

Privacy Policy of Application “MyRaif”

Introduction

We, at Raiffeisen Bank (hereinafter referred to as the “Bank”), take special care of security and privacy of our customers. That is why we have created this Privacy Policy (hereinafter referred to as the “Policy”) to inform you as an end user of application “Raiffeisen: Open a Card” (hereinafter referred to as the “Application”) on the following:

- Which personal data (hereinafter referred to as the “data”) are processed while using the Application;
- For what purposes does the Bank collect and/or process these data;
- What are legal grounds for processing these data;
- To whom the Bank transfers your data;
- Other information related to processing of your data.

Scope of this document

This document covers processing of personal data within the framework of using the Application. For more complete information regarding processing 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 provides information about:

- Your rights under the law;
- Details regarding processing of 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 does the Application collect?

While using the Application, the Bank collects various categories of data about you. Below you can learn about categories of data that are collected while using the Application, a description of data included in the category, and the source of obtaining these data.

Data category	Description of data included in specified category	Source of obtaining data
Document data	<ul style="list-style-type: none">• Information about your documents: passport and taxpayer identification number (TIN);• Name, surname, patronymic;• Gender (based on information from your documents);• Other documents (if necessary).	Unified portal of public services “Diia” (https://diia.gov.ua/) (state enterprise “Diia”, code in the Ukrainian National State Registry of Ukrainian Enterprises and Organizations 43395033)

Contact information	E-mail address and mobile phone number.	Provided by you independently
Data on selected products	The product you selected during registration: Virtual card, ATB card from Raif, etc.	Selected by you independently
Questionnaire data	<ul style="list-style-type: none"> • your place of registration and/or residence (if different); • data on whether you belong to politically exposed persons; • data on your citizenship (if different from Ukraine or if you have an additional citizenship); • data on source of your income and its amount, place of employment and position; • an expected amount of monthly receipts onto accounts; • data on the Bank's products and services that you plan to use; • data on your registration as an individual entrepreneur (if you are registered as an individual entrepreneur). 	<ul style="list-style-type: none"> • Provided by you independently • Unified State Register of Legal Entities, Individual Entrepreneurs and Public Formations – in case of verification of data on your registration as an individual entrepreneur.
Password data	A password word chosen by you.	Provided by you independently
Technical data	<p>Data on the device through which you use the Application</p> <ul style="list-style-type: none"> • IP address; • MAC address; • IMSI (SIM card identification number); • IMEI; • your actions in the Application and time of execution thereof; • presence/absence of modifications in the operating system (root rights, etc.); • device information and device operating system version. 	Obtained from your device
<p>Data from qualified electronic signature</p> <p>When you use a qualified electronic signature (QES), for example, Diia.Signature, in the processes of remote banking services (for example, registration, identification onboarding, authentication,</p>	<p>Information stored in the qualified public key certificate:</p> <ul style="list-style-type: none"> • Surname, first name and patronymic of signatory; • Information about organization and position of signatory (if applicable); • Name of organization (qualified provider of electronic trust services) that 	Your qualified public key certificate

authorization, signature of electronic documents), the Bank receives and processes only the information stored in the qualified public key certificate, which is transferred as part of QES (that is, the systems do not store your personal key, signature is made using a qualified electronic signature or seal, which has positive expert opinion based on the results of state expert review in the field of cryptographic information protection).	issued the qualified public key certificate; <ul style="list-style-type: none"> • Term of the qualified public key certificate; • Other information about the certificate: signature type, signature algorithm, certificate type, etc. 	
Beta test participant data. When you submit your application for participation in beta testing, the Bank processes the data in this application in order to include you in testing. Also, if you have reported a problem with the beta version of the Application, the Bank may request data from your device to analyze the problem that has arisen.	<ul style="list-style-type: none"> • Data from your application form; • Data about your device and actions in the beta version of the Application (if necessary). 	<ul style="list-style-type: none"> • Data from your application form - Provided by you independently; • Data about your device and actions in the beta version of the Application Obtained from your device.
Geolocation data	Your geolocation data	Obtained from your device

Why does the Bank use the collected data and on what legal grounds?

The Bank uses your data for various purposes. For maximum transparency in processing your data, in this section you will learn about the purposes for which the Bank has collected these data, as well as relevant legal grounds. To learn more about grounds for processing personal data, please refer to [Article 11](#) of the Law of Ukraine on Personal Data Protection (hereinafter referred to as the “Law”) and Article 6 of [the Regulation of the European Parliament and Council \(EU\) 2016/679 \(GDPR\)](#).

Purpose of data processing	Categories of data used in processing	Ground(s) for data processing
Opening a personal bank account and providing	All categories of data specified in the Policy	Conclusion and execution of a transaction (contract)

<p>selected services or products of the Bank.</p> <p>Your data are required by the Bank to conclude an agreement with you and provide you with banking and financial services, to fulfil the terms of the agreements concluded between you and the Bank.</p> <p>To learn more about such processing, please refer to the Notification available at https://raiffeisen.ua/data-protection</p>		
<p>Meeting the requirements of the law applicable to the Bank.</p> <p>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.</p> <p>To learn more about such processing, please refer to the Notification available at https://raiffeisen.ua/data-protection</p>	<p>All categories of data specified in the Policy</p>	<p>Compliance with a legal obligation to which the Bank is subject</p>
<p>Protection of legal interests of the Bank.</p> <p>The Bank may use your data if it is necessary to protect its legitimate interests (for example, claims, complaints, requests).</p> <p>To learn more about such processing, please refer to the Notification available at https://raiffeisen.ua/data-protection</p>	<p>All categories of data specified in the Policy</p>	<p>Legitimate interest of the Bank</p>
<p>Verification of your identity when opening (or activating) a banking product.</p>	<ul style="list-style-type: none"> • Document data; • Contact information; <p>Data from qualified electronic signature;</p>	<ul style="list-style-type: none"> • Compliance with a legal obligation to which the Bank is subject

	<ul style="list-style-type: none"> • Questionnaire data. 	<ul style="list-style-type: none"> • Legitimate interest of the Bank
<p>Protection of the Bank and you (and your funds) from fraud.</p> <p>The Bank analyses your data and data of other clients to prevent fraud and other illegal activities.</p>	All categories of data specified in the Policy	<ul style="list-style-type: none"> • Compliance with a legal obligation to which the Bank is subject • Legitimate interest of the Bank
Protection of the Bank's information infrastructure from information security threats.	All categories of data specified in the Policy	<ul style="list-style-type: none"> • Compliance with a legal obligation to which the Bank is subject • Legitimate interest of the Bank
<p>Providing you with the Application and optimizing it for your device.</p> <p>Your technical data are analysed to provide you with the most optimized application for your device (for example, for the version of your operating system).</p>	Technical data	Legitimate interest of the Bank
<p>Sending you notifications on new services and products of the Bank.</p> <p>If you no longer wish to receive such notifications, please contact the Bank using contact information (provided at the end of the document, or send a request at the e-mail address info@raiffeisen.ua).</p>	Contact information	Your consent to processing of personal data
Conduct Beta Testing	Beta test participant data	Conclusion and execution of a transaction (contract)

To whom are your data transferred?

In this section, you can familiarize yourself with the list of organizations to which your personal data are transferred. Please note that this section lists the recipients of your data in the context of using the Application. In order to learn more about processing of your data as a client of the Bank, refer to the Notification available at <https://raiffeisen.ua/data-protection>.

Recipient of your data	Data transferred	Reason for transfer
Amazon AWS. Data of legal entity: Amazon Web Services EMEA SARL, 38 Avenue	All categories of data specified in the Policy.	Location of the Bank's information infrastructure on Amazon AWS servers.

John F. Kennedy, L-1855, Luxembourg		
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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 Henerala Almazova St., Kyiv, 01011

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

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

E-mail: info@raiffeisen.ua

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