

Personal Data Processing and Protection Policy

QIWI Bank (Joint Stock Company)

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1 GENERAL PROVISIONS

1.1 This Policy is elaborated in accordance with the EU General Data Protection Regulation 2016/679 of April 27, 2016 (hereinafter – the GDPR), and the Russian Federation Federal Law of 27 July 2006 N 152-FZ “On Personal Data” to lay out the system of main principles, employed by the QIWI Bank (JSC) with respect to personal data processing.

1.2 This Policy determines general principles, purposes, procedures and conditions of the Bank employees’ and other persons’ personal data processing when their data is processed by the Bank to ensure protection of human and civil rights and freedoms while processing their personal data.

1.3 This Policy is applied to all operations, performed on personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, use, transmission, anonymization, restriction, erasure, destruction, whether or not by automated means.

1.4 This Policy is applied to personal data obtained both before and after this Policy takes its effect.

1.5 This Policy is subject to change and amendment in case new legislation or special regulation is passed or the existing legislation and special regulation is modified. The new version of the Policy shall take its effect after publication or after unlimited access to the same is otherwise provided, unless otherwise is stipulated in the new version of the Policy.

2 PERSONAL DATA PROCESSING PRINCIPLES

2.1 The Bank has documents available and in force, which stipulate procedures for processing and protecting personal data to ensure meeting the requirements of the GDPR and the Russian Federation Federal Law of 27 July 2006 N 152-FZ “On Personal Data” as well as regulations, passed in connection with the later.

2.2 Personal data is processed on the basis of the following principles:

- Personal data is processed lawfully and fairly;
- Personal data processing is limited to achievement of specified, explicit and legitimate purposes;
- Processing personal data, incompatible to the personal data collection purposes is not permitted;
- Integration of the databases, containing personal data, processed for the purposes, incompatible with each other, is not permitted;
- Only personal data, relevant to the purposes of its processing, may be processed;
- The content and scope of personal data shall correspond to the declared purposes, personal data to be processed shall not be excessive with regard to the declared purposes of processing;
- While processing personal data its accuracy, sufficiency and, when necessary, relevance to declared processing purposes is to be ensured;
- Personal data storage is to be carried out in the form, allowing to identify the personal data subject not longer than it is required for the personal data processing purposes, unless personal data storage period is set out in the federal law, the contract, whose party, beneficiary or guarantor is the personal data subject;
- The processed personal data is subject to erasing or anonymization, once personal data purposes are achieved or when achieving such purposes becomes no more necessary, unless otherwise provided in the Federal Law.

3 PERSONAL DATA PROCESSING PURPOSES

- 3.1 The Bank shall process personal data for the following purposes:
- to comply with the Russian Federation legislation requirements;
 - to conclude contracts with the Bank, perform the contracts, concluded between the Bank and the data subject;
 - to identify the data subject, to meet requirements of the anti-money laundering legislation;
 - to offer financial products (financial services) by the Bank and/or promote goods (works, services, intellectual activity results) of other parties;
 - to conduct surveys, including through direct contact with the data subject.

4 SCOPE AND TYPES OF PROCESSED PERSONAL DATA

4.1 The personal data scope is determined according to the purposes of its processing and shall be set out in the document “Regulation on Processing and Protecting Personal Data by QIWI Bank (JSC)”.

4.2 The Bank shall process personal data of the following subjects:

- Clients, counterparties, their representatives and counterparties contact persons, in scope and within the period, necessary to perform under the contracts, whose party or guarantor is such personal data subject, as well as to achieve purposes, stipulated by the laws of the Russian Federation, to exercise and follow the Bank’s obligations, authorizations and functions as stipulated by the legislation of the Russian Federation;

- Participants of the marketing research, in scope and within the period, necessary to achieve statistical or other research purposes, provided that personal data is always anonymized;

- Bank’s employees, in scope and within the period, necessary to perform under the contract, whose party or guarantor is such personal data subject, as well as to achieve purposes, stipulated by the laws of the Russian Federation, to exercise and follow the obligations, authorizations and functions as stipulated by the legislation of the Russian Federation;

- Candidates to fill vacancies, in scope and within the period, necessary to enter into a contract, whose party, beneficiary or guarantor will be such personal data subject;

- Directors, shareholders, founding members, shareholders/company member spouses, shareholder heirs, Company Board of Directors Members, in scope and within the period to achieve purposes, stipulated by the laws of the Russian Federation, to exercise and follow the Bank’s obligations, authorizations and functions as stipulated by the legislation of the Russian Federation;

- The Bank’s affiliated persons, in scope and within the period to achieve purposes, stipulated by the laws of the Russian Federation, exercise and follow the Bank’s obligations, authorizations and functions as stipulated by the legislation of the Russian Federation;

- Parties of the legal proceedings, involving the Bank, in scope and within the period as required for law enforcement as well as to ensure Bank’s activities lawfulness and protect the Bank’s lawful rights and interests;

- Guarantors under commercial loans, in scope and within the period as necessary to enter into agreement, according to which such personal data subject will be a beneficiary or guarantor;

- Persons, involved in courier delivery, in scope and within the period as necessary to exercise rights and lawful interests of the Bank or other parties;

- Receivers of alimony, in scope and within the period as necessary to achieve purposes, stipulated by the laws of the Russian Federation, to exercise and follow the Bank’s obligations, authorizations and functions, as stipulated by the legislation of the Russian Federation, as well as to ensure enforcement of judicial decisions.

4.3 The Bank shall not process special categories of personal data.

4.4 The Bank shall process biometric personal data to follow also the requirements of the Article 7 of the Federal Law No. 115-FZ of August 07, 2001 “On Countering the Legalisation of Illicit Earnings (Money Laundering) and Terrorism Financing”.

5 USE OF COOKIES

5.1 The Bank uses cookies on its websites *.sovest.ru, *.qiwi.com, *.qiwi.ru, *.contact-sys.com, *.rapida.ru, *.rocketbank.ru, *.tochka.com (hereinafter individually and collectively referred to as “Bank’s website”).

5.2 The Bank uses cookies for the following purposes:

- To log in at the Bank’s website as registered user, provide Bank’s services;
- To identify and recover errors at the Bank’s website;
- To support the Bank’s website operation and improve its performance and quality;
- To decrease risks, prevent possible fraud, ensure safe use of the Bank’s website;
- To store users’ personal preferences and settings;
- To provide targeted information about products and services of the Bank and its partners;
- To improve products and/or services, to develop new products and/or services;
- To maintain analytics.

5.3 When visiting the Bank’s website on the Internet other data is automatically collected, including: technical characteristics of the device, IP address, information about browser and language used, the date and time of the access to the website, addresses of the requested pages of the website and other similar information.

5.4 The Bank may use cookies and other automated and non-automated methods of processing user data (information about actions performed by the user on the Bank’s website, information about devices used to access the Bank’s website, the time and date of the session) and may also transfer them to a third party to conduct research, perform work or provide services.

5.5 Users may manage cookies on their own. The utilized browser and/or device may permit blocking, deleting or otherwise limiting use of cookies. The operation manual, provided by the browser developer or device manufacturer, shall be used to find out how to manage cookies of the utilized browser or device.

5.6 Some Bank’s website functions or Bank’s services may become unavailable in case cookies are blocked or deleted.

5.7 The processed cookie files are deleted or anonymized once the above specified processing purposes are achieved or when it is no more necessary to achieve such purposes.

6 TERMS AND CONDITIONS OF PERSONAL DATA PROCESSING

6.1 The period for which the personal data shall be processed are determined in accordance with the validity periods of the contracts, entered into with the personal data subjects, Order of the Ministry of Culture of the Russian Federation of August 25, 2010 No. 558 "On Approval of the "List of typical management archive documents, prepared in course of government, local government authorities' and organizations' activities, with specification of their archive lives", Resolution of the Russian Federation Federal Commission for the Securities Market of July 16, 2003 No. 03-33/ps "On Approval of the Regulation on procedures and time of joint stock company documents keeping", limitation periods, as well as other requirements of the Russian Federation laws.

6.2 The Bank shall process personal data both with use of computers and without them and personal data may be provided both in written form or as a soft copy. The Bank shall at the same time follow all requirements set forth for personal data processing carried out by automated means as well as non-automated means as provided for in the GDPR, Russian Federation Federal Law of 27 July 2006 N 152-FZ "On Personal Data" and regulations, passed on the basis of the later.

6.3 The Bank shall carry out cross-border transferring of personal data, therewith the Bank shall follow all requirements to cross-border personal data transferring as set forth in the Russian Federation Federal Law of 27 July 2006 N 152-FZ "On Personal Data".

6.4 The decisions, involving legal consequences for a personal data subject or otherwise affecting their rights and lawful interests, are not taken based only on automated decision-making.

6.5 Upon consent of the personal data subject the Bank shall have the right to order personal data processing to a third party on the basis of the agreement to be concluded with such third party (hereinafter – controller's order), unless otherwise provided for in the federal law. At the same time the Bank shall in its agreement oblige the party, carrying out personal data processing against the Bank's order, to follow the principles and rules of personal data processing as provided for in the Russian Federation Federal Law of 27 July 2006 N 152-FZ "On Personal Data".

6.6 Should the Bank order personal data processing to a third party, the Bank shall be responsible before the personal data subject for the actions of such third party. The party, carrying out personal data processing against the Bank's order, shall be responsible before the Bank.

6.7 The Bank shall undertake and make other parties, obtained access to personal data, undertake not to disclose them to third parties and not to disseminate personal data without consent of personal data subject, unless otherwise stipulated in the federal law.

6.8 The Bank's employees shall acknowledge in writing the Bank's documents, laying out procedures for processing and protecting personal data, as well as rights and obligations, arising in course of processing and protecting personal data.

6.9 The Bank shall receive personal data directly from personal data subjects or from the persons being not personal data subjects, therewith the Bank shall follow all requirements, set forth for processing such data as stipulated by the Russian Federation Federal Law of 27 July 2006 N 152-FZ "On Personal Data", and ensure security of personal data obtained.

6.10 The Bank shall process personal data only with consent of personal data subjects, save the following:

- Personal data processing is required to achieve purposes, stipulated by the laws of the Russian Federation, exercise and follow the Bank's obligations, authorizations and functions as stipulated by the legislation of the Russian Federation;

- Personal data processing is required to perform under a contract whose party or beneficiary or guarantor is personal data subject;
- Personal data processing is required to enforce court award;
- Personal data processing is required to ensure a contract is entered into under initiative of the personal data subject;
- Personal data processing is required to exercise the Bank's rights and lawful interests;
- Personal data processing is carried out for statistical or other research purposes, provided that personal data is anonymized;
- In other cases as provided for in the laws of the Russian Federation.

6.11 When personal data subject written consent to process their personal data is not required such consent may be given by the personal data subject or their representative in any form allowing to confirm the fact that such consent is obtained.

7 RIGHTS OF SUBJECTS OF PERSONAL DATA, PROCESSED IN THE BANK

7.1 Personal data subject shall have the right to receive information related to processing their personal data, including the one, containing the following:

- Confirmation of the fact that the Bank processes their personal data;
- Legal grounds and purposes of personal data processing;
- Purposes and methods used in the Bank to process personal data;
- Name and location of the Bank, details of the persons (save Bank employees), having access to the personal data or those who may be granted access to personal data on the basis of a contract, entered into with the Bank, or on the basis of the federal law;
- The processed personal data, related to the respective personal data subject, source of such personal data, unless other way to provide such data is not stipulated by the federal law;
- Period for which personal data is being processed, including storage period;
- Procedures for a personal data subject exercising rights as provided for in the federal law;
- Information on performed or proposed cross-border personal data transferring;
- Company name or full name and address of the party, carrying out personal data processing under the Bank's order, if processing is ordered or will be ordered to such party;
- Other details as provided for in the federal law.

7.2 Personal data subject shall have the right to obtain details, relating to processing such subject's personal data, by forwarding their request to the Bank, specifying their identification document number, date of issuance and issuing authority. The request may be forwarded as a soft copy and e-signed in accordance with the laws of the Russian Federation.

7.3 Personal data subject's right of access to their personal data may be limited in accordance with the federal laws, including in the cases when access of personal data subject to their personal data violates rights and lawful interests of third parties.

7.4 Personal data subject shall have the right to demand from the Bank rectification of their personal data, their restriction or erasure, when such personal data is incomplete, outdated, inaccurate, unlawfully obtained or is not necessary to achieve declared purpose of processing, furthermore they shall have the right to take measures to protect their rights as provided for by law.

7.5 The information, related to subject's personal data processing, shall be provided to the same by the Bank in an understandable way and shall not contain data, relating to other personal data subjects, save the cases when there are legal grounds to disclose such personal data.

7.6 When the information, related to data subject's personal data processing or such processed personal data have been provided to the personal data subject for their consultation upon their request, such personal data subject shall have the right to apply again to the Bank or forward their next request not earlier than in thirty days after first application has been made or request forwarded, unless shorter period is stipulated by the federal law or regulation, passed in accordance with the later, or by the contract, whose party or beneficiary or guarantor is such personal data subject.

7.7 Personal data subject shall have the right to apply again to the Bank or forward their next request to obtain details related to the subject's personal data processing, or in order to review the processed personal data before expiration of the thirty day period if such details and (or) personal data were not provided to them for consultation in full after examination of their first application. The next request shall contain reasons for forwarding such request along with the details, related to the subject's personal data processing.

7.8 If personal data subject believes that the Bank carries out their personal data processing with violations of the requirements of the federal law or otherwise violates their rights and freedoms, such personal data subject shall have the right to appeal against actions or omissions of the Bank to the supervisory authority, responsible for personal data subjects rights protection, or to the court.

7.9 Personal data subject shall have the right for protection of their rights and lawful interests, including claiming losses and (or) moral damage in court.

7.10 Personal data subject shall have the right to withdraw their consent to personal data processing. If personal data subject withdraws their consent to process personal data the Bank shall have the right to continue processing personal data without the personal data subject's consent in cases stipulated by the legislation of the Russian Federation in force.

7.11 According to the GDPR requirements, the personal data subject, located on the territory of the European Union, shall have the right to request the subject's personal data, processed by the Bank, in a structured, machine-readable form and transfer such data to another personal data controller.

8 OBLIGATIONS OF THE BANK

8.1 According to the GDPR, Federal Law of 27 July 2006 N 152-FZ “On Personal Data” and regulations, passed in accordance with the later, the Bank undertakes to:

- In case of application or receipt of a request from a personal data subject or their representative, provide information related to the processing of their personal data or reasonably refuse to provide such information in the manner, in the cases and within timelines, stipulated by the Russian Federation Federal Law of 27 July 2006 N 152-FZ “On Personal Data” and GDPR;
- Notify a personal data subject on their personal data processing if such data is received not from the personal data subject (save if such way is agreed in advance);
- Clarify to the personal data subject legal consequences of refusal to provide their personal data in cases stipulated by the Russian Federation Federal Law of 27 July 2006 N 152-FZ “On Personal Data”;
- Upon request of a personal data subject rectify their processed personal data, restrict their processing or erase them in cases when such data is incomplete, outdated, inaccurate, unlawfully obtained or is no more necessary for declared processing purposes;
- Make necessary modifications to personal data, erase them, notify personal data subject or their representative on modifications made and measures taken, as well as to take reasonable measures to notify third parties, whom such subject’s personal data have been transferred, within the period and in cases, provided for in the Russian Federation Federal Law of 27 July 2006 N 152-FZ “On Personal Data” and GDPR;
- Notify the supervisory authority, responsible for personal data subjects rights protection, on its intention to process personal data in case of changes in the details, related to data subjects’ personal data processing, as well as in cases of terminating personal data processing, in the manner, within period and in cases, stipulated by the Russian Federation Federal Law of 27 July 2006 N 152-FZ “On Personal Data”;
- Provide the supervisory authority, responsible for personal data subjects rights protection, against request of such agency, with the necessary information within the period, stipulated by the Russian Federation Federal Law of 27 July 2006 N 152-FZ “On Personal Data”;
- Immediately stop personal data processing and erase respective personal data once the personal data processing purpose is achieved, latest within thirty days from the personal data processing purpose achievement, unless otherwise is provided for in the federal laws;
- Stop personal data processing and erase personal data if the personal data subject withdraws their consent to process personal data, latest within thirty days from receipt of such withdrawal, unless otherwise is provided for in the contract between the Bank and the personal data subject. The Bank shall notify the personal data subject on the personal data erasure;
- Immediately stop personal data processing once the subject requests to stop personal data processing for the purposes of goods, works and services market promotion;
- Notify personal data subjects, located on the territory of the European Union, and the supervisory authority, responsible for personal data subjects rights protection, in case of a personal data breach, within 72 hours after becoming aware of a data breach.

9 MEASURES TO ENSURE PERSONAL DATA PROCESSING SECURITY

9.1 The Bank shall, while processing personal data, take necessary legal, organizational and technical measures to protect personal data from unlawful or accidental access, erasure, modification, restriction, copying, transmitting, disseminating, as well as from other unlawful actions with personal data.

9.2 Personal data security shall be ensured in particular through:

- Determining personal data security threats at its processing in the personal data information systems;
- Determining personal data protection levels at its processing in the personal data information system;
- Employing organizational and technical measures to ensure personal data security at its processing in the personal data information systems, necessary to comply with the requirements to personal data protection, whose observation ensures achieving personal data protection levels, stipulated by the Government of the Russian Federation;
- Assessing efficiency of the measures, being taken to ensure personal data security, before putting personal data information system in operation;
- Registering personal data mediums;
- Identifying facts of unauthorized access to personal data and taking measures to remedy revealed violations;
- Restoring personal data, modified or erased as a result of unauthorized access;
- Setting rules of access to personal data, processed in the information system, as well as ensuring registering and recording all actions made with the personal data in the personal data information system;
- Controlling of the implemented security measures to ensure personal data protection levels at its processing in the personal data information system;
- Appointing an officer, responsible for personal data processing organization;
- Appointing an officer, responsible for personal data security;
- Issuing bylaws, regulating personal data processing and protection as well as those, setting procedures aimed at prevention and identification of violations of the Russian Federation legislation and remedying consequences of such violations;
- Exercising internal control to ensure that personal data processing meets the requirements of the GDPR, Russian Federation Federal Law of 27 July 2006 N 152-FZ “On Personal Data”, as well as regulation, passed in accordance with the later, this Policy and Bank’s bylaws;
- Assessing damage, which may be caused to personal data subjects in cases of violations of the requirements of the federal personal data legislation, correlating such damage and measures, undertaken by the Bank to ensure fulfilling obligations, set forth in the Russian Federation Federal Law of 27 July 2006 N 152-FZ “On Personal Data” as well as regulation, passed in accordance with the later;
- Making the Bank’s employees, directly involved in personal data processing, aware of the requirements of the Russian Federation Federal Law of 27 July 2006 N 152-FZ “On Personal Data” as well as regulation, passed in accordance with the later, this Policy and Bank’s personal data processing bylaws.

9.3 Upon request of the supervisory authority, responsible for personal data subjects rights protection, the Bank shall be ready to confirm the fact, that the measures have been taken as provided for in the Russian Federation Federal Law of 27 July 2006 N 152-FZ “On Personal Data” as well as regulation, passed in accordance with the later.

10 RESPONSIBILITY FOR VIOLATING PERSONAL DATA PROCESSING AND PROTECTION REGULATIONS

10.1 The parties, found guilty of violating requirements of the Russian Federation Federal Law of 27 July 2006 N 152-FZ “On Personal Data”, pursuant to which this Policy has been elaborated, shall bear civil, administrative, disciplinary as well as other responsibility, as provided for in the laws of the Russian Federation.