

PRIVACY POLICY

Regarding the disclosure and use of data/banking secrets in accordance with the EU General Data Protection Regulation ("GDPR"), the Austrian Data Protection Act (*Datenschutzgesetz*) (together with the GDPR "**applicable data protection laws**"), Banking Act (*Bankwesengesetz*), and Telecommunications Act 2003 (*Telekommunikationsgesetz 2003*) by

Sberbank Europe AG, an Austrian stock corporation (*Aktiengesellschaft*) with its corporate seat in Vienna and its business address at Schwarzenbergplatz 3, A-1010 Vienna, Austria, registered with the commercial register of the Commercial Court Vienna (*Handelsgericht Wien*) under registration number FN 161285i ("Sberbank") as described below.

Other documents: Legal issues which may arise in connection with this Policy as well as applicable law and jurisdiction shall be governed by the provisions in the Account Agreement and the General Terms and Conditions of Sberbank (particular with respect to data protection aspects).

Sberbank processes your personal data only based on your consent.

You can withdraw your consent at any time, in whole or in part, by the same means via which you granted your consent. Additionally you can unsubscribe from any marketing communications we may (upon your consent) send you, by clicking on the respective link sent to you in the marketing e-mails. The withdrawal of the respective consent does not affect the lawfulness of processing based on consent before its withdrawal.

1.1. Small loans register and warning list

The following personal data on any outstanding overdue claims resulting from acting in violation of contractual arrangements may be provided to the warning list and to the small loans register (*Kleinkreditevidenz*) maintained by "Kreditschutzverband von 1870" within the scope of the existing business relationship and also after its termination until full settlement of the claim: name/company name, address, date of birth, amount of the liability, transfer modalities, any customer conduct which is in violation of contractual arrangements, and any steps taken by the bank in connection with repayment and enforcement.

- The **warning list** is a joint information system maintained for the purposes of protecting creditors and minimizing risk to which the participating banks may refer for indications of customer conduct which is contrary to contractual arrangements. The data stored in the warning list will be transmitted solely to banks that are authorised to receive such data so that they can more effectively exercise the statutory due diligence in the accurate assessment of credit risk.
- The **small loans register** is a joint information system maintained by banks, insurance companies which grant loans and leasing companies for the purposes of protecting creditors and minimizing risk, which is operated by "Kreditschutzverband von 1870". Data stored in the small loans register is only forwarded upon request to banks, insurance companies which grant loans and leasing companies which have their registered office in a member state of the European Economic Area (EEA), to the extent that such institutions are required by law to correctly assess the credit risk associated with an applicant for a loan.

1.2. Transfers to Sberbank Group members and potential counterparties and potential refinancing grantor

Personal Data for the purposes of this point is the following information relating to you or any of your affiliates:

- The identity, contact and corporate information of the account holder, any trustor and any beneficial owner to the extent indicated in the contractual documentation, any application form in connection therewith and the know-your-customer forms (that is, the customer questionnaire, the know-your-customer documentation form and the supporting documents provided therewith, the PEP (i.e. politically exposed person) statement and the identification of beneficial owner),
- the fact that there is an account relationship with Sberbank,
- any financial information, assigned rating or other information on the financial standing of the account holder or any of its affiliates and any transaction-related information that becomes known to Sberbank in the course of the banking relationship, in particular transactions with or routed via Sberbank or as otherwise provided to Sberbank by the customer, as well as any account balance, value and maturity of outstanding claims, available credit lines and collateral which you have provided.

Purpose: Personal data that becomes known to Sberbank in the course of the banking relationship, is processed and distributed within Sberbank for banking purposes and may further be passed on and disclosed to domestic or foreign (world-wide) members of the Sberbank Group for intra-group purposes. These are purposes of

- determining, calculating, evaluating and managing credit, concentration, market and similar risks (including the risk limitation in respect of large exposures), as required for regulatory reasons and banking operations,
- balance sheet consolidation, Group-wide internal audit and business planning,
- storage and processing of such data in the Sberbank customer database and common IT services and data processing centers, as well as
- customer servicing purposes (e.g. replying to customer requests, processing of customer complaints and providing services upon client's request).

An up-to-date list of the members of Sberbank Group (the consolidated subsidiaries of JSC Sberbank) can be found in the most recent consolidated financial statements of JSC Sberbank available at <http://www.sberbank.com/investor-relations/disclosure/affiliates>. Some members of the Sberbank Group may be located in countries for which an adequate level of data protection has not been determined yet and data may be subject to access by local authorities and courts in accordance with local laws and regulations. Within Sberbank Group, we have implemented all adequate safeguards to protect your personal data.

Furthermore, Sberbank may pass on your Personal Data which is necessary or appropriate for the assessment of the risks arising in connection with transactions contemplated with the relevant person or entity, world-wide to

- any (potential) counterparty to an assignment, transfer or sub-participation agreement or any other agreement aiming at the assumption of risks by third parties as well as any (potential) syndicate member in a syndicate transaction for the purpose of commercial and risk assessment by the (potential) counterparty or syndicate member;
and
- any (potential) refinancing grantor of Sberbank, for whom the claims of Sberbank against the customer are to serve as collateral or who are to buy the claims (including without limitation the Austrian National Bank (OeNB), the Austrian Control Bank (OeKB), the European Central Bank (ECB) and the European Investment Bank (EIB) for the purpose of the evaluation of such collateral or claims.

1.3. Transfer to correspondent banks

For the purpose of providing a list of correspondent banks with accounts held with Sberbank (list of loro accounts), in case of a correspondent bank relationship with Sberbank, the following personal

data may be processed and transferred to other correspondent banks of Sberbank world-wide upon their request, as is customary in international banking practice: company name, legal form, address, SWIFT, the fact that you have a current account/current accounts with Sberbank as well as the currency of such account(s).

Such recipients may be located in countries for which an adequate level of data protection has not been determined yet and personal data may be subject to access by courts and authorities in accordance with local laws and regulations.

1.4. Marketing purposes

Sberbank may use your personal data (name/company name, address, telephone, fax, email) for Sberbank's own purposes to improve the quality of its services, and sending you personalized information about new offers for own products and services, special conditions for existing own products and services, upgrades/changes of conditions of individual products, promotions (e.g. competitions, contests, test offers, newsletters, surveys) and invitations to events.

FURTHER INFORMATION UNDER ART 13 GDPR

Your rights: Additionally to the right to withdraw your consent, you have the right in accordance with applicable data protection law, to access, correct, request deletion, to object, to portability of your personal data, to request restriction of the processing of your personal data. To exercise these rights you can send an email to dataprotection@sberbank.at or a letter to Sberbank AG, Schwarzenbergplatz 3, 1010 Vienna, Austria. Further, you have the right to file a complaint with a data protection authority (in particular in the Member State of your habitual residence, place of work or place of the alleged infringement).

Term of processing personal data: Your personal data will be kept as long as necessary for the fulfilment of the underlying purpose and furthermore as long as legal obligations (e.g. storage and documentation obligations according to the Austrian Federal Fiscal Code (BAO), the Austrian Commercial Code (UGB), Bankwesengesetz (BWG), Finanzmarkt-Geldwäschegesetz (FM-GwG), Wertpapieraufsichtsgesetz (WAG)), applicable limitation periods or other justified interests in retention (e.g. as evidence in ongoing proceedings) exist.

As soon as there are no legitimate purposes for the further storage of personal data, they will either be erased or anonymised. If this is not possible (e.g. because they are stored in backup archives), Sberbank will store your personal data securely and make it inaccessible to further processing until deletion is possible.

In the circumstances above no automated decision-making, including profiling, within the meaning of Art 22 GDPR takes place.

Sberbank's data protection officer can be contacted under dataprotection@sberbank.at or Schwarzenbergplatz 3, 1010 Vienna, Austria.