



**Approved by the Board of Directors of
“BAKAI BANK” OJSC
Protocol No. 75 dated October 29, 2024.**

POLICY OF PERSONAL DATA PROCESSING IN “BAKAI BANK” OJSC

1. General provisions

1. The policy of personal data processing in “BAKAI BANK” OJSC (hereinafter - the Policy) is aimed at ensuring the protection of rights and freedoms of a subject of personal data during the processing of his/her personal data and applies to all operations with personal data performed by the holder/processor, both in automated mode and without it.
2. This Policy is developed to meet the requirements of the Part 2 of the Article 4 of the Law of the Kyrgyz Republic “On Personal Information”, defines the legal and organizational basis for processing of personal data in “BAKAI BANK” OJSC (hereinafter - the Bank) and extends to the receipt of data through the form on the website <https://bakai.kg/ru/about/complaints-suggestions/>.
3. Basic concepts and terms used in this Policy:

Personal Data/Personal Information	recorded information on a tangible medium about a specific person, identified with a specific person or which can be identified with a specific person, which allows to identify that person directly or indirectly, by reference to one or more factors specific to their biological, economic, cultural, civil or social identity. Personal data includes biographical and identifying data, personal characteristics, information on marital status, financial situation, health status and others
List of personal data	list of categories of data about one subject
Array of personal data	any structured aggregate of personal data of an indefinite number of subjects, regardless of the type of data carrier and the means used for their processing (archives, file cabinets, electronic databases, etc.).
Publicly accessible arrays of personal data	arrays of personal data, access to which is not restricted by law and intended for public use (directories, telephone books, address books, etc.).
Personal data confidentiality regime	normatively established rules defining restrictions on access, transfer, provision and conditions of storage of personal data.
Personal data subject (subject)	the physical entity to whom the relevant personal data relates.
Holder (owner) of personal data array	public authorities, local self-government bodies and legal entities authorized to determine the purposes, categories of personal data and control the collection, storage, processing and use of personal data in accordance with this Law.
Processor	a physical or legal entity determined by the holder (owner) of personal data, which processes personal data on the basis of a contract concluded with it.
Recipient of personal data	public authority or local self-government bodies, legal entities and individuals, as well as the subject of personal data (subject) to whom personal data are transferred and provided in accordance with the legislation of the Kyrgyz Republic.
Collection of personal data	the procedure of obtaining personal data by the holder (owner) arrays of personal data from the subjects of such data or from other sources in accordance with the legislation of the Kyrgyz Republic
Processing of personal data	any operation or set of operations performed independently by or on behalf of the holder (owner) of personal data, by automatic means or not, in order to collect, record, store, update, group, block, erase and destroy personal data

Consent of the personal data subject	expressed in the form provided for by the legislation of the Kyrgyz Republic, free, specific, unconditional and informed expression of the person's will, according to which the subject notifies his/her consent to the procedures related to the processing of his/her personal data.
Transfer of personal data	provision of personal data by the holder (possessor) to third parties in accordance with the legislation of the Kyrgyz Republic and international treaties.
Cross-border transfer of personal data	transfer by the holder (possessor) of personal data to holders under the jurisdiction of other states.
Updating of personal data	promptly making changes to personal data in accordance with the procedures established by the current legislation of the Kyrgyz Republic.
Blocking of personal data	temporary cessation of transfer, clarification, use and destruction of personal data.
Destruction (erasure or destruction) of personal data	actions of the holder (possessor) of personal data to bring this data into a state that does not allow restoring its content.
Anonymization of personal data	removal of the part of personal data that allows to identify them with a specific person
Personal data information system	the totality of personal data contained in databases and information technologies and technical means ensuring their processing.

4. Basic rights and obligations of personal data subjects:

1) Personal data subjects have the right:

- to receive full information about their personal data processed by the Holder / Processor;
- to access their personal data, including the right to receive a copy of any record containing their personal data, except as provided by the Law of the Kyrgyz Republic "On Personal Information";
- to clarify their personal data, block or destroy them in cases when personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing;
- to take measures provided for by law to protect their rights, including appealing to an authorized state authority on personal data;
- to exercise other rights provided for by the legislation of the Kyrgyz Republic.

2) Subjects of personal data are obliged:

- to provide the Holder / Processor only reliable data about themselves;
- to provide documents containing personal data in the volume necessary for the purpose of processing;
- to inform the Holder / Processor about clarification (update, change) of their personal data.

5. Main rights and obligations of the Holder / Processor:

1) The Holder / Processor has the right:

- to receive from the subject of personal data reliable information and/or documents containing personal data;
- to clarify the personal data provided by the subject.

2) The Holder / Processor is obliged to:

- process personal data in accordance with the procedure established by the Law of the Kyrgyz Republic "On Personal Information";

- consider the appeals of the subject of personal data on the availability and content of personal data and provide answers within a period not exceeding 7 days from the date of submission of the application;
- provide the personal data subject with free access to his/her personal data;
- take measures to update personal data in connection with the personal data subject's request;
- organize protection of personal data in accordance with the requirements of the legislation of the Kyrgyz Republic;

- familiarize the personal data subject, before providing his/her personal data, with the list of collected data, the grounds and purposes of their collection and use, with the possible transfer of personal data to a third party, as well as to inform about other possible use of personal data.

6. The Holder / Processor collects, uses and protects personal data, which is provided by the subject of personal data during communication in any form, in accordance with this Policy and the laws of the Kyrgyz Republic.

2. Scope and categories of processed personal data, categories of personal data subjects

7. The Holder / Processor processes personal data of the following subjects of personal data - Applicant.

8. The personal data processed by the Holder / Processor include:

- full name;
- contact phone number;
- postal address and zip code (in case of sending a response through a postal service branch);
- other information that allows to identify the subject of personal data.

The special category of personal data processed by the Holder / Processor includes a photograph.

9. The Holder / Processor provides conformity of the content and volume of processed personal data to the stated purposes of processing and, if necessary, takes measures to eliminate their redundancy in relation to the stated purposes of processing.

10. Processing of special categories of personal data, revealing racial or ethnic origin, nationality, political views, religious or philosophical beliefs, as well as concerning the state of health and intimate life, is not carried out by the Holder / Processor in strict accordance with Article 8 of the Law of the Kyrgyz Republic "On Personal Information".

11. Lists of personal data and categories of subjects of personal data can be revised by the Holder / Processor with mandatory changes to this Policy and notification of subjects of personal data by any available method (official website, announcement, push-notification, sending a message to e-mail and others.).

3. Purposes of personal data collection

12. Personal data will be processed by the Holder / Processor for the following predetermined and legitimate purposes:

1. processing complaints/concerns - personal data will be used to deal with complaints/concerns of subjects about the Bank's services. This may include receiving, analyzing and responding to complaints/concerns;
2. processing of suggestions - personal data will be used to process suggestions received from subjects regarding improvements or changes to the Bank's services;

3. processing of acknowledgements - the personal data of the data subjects will be used to receive and possibly publicly present acknowledgements for the Bank's services.

4. Legal grounds for processing personal data

13. The legal basis for the processing of personal data by the Holder / Processor are the provisions of the Law of the Kyrgyz Republic "On Personal Information".

5. Procedure and conditions of personal data processing

14. Processing of personal data performed by the Holder / Processor includes any operations or set of operations, performed regardless of methods, by automatic means or without such, for the purpose of collection, recording, storage, updating, grouping, blocking, erasure and destruction of personal data.

15. Processing of personal data is carried out by the Holder / Processor subject to obtaining the consent of the subject of personal data (hereinafter - Consent), except for cases established by law, when the processing of personal data can be carried out without such consent.

16. Methods of notifying the subject of personal data:

- SMS notifications;
- email;
- other.

17. The subject of personal data shall make a decision to provide his/her personal data and give it in writing on paper or in the form of an electronic document signed in accordance with the legislation of the Kyrgyz Republic with an electronic signature.

18. The condition for termination of personal data processing may be the achievement of the purposes of personal data processing, actualization of personal data, as well as detection of unlawful processing of personal data.

19. The Holder / Processor to achieve the purposes of processing in the presence of the consent of the subject of personal data has the right to transfer personal data to third parties, provided that the recipient of the data is obliged to comply with the confidentiality of these data.

20. Holder / Processor in the processing of personal data takes or ensures the adoption of the necessary legal, organizational and technical measures to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other unlawful actions in respect of personal data.

21. Personal data shall not be stored longer than it is necessary to fulfill the purposes of its collection. Retention periods may be extended only in the interests of the personal data subject or in cases stipulated by the legislation of the Kyrgyz Republic.

6. Updating, correction, deletion and destruction of personal data, responses to requests of personal data subjects for access to personal data

22. In case of confirmation of the fact of unreliability of personal data or illegality of their processing, personal data shall be updated, blocked or destroyed depending on the legality of their collection, storage and processing of such personal data by the Holder / Processor, or their processing shall be terminated accordingly.

23. On the facts of unreliability of personal data or illegality of their processing the subject of personal data has the right to address directly to the Holder / Processor, or to the authorized state authority on personal data.

24. At the written request of the subject of personal data, the Holder / Processor shall be obliged to provide information on the processing of personal data carried out by it, reflecting the following information:

- confirmation of the fact of personal data processing by the Holder / Processor;
- legal grounds and purposes of personal data processing;
- purposes and methods of personal data processing applied by the Holder / Processor;
- name and location of the Holder / Processor, information about persons (except for employees of the Holder / Processor, who have access to personal data or to whom personal data may be transferred on the basis of a contract with the Holder / Processor of personal data array or on the basis of the legislation of the Kyrgyz Republic;
- processed personal data related to the respective personal data subject, the source of their receipt;
- terms of personal data processing, including the terms of their storage;
- procedure of exercising by the personal data subject of his/her rights regarding the updating, blocking and destruction of personal data;
- information on the realized or supposed trans-border data transfer.

25. If the subject does not have rights of access to the requested information, a reasoned refusal shall be sent to him/her.

26. Upon expiration of the storage period and achievement of the purposes of personal data collection, personal data shall be destroyed within two weeks. Destruction is confirmed by an act, a copy of which can be delivered to the subject of personal data upon his written request.

7. Final Provisions

27. All relations related to the processing of personal data not reflected in this Policy shall be regulated in accordance with the provisions of the Law of the Kyrgyz Republic “On Personal Information”.

28. The Holder / Processor has the right to make changes to this Policy. When making changes in the current edition, the date of the last update shall be indicated. The new edition of the Policy comes into force from the moment of its placement in free access for the possibility of familiarization with the condition of mandatory preliminary announcement of planned changes at least 14 working days prior to the date of publication of the new edition of the Policy.

29. This Policy shall be subject to revision at least once a year or in case of amendments to the personal data legislation of the Kyrgyz Republic.

30. The Personal data processing Policy, as well as amendments and additions to it, are approved by the Bank’s Board of Directors and are reflected in the following table “Document Version Control”:

No.	Date of the change / addition	Full name, position, of a specialist responsible for making changes / additions	A brief description of the changes / additions