with international and Georgian legislation and regulations.

Also, the data may be transferred on etc. legitimate grounds.

We do our best to ensure the security of the personal data.

### **How Long do We Store Your Personal Data?**

The Bank shall be authorized to store your personal data throughout the service term and upon its termination for up to 15 years. Your data can be stored for more than 15 years, unless the data cannot be deleted due to the relevant legal grounds. The purposes of direct marketing by the data subject, the Bank shall be obliged to record and store the fact and time of approval and/or withdrawal thereof through the direct marketing term and 1 year from its termination.

### **How to Contact Us?**

If you need to correct, update, add, block, delete, destruct of your data, you can visit a Bank service center or dial: \* 8080, (032) 200 80 80.

The cancellation/refusal of consent to the direct marketing can be confirmed at any of our service centers or by texting “INFOOFF” to 90199.