



**PERSONAL DATA POLICY**  
**Appendix No. 1 The List of Personal Data**

No.	The task, including functions, powers, responsibilities	Purposes of collection and processing within the task performed	Personal data for a specific purpose	Reference to documents or regulations that have direct references to the tasks performed by the Bank
1	<p>Provision of banking and other services in accordance with the Bank's charter and the license issued to the Bank to perform banking and other services, including:</p> <ul style="list-style-type: none"> <li>- bank loan operations;</li> <li>- payment card operations;</li> <li>- current and savings account operations;</li> <li>- cash operations;</li> <li>- safety deposit operations;</li> <li>- metal account operations;</li> <li>- accounting operations, conversion operations;</li> <li>- operations with guarantees, letters-of-credit and sureties.</li> </ul>	<ul style="list-style-type: none"> <li>- proper provision of banking services and compliance with the requirements established by the legislation of the Republic of Kazakhstan and the NBRK;</li> <li>- for consideration of the Client's application for banking services and provision of services, including: bank loan operations, payment card operations, bank and savings account operations, cash operations, safety deposit operations, metal account operations, accounting operations, conversion operations, operations with guarantees, letters-of-credit and sureties;</li> <li>- for provision of information to Kazakhstan Deposit Insurance Fund JSC;</li> <li>- for assignment by the Bank of the rights of claim under contracts (agreements) concluded between the Client and the Bank, if such assignment is provided for by the terms of the relevant contracts (agreements) concluded between the Client and the Bank;</li> <li>- for customer identification;</li> <li>- for issue of a customer card;</li> <li>- for notification of performed operations;</li> <li>- for exchange of information, including for consideration of the provision of responses to customer requests, complaints, suggestions, recommendations, claims, orders, etc. (and / or third parties), the transfer (receipt) of correspondence (mail) to the Customer's address for sending (delivery)/receiving via courier services, courier service, express mail;</li> </ul>	<p><u>Personal data of an individual with limited access:</u></p> <ul style="list-style-type: none"> <li>- surname, first name, patronymic (if any);</li> <li>- Information about the change of surname, first name, patronymic (if any);</li> <li>- Transcription of surname and first name;</li> <li>- date, month, year of birth;</li> <li>- ethnicity;</li> <li>- place of birth: country, province, district, locality;</li> <li>- the identity document;</li> <li>- number, series, date of issue, validity period of the identity document;</li> <li>- the authority that issued the identity document;</li> <li>- citizenship;</li> <li>- address of residence / place of residence / postal address;</li> <li>- individual identification number;</li> <li>- country of residence;</li> <li>- contact phone numbers: home, work, cell;</li> <li>- email address;</li> <li>- gender;</li> <li>- photo;</li> <li>- signature (handwritten and digital);</li> <li>- details and content of the marriage certificate;</li> <li>- details and content of the certificate of dissolution of marriage;</li> <li>- details and content of the marriage contract;</li> </ul>	<p>The legislation of the Republic of Kazakhstan:</p> <p>On banks and banking activity in the Republic of Kazakhstan</p> <p>The Law on Payments and Payment Systems</p> <p>The Civil Code of the Republic of Kazakhstan</p> <p>The Real Estate Mortgage Law</p> <p>On Payments and Payment Systems</p> <p>On Credit Bureaus and Formation of Credit Histories in the Republic of Kazakhstan</p> <p>On Approval of the Rules of Functioning of the Interbank Payment Card System</p> <p>On Approval of the Rules for Opening, Maintenance and Closing Customer Bank Accounts</p> <p>On Approval of the Rules for Opening, Maintenance and Closing Customer Bank Accounts</p> <p>On Approval of the Rules of Functioning of the Interbank Money Transfer System</p>



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		<ul style="list-style-type: none"> <li>- for marketing purposes, providing (forwarding) to the Client any information materials, including about the products and (or) services of the Bank, as well as other notifications by telephone, fax, other types of communication, as well as through open communication channels (including SMS, e-mail, notification in the Smartbank RBS, etc.);</li> <li>- for provision of services to the client, spouse, who are heirs, including on the active products of the Bank available to the client: bank loan transactions, payment card transactions, bank and savings account transactions, cash transactions, safety deposit operations, metal account transactions, accounting transactions, conversion operations;</li> <li>- for subsequent extra-judicial sale of collateral;</li> <li>- for opening and maintenance of special accounts for transferring pensions, aids, and social benefits;</li> <li>- for opening and maintenance of special accounts for transferring alimony, aids, and social benefits,</li> <li>- for opening and maintenance of accounts in the name of a minor,</li> <li>- for opening and servicing accounts for maintenance of minor children and adult disabled children;</li> <li>- for providing a deposit as collateral under a loan;</li> <li>- for withdrawal of the amount of debt from the deposit and transferring it to the debt repayment account,</li> <li>- for providing a savings account statement at the request of the client, individual,</li> <li>- for providing information to the state revenue authority;</li> <li>- for withdrawal of the amount of debt from the deposit and transferring it to the debt repayment account,</li> <li>- for opening, maintenance, closing an account.</li> </ul>	<ul style="list-style-type: none"> <li>- details and content of the statement on the absence of marital relations;</li> <li>- details and contents of the death certificate of the spouse (if required, determined by the Bank);</li> <li>- data on disability, social and tax benefits;</li> <li>- details and content of the document that is the basis for granting benefits and assigning status;</li> <li>- data on the presence/absence of minor children;</li> <li>- details and contents of the child's birth certificate,</li> <li>- details and contents of the child's death certificate (if required, determined by the Bank);</li> <li>- data on the availability of bank deposits, bank account numbers, deposit conditions, type of deposit, amount and term of placement, balances and amount of money movement on accounts: details and contents of supporting documents;</li> </ul> <p>Data on the Bank's related persons, persons connected with the Bank by special relations, about their spouses and close relatives, close relatives of the spouse(s):</p> <ul style="list-style-type: none"> <li>- details and contents of the identity document;</li> <li>- individual identification number;</li> <li>- postal address;</li> <li>- degree of kinship of close relatives;</li> <li>- country of residence.</li> </ul> <p>Data on obligations:</p> <ul style="list-style-type: none"> <li>- the presence of unfulfilled obligations to the Bank / to other persons;</li> </ul>	<p>Other NLAs</p>
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			<ul style="list-style-type: none"> <li>- availability/absence of loans, issued (issued) guarantees and sureties, uncovered letters-of-credit and other obligations;</li> <li>- availability/absence of credit/other history about the amount, term and currency of obligations, number, date of the obligation agreement;</li> <li>- about the terms of fulfillment of obligations, about counterparties on obligations, about other data on obligations;</li> <li>- details and contents of supporting documents, including details and contents of contracts, data on creditors</li> <li>- data on availability of bank deposits, bank account numbers, deposit conditions, type of deposit, amount and term of placement, balances and amount of money movement on accounts: details and contents of supporting documents.</li> </ul> <p><u>Publicly available personal data for the Individual Entrepreneurs client category (IE):</u></p> <ul style="list-style-type: none"> <li>- surname, first name, patronymic (if any);</li> <li>- contact phone number;</li> <li>- individual identification number;</li> <li>- registration address;</li> <li>- e-mail;</li> <li>- website, social networks.</li> </ul>	
2	Keeping registers (lists) of related persons/parties of the Bank.	<ul style="list-style-type: none"> <li>- identification of the client/counterparty for relatedness with the Bank;</li> <li>- reporting in accordance with the requirements of the legislation of the Republic of Kazakhstan;</li> </ul>	<p><u>Personal data of an individual with limited access<sup>1</sup>:</u></p> <p>Data on the Bank affiliates, related persons of the Bank, related parties under</p>	The Law of the Republic of Kazakhstan "On Banks and Banking Activity in the Republic of Kazakhstan"

<sup>1</sup> Information on related persons provided within the framework of the requirements of the legislation of the Republic of Kazakhstan shall not apply to restricted access data.

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		<p>- compliance with the requirements of the legislation of the Republic of Kazakhstan in implementation of banking and other operations / services and transactions;</p>	<p>IFRS, their spouses and close relatives, close relatives of the spouse(s):</p> <ul style="list-style-type: none"> <li>- details and contents of the identity document;</li> <li>- individual identification number;</li> <li>- postal address, phone numbers, e-mail;</li> <li>- degree of kinship of close relatives;</li> <li>- country of residence;</li> <li>- major participation in the authorized capital of legal entities, the number of shares (share in the authorized capital)/availability of control in legal entities.</li> <li>- data on officials of a legal entity that is affiliated/related to the Bank through the participation of other affiliated/related persons (position of the person, details and contents of the identity document, individual identification number, phone numbers, e-mail)</li> </ul>	<p>The Law of the Republic of Kazakhstan "On Joint-Stock Companies"</p> <p>International Financial Reporting Standards (IFRS) IAS 24</p>
3	<p>Conducting interviews (filling out a questionnaire for inspection by the SB – for introductory visits and into the staff)</p>	<p>To pass introductory visits and for further employment of the candidate into the staff</p>	<p><u>Restricted personal data:</u></p> <ul style="list-style-type: none"> <li>- surname, first name, patronymic (if any);</li> <li>- date, month, year of birth;</li> <li>- place of birth: country, province, district, locality;</li> <li>- the identity document;</li> <li>- number, series, date of issue, validity period of the identity document;</li> <li>- the authority that issued the identity document;</li> <li>- individual identification number;</li> <li>- gender;</li> <li>- photo;</li> <li>- information about the address of the place of residence /place of registration, contact phone numbers: home, cell;</li> <li>- data contained in the employment record;</li> </ul>	<p>The Labor Code of the Republic of Kazakhstan</p> <p>Instructions for selection, reception and adaptation of personnel</p>



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			<ul style="list-style-type: none"> <li>- education information;</li> <li>- data about family members;</li> </ul>	
4	Entering data into SAP software, forming an employee's personal file	Employee onboarding	<p><u>Restricted personal data:</u></p> <ul style="list-style-type: none"> <li>- surname, first name, patronymic (if any);</li> <li>- date, month, year of birth;</li> <li>- place of birth: country, province, district, locality;</li> <li>- the identity document;</li> <li>- number, series, date of issue, validity period of the identity document;</li> <li>- the authority that issued the identity document;</li> <li>- citizenship;</li> <li>- individual identification number;</li> <li>- country of residence;</li> <li>- address of residence / place of residence / postal address;</li> <li>- contact phone numbers: home, work, cell;</li> <li>- photo;</li> <li>- information about education (education, profession, specialty, names of educational and other institutions, details and content of the document on education);</li> <li>- data on the attitude to military duty / military registration (details and contents of documents on military duty / military registration).</li> </ul>	The Labor Code of the Republic of Kazakhstan Instructions for selection, reception and adaptation of personnel
5	Entering data into SAP software	At changing the employee's name; At providing financial assistance to the employee	<p><u>Restricted personal data:</u></p> <p>Data on family and social status:</p> <ul style="list-style-type: none"> <li>- list of close relatives and degree of kinship;</li> <li>- details and content of the marriage certificate;</li> <li>- details and content of the certificate of dissolution of marriage;</li> </ul>	The Labor Code of the Republic of Kazakhstan Instructions for granting benefits to employees

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			- details and contents of the death certificate of the spouse (if required, determined by the Bank).	
6	Entering data into SAP software	To be taken into account when granting additional leave	<u>Restricted personal data:</u> Data on disability, social and tax benefits: - details and content of the document that is the basis for granting benefits and assigning status	The Labor Code of the Republic of Kazakhstan Internal labor regulations
7	Entering data into SAP software	To be taken into account when granting parental leave	<u>Restricted personal data:</u> Data on the presence of minor children: - details and contents of the child's birth certificate	The Labor Code of the Republic of Kazakhstan Internal labor regulations
8	Formation and submitting of a package of documents of the candidate to the Authorized Body of the Republic of Kazakhstan	Coordination of candidates considered for the positions of Bank executives with the Authorized Body of the Republic of Kazakhstan	<u>Restricted personal data:</u> Data contained in employment records, employment contracts and other documents: - the positions held and being held; - the structural unit, body, organization, person in which/for whom the candidate worked; - period, dates, terms, duration of work; - criminal record data; - data on the details and content of the employment contract; - data on the details and contents of the employment record.	Resolution of the Board of the Agency of the Republic of Kazakhstan on Regulation and Development of the Financial Market dated March 30, 2020 No. 43  The Labor Code of the Republic of Kazakhstan
9	Granting access rights to Bank employees, employees of partners/suppliers	Approval, execution of requests for access.	<u>Restricted personal data:</u> - surname, first name, patronymic (if any); - date, month, year of birth; - place of birth: country, province, district, locality; - the identity document; - number, series, date of issue, validity period of the identity document; - the authority that issued the identity document; - citizenship.	- Instructions for identification and access rights management Instructions - OMB of the National Bank of the Republic of Kazakhstan dated March 27, 2018 No. 48 on approval of Requirements for ensuring information security of banks, branches of non-resident banks of the Republic of Kazakhstan and organizations engaged in certain types of banking operations, Rules and deadlines for providing information about information security



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				incidents, including information about violations, failures in information systems  On Approval of the Rules of Functioning of the Interbank Money Transfer System
10	Maintennace of biometric identification	Ensuring customer identification processes	<u>Restricted personal data:</u> - surname, first name, patronymic (if any); - date, month, year of birth; - place of birth: country, province, district, locality; - the identity document; - number, series, date of issue, validity period of the identity document; - the authority that issued the identity document; - citizenship. - Biometric data (face cast)	- OMB of the National Bank of the Republic of Kazakhstan dated March 27, 2018 No. 48 on approval of Requirements for ensuring information security of banks, branches of non-resident banks of the Republic of Kazakhstan and organizations engaged in certain types of banking operations, Rules and deadlines for providing information about information security incidents, including information about violations, failures in information systems; - The Law on Personal Data and their Protection
11	Support of the Certification Authority	Ensuring processes related to maintenance of the Certification Authority	<u>Restricted personal data:</u> - surname, first name, patronymic (if any); - date, month, year of birth; - place of birth: country, province, district, locality; - number, series, date of issue, validity period of the identity document; - the authority that issued the identity document; - citizenship.	- The Law of the Republic of Kazakhstan “On electronic document and electronic digital signature”
12	Collecting and keeping audit events in systems	Ensuring the process of logging events from the Bank systems	<u>Restricted personal data:</u> - surname, first name, patronymic (if any); - date, month, year of birth; - place of birth: country, province, district, locality;	- OMB of the National Bank of the Republic of Kazakhstan dated March 27, 2018 No. 48 on approval of Requirements for ensuring information security of banks, branches of non-resident banks of the Republic of Kazakhstan and organizations engaged



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			<ul style="list-style-type: none"><li>- number, series, date of issue, validity period of the identity document;</li><li>- the authority that issued the identity document;</li><li>- citizenship;</li><li>- individual identification number;</li><li>- country of residence;</li><li>- address of residence / place of residence / postal address;</li><li>- contact phone numbers: home, work, cell.</li></ul>	in certain types of banking operations, Rules and deadlines for providing information about information security incidents, including information about violations, failures in information systems;
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