

Privacy Policy of Application “Raiffeisen Online”

Introduction

We, at Raiffeisen Bank (hereinafter referred to as the “Bank”, “we”, “our”, “us”), take special care of security and privacy of our clients. That is why we have created this Privacy Policy (hereinafter referred to as the “Policy”). This Policy applies to processing of personal data in the context of using Internet banking “Raiffeisen Online”, both its web version and mobile application (hereinafter referred to as “Raiffeisen Online”).

In this document you can find information about the following:

- Which personal data (hereinafter referred to as the “data”) are processed when using Raiffeisen Online;
- For what purposes does the Bank collect and/or process these data;
- To whom the Bank transfers your data.

Scope of this document

This document covers processing of personal data within the framework of using Raiffeisen Online. For more detailed information regarding processing of your data, please refer to the text of the Notification on the Procedure of Personal Data Processing and the Rights of Personal Data Subjects (hereinafter referred to as the “Notification”) available at: <https://raiffeisen.ua/data-protection>.

The Notification contains the following information:

- Your rights in accordance with the law on personal data protection;
- Legal grounds for processing your data;
- Details regarding processing your data as client of the Bank;
- To which authority a complaint can be filed if you believe that your rights under the law on personal data protection have been violated.

Which data are processed when using Raiffeisen Online?

When using Raiffeisen Online, the Bank collects and processes various categories of personal data. Below you can familiarize yourself with the categories of data that are collected when using Raiffeisen Online and a description of data included in specified category.

Identification data. When you log in Raiffeisen Online, Internet banking receives identification data from the Bank’s information systems. Such data include:

- Surname, first name, patronymic (full name);
- Ukrainian Tax Identification Number (TIN);

Data on your cards and accounts. Raiffeisen Online processes data on your cards and accounts. These data include:

- Card data – your credit and/or debit card numbers, their current balances and card expiration dates;

- Account data – numbers of your bank accounts, their current balances, types, balance history and agreement terms.

Data on your cards and recipient accounts. When you make transfer onto a card or make payment or other transaction, the Bank collects data about recipients of transfers or transactions. These data include:

- Account or card number;
- Ukrainian Tax Identification Number (TIN);
- Payment amount;
- Purpose of payment;
- Number of your agreement or account with a third-party organization (for example, if you make utility payments via Raiffeisen Online).

Data on phone numbers. When you top up your mobile phone account via Raiffeisen Online, we collect information about this mobile phone number. The Bank also collects information about phone number you choose to inform you about crediting and debiting funds onto accounts and cards.

Chat data. If you initiate conversation with the Bank via chat, Raiffeisen Online collects history of these chats and questions that were asked or initiated by you.

Authorization data. When you create an account in Raiffeisen Online, the Bank collects information about data you will use to log in your account. Such data include:

- Data on hash of your password. When you create an account in Raiffeisen Online, the Bank stores a password hash to enable you to log in Raiffeisen Online. Please note that the Bank does not store your password, but only its hash (that is, it cannot reproduce or learn your password);
- Data on your login in Raiffeisen Online;
- Authorization token when you use biometrics to authorize into Raiffeisen Online (Face ID/Touch ID etc). Please note that in this case the Bank does not process your biometric data, only the token that contains the information that enable us to define that specifically you used your mobile device for authorization.

Technical data of the device. The Bank collects data about device through which you use Raiffeisen Online and collects the following data:

For mobile devices:

- IP address;
- MAC address;
- IMSI (SIM card identification number);
- IMEI;
- presence or absence of modifications in the operating system (root rights, etc.);
- device information and device operating system version.

When using a web version:

- IP address;
- user-agent line: data about your device, operating system, etc.

History of actions in Raiffeisen Online. The Bank collects information about your actions in Raiffeisen Online, for example:

- History of your authorizations in Raiffeisen Online;
- Any actions executed by you in Raiffeisen Online, including time of their execution.

Information from cookie files. The web version of Raiffeisen Online processes information obtained from cookie files of your web browser or local storage files.

Why does the Bank process your data?

The Bank uses your data for various purposes. In this section you can learn about the purposes for which we process your data.

Provision of the Bank's services. We process your data to provide you with the Bank's services using Raiffeisen Online. For example:

- Processing our financial transactions;
- Opening new accounts or deposits;
- Executing actions with payment cards;
- Informing about financial transactions on your accounts or cards to a selected mobile phone number.

Providing Raiffeisen Online with all its functionality. We process your data so that we can provide you with Raiffeisen Online Internet Banking and all its technical and functional capabilities. For example:

- Your technical data are analysed so that Raiffeisen Online has been maximally optimized for your device (for example, for a version of your operating system or for a screen size of your device);
- If you use a web version of Raiffeisen Online, your cookies are necessary for authorization on the Raiffeisen Online website. If you disable cookies in settings of your web-browser, you simply will not be able to log in your account.

Responding and processing the requests. If it is necessary to process requests, claims, complaints relating to use of Raiffeisen Online, the Bank can respond to them using your data.

Protection of the Bank and you (and your funds) from fraud. The Bank analyses your data and data of other clients in order to combat fraud and other illegal activities. For example:

- The Bank may analyse data on the device used to log in your Raiffeisen Online account in order to make sure that it is you who is logging in;
- The Bank can analyse transactions from your Raiffeisen Online account to detect unusual behaviour – in order to make sure that transactions are really made by you.

Protection from information security threats. The Bank processes your data to protect from information security threats. For example:

- The Bank only processes the password hash (and not password itself) so that no one but you can log in your Raiffeisen Online account;

The Bank processes your web traffic data to prevent cyberattacks, such as DDoS attacks.

Analysis of the use and improvement of Raiffeisen Online and the Bank's services in general.

The Bank uses data on how you use Raiffeisen Online to analyse how you and other Bank clients use Raiffeisen Online and its functionality. Using these data, the Bank improves both Raiffeisen Online and other services and products of the Bank. When performing such analyses, the Bank makes every effort to ensure that your data are processed in an anonymized form, except for situations when it is necessary to investigate how a particular client of the Bank uses Raiffeisen Online or other Bank services.

Providing technical support and analysing errors in the operation of Raiffeisen Online. We

use your data to provide you with technical support and analyse errors in the operation of Raiffeisen Online. For example:

- If you contact us with a problem arising from the use of Raiffeisen Online, your data may be used to solve your problem (to the extent that it is necessary to solve the problem);
- If Raiffeisen Online failed or did not operate correctly for you, we will need your data to understand why the problem occurred specifically in your case or even reproduce your case (we will run Raiffeisen Online on a device with similar characteristics and geolocation).

Communication with you and answers to your requests. If you contact us via Raiffeisen Online chat, the Bank will use your contact information to answer your question or process your request.

Meeting the requirements of the law applicable to the Bank. The Bank processes your data to meet the requirements of the law, including: law on anti-money laundering and countering the financing of terrorism, resolutions of the National Bank of Ukraine and other regulatory acts.

To whom does the Bank transfer your data?

Our employees, contractors, consultants, etc. To provide you with Raiffeisen Online Internet banking and other services of the Bank, we can engage various persons on the basis of employment contracts or as independent contractors. Accordingly, in the course of their activities, they may have access to your personal data. However, we would like to assure you that all these persons will process your data in accordance with this Policy and applicable law and have contractual and/or statutory obligations regarding security and confidentiality of your personal data.

Google. The Bank uses Google services provided by Google LLC., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA, as well as Google Ireland Limited, Gordon House Barrow Street Dublin 4, D04E5W5 Ireland, which include Google Analytics and Google Tag Manager (does not process personal data). There is a Google Analytics browser application that allows you to opt out of the collection and use of Google Analytics data. To install a browser application that will block Google Analytics, please follow this link: <https://tools.google.com/dlpage/gaoptout?hl=en>. If you want to know how Google processes your personal data, please refer to [Google Privacy Policy](#) or the Analytics Help section [Security and Privacy in Universal Analytics](#).

Cloudflare. The Bank uses services of Cloudflare (Cloudflare, Inc. 101 Townsend St, San Francisco, CA 94107 USA) to protect the web-version of Raiffeisen Online from information

security threats. Cloudflare collects information from web-browser requests (user-agent and IP address). To learn more about data processing by Cloudflare, please refer to [Cloudflare Privacy Policy](#) (in English).

Amazon. The Bank uses Amazon AWS cloud storage to host the Bank's digital infrastructure. Legal entity details: Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, L-1855, Luxembourg. Location: Germany, Frankfurt am Main. To learn more about AWS data processing, please refer to the [AWS Data Processing Addendum](#).

Contact Information

In case of any questions regarding processing of your data, please contact us as a [personal data controller](#) using the following contact information:

Raiffeisen Bank JSC

4a Heneral Almazova St., Kyiv, 01011

Tel.: 0 800 400 504, 0 800 500 500

Web-site: <https://raiffeisen.ua/>

E-mail: info@raiffeisen.ua