

Personal Data Policy of Eldik Bank OJSC

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1. General Provisions

- 1.1. Personal Data Policy of Eldik Bank OJSC (hereinafter referred to as the Policy) defines the general principles of personal data processing and rules for handling personal data in Eldik Bank OJSC (hereinafter referred to as the Bank).
- 1.2. The Policy was developed in accordance with the Law of the Kyrgyz Republic "On Personal Information" No. 58 dated April 14, 2008, other legislative and regulatory legal acts, international treaties with participation of the Kyrgyz Republic, determining the procedure for working with personal data and requirements for ensuring their security.
- 1.3. The Policy was developed for the purposes of:
 - protecting the rights and freedoms of a person and citizen in the process of processing personal data, including the rights to privacy, personal and family secrets;
 - strict compliance by the Bank with the requirements of the legislation of the Kyrgyz Republic and international treaties with the participation of the Kyrgyz Republic in the personal data area.
- 1.4. The Policy applies to personal data of subjects of personal data that are processed in the Bank with and without the use of automation tools.
- 1.5. The Policy applies to all employees of the Bank, regardless of their position and tenure in the Bank.
- 1.6. The Policy is published on the official website of the Bank for free access of stakeholders of the Bank.

2. Terms and Definitions Used in the Policy

- 1) Bank employee – employee of the head office, as well as branches, structural units, representative offices of the Bank, who work based on an employment contract concluded with the Bank.
- 2) Confidential information – information in respect of which the applicable legislation and internal documents of the Bank establish a regime of confidentiality.
- 3) Consent of the subject of personal data – free, specific, unconditional and informed expression of will of a person, expressed in the form stipulated by the legislation of the Kyrgyz Republic, in accordance with which the subject notifies of the consent to implementation of procedures related to processing of his/her personal data.
- 4) Counterparty – any legal entity with which the Bank enters into any contractual relationship, or any individual with whom the Bank enters into any contractual relationship, with the exception of employment relationships.
- 5) Cross-border transfer of personal data – transfer of personal data to the territory of a foreign state to a foreign government body, a foreign individual or a foreign legal entity.
- 6) Holder (owner) of personal data – state authorities, local authorities and legal entities that are entrusted with the authority to determine the purposes, categories of personal data and control the collection,

storage, processing and use of personal data in accordance with the legislation of the Kyrgyz Republic. In the context of the Policy, the given definition applies to the Bank.

- 7) Human rights – inalienable rights of every person, based on recognition of the inherent dignity of a human person, as well as the freedom and equality of all people.
- 8) Personal information (personal data) – information recorded on a tangible medium about a specific person, identified with a specific person or which can be identified with a specific person, allowing this person to be identified directly or indirectly by reference to one or more factors specific to his biological, economic, cultural, civil or social identity.
- 9) Processing of personal data – any operation or set of operations performed, regardless of the methods, by the holder (owner) of personal data or on its instructions, by automatic means or without such means, for the purpose of collecting, recording, storing, updating, grouping, blocking, erasing and destroying personal data.
- 10) Stakeholders – individuals and legal entities, as well as groups of such individuals, that are involved to varying degrees in interactions with the Bank that influence the Bank’s activities and/or are influenced in their decisions and activities by the Bank.
- 11) Subject of personal data (subject) – individual to whom the relevant personal data relate.

3. Purposes of Personal Data Processing and Categories of Subjects of Personal Data

- 3.1. The Bank processes personal data for the following purposes:
 - compliance with the requirements of the legislation of the Kyrgyz Republic and international treaties with the participation of the Kyrgyz Republic in the personal data area;
 - provision of banking services and products, opening and maintaining bank accounts, carrying out banking operations in accordance with the Charter and licenses;
 - identification of the clients and beneficiaries of the Bank when carrying out banking operations;
 - assessing the solvency of clients, verifying the accuracy of client data and combating fraud;
 - conclusion of civil law transactions in accordance with the legislation of the Kyrgyz Republic;
 - organizing the registration of Bank employees, attracting and selecting candidates for work in the Bank;
 - conclusion of civil law contracts;
 - organizing the work of the Bank’s official website and the digital applications of the Bank;
 - consideration of requests from clients and other stakeholders;
 - other purposes not prohibited by the legislation of the Kyrgyz Republic.
- 3.2. The list of personal data processed by the Bank is determined in accordance with the legislation of the Kyrgyz Republic and the internal documents of the Bank, taking into account the purposes of processing personal data.
- 3.3. In carrying out its activities, the Bank processes personal data of following categories of subjects of personal data:
 - clients of the Bank, as well as managers, participants (shareholders) or employees of legal entities that are clients of the Bank;
 - counterparties of the Bank, as well as managers, participants (shareholders) or employees of legal entities that are counterparties of the Bank;
 - potential clients and counterparties of the Bank, including personal data necessary to the Bank for the purpose of considering issues related to concluding contracts, conducting operations and transactions with potential clients and counterparties;
 - representatives of clients, beneficiaries, beneficial owners;
 - employees of the Bank in terms of personal data required by the Bank in connection with employment relations and concerning a specific employee;
 - candidates for employment at the Bank from the point of view of personal data required by the Bank to make a decision on the candidate’s compliance with the established requirements;
 - employees of the Bank with whom employment relations are terminated, in terms of personal data, the processing of which the Bank is obliged to carry out after the termination of the employment contract with the employee in cases established by the legislation of the Kyrgyz Republic;

- affiliated persons, managers, shareholders or employees of a legal entity who are affiliated persons with respect to the Bank;
- visitors of the official website of the Bank from the point of view of the visitors' use of the feedback form on the official website of the Bank;
- other individuals whose personal data processing is necessary to the Bank to achieve the goals stipulated by the legislation of the Kyrgyz Republic, to implement and fulfill its functions, powers and obligations in accordance with the legislation of the Kyrgyz Republic.

4. Basic Principles of Working with Personal Data

- 4.1. Personal data must be obtained and processed in accordance with the procedure established by the legislation of the Kyrgyz Republic.
- 4.2. Personal data must be collected for precise, pre-defined, declared and legitimate purposes, not used in a manner inconsistent with those purposes and not further processed in a manner incompatible with those purposes.
- 4.3. Personal data must be accurate and updated when necessary.
- 4.4. Personal data must be stored no longer than required by the purposes for which they were collected and must be destroyed once the purposes have been achieved or the need for them has passed.
- 4.5. Arrays of personal data collected by holders (owners) of personal data for different purposes should not be combined for automated information processing.
- 4.6. Personal data must be stored and protected by holders (owners) of personal data from unauthorized access, additions, changes and destruction.

5. Terms of Personal Data Processing

- 5.1. The Bank ensures protection and processing of personal data, including in electronic (digital) form, in compliance with the requirements of the legislation of the Kyrgyz Republic and the internal documents of the Bank in the personal data area.
- 5.2. The processing of personal data in the Bank is permitted for implementation and performance of the functions, powers and obligations imposed on the Bank by law in the following cases:
 - subject of personal data gives the consent to processing of personal data;
 - processing of personal data is necessary for execution of competence by state authorities and local government bodies according to the legislation of the Kyrgyz Republic;
 - processing of personal data is necessary to achieve the legitimate interests of the holders (owners) of personal data, when implementation of these interests does not interfere with the exercise of the rights and freedoms of personal data subjects in relation to the processing of personal data;
 - processing of personal data is necessary to protect the interests of the subject of personal data.
- 5.3. The Bank processes personal data only if a subject of personal data gives personal consent to processing of personal data. A subject of personal data independently makes a decision to provide the personal data and gives consent freely, of own free will and in own interests.
- 5.4. Personal data managed by the Bank as the holder (owner) of personal data are classified as confidential information. The Bank ensures the confidentiality of information about personal data subjects and does not disclose personal data of personal data subjects to third parties, and does not distribute personal data without the consent of subjects of personal data, except in cases determined by the legislation of the Kyrgyz Republic.
- 5.5. As the holder (owner) of personal data, the Bank informs subjects of personal data about the rights concerning their personal data, and also familiarizes subjects of personal data with the list of data collected, grounds and purposes of their collection and use, with the possible transfer of personal data to a third party, and also informs about other possible uses of personal data.
- 5.6. The Bank has the right to transfer personal data to another holder (owner) without the consent of the subject of personal data in the following cases:
 - extreme necessity to protect the interests of the subject of personal data;

- at the request of state authorities and local authorities, if the requested list of personal data corresponds to the powers of the requesting authority;
 - based on the legislation of the Kyrgyz Republic.
- 5.7. The Bank is obliged to inform subjects of personal data about the completed transfer of their personal data to a third party in any form within one week.
- 5.8. The Bank carries out cross-border transfer of personal data of clients at the request (instruction) of the Bank's clients when they carry out banking operations with clients of credit institutions of foreign countries, while maintaining the confidentiality of the information.
- 5.9. Cross-border transfer of personal data to the territory of foreign states that do not ensure adequate protection of the rights of personal data subjects may be carried out by the Bank in the event of:
- presence of consent of a subject of personal data for that transfer;
 - if the transfer is necessary to protect the interests of the subject of personal data;
 - if personal data is contained in a publicly available personal data.
- 5.10. Except in cases established by the legislation of the Kyrgyz Republic, the Bank does not process personal data related to such special categories as racial or ethnic origin, nationality, political views, religious or philosophical beliefs, as well as those related to health status and sexual inclinations, solely for the purpose of identifying these factors.
- 5.11. Information that characterizes the physiological and biological characteristics of persons, based on which their identity can be established (biometric personal data), is processed by the Bank only with the consent of subjects of personal data and in the event that such processing is provided for by the legislation of the Kyrgyz Republic.

6. Rights of the Bank in Personal Data Processing

- 6.1. The Bank has the right to process the personal data of the subject of personal data in accordance with the stated purpose.
- 6.2. The Bank has the right to demand from the subject of personal data to provide reliable personal data necessary for the execution of the contract, provision of the service, identification of the subject of personal data, as well as in other cases stipulated by the legislation of the Kyrgyz Republic on personal data.
- 6.3. The Bank has the right to restrict the access of subjects of personal data to their personal data in cases stipulated by the legislation of the Kyrgyz Republic.
- 6.4. The Bank has the right to process publicly available personal data of individuals, as well as to process personal data subject to publication or mandatory disclosure in accordance with the legislation of the Kyrgyz Republic.
- 6.5. The Bank has the right to entrust the processing of personal data to another entity with the consent of the subject of personal data.
- 6.6. The subject providing personal data to the Bank is responsible for accuracy, reliability and relevance of personal data provided in accordance with the legislation of the Kyrgyz Republic. The Bank has the right to verify accuracy, reliability and relevance of personal data provided in the cases, volume and procedure provided for and established by the legislation of the Kyrgyz Republic.

7. Rights of Subjects of Personal Data

- 7.1. Subjects of personal data make a decision on providing their personal data and give the Bank consent to their processing by the Bank freely, of their own free will and in their own interests. Consent to the processing of personal data may be given by subjects of personal data or their representative in any form that allows confirming the fact of its receipt, unless otherwise established by the legislation of the Kyrgyz Republic.
- 7.2. The obligation to provide proof of a consent of subjects of personal data to processing of their personal data or proof of existence of grounds for processing provided for by the legislation of the Kyrgyz Republic, is assigned to the Bank in cases where it is a holder (owner) of personal data.

- 7.3. The Bank respects the right of subjects of personal data to know whether the Bank, as the holder (owner), has personal data relating to them and to have access to such data. Restrictions on the rights of access of a subject of personal data to their personal data are not permitted, except in cases stipulated by the legislation of the Kyrgyz Republic.
- 7.4. The subject of personal data has the right to demand from the Bank clarification of personal data, their blocking or destruction if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, and also to take measures provided for by the legislation of the Kyrgyz Republic to protect the rights of the subject of personal data.
- 7.5. If it is established that collection of personal data is unlawful, the Bank is obliged to destroy the relevant data immediately from the moment of such establishment and to notify the subject of personal data in writing.
- 7.6. Subjects of personal data have the right to revoke consent to processing of their personal data. In the event that a subject of personal information revokes consent to the processing of personal data in the absence of other legal grounds for their processing, the Bank shall terminate the processing and destroy the personal data within the timeframes established by the legislation of the Kyrgyz Republic.
- 7.7. If subjects of personal data believe that the Bank processes their personal data in violation of the requirements of the legislation of the Kyrgyz Republic or otherwise violates his rights and freedoms, subjects of personal data have the right to appeal the actions or inaction of the Bank, including in court.
- 7.8. Subjects of personal data have the right to protect their rights and legitimate interests, including compensation for damages in court.
- 7.9. The Bank has the right to publish personal data of Bank employees consisting of the last name, first name, patronymic, job position, work telephone number, email address, photograph, and other official information about Bank employees, for the purpose of organizing customer service and interaction with counterparties only if there is separate written consent to processing of personal data, permitted by the Bank employee for distribution.
- 7.10. Other rights of subjects of personal data, as well as the rights and obligations of the Bank related to the processing of personal data by the Bank, are determined by the legislation of the Kyrgyz Republic in the field of personal data.

8. Ensuring the Protection of Personal Data

- 8.1. The Bank strives to implement sufficient organizational and technical measures in accordance with the legislation of the Kyrgyz Republic to protect personal data from unauthorized, accidental or illegal destruction, loss, alteration, unfair use, disclosure or access, as well as other illegal forms of processing and use.
- 8.2. When processing personal data, the Bank and Bank employees are obliged to:
 - prevent unauthorized persons from accessing equipment used to process personal data (access control);
 - prevent unauthorized reading, copying, modification or removal of data carriers (control over the use of data carriers);
 - prevent unauthorized recording of personal data and the modification or destruction of recorded personal data (control over recording) and ensure the possibility of establishing retroactively when, by whom and what personal data were changed;
 - ensure the security of data processing systems intended for the transfer of personal data regardless of the means of data transmission (control over the means of data transmission);
 - ensure that each user of the data processing system has access only to those personal data for which he has permission to process (access control);
 - ensure the possibility of establishing retroactively when, by whom and what personal data were entered into the data processing system (input control);
 - prevent unauthorized reading, copying, modification and destruction of personal data during the transfer of personal data (transfer control);
 - ensure the confidentiality of information obtained during processing of personal data;

- ensure compliance with the requirements established in the Kyrgyz Republic for the protection of personal data when processing them in personal data information systems, implementation of which ensures the established levels of protection of personal data;
 - keep records of machine-readable media containing personal data;
 - ensure the restoration of personal data modified or destroyed as a result of unauthorized access to them.
- 8.3. To prevent violations and unauthorized actions in the personal data area, the Bank applies the following organizational and technical measures to ensure the security of personal data in accordance with the requirements of the legislation of the Kyrgyz Republic:
- implementation of internal control in personal data processing to ensure compliance with the legislation of the Kyrgyz Republic, internal documents of the Bank regarding the processing of personal data;
 - appointment of officials responsible to organize processing and ensuring the security of personal data;
 - limiting the number of Bank employees who process personal data and have access to personal data in the performance of their work duties, regulating the procedure for providing such access;
 - reviewing the requirements of legislation and internal regulatory documents of the Bank on the processing and protection of personal data with Bank employees;
 - training of Bank employees using information security tools applied in personal data information systems in the rules for working with them;
 - centralized management of personal data protection system;
 - ensuring the control and storage of tangible media of personal data and establishing the procedure for handling them, aimed at preventing their theft, substitution, unauthorized copying and destruction;
 - implementation of a permit system for user access to information resources, software and hardware for processing and protecting information, password protection of user access to the personal data information system;
 - registration and accounting of actions of users of personal data information systems;
 - analysis of the security of the Bank's personal data information systems using specialized software;
 - organization of access control to the Bank's territory, security of premises and technical means of processing personal data, placement of technical means of processing personal data within the protected territory;
 - systematic monitoring of user actions, conducting investigations in the event of detection of violations of personal data security requirements.

9. Compliance with the Policy and Liability for Violations

- 9.1. All employees of the Bank, regardless of their position and tenure at the Bank, bear personal responsibility for their failure to comply with the principles and requirements of the Policy.
- 9.2. Bank employees found guilty of violating the rules governing the processing and protection of personal data may be subject to financial, disciplinary, administrative and other liability in accordance with the procedure established by the legislation of the Kyrgyz Republic and the internal documents of the Bank.
- 9.3. The Information Security Service of the Bank is responsible for organizing the processing of personal data.
- 9.4. As a part of the control procedures carried out, the Internal Audit Division evaluates the effectiveness of compliance with the requirements of this Policy, as well as the approved internal documents of the Bank regarding personal data.
- 9.5. The structural unit of the Bank responsible for organizing the processing of personal data monitors the legislation of the Kyrgyz Republic and communicates information about changes in legal norms in relation to personal data to the Bank employees and structural units.

10. Final Provisions

- 10.1. The Policy, as well as additions and amendments to it, are approved and declared invalid by a decision of the Board of Directors.

Policy of Eldik Bank OJSC in the field of personal data, approved by the Decision of the Board of Directors of Eldik Bank OJSC No. _____ dated ____ 2024.

- 10.2. The Policy is reviewed at least once a year for its relevance and compliance with the legislation of the Kyrgyz Republic and international practices of responsible business conduct that do not contradict the legislation of the Kyrgyz Republic.
- 10.3. If certain parts of the Policy come into contradiction with the legislation of the Kyrgyz Republic as a result of changes in the legislation of the Kyrgyz Republic, the provisions of the legislation of the Kyrgyz Republic shall apply until the relevant changes are made to the Policy.