

**Personal Data Collection, Processing and Protection Policy
of JSC Halyk Bank**

Almaty
2022

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1. General provisions

1. This Personal Data Collection, Processing and Protection Policy of JSC Halyk Bank (hereinafter - the “Policy”) is developed in accordance with the Law of the Republic of Kazakhstan “On Personal Data and their Protection” No. 94-V dated 21 May 2013 (hereinafter - the “Law”).

2. The Policy defines general principles, purposes, procedure and conditions for collection, processing¹ and protection of personal data in JSC Halyk Bank (hereinafter - the “Bank”).

3. The Policy applies to all processes of processing, recording, systematization, accumulation, storage, clarification, extraction, use, transfer (provision, access), depersonalization, blocking, deletion, destruction of personal data of Bank employees, customers and other persons, carried out with or without the use of automation tools.

4. The Policy is subject to change and amendment in case of changes in legislation on personal data.

2. Principles of personal data processing

5. Personal data processing shall be based on the following principles:

- legality and fairness;
- achievement of specific purposes of personal data processing;
- compliance and sufficiency of personal data in relation to the stated purposes of processing;
- integrity of personal data, and if necessary their relevance with respect to the stated purposes of their processing;
- observance of deadlines of personal data processing;
- destruction, blocking or depersonalization of personal data upon achievement of processing purposes, as well as in cases stipulated by the legislation of the Republic of Kazakhstan.

3. Purposes of personal data processing

6. The Bank shall process personal data for the following purposes:

- conclusion, fulfillment, termination of agreements between the Bank and the personal data subject as part of the implementation of business and other activities of the Bank;
- identification of the personal data subject to meet the requirements of legislation on combating legalization (laundering) of proceeds of crime and terrorist financing, the policy of “Know Your Customer”;
- compliance with the requirements of the legislation of the Republic of Kazakhstan, as well as the legislation of foreign countries to the extent and within the limits prescribed by the legislation of the Republic of Kazakhstan;
- offering of financial products (financial services) by the Bank and/or promotion of goods (works, services, outcomes of intellectual activities) of other persons;
- conducting surveys, statistical research, market analysis, contests and prize draws as part of marketing initiatives, including through direct contact with the personal data subject;
- personnel administration (personnel search and selection, conclusion, fulfillment, termination and cancellation of employment contracts and other agreements in the performance of labor functions and duties);
- in other cases stipulated by the legislation of the Republic of Kazakhstan.

4. Scope and composition of processed personal data

7. Personal data composition shall be determined by the purposes of their processing and is regulated by internal documents of the Bank.

8. In order to achieve the objectives of its activities, perform its functions, powers and duties stipulated by the legislation of the Republic of Kazakhstan, the Bank shall process personal data of the following subjects:

- customers, counterparties, their representatives and contact persons of counterparties, in the

¹ The term “processing” means the process of collection, processing and storage of personal data in the Bank.

composition and within the period necessary for the conclusion, fulfillment, termination and cancellation of the agreement, to which the subject of personal information is a party;

- participants of market research, in the composition and within the period necessary to achieve statistical or other research purposes, subject to the mandatory depersonalization of personal data;
- employees of the Bank, in the composition and within the period necessary for the conclusion, fulfillment, termination and cancellation of the employment contract;
- candidates to fill vacant positions, in the composition and within the period necessary for the conclusion, fulfillment, termination and cancellation of the contract;
- directors, shareholders, founders, spouses of shareholders/participants, heirs, shareholders, insiders, in the composition and within the period necessary to achieve the objectives of the Bank's activities, perform the functions, powers and duties stipulated by the legislation of the Republic of Kazakhstan;
- affiliated persons of the Bank/related parties of the Bank, in the composition and within the period necessary to achieve the objectives of the Bank's activities, to perform the functions, powers and duties stipulated by the legislation of the Republic of Kazakhstan;
- persons undergoing judicial and other proceedings involving the Bank, in the composition and within the period necessary for legal support of the Bank's activities, as well as to protect the legitimate rights and interests of the Bank and its customers;
- sureties/guarantors, borrowers/co-borrowers, pledgers on financial instruments, in the composition and within the period necessary for the conclusion, fulfillment, termination and cancellation of the agreement;
- persons to whom courier delivery is made, in the composition and within the period necessary to exercise the rights and legitimate interests of the Bank or third parties;
- alimony recipients, in the composition and within the period necessary to achieve the objectives stipulated by the legislation of the Republic of Kazakhstan, as well as for the execution of a judicial act;
- correspondent banks within correspondent relations and counterparties as part of the “Know Your Customer” procedure, in the composition and within the period necessary for the conclusion, fulfillment, termination, cancellation of the agreement/establishment of the business relationship;
- other persons whose personal data shall be processed in accordance with the requirements of the legislation of the Republic of Kazakhstan.

9. The Bank shall process biometric personal data, including in order to comply with the requirements of the legislation of the Republic of Kazakhstan on combating legalization (laundering) of proceeds of crime and terrorist financing.

5. Procedure and conditions of personal data processing

10. The terms of personal data processing shall be determined in accordance with the validity of agreements with the personal data subject, banking and tax legislation of the Republic of Kazakhstan, as well as other requirements of the legislation.

11. Personal data is processed at the Bank both by technical tools and without the use of such tools, and can be presented both on paper and on electronic media. At the same time, the Bank shall comply with all the requirements for automated and non-automated processing of personal data, stipulated by the Law and other legislative acts of the Republic of Kazakhstan.

12. The Bank carries out cross-border transfer of personal data. At the same time, the Bank shall comply with all the requirements for cross-border transfer of data stipulated by the legislation of the Republic of Kazakhstan.

13. The Bank has the right to entrust the processing of personal data to another person with the consent of the personal data subject, unless otherwise provided by the legislation of the Republic of Kazakhstan, on the basis of an agreement concluded with this person. At the same time, the Bank in the agreement shall oblige the person, processing personal data on behalf of the Bank, to comply with the principles and rules of personal data processing, stipulated by the Law.

14. If the Bank entrusts the processing of personal data to another person, the Bank shall be liable to the personal data subject for the actions of that person. The person processing personal data on behalf of the Bank shall be liable to the Bank.

15. The Bank undertakes and obliges other persons who obtained access to personal data not to

disclose to third parties and not to distribute personal data without the consent of the personal data subject, unless otherwise provided by the legislation of the Republic of Kazakhstan.

16. Employees of the Bank shall be familiarized with the Bank's documents establishing the procedure for processing and protection of personal data, as well as the rights and obligations arising from the processing and protection of personal data.

17. Personal data are received by the Bank directly from the personal data subject or from persons who are not subjects of personal data. At the same time, the Bank shall comply with all requirements for the processing of such data provided by the Law, as well as ensures the security of personal data obtained.

18. Processing of personal data in the Bank shall be carried out with the consent of personal data subjects, except as expressly provided by the legislation of the Republic of Kazakhstan.

19. If written consent of the subject for processing of his/her personal data is not necessary, the subject's consent may be given by the subject of personal data or his/her representative in any form that does not contradict the legislation of the Republic of Kazakhstan and allows confirming the fact of its receipt.

6. Rights of personal data subjects

20. Personal data subject has the right to:

- know about the availability of his/her personal data to the Bank, as well as to receive information containing: confirmation of the fact, purpose, sources, methods of personal data processing; list of personal data, periods of processing of personal data, including the periods of their storage;
- require from the Bank changes and amendments to his/her personal data if there are grounds, confirmed by the relevant documents;
- require the Bank to block his/her personal data in case there is information about violation of the terms of personal data processing;
- require the Bank to destroy his/her personal data, which has been processed in violation of the legislation of the Republic of Kazakhstan, as well as in other cases stipulated by the legislation of the Republic of Kazakhstan;
- withdraw consent to the collection, processing, distribution in public sources, transfer to third parties and cross-border transfer of personal data, except as required by the legislation of the Republic of Kazakhstan;
- give consent to the Bank to distribute his/her personal data in publicly accessible sources of personal data;
- protection of his/her rights and legitimate interests, including compensation for moral and pecuniary damage;
- exercise of other rights stipulated by the legislation of the Republic of Kazakhstan.

21. Personal data subject has the right to obtain information relating to the processing of his/her personal data, by sending a written request to the Bank. The request may be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Republic of Kazakhstan.

22. The right of the personal data subject to access to his/her personal data in the Bank may be limited in accordance with the legislation of the Republic of Kazakhstan, including if the access of the personal data subject to his/her personal data violates the rights and legitimate interests of third parties.

23. Personal data subject has the right to demand from the Bank to take measures stipulated by the Law to protect her/his rights.

24. Information relating to the processing of the subject's personal data shall be provided to him/her by the Bank in an accessible form and shall not contain personal data relating to other subjects of personal data, unless there are legitimate grounds for the disclosure of such personal data.

25. If information concerning the processing of personal data of the personal data subject, as well as if the processed personal data was provided for familiarization to the personal data subject at his/her request, the personal data subject may apply again to the Bank or send a second request not earlier than thirty days after the initial application or sending the original request, unless a shorter period is not established by the legislation of the Republic of Kazakhstan or the agreement, to which the subject of personal data is a party.

26. Personal data subject has the right to apply again to the Bank or to send a repeated request in

order to obtain information relating to the processing of personal data of the subject, as well as to familiarize with the processed personal data before the expiration of thirty days after the initial application, if such information and (or) processed personal data were not provided to him/her for familiarization in full by the results of consideration of the initial application. Repeated request along with information related to processing of the subject's personal data shall contain justification for sending repeated request.

27. If the personal data subject believes that the Bank is processing his/her personal data in violation of the legislation of the Republic of Kazakhstan or otherwise violates his/her rights and freedoms, the personal data subject shall be entitled to appeal the actions or inaction of the Bank to the authorized state body in the field of personal data protection or in court.

28. Personal data subject has the right to protect his/her rights and legitimate interests, including compensation for losses and (or) compensation for moral damage in court.

29. Personal data subject has the right to withdraw consent for processing of personal data. In case of withdrawal of consent for processing of personal data by the personal data subject, the Bank shall be entitled to continue processing of personal data without consent of the personal data subject in cases stipulated by the current legislation of the Republic of Kazakhstan.

7. Obligations of the Bank

30. In accordance with the requirements of the legislation of the Republic of Kazakhstan, the Bank shall:

- approve the list of personal data, necessary and sufficient for the performance of its tasks, unless otherwise provided by the laws of the Republic of Kazakhstan;
- approve documents defining the policy for the collection, processing and protection of personal data;
- take and comply with the necessary measures, including legal, organizational and technical, to protect personal data in accordance with the legislation of the Republic of Kazakhstan;
- comply with the legislation of the Republic of Kazakhstan on personal data and their protection;
- provide, at the request of the authorized body as part of the consideration of applications from individuals and legal entities, information on the methods and procedures used to ensure compliance with the requirements of the Law;
- take measures to destroy personal data in case of achieving the purpose of their collection and processing, as well as in other cases stipulated by the legislation of the Republic of Kazakhstan;
- provide evidence of the subject's consent to the collection and processing of his/her personal data in cases stipulated by the legislation of the Republic of Kazakhstan;
- upon the subject's request, report information relating to it within the period stipulated by the legislation of the Republic of Kazakhstan;
- in case of refusal to provide information to the subject or his/her legal representative, provide a reasoned response within the time frame stipulated by the legislation of the Republic of Kazakhstan;
- within one working day: change and (or) supplement personal data on the basis of appropriate documents confirming their reliability, or destroy personal data if they cannot be changed and (or) supplemented; block personal data relating to the subject, in case of information about violations of the conditions of their collection, processing; destroy personal data in case of confirmation of the fact of their collection, processing in violation of the legislation of the Republic of Kazakhstan, as well as in other cases stipulated by the legislation of the Republic of Kazakhstan; remove the blocking of personal data in case of non-confirmation of the fact of violation of the terms of personal data collection and processing;
- provide the subject or his/her legal representative with the opportunity to familiarize themselves with personal data relating to the subject, free of charge;
- appoint a person responsible for organization of personal data processing at the Bank.

8. Measures to ensure the security of personal data during their processing

31. When processing personal data, the Bank shall take necessary legal, organizational and technical measures to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other

unauthorized actions in relation to personal data.

32. Ensuring the security of personal data shall include:

- determination of threats to security of personal data during their processing in the Bank's information systems;
- determination of levels of protection of personal data during their processing in the Bank's information systems;
- application of organizational and technical measures to ensure security of personal data during their processing in the Bank's information systems, necessary to meet the requirements to protection of personal data, implementation of which ensures the level of protection of personal data established by the legislation of the Republic of Kazakhstan;
- record of places of storage and processing of personal data;
- identifying the facts of unauthorized access to personal data and taking measures to eliminate detected violations;
- restoration of personal data modified or destroyed as a result of unauthorized access to them;
- establishing the rules of access to personal data processed in the Bank's information systems, as well as ensuring registration and accounting of actions performed with personal data in the information systems;
- control over measures taken to ensure the security of personal data and the level of protection of personal data during their processing in the information system;
- appointment of the person responsible for the organization of personal data processing;
- internal control over compliance of personal data processing with the requirements of the legislation of the Republic of Kazakhstan, the Policy, internal documentation of the Bank;
- familiarization of the Bank's employees, directly engaged in processing of personal data, with the requirements of the Law and regulations adopted in accordance with them, the Policy and internal documents on the processing of personal data.

9. Responsibility

33. Persons guilty of violating the requirements of the Law and the Policy shall bear civil, administrative, disciplinary and other liability stipulated by the legislation of the Republic of Kazakhstan.