

APPROVED BY

General Director
ING BANK (EURASIA) JSC

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ENGLISH

**ING BANK (EURASIA)
JOINT STOCK COMPANY**

**Policy on the Processing and Securing of the Personal Data
in Russia**

Reviewed by	Signature	Date
General Director		19.11.2019
Head of Human Resources		28.10.2019
Chief Operating Officer		13.11.2019
Head of Transactional Services		13.11.2019
Head of Legal		28.10.2019
Head of Compliance		15.11.2019

Data Sheet

General Information

Target Audience: All owners of personal data being processed in ING BANK (EURASIA) JSC. For general use.

Target workflows: Personal data handling and security

Procedure Owner: Legal Department

Effective from:

Document history

Version	Originator	Date	Revision description
1.0		07.09.2015	Initial drafting of the document
2.0		25.10.2019	Second drafting of the document

Policy on the Processing and Securing of the Personal Data in Russia, ING BANK (EURASIA) JSC

In order to maintain the business reputation and ensure compliance with the requirements of Federal Act dated 27.07.2006 No. 152-FZ "On personal data" as well as statutes and regulations adopted in accordance therewith ING BANK (EURASIA) JSC (hereinafter referred to as the "Bank") guarantees legitimacy of personal data processing as well as an adequate security level of personal data being processed.

Personal data processing in the Bank is being carried out on lawful and equitable grounds and does not go beyond achievement of specific, predefined and lawful purposes. Only personal data meeting the purposes of their processing shall be subject to processing. The contents and volume of personal data being processed meet the stated purposes of processing, the redundancy data being processed is not allowed.

During personal data processing the Bank ensures personal data accuracy, their sufficiency and, where necessary, their actuality in relation to the purposes of personal data processing. The Bank makes and ensures making arrangements in order to delete or clarify incomplete or inaccurate personal data.

The Bank employee before uploading any document (for example, contracts, copies of passports, questionnaires, etc.,) containing personal data of Russian citizens in the system, not localized in the territory of the Russian Federation, is obliged to save such documents in the local database of the Bank. Due to the fact that the list of non-localized systems of the Bank is changing, up-to-date information on the localization status of a particular system of the Bank shall be confirmed in the Department of information technology responsible for the business application (IT Custodian).

Each Department of the Bank independently determines and fixes in its procedures or operational instructions the procedure and conditions for the localization of personal data, as well as local media on which the initial data entry of Russian citizens will be made. In this case, this procedure is determined taking into account the requirements for a unified structure of storage of documents, as well as the possibility of timely deletion/destruction of data in accordance with the legislation of the Russian Federation.

The Bank stores personal data in the form permitting identification of personal data owner only as long as is needed for the purpose of personal data processing if the period for retaining personal data is not fixed by the federal act, agreement, in which the personal data owner is a party, beneficiary or guarantor. The personal data being processed shall be destroyed or impersonalized upon achievement of the processing goals or if there is no further need in achievement of these goals, unless otherwise stipulated by the Federal Act.

The purpose of personal data processing, composition and content of personal data as well as categories of the personal data owners, whose data is being processed by the Bank, shall be included into a Notification of Personal Data Processing submitted to the authorized body for protection of the rights of personal data owners (Roskomnadzor) and should be updated in case of their changes.

In the course of its activities the Bank may submit and (or) commission another person with personal data processing with the consent of the personal data owner unless otherwise stipulated in the Federal Act. In this connection the mandatory condition for submission and (or) commissioning of another person with personal data processing consists in the parties' obligation to maintain confidentiality and security of personal data during their processing.

The Bank shall not publish personal data of a personal data owner in publicly accessible sources without his/her prior consent.

In the course of its activities the Bank effects cross-border transmission of personal data to legal entities at the territory of foreign states. In this connection the issues of adequate protection of the rights of personal data owners and security of their personal data during the cross-border transmission shall be the highest priority for the Bank, the resolution of which is being implemented

in accordance with the Russian legislation in the sphere of personal data processing.

The cross-border transmission of personal data to the territory of the foreign states, which do not ensure adequate protection of the rights of personal data owners shall be effected only if there is the personal data owner's consent in writing to the cross-border transmission of personal data; the performance of the contract, in which the personal data owner is a party; as well as other cases stipulated by Russian legislation.

In order to ensure the adequate personal data protection the Bank evaluates the damage, which may be caused to personal data owners in case of personal data security incidents, as well as defines actual threats to personal data security during their processing in personal data information systems.

In order to ensure personal data security during their processing the Bank takes necessary and adequate legal, organizational and technical measures to protect personal data against unauthorized or accidental access, destruction, modification, blocking, copying, submission, distribution of personal data as well as against other unlawful acts with respect to personal data.

The Bank tries to ensure that all organizational and technical arrangements for the protection of personal data are carried out on legal grounds including in accordance with requirement of the Russian personal data legislation.

The Bank's management realizes the importance and the need for ensuring personal data security and encourages continual improvement of personal data protection systems to be processed within the framework of execution of the Bank's core business.

The Bank has appointed persons responsible for arrangement for personal data handling and security.

Each new Bank employee, directly engaged in personal data processing shall be acquainted with requirements of the Russian personal data legislation, with this Policy and other local acts of the Bank as regards processing and personal data security and shall bear responsible for their observance.