

NOTICE
on the procedure for processing personal data and the rights of personal data subjects
Version effective as of May 01, 2023

Hereby the Private Joint Stock Company “Ukrainian Processing Centre” (hereinafter referred to as UPC), guided by Articles 8, 12 of the Law of Ukraine “On Personal Data Protection” No. 2297-VI dated June 1, 2010, informs about the rights of personal data subjects, the procedure for processing personal data and requests for personal data protection applied by UPC. UPC ensures processing and protection of personal data in compliance with the requirements of the Constitution of Ukraine, the Law of Ukraine “On Personal Data Protection”, other laws and regulations of Ukraine, the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data and international treaties of Ukraine. UPC uses personal data processing procedures that take into account the requirements of the European Parliament and Council Regulation 2016/679 dated 27.04.2016 On the Protection of Individuals with regard to the Processing of Personal Data and on the Free Movement of Such Data (General Data Protection Regulation - hereinafter referred to as GDPR).

UPC processes personal data of customers of its counterparties, counterparties, employees, related parties, as well as other individuals whose data is received by UPC during its statutory activities, provision of services as a payment service provider and other activities in accordance with the laws of Ukraine.

Information about UPC as a personal data owner

Private Joint Stock Company “Ukrainian Processing Centre”, USREOU code 24747867, Location: 8 Jones Garrett Street, bldg. B-11, Kyiv, 04119, Ukraine (Postal address: P.O. Box 65, Kyiv, 04119).

Protection of personal data

The procedure for personal data protection is determined by UPC independently in accordance with the requirements of the Law of Ukraine “On Personal Data Protection”, internal policies and rules of UPC on personal data protection, as well as group policies of Raiffeisen Bank International AG (Austria, Vienna). For access to personal data, as well as other questions regarding processing of personal data by UPC, the personal data subject should contact the following address: 8 Jones Garrett Street, building B-11, Kyiv, 04119, Ukraine, Data Protection Officer: Prytula Nazar Mykolaiovych.

Compliance with the legislation on personal data protection within the powers provided for by the legislation of Ukraine is monitored by the Ukrainian Parliament Commissioner for Human Rights, 21/8 Instytutaska Str., Kyiv, Ukraine, 01008, tel.: (044) 253-75-89; 0800-50-17-20.

If UPC detects violations of the processing of personal data of person, who is a citizen of the European Union member state, UPC will report such incidents to Raiffeisen Bank International AG for further submission to the relevant supervisory authority of the Republic of Austria in accordance with the GDPR. Raiffeisen Bank International AG is the representative of UPC in the European Union as defined in Article 27 of the GDPR.

Purpose of personal data processing

UPC processes personal data in order to:

- perform functions of a technological operator of payment services, providing UPC with processing services and carrying out other activities specified in the Articles of Association of UPC and provided for by the Ukrainian legislation;
- fulfill the terms and conditions of the agreements that were/will be concluded by UPC (including: exercise and protection of the rights of the parties under the concluded agreements);

- profiling (automated processing of the data of customers and other counterparties in order to assess various aspects of behaviour, economic, social and other interests/preferences of these persons, to build development strategies, to develop and offer UPC products and services);
- ensure the quality of service and security in the activities of UPC;
- fulfill the obligations of UPC stipulated by law, including those to prevent and counteract legalization (laundering) of proceeds of crime, financing of terrorism and financing of proliferation of weapons of mass destruction;
- protect the legitimate interests of UPC or a third party to whom UPC discloses personal data, unless the need to protect the fundamental rights and freedoms of individuals in connection with the processing of their data outweighs such interests;
- exercise other powers, perform functions and duties of UPC provided for by the legislation of Ukraine or not contradicting it, in particular, for the implementation of UPC internal documents, group policies of Raiffeisen Bank International AG, collective agreement, decisions of state authorities and supervisory bodies of UPC, court judgments, decisions of UPC management bodies.

The purpose of processing of the personal data of personal data subjects by UPC may change due to changes in the terms and conditions of agreements or business relations concluded with them, the content of the activities of UPC, including changes in the legislation of Ukraine.

Processing of personal data for the purpose of providing information/offers about UPC services, or for historical, statistical or scientific purposes determined by UPC, as well as the storage of Personal Data in order to comply with the requirements of the legislation of Ukraine on the procedure for storing documents, is not considered incompatible processing and is carried out by UPC, provided that the proper protection of Personal Data is ensured.

Rights of individual personal data subjects

Pursuant to Article 8 of the Law of Ukraine “On Personal Data Protection”, a personal data subject has the right to:

1. Know about the sources of collection, location of their personal data, purpose of processing, location and/or place of residence (stay) of the personal data owner or controller or give an appropriate order to obtain this information to their authorized persons, except in cases established by the legislation of Ukraine/European Union, as applicable to UPC.
2. Receive information on the terms and conditions of granting UPC access to his/her personal data, including information on third parties to whom UPC transfers his/her personal data.
3. Access their personal data processed by UPC.
4. Receive a response on whether his/her personal data is processed by UPC no later than thirty calendar days from the date of receipt of the request, except in cases provided for by the legislation of Ukraine, and to receive the content of such personal data.
5. Submit a reasoned request to the personal data owner with objection to the processing of his/her personal data.
6. Submit a reasoned request to change or destroy their personal data by any personal data owner and controller, if this data is processed illegally or is unreliable.
7. Protect their personal data from unlawful processing and accidental loss, destruction, damage due to intentional concealment, failure to provide or untimely provision, as well as to protect against the provision of information that is inaccurate or discrediting the honour, dignity and business reputation of an individual.
8. File a complaint about the processing of their personal data with the Ukrainian Parliament Commissioner for Human Rights or a court.
9. Apply legal remedies in case of violation of the legislation on personal data protection.
10. Make reservations regarding the restriction of the right to process their personal data when giving consent.
11. Withdraw consent to the processing of personal data.
12. Know the mechanism of automatic processing of personal data.
13. Be protected against an automated decision that has legal consequences for him/her. The personal data subject has the right to receive any information about himself/herself from UPC, provided that UPC has

the opportunity to identify the personal data subject who has made such a request. If UPC processes personal data of a particular personal data subject, his/her request for access to his/her personal data shall be satisfied within thirty calendar days from the date of its receipt, unless otherwise provided by the legislation of Ukraine. Access of the personal data subject to his/her personal data shall not be delayed. Copy of the personal data processed by UPC shall be provided to the personal data subject in the form of an extract, the procedure for generation which is determined by UPC independently. Access of the personal data subject to his/her personal data (including provision of an extract) is provided by UPC free of charge.

Grounds for processing personal data

UPC processes personal data on the grounds specified in Article 11 of the Law of Ukraine “On Personal Data Protection”, including:

- permission to process personal data granted by UPC in accordance with the law and solely for the purpose of carrying out the statutory activities of UPC;
- necessity to fulfil the obligation of UPC provided for by the law of Ukraine and, if applicable to UPC, the legal requirements of the European Union;
- conclusion and execution by UPC of a transaction to which the personal data subject is also a party or which is concluded in favour of the personal data subject or for the purpose of taking measures preceding the conclusion of a transaction at the request of the personal data subject;
- protection of vital interests of the personal data subject;
- need to protect the legitimate interests of UPC or a third party to whom UPC transfers personal data, unless the need to protect the fundamental rights and freedoms of individuals in connection with the processing of their data outweighs such interests;
- consent of an individual to the processing of his/her personal data (if provided).

UPC also processes personal data that is public and/or information in the form of open data (Article 101 of the Law of Ukraine “On Access to Public Information”) obtained from publicly available sources, including open state registers, without obtaining consent of the personal data subject. Such information may be freely copied, distributed and otherwise used by UPC, including for commercial purposes, in combination with other information, only to the extent necessary for the purpose of processing and with reference to the source of the information.

UPC processes certain categories of personal data, the processing of which poses a particular risk to the rights and freedoms of personal data subjects, only if there are special legal grounds determined by the legislation of Ukraine, in particular:

- provided that the personal data subject gives an unambiguous consent to processing of such data; or
- processing of such data is necessary for the exercise of rights and fulfilment of obligations of UPC in labour relations in accordance with the legislation of Ukraine with the provision of appropriate data protection of the personal data subject; or
- processing of such data is necessary to protect vital interests of the personal data subject or another person in case of incapacity or restriction of civil capacity of the personal data subject; or
- processing of such data is necessary to substantiate, satisfy or protect a legal requirement; or
- processing relates to data that has been explicitly disclosed by the personal data subject.

Composition and content of personal data processed, sources of their receipt

The content and scope of personal data processing by UPC depends to a large extent on the type of relationship between UPC and the corresponding personal data subject, including for customers who are contractors of UPC - personal data subjects - the content and scope of personal data processing depends on the products and services that UPC customers have requested or agreed to.

The content of the personal data processed by UPC corresponds to information received from the contractors and/or individuals of UPC who are the subjects of such personal data or lawfully obtained from their representatives or third parties from persons represented by the personal data subjects, or obtained by UPC from publicly available sources (for example, from the Unified State Register of Individual Entrepreneurs and

Public Organizations) and also includes information that is known/became known to UPC in connection with the implementation of contractual and other legal relations with such individuals and other persons who are clients/counterparties of UPC in such relations, as a result of audio recording (recording of telephone conversations of personal data subjects/ their representatives with UPC employees) and photo/video recording or obtained from publicly available sources.

UPC processes personal data of individuals received from third parties, if it is provided for by the legislation of Ukraine or provided that such third parties give a guarantee that such transfer is carried out in compliance with the requirements of the Ukrainian legislation and does not violate the rights of individuals whose personal data are transferred by UPC.

UPC may process personal data in the following composition:

- surname, name, patronymic; registration number of the taxpayer's account card (identification number);
- address (actual place of residence and the one according to state registration), living conditions, citizenship;
- education, profession, specialty, period of service and information about the place of work and position;
- information on age (date and place of birth), marital and family status, relatives;
- data, copies, photos of documents issued in the name of an individual or on his/her behalf;
- information on identification of the person (for example, a signature sample, information on ID);
- financial identification data (data from payment cards (credit, debit, etc.));
- email addresses, telephone numbers and other electronic identification data;
- marketing data and electronic logs and identification data (applications, cookies, etc.);
- biometrical data;
- certain categories of personal data, processing of which poses a particular risk to the rights and freedoms of personal data subjects, namely: membership in political parties and/or organizations, trade unions, religious organizations or public organizations of a worldview orientation; bringing to administrative or criminal liability; application of measures to a person within pre-trial investigation or measures provided for by the Law of Ukraine "On Operational and Investigative Activities"; data relating to health, location and/or movement of the personal data subject;
- other information that has become known to UPC in connection with the implementation of legal relations with an individual, in compliance with the requirements of the legislation of Ukraine and internal documents of UPC.

Persons to whom access to personal data is granted and/or personal data is transferred

Within UPC, access to personal data is granted to divisions and/or individual employees of UPC to perform their official (employment) duties related to the fulfilment of contractual, legal and/or regulatory obligations of UPC and the realization of legitimate interests of UPC. Each UPC employee signs confidentiality undertaking for the information to which he or she has access.

Access to personal data of individuals is provided by UPC to private individuals and organizations (including personal data processors) to enable them to perform their functions or provide UPC services (including IT). All personal data controllers who have been authorized by UPC to process personal data on their own behalf are obliged to treat such data confidentially and to process it solely for the purpose of providing UPC with the relevant services.

UPC may transfer personal data of individuals to its parent company, Raiffeisen Bank International AG, and other controllers of the personal data base owned by UPC, or to subcontractors of such controllers, including those located outside Ukraine in other countries. They are required to comply with the European data protection and security standards, including the requirements of the GDPR. For more information on this, please contact the Data Protection Officer.

UPC shall notify the personal data subject within ten business days of the transfer of personal data to third parties, including personal data processors, if required by the terms of their consent or unless otherwise provided by the legislation of Ukraine/European Union, as applicable to UPC.

In particular, UPC does not provide such notification in cases where the personal data subject has expressly refused to receive notifications from UPC about the transfer of personal data of this subject to third parties, including to controllers, in the text of the consent or agreement, and/or the subject has been informed about the terms of processing of his or her personal data by UPC when providing consent/signing an agreement with UPC.

UPC also does not obtain a separate consent from the personal data subject to transfer his or her personal data to third parties and does not notify the personal data subject of the transfer of his or her data to third parties in cases where such transfer is necessary for the performance of the agreement concluded between UPC and/or a contractor of UPC and the personal data subject and/or provided for in the terms and conditions of such agreement.

How and where UPC stores personal data

The personal data bases processed by UPC are hosted on its own servers located in Ukraine.

To ensure proper security of personal data processing, UPC takes the appropriate technical and organizational measures, including:

- pseudonymization and encryption of personal data;
- continuous ensuring the confidentiality, integrity, availability of personal data and the stability of processing systems and services;
- ensuring timely restoration of access to personal data in the event of an emergency or incident;
- regular testing, evaluation and measurement of the effectiveness of technical and organizational measures to ensure the security of processing;
- access to personal data is granted only to persons authorized to do so for the purposes provided for by law;
- implementation of a security policy for personal data processing;
- regular training of employees on personal data protection.

Period for retaining personal data

UPC processes personal data as necessary, throughout the entire duration of all business relations with the relevant personal data subjects and/or counterparties of UPC (from the conclusion of the contract/service order, their execution and ending with the termination of the relevant contract), as well as until the expiration of periods for retaining information (documents containing such information) determined by the terms and conditions of the concluded contracts or the legislation of Ukraine, internal documents of UPC.

On the obligation to provide personal data to UPC

Within business relations, the personal data subjects must provide UPC with all personal data necessary for the conclusion of the relevant agreement (transaction) and for its further performance, including personal data that UPC collects in accordance with the requirements of the legislation of Ukraine. If the personal data subjects refuse to provide UPC with the data requested by UPC, UPC shall refuse to enter into an agreement or cease to fulfill its obligations under an already concluded agreement (transaction), or UPC shall terminate the agreement if failure of the personal data subject to provide the information requested by UPC prevents UPC from further performance of the agreement. The personal data subjects are not obliged to provide UPC with their personal data if such data is not necessary for the conclusion and performance of the agreement, or is not required by law or internal documents of UPC.

Conclusion and execution of the agreement between UPC and the personal data subject is an independent basis for UPC to process the personal data of that subject, and therefore provision of a separate consent to personal data processing by the personal data subject to UPC is not a prerequisite for the conclusion of agreement between them.

When UPC processes personal data on the basis of consent of the personal data subject, the personal data subject may withdraw the consent to personal data processing granted by UPC in part or in full by his or her respective request in a form that allows the individual to be identified.

If the personal data subject withdraws his or her consent to personal data processing, but UPC has other legal grounds for processing the data of this individual, UPC continues to process the personal data of such individual to the extent, in the composition and in the manner necessary for UPC to exercise its rights, fulfill its obligations arising from such grounds for processing personal data (fulfillment of the agreement concluded with the personal data subject and/or counterparty of UPC, exercise of rights and fulfillment of obligations under such agreement, fulfillment of UPC's obligations provided for by law, protection of legitimate interests of UPC or a third party to whom UPC transfers personal data, etc.).

Regarding automated decision-making

In general, UPC does not use fully automated decision-making to establish and/or maintain business relationships. If UPC does use such procedures on a case-by-case basis, UPC will inform the personal data subjects accordingly, as required by law.

Additional information on the application of special legislation in personal data protection is available on the official website of the Ukrainian Parliament Commissioner for Human Rights:

<http://www.ombudsman.gov.ua>

Personal data protection regulations

LAW OF UKRAINE On Personal Data Protection No. 2297-VI dated 01.06.2010

Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data dated 28.01.1981

Additional Protocol to the Convention on Supervisory Authorities and Transborder Flows of Data dated 08.11.2001

Regulation of the European Parliament and of the Council 2016/679 dated 27.04.2016 on the Protection of Individuals with regard to the Processing of Personal Data and on the Free Movement of such Data (General Data Protection Regulation).