



APPROVED BY

JSC Nordea Bank
CEO Order

No. 266 dated «04» march 2015

**JSC Nordea Bank
Personal Data Processing and Protection Policy**

**Moscow
2015**

1. General provisions

- *JSC Nordea Bank Personal Data Processing and Protection Policy* (hereinafter – the ‘Policy’) outlines the main principles, procedure and terms of personal data processing at JSC Nordea Bank (hereinafter – the ‘Bank’), describes the Bank’s rights and obligations in personal data processing, rights of personal data owners and provides a set of measures used by the Bank to ensure the security of personal data in the course of processing;
- The purpose of this Policy is to protect the interests of the Bank, its customers, partners and employees and to ensure compliance with the Russian Personal Data Protection Legislation;
- This Policy complies with Federal Law No. 152-FZ dated 27.06.2006 ‘On Personal Data’ and is applicable to all automated and non-automated banking activities with personal data, incl. collection, record, systemisation, accumulation, storage, amendment (update and change), extraction, use, transmission (circulation, submission, access), desensitisation, blocking, deletion, destruction of personal data as well as to the Bank’s employees involved in the said activities;
- Details of the personal data operator:
 - Name: Joint Stock Company Nordea Bank;
 - INN: 7744000398;
 - Address: 19, 3-ya Ulitsa Yamskogo Polya, Building 1, Moscow, 125040;
 - Tel.: +7 (495) 777-34-77;
 - Fax: +7 (495) 921-25-03;
 - Personal data operators register: <http://rkn.gov.ru/personal-data/register/>.

2. Terms and definitions

Personal data – any information directly or indirectly related to an identified individual or an individual under identification (personal data owner);

Personal data processing – any activity (operation) or a number of activities (operations), either automated or non-automated, with personal data, incl. collection, record, systemisation, accumulation, storage, amendment (update and change), extraction, use, transmission (circulation, submission, access), desensitisation, blocking, deletion, destruction of personal data;

Personal data operator – a state authority, municipal body, legal entity or individual that/who on its own or together with other persons arranges and (or) performs personal data processing, as well as sets the purposes of personal data processing, defines personal data subject to processing and activities (operations) to be performed towards personal data;

Personal data information system – all personal data contained in the personal data bases and information technologies and technical means for their processing;

Transborder transmission of personal data – transmission of personal data to another state, to a foreign state authority, foreign individual or foreign legal entity.

3. Purposes and legal grounds for personal data processing

The Bank processes personal data for the following purposes exclusively:

- Performing the functions the Bank is vested with by the legislation of the Russian Federation in compliance with the Tax Code of the Russian Federation, federal laws, namely: ‘On Banks and Banking’, ‘On Credit Histories’, ‘On Counteracting Money Legalisation (Laundering) and Terrorism Financing’, ‘On Currency Regulation and Currency Control’, ‘On the Securities Market’, ‘On the Insolvency (Bankruptcy) of Credit Institutions’, ‘On Insurance of

Individual Deposits in Banks of the Russian Federation’, ‘On Individual (personified) Registration in the System of Obligatory Pension Insurance’, ‘On Personal Data’, regulatory acts of the Bank of Russia and the Bank’s Charter and internal regulatory acts;

- Record-keeping of the bank’s employees to ensure compliance with the law and regulatory acts, assisting an employee in employment, education, job promotion, using a variety of benefits stipulated by the Labour Code of the Russian Federation, Tax Code of the Russian Federation, federal acts, namely: ‘On Individual (personified) Registration in the System of Obligatory Pension Insurance’, ‘On Personal Data’ and the Bank’s Charter and internal regulatory acts;
- Executing, performing and terminating civil contracts with individuals, legal entities, individual entrepreneurs and other persons as stipulated by the legislation and the Bank’s Charter;
- Access control and security.

4. Key principles and terms of personal data processing

- Principles of personal data processing in the Bank:
 - purposes and means of personal data processing shall be legal and rightful;
 - purposes of personal data processing shall be aligned with those initially set and announced in the course of personal data collection, and fall within the Bank’s authorities;
 - the volume and nature of processed personal data, means of personal data processing shall comply with the purposes of personal data processing;
 - personal data shall be authentic, sufficient for processing; personal data being excessive for the intended purposes announced in the course of personal data collecting cannot be processed;
 - personal data bases cannot be combined for incompatible purposes;
 - personal data enabling to identify their owner cannot be stored longer than required by the processing purposes;
 - personal data shall be destructed after the processing purposes are achieved or are no longer required to be achieved.
- The Bank does not process personal data of certain categories such as ethnicity and nation, political, religious and philosophic views, state of health, private life.
- The Bank, in the course of its activity, may transmit personal data to another state, to state authorities of foreign states, foreign individuals and legal entities (hereinafter – transborder transmission of personal data). In this respect the Bank’s top priority is to ensure adequate protection of rights of personal data owners and to ensure the security of their personal data in effecting transborder transmissions, in accordance with the legislation of the Russian Federation on personal data.
- Transborder transmission of personal data to foreign states that cannot ensure adequate protection of personal data owners’ rights is allowed provided that a personal data owner submits an express written consent for transmission of his personal data, a contract with a personal data owner shall be executed and in other cases stipulated by the legislation.

5. Categories of processed personal data

The Bank processes personal data of the following owners of personal data:

- The Bank’s employees (potential, existing and former) – the Bank needs this information to manage employment relationship on the whole and that with individual employees;
- Affiliated persons and managers, participants (shareholders) or employees of a legal entity affiliated to the Bank – the Bank needs this information to incorporate into

reports on its activity pursuant to the federal laws, regulatory documents of the Bank of Russia and other regulatory acts;

- Customers (potential Customers, partners, counterparties) and personal data of managers, participants (shareholders) or employees of a legal entity being the Customer (potential Customer, partner, counterparty) of the Bank – the Bank needs this information to perform its contractual obligations to the Customer and to ensure compliance with the legislation of the Russian Federation.

6. Personal data processing timelines

Personal data processing timelines depend on:

- Validity period of the contract with a personal data owner;
- Validity period of a personal data owner's consent for processing his personal data;
- Period of limitation of actions;
- Order of the Ministry of Culture of the Russian Federation No. 558 dated 25.08.2010 'On Approval of the 'List of Standard Archive Managerial Documents Produced by State Authorities, Municipal Bodies and Institutions' Stating the Storage Period';
- Order of the Federal Committee of the Bank of Russia No. 03-33/ps dated 16.07.2003 'On Approval of the Regulation on the Procedure and Periods of Storing Joint Stock Company Documents';
- Other requirements of the legislation of the Russian Federation and regulatory documents of the Bank of Russia.

7. Personal data protection measures implemented

In personal data processing the Bank takes all legal, organisational and technical measures to protect personal data from unauthorised or accidental access, destruction, change, blocking, copying, submission, circulation or any other illegal actions towards personal data. Personal data are protected as follows:

- A responsible person is appointed to set up personal data processing framework in the Bank;
- Threats to personal data security are identified in the course of their processing in information systems;
- Organisational and technical measures are applied to ensure personal data security in the course of processing in personal data information systems to comply with the personal data protection requirements and ensure the personal data protection levels set by the Government of the Russian Federation;
- Effectiveness of personal data protection measures is assessed before a personal data information system is put into operation;
- Personal data media are registered;
- Unauthorised access to personal data is identified and the respective measures are taken to avoid any future cases;
- Personal data modified or destructed as a result of unauthorised access are recovered;
- Rules are set for accessing personal data processed in the personal data information system and all actions towards personal data in the personal data information systems are recorded;
- Control is implemented over personal data protection measures and protection level of personal data information systems;
- The Bank's employees directly involved in personal data processing are familiarised with the legislation of the Russian Federation on personal data, incl. personal data protection requirements, local regulatory acts on personal data processing; and such employees are educated;

- Internal control and audit is carried out to ensure the compliance of personal data processing with Federal Law No. 152-FZ dated 27.07.2006 ‘On Personal Data’ and the related regulatory acts, personal data protection requirements, local regulatory acts on personal data processing and protection.

8. Rights of personal data owners

- A personal data owner has a right to get information related to processing of his personal data by the Bank, inter alia:
 - Confirmation of the fact that his personal data have been processed by the Bank;
 - Legal grounds for and purposes of personal data processing;
 - Means of personal data processing used by the Bank;
 - Name and location of the Bank;
 - List of processed personal data related to a personal data owner who has submitted a request, and information about the source of such data unless otherwise provided for by the Federal Law;
 - Period of personal data processing, incl. the storage period;
 - Procedure for the exercise of owner rights stipulated by the Federal Law ‘On Personal Data’;
 - On-going or proposed transborder transmission of personal data;
 - Name and address of a person charged with personal data processing by the Bank;
 - Other information provided for by the Federal Law ‘On Personal Data’ and other federal laws;
- A personal data owner may request the Bank to amend his personal data, to block or destroy them in case they are incomplete, out-of-date, inaccurate or are not needed for the intended processing purpose and to take measures allowed by law to protect his rights;
- A personal data owner can revoke his consent for personal data processing;
- A personal data owner can appeal against the actions or omissions of the Bank to the Federal Service for Supervision of Communications, Information Technology and Mass Media, or to court, assuming that the Bank violates the Federal Law ‘On Personal Data’ in processing his personal data or his other rights and freedoms;
- A personal data owner can protect his rights and legitimate interests, incl. the rights for indemnification of losses and (or) compensation for moral injury in a judicial procedure.

9. Final provisions

- This Policy shall take effect on the date of approval by the Bank’s CEO and shall stay in force until superseded;
- This Policy shall be reviewed in case new regulatory acts and dedicated regulations in the sphere of personal data protection are adopted;
- This Policy is publicly available and shall be placed on the Bank’s official web-site (<http://www.nordea.ru/>).