**Privacy Policy**

1. Introduction

This Privacy Policy contains general information about the processing and maintenance of Raiffeisen Bank Aval JSC (hereinafter - the Bank) in “Raiffeisen Pay” aplication, “Raiffeisen Online” and “Raiffeisen Business Online” mobile applications.

The Bank knows the importance of confidentiality (secrecy) of information and security for the Bank's customers.

Information about the activities and financial state of the clients, which became known to the Bank during service provision process to clients and relationship with them and third parties during service provision process to the Bank while using application "Raiffeisen Pay", "Raiffeisen Online" and "Raiffeisen Business Online" mobile applications, in accordance with Art. 1076 of the Civil Code of Ukraine and Art. 60 of the Law of Ukraine "On Banks and Banking" is a banking secrecy.

Processing information by the Bank in the “Raiffeisen Pay” application, the “Raiffeisen Online“and “Raiffeisen Online Business” mobile applications shall be carried out in accordance with the legislation of Ukraine, the National Bank of Ukraine regulations, in cases where it is applied by the European Parliament and Council Regulation 2016/679 of 27.04.2016 "Protection of individuals during processing of personal data and open movement of such data" (Genaral Data Protection Regulation), agreements (contracts) between clients and the Bank, given by the Bank clients’ agreement, and also Information security policies of the Bank and the procedure for processing personal data, the notice of which is posted on the Bank's website (www.aval.ua) in the section "Data protection" with features determined by this Privacy Policy.

The Privacy Policy is applied by the Bank to application‘’Raiffeisen Pay’’, mobile applications ‘’Raiffeisen Online’’ and ‘’Raiffeisen Business Online’’ (hereinafter - Services) regardless of how those services are being used by the customers of the Bank: via computer, mobile phone, tablet or any other convinient device of the Bank customer.

2. List of information processed by the Bank for providing Services to the Clients

In order to process payments made by the Bank's customers using the Payment Services and to allow customers to carry out other transactions, the Bank collects the information specified: in the agreements (contracts) between the clients and the Bank; in the consent given by the Bank's clients for the processing of personal data, the Notice on the procedure of processing of personal data and the rights of the subjects of personal data on the Bank's website (www.aval.ua); in the Privacy Policy, including:

- last name, first name, patronymic (full name), name (for Entrepreneur clients and legal entities);

- credit and / or debit card numbers, their current balance and expiry dates;

- bank account numbers, their current balance and expiry dates;

 - date of birth, passport details of the customer / authorized persons of the customer, registration number of the taxpayer's registration card / taxpayer identification number (IDN), EDRPOU or any other state-recognized identification number, e-mail address;

- device information - such as operating system name and version, hardware model, IMEI, IMSI, and other unique device identifiers. The Bank does not collect call history information, contact list, SMS (SMS) and any other information;

- information about the activities of the Bank's customer - user of the Service (system) - such as: time and duration of using the Services, actions that the Bank's customer performed while using the Services, geolocation while using the Services;

- Cookie files and other data collection technologies such as fingerprint, etc;

- other information – about the Bank clients use of the Services, e.g. how the Bank client uses content offered by the Service;

- information about the transaction initiated by the Client, including: date, time and amount of the transaction, location and description of the merchant (seller), description provided by the seller of the goods or services for which payment is made, payment method used, purpose of payment and any other information that may be added to the transaction by the seller and / or buyer (the client of the Bank).

- when Bank client replenishes of other persons' mobile numbers in mobile application "Raiffeisen Online" by using the names of the contacts of these persons contained in a mobile phone, tablet, or other device of the Bank's client, the Bank, based on the client's permission, uses the number of client’s mobile phone, as well as, for the period of replenishment operation execution, accesses the contact list of the client. At the same time, the Bank does not collect information about the Bank's client contacts, the history and content of SMS messages and /or calls.

3. The purpose of processing information

  The Bank uses collected information (and can consolidate with other collected information about the Bank client) for the next purposes:

- Provision of the service or function in Services which the Bank client ordered;

- Provision of personalized content and recommendations as to usage of “Raiffeisen Pay” application, “Raiffeisen Online” and “Raiffeisen Business Online” mobile applications;

- For advertising, e.g. providing to the Bank client personalized offers, sending him promotional communications;

- For assessment and market analysis, clients, products and services which are provided by application “Raiffeisen Pay”, “Raiffeisen Online” and “Raiffeisen Business Online” mobile applications (including polling clients as to services provided by application “Raiffeisen Pay”, "Raiffeisen Online" and "Raiffeisen Business Online" mobile applications);

- Conducts polls as to the way clients use given Services to improve the service quality;

- Provision maintenance services and technical support of Services on client’s device;

- Fraud counteracting using a service or feature in the Services (which consists in unauthorized use of the registration data (account) of the Bank's client)

4. Procedure for disclosure of information

The procedure of disclosing banking secrecy, including information being known by the Bank because of the use of application “Raiffeisen Pay”, mobile applications “Raiffeisen Online” and “Raiffeisen Business Online” by the clients, shall be governed by Article 62 of the Law of Ukraine ‘’ Banks and banking ”, agreements (contracts) between clients and the Bank, consent provided by the clients.

Information about the Bank client can be disclosed by the Bank to third parties and also can be used by these third parties in cases specified by the legislation of Ukraine, conditions of agreement (contacts) between clients and the Bank, by conditions given by the Bank clients’ agreement.

Any personal information provided by the Bank clients directly to third party (side): to merchant (of goods and services), website or program is not covered by this Privacy Policy. The Bank is not responsible for privacy of information and security of merchants or third parties to which the Bank directly passes its personal information. The Bank encourages the Bank clients to review the Privacy Policy of third party to whom clients choose to share their personal information.

The Bank will not share/disclose the Bank clients information outside the Bank, except cases predetermined by the legislation of Ukraine, conditions of agreements (contracts) between clients and the Bank, conditions of given by the Bank clients agreement (permission).

5. Security measures

The security of the Bank's client account in the “Raiffeisen Pay” application and/or in the “Raiffeisen Online”and “Raiffeisen Business Online” mobile applications depends on the way clients keeps his/her computer, mobile phone, tablet or any other device, password (-s), PIN or any other information, which gives the access to the Bank client’s account in appropriate Service and whether the Bank client discloses information to third parties. In case if client willfully shares his/her computer, mobile phone, tablet or any other device and/or above mentioned information to third party who will have access to the Bank client’s account in Services and personal information of this Bank client thereat the Bank is not responsible for such cases.

The Bank's customer is responsible for access to computer, mobile phone, tablet, or other mobile device, the “Raiffeisen Pay” application and/or the “Raiffeisen Online” and “Raiffeisen Business Online” mobile applications which can be possible installed on mobile phone, tablet, or other mobile device of the Bank's client, and is responsible for storing the Electonic Signature key file, his/her passwords and/or PIN and also for disclosure (distribution) this information to third parties. The Bank cannot control the disclosure of information to third parties by its clients and is not responsible for the consequences of the transfer of information by the Bank's clients to a third party.

The Bank's customer is also obliged to immediately notify the Bank if he/she believes that his/her personal information in “Raiffeisen Pay” appliacion and/or “Raiffeisen Online” and “Raiffeisen Business Online” mobile applications has been compromised.

6. Final conditions.

Regarding the confidentiality of the data, clients may contact the Bank at the address:

“Raiffeisen Bank Aval” JSC

9, Leskova st.

Kyiv

01011

Ukraine

Tel.: 0(800)500500

Website: <http://aval.ua/>