

PRIVACY POLICY

JUNE 2020

GENERAL INFORMATION ON HOW AND WHY WE COLLECT, GENERAL
INFORMATION ON HOW AND WHY WE COLLECT, STORE, USE AND SHARE
YOUR PERSONAL INFORMATION

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1. Introduction

GPB – Financial Services Limited (“We”, “Us”) take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. By providing us with your personal information and using our services, you are accepting and consenting to the practices described in this policy. It also explains your rights in relation to your personal information and how to contact us or the supervisory authorities in the event you have a complaint.

We collect, use and process certain personal information about you. When we do so we are subject to the EU Regulation 2016/679 (General Data Protection Regulation) hereinafter referred to in this policy as the “**GDPR**”, which applies across the European Union and we are responsible as ‘controller’ of that personal information for the purposes of the Regulation. The GDPR replaces the Data Protection Directive 95/46/EC and was designed to harmonize data privacy laws across Europe, to protect and empower all EU citizens’ data privacy and to reshape the way organizations across the region approach data privacy. Our nominated representative for the purpose of the GDPR is Maria Chrysostomou, who can be contacted at MChrysostomou@gpbfs.com.cy

2. Definitions

It would be helpful to start by explaining some key terms used in this policy:

Our Data Protection Officer (DPO) – Maria Chrysostomou, telephone +357 25 055119, Mchrysostomou@gpbfs.com.cy

Personal information - Any information relating to an identified or identifiable individual

Special categories of personal information - Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership; Genetic and biometric data; Data concerning health, sex life or sexual orientation.

3. Information we collect about you

We will collect and process the following data about you:

Information you give us: This is information about you that you give us by filling our client forms/agreements, or by corresponding with us by phone, e-mail, in person or otherwise. It includes information you provide when you choose to use our services and/or become an affiliate to our company, participate in any company event and when you send any information to us under any capacity. The information you give us may include your name, address, e-mail address and phone number, financial information, personal description and photograph.

Information we collect/receive from other sources: This is information we receive about you if you use any of the services we provide and/or from other affiliates and/or professionals. In this case we

will inform you when we collect that data and if we intent to share those data internally. We will also tell you for what purpose we will share and combine your data. We are working closely with third parties (including, for example, business partners, brokers, vendors, insurers, payment service providers, analytics providers, search information providers, credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

4. How we use your data

We use the information we collect about you in the following ways:

We use the information you give us:

- To carry out our obligations arising from any contracts between you and us and to provide you with the information, products and services that you request from us;
- For our legitimate interests or those of a third party, for example, to prevent and detect fraud/unauthorized access to our systems that can be damaging to us and you and/or to be as efficient as we can so we can deliver the best service to you at the best price and/or conducting credit reference checks via external credit reference agencies to ensure our customers are likely to be able to pay for our products and services;
- To comply with our legal and regulatory obligations, for example, conducting checks to identify our customers and verify their identity as required by “The Prevention and Suppression of Money Laundering and Terrorist Financing Law Of 2007” and CYSEC;
- to provide you with information about other services we offer that are similar to those that you have already used or enquired about;
- to notify you about changes to our service.

We use the information we collect/receive from other sources:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective and easily accessible manner;
- as part of our efforts to keep our site safe and secure;

Note: The above table does not apply to the special categories of personal information, which we will only process with your explicit consent.

5. Disclosure of your information

You agree that we have the right to share your information with:

- Any member of our group, which means our ultimate holding company Gazprombank Joint Stock Company, a public company incorporated in the Russian Federation, and its subsidiaries, as defined under the Cyprus Companies' Law.
- Selected third parties we use to help deliver our products and/or services to you including:
 - business partners, brokers, vendors, insurers, payment service providers for the performance of any contract we enter into with them or you;
 - analytics and search engine providers that assist us in the improvement and optimisation of our site;
 - credit reference agencies and/or banking and financial institutions and/or auditors for, among others, the purpose of assessing your credit score (where this is a condition of us entering into a contract with you).
- Law enforcement agencies and regulatory bodies such as CYSEC and/or the Police for the purposes of complying with local and international regulations against money-laundering, fraud and the general prevention of crime and illegal activities

We will disclose your personal information to third parties:

- In the event that this is necessary for the delivery of our products and/or services to you (for example by using appropriate and compliant IT systems that transmit financial information and/or orders and/or execute payment and/or other financial transactions);
- If GPB-Financial Services Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- If we are under a duty to disclose or share your personal data to comply with any legal and/or regulatory obligation, or to enforce or apply our terms of use and other agreements, or to protect the rights, property, or safety of GPB- Financial Services Limited, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection, anti-money laundering and credit risk reduction;

We only allow the third parties we work with to process your personal information if we are satisfied, they take appropriate measures to protect your personal information. We also impose contractual obligations on our selected third parties to ensure they can only use your personal information to provide services to us and to you.

Note: We will not share your personal information with any additional third party which is not specified above.

6. Where we store your personal data

The data that we collect from you will be stored locally at our servers and/or on cloud servers. Certain email communications and/or data transmitted to us over email and/or other means of electronic transfer of documents may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and the GDPR, especially in instances where data will be transferred to, and stored at, a destination outside the EEA. For more information on how we safeguard your personal data when it is transferred to, and stored at, a destination outside the EEA, see below **“Transferring your personal information out of the EEA”**.

All information you provide to us is stored on secure servers and/or cloud servers. Where we may have given you (or where you have chosen) a password which enables you to access certain parts of our site and/or use any other of our services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

7. Duration your personal information will be kept

We will keep your personal information while you have an account with us or while we are providing services and/or products to you or while we are in a contractual relationship with you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law, regulations and regulatory authorities.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information. When it is no longer necessary to retain your personal information, we will delete or anonymize it.

8. Transferring your personal information outside the EEA

As explained above, it is sometimes necessary for us to share and/or store your personal information outside the EEA, for example:

- With our holding company Gazprombank Joint Stock Company in Russia;
- with your and our service providers located outside the EEA;
- if you are based outside the EEA.

These transfers are subject to compliance rules under GDPR and Cyprus data protection law, as non-EEA countries do not have the same data protection laws as Cyprus and other Member States of the EEA. We will, however, ensure that those transfers comply with the GDPR and Cyprus data protection law and that all of your personal information will be secure. Our standard practice is to use standard data protection contract clauses that have been approved by the European Commission. To obtain a copy of those clauses, you may visit the official EU Website at: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en

If you would like further information please contact our DPO.

9. Your rights

You have the following rights, which you can exercise:

Access	The right to be provided with a copy of your personal information (the right of access) – the Company has the right to reply within one month to access requests
Rectification	The right to require us to correct any mistakes in your personal information – the Company will reply without delay to rectification requests
To be forgotten	The right to require us to delete your personal information—in certain situations – the Company has the right to decide on whether to erase the data as soon as possible, but at the latest within 15 working days
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, for example, if you contest the accuracy of the data. Where you contest the accuracy of the data relating to you, the data must be blocked ‘for a period enabling the Company to verify the accuracy, including the completeness, of the data’. Consequently, where we receive a request for blocking on those grounds, the data will be immediately blocked for the period necessary to verify the accuracy and completeness of the data.

Where you request the blocking of your data on grounds of unlawful processing or where the data must be blocked for purposes of proof, we will need a certain amount of time to conduct this assessment in order to decide whether the data should be blocked. In this case, even though the data cannot be blocked immediately, the request will be processed promptly in order to protect your rights. We therefore consider that such requests should be assessed as quickly as possible and, at the latest, within 15 working days.

Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	<p>The right to object:</p> <ul style="list-style-type: none"> —at any time to your personal information being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal information, for example, processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

As regard the right of access, GDPR gives you the right to access the information held about you. Under certain conditions, your right of access can be exercised in accordance with the Act.

Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, we may either:

- a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or
- b) refuse to act on the request.

Any access request which will be subject to a fee, this fee will be of the amount of €10 to meet our costs in providing you with details of the information we hold about you.

We aim to comply with requests for access to personal information as quickly as possible and will ensure that we comply with legislation unless exceptions apply. In such cases, the reason for any delay will be explained in writing to the data subject making the request.

In processing a request, the identity of the data subject needs to be verified before information will be released. No personal data will be disclosed to a third party without the written consent of the data subject.

We reserve the right to refuse repeated/vexatious requests.

For further information on each of those rights, including the circumstances in which they apply, please contact our DPO at: MChrysostomou@gpbfs.com.cy

10. Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

11. How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The GDPR also gives you the right to lodge a complaint with a supervisory authority, normally in the EEA Member State where you work, live or where any alleged infringement of data protection laws occurred. The supervisory authority in Cyprus is the Data Protection Commissioner who may be contacted at commissioner@dataprotection.gov.cy or telephone: +357 22818456.

12. Changes to this privacy policy

This privacy notice was published May 2018 and last updated in June 2020.

We may change this privacy notice from time to time—when we do we will inform you via email.

13. How to contact us

Please contact us and/or our DPO by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

GPB-FS contact details

GPB-Financial Services Ltd
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Tel: +357 25 055 000
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GPB-FS contact details

Our DPOs contact details

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