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NOTIFICATION
on the procedure of personal data processing and the rights of personal data subjects
JSC Deutsche Bank DBU

By this notification (hereinafter - **Notification**) according to Articles 8, 12 of the Law of Ukraine "On Personal Data Protection" No. 2297-VI dated 1 June 2010 Joint Stock Company Deutsche Bank DBU (hereinafter – **Bank**) publicly informs and acquaints all personal data subjects on their rights, and on the used in the Bank procedure for collection (processing), storage, transfer of the personal data and information provided by personal data subjects within the framework of the provision by the Bank of services to corporate clients (hereinafter - **Corporate Clients**), as well as the procedure for requests by personal data subjects about the protection of their personal data.

Please read the terms and conditions of this Notification carefully.

By transferring data, documents and information to the Bank, including transferring copies and/or originals of documents, and any personal information by personal data subjects, representatives of personal data subjects, as well as representatives of legal entities, the authorized representatives of which are these personal data subjects/legal entities with which they are in an employment relationship (including, without restrictions, on the basis of an employment agreement/contract)/legal entities/Corporate Clients to which they provide services (including, without limitation, on the basis of a civil law agreement), as well as while using by personal data subjects of the official website of the Bank and/or official websites of the Deutsche Bank Group (hereinafter - **DB Group**), platforms of users of services of the Bank and/or the DB Group (including, without limitation, <https://autobahn.db.com/>), mobile applications, applications, services offered by the Bank and/or the DB Group, systems of online banking of the Bank and the DB Group, application programming interfaces and applications, etc., personal data subjects agree to all terms and conditions of this Notification.

The Bank ensures the processing and protection of personal data according to the requirements of the Constitution of Ukraine, the Law of Ukraine "On Personal Data Protection", other laws and regulatory acts of Ukraine, Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data and international treaties of Ukraine.

Processing of the personal data constituting the banking secrecy is carried out by the Bank also in compliance with the requirements of the Law of Ukraine "On Banks and Banking Activity" and the regulatory acts of the National Bank of Ukraine.

The Bank processes the personal data of individuals which are authorized representatives of its Corporate Clients, contractors, shareholders, employees, related persons, as well as the personal data of other individuals, received by the Bank while carrying out banking activity, providing financial services and carrying out other activities according to the laws of Ukraine.

Due to constant technological changes, the Bank may regularly update this Notification. We advise personal data subjects to regularly review the latest version of this Notification on the Bank's website on the Internet, and the Bank may notify Corporate Clients of any material changes through its website or through other usual channels of communication.

1. Information on the Bank as the personal data controller

Joint Stock Company Deutsche Bank DBU, identification code of the legal entity: 36520434, address: 20 Lavrska Str., Kyiv, 01015.

2. Protection of personal data

The protection of personal data is important for the Bank as part of the DB Group which in their activities use world-renowned practices and standards related to ensuring data security, including, without limitation, the Bank has introduced means of data and information protection provided by the legislation of Ukraine on information (cyber) security.

General information and principles of processing, storage and transfer of personal data, as well as protection measures implemented at the DB Group level are available at: <https://www.db.com/legal-resources/privacy-notice>.

The Bank independently and at its own discretion defines the procedure for protection of personal data according to the Law of Ukraine "On Personal Data Protection", internal policies and the rules of the Bank and the DB Group related to personal data protection.

For the purpose of receiving access to personal data, as well as for other purposes related to personal data processing in the Bank, the subject of personal data has the right to apply to the Bank at the address: Joint Stock Company Deutsche Bank DBU, 20 Lavrska Str., Kyiv, 01015, Data protection Officer: Tsabal Maria Yehorivna (Head of the Legal Department), tel.: +380 44 461 15 42.

The control over the adherence to the laws on personal data protection shall be provided by the Ukrainian Parliament Commissioner for Human Rights (21/8, Instytutska Str., Kyiv, Ukraine, 01008, tel. (044) 253-75-89; 0800-50-17-20) within the powers established by the laws of Ukraine.

3. Purpose of personal data processing

The Bank collects and processes personal data for the purpose of:

- 1) provision of financial services by the Bank and carrying out other activities defined in the Bank's Charter (the text of the Charter is available on the web-site of the Bank at <https://www.db.com/ukraine/>) and stipulated by the laws of Ukraine;
- 2) performance of the terms the agreements that were/will be concluded by the Bank (including with the aim of exercising and protection of the rights of the parties under the executed agreements);
- 3) profiling (automatic processing of the data of Corporate Clients, other contractors to assess different aspects of behavior, economic and other interests/preferences of the respective persons, to define the development strategy, develop and offer products and services of the Bank) ;
- 4) sending of informational, promotional messages and offers on the services of the Bank, its partners to individuals which represent Corporate Clients, for the participation of Corporate Clients and their representatives (individuals) in the programs and events of the Bank and its partners;
- 5) ensuring the quality of banking services and security in the Bank's activity;
- 6) performance of the obligations of the Bank stipulated by the laws including, without limitation, for compliance with regulations, in particular related to banking and financial regulation;

- 7) protection of the legitimate interests of the Bank or third party to which the Bank transfers personal data, except for cases when the needs related to protection of the basic rights and liberties of individuals in relation to the processing of their data prevail over the respective interests;
- 8) exercising other powers, performance of the functions, obligations of the Bank stipulated by the laws of Ukraine or which are not contradictory to the laws of Ukraine, in particular for the performance of the internal documents of the Bank and the DB Group, a collective agreement, decisions of the state authority bodies and bodies that supervise the activity of the Bank, court decisions, decisions of the management bodies of the Bank.

The purpose of processing personal data of personal data subjects by the Bank may change due to the change of the terms of the agreements executed between the Bank and Corporate Clients or changes of business relations between the Bank and Corporate Clients, change of the Bank's activities and/or change of the procedure for provision of services by the Bank to Corporate Clients, as well as due to the changes in the laws of Ukraine.

The processing of personal data for the purpose of providing the information/offers on the Bank's services, or for the statistical or other analytical purposes, defined by the Bank, as well as the storage of personal data in view of performance of the requirements of the laws of Ukraine on the procedure for documents storage are not considered inconsistent processing and are carried out by the Bank on the condition of providing the proper personal data protection.

The Bank is authorized at its discretion and without restriction to call, send information on the performance of the agreements, entered into with Corporate Clients, other information, advertising messages and proposals for services of the Bank, its partners by mail, electronic means of communication, SMS - messages, with using mobile communication or the Internet, etc. to postal addresses, e-mail addresses, telephone numbers provided by the personal data subject who represent Corporate Clients of the Bank (specified in any documents) or became known to the Bank in any other way.

The term "processing of personal data" is defined by the applicable legislation of Ukraine, in particular the Law of Ukraine "On Personal Data Protection", and means any action or set of actions such as collection, registration, accumulation, storage, adaptation, amendment, renewal, use and distribution (dissemination, realization, transfer), depersonalization, destruction of personal data, including with the use of information (automated) systems.

4. Composition and content of the processed personal data and sources of the respective data

Content and scope of personal data processed by the Bank depend greatly on the type of relations between the Bank and the respective personal data subject, including for individuals – personal data subjects the content and scope of personal data processed by the Bank depend on the products and services requested or approved by Corporate Clients of the Bank.

The content of personal data processed by the Bank consists of the information provided by individuals – personal data subjects or legally received from Corporate Clients, representatives of personal data subjects or third parties, including from credit bureaus, the credit register of the National Bank of Ukraine, from BankID System of National Bank of Ukraine, or received by the Bank from open sources (for example, from the United State Register of Legal Entities, Individual Entrepreneurs and Public Organizations), and includes the information that is known/became known to the Bank in course of performing the contractual and other legal relations with the respective individuals and other persons that are Corporate Clients/contractors of the Bank in the respective relations, via audio record (record of the phone calls of the employees of the Bank with personal data subjects/their representatives) and photo and video filming or was received from open sources, as well as obtained from personal data

subjects when they use the official website of the Bank and/or the official websites of the DB Group, the platforms for users of services of the Bank and/or the DB Group (including, without limitation, <https://autobahn.db.com/>), mobile applications, systems of online banking of the Bank and the DB Group, application programming interfaces and applications, etc. The Bank is authorized to change/supplement such personal data according to the information of third parties.

The Bank processes the personal data of individuals received from third parties, if it is provided for by the laws of Ukraine or if the respective third parties guarantee that the respective transfer is carried out by them in compliance with the requirements of the laws of Ukraine and does not violate the rights of individuals, whose personal data is transferred to the Bank.

The Bank processes the personal data in the following composition:

- 1) name, surname, patronymic;
- 2) registration number of taxpayer account card (identification number);
- 3) date and place of birth, citizenship;
- 4) sex
- 5) age
- 6) place of residence (actual and an address of registration of place of residence);
- 7) information on the place of work and position;
- 8) data, copies, photos of documents issued in the name of an individual or on his/her behalf (including passport data or details of another identity document (including the series, number, date of issue and the authority that issued an identity document, as well as all other information specified in such document(s));
- 9) information of the identification of the person (for example, signature sample, information of the identity document);
- 10) e-mail addresses, and numbers of means of communication, including: numbers of telephone/fax (including work, mobile, telephone number at the address of registration of the place of residence or actual residence) and other electronic identification data;
- 11) audio records/voice records (for example, records of phone calls), pictures and videos (for example, during photo- and video-identification, verification of individuals), as well as the data on the correspondence and other data comparable to the above category;
- 12) marketing data and electronic logs and identification data (application, cookie files and similar technologies etc.);
- 13) data on the interaction of the personal data subject with the Bank (reports on contacts with the Bank on the sites, programs, online services and pages in social networks (including meetings, calls, chats, electronic letters and other));
- 14) geolocation data and information about the device and network connections of device of the personal data subject (for example IP addresses, technical specification and unique data identification, etc. for security reasons);
- 15) login data used to connect to the DB Group website and/or official websites, platforms of users of services of the Bank and/or the DB Group (including, without limitation, <https://autobahn.db.com/>), mobile applications, systems of online banking of the Bank and the DB Group, applications programming interfaces and applications, etc.;
- 16) other information that became known to the Bank in course of legal relations with individual when performing the requirements of the laws of Ukraine and internal documents of the Bank and the DB Group.

With the aim to provide the quality and security of servicing, carrying out of identification/verification of Corporate Clients and personal data subjects, the Bank may record the phone calls of individuals with the employees of the Bank, carry out photo/video filming including on the premises of the Bank on magnetic and/or electronic carriers and use the results of records/filming, including as evidence. The data from the video surveillance system of the Bank (photo and video filming on the premises of the

Bank), audio/phone calls records with the employees of the Bank may be used in each separate case both by the Bank and by the authorized state bodies, including by the court (as evidence in criminal proceedings), by the law enforcement bodies (for security purposes), courts (as evidence in civil and commercial cases), employees of the Bank, witnesses of the violations, victims of the violations (to satisfy their claims), insurance (only to settle insurance claims), attorneys and other bodies to perform the functions of the law enforcement bodies purposes.

For storing and processing personal data the Bank may use cloud environments which comply with the international security standards (including ISO 27001), located on the territory of Ukraine and/or states-members of EU, the European Economic Area, or states that signed Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data, as well as processing and storage of personal data and information collected by the Bank may be carried out using cloud environments located in countries where the law provides for a lower level of personal data protection than in Ukraine. The Bank guarantees non-interference in the personal and family life of the personal data subject in the event of use of cloud environments by the Bank. Other information on the issues related to the data transfer is provided in Section 7 below (*Persons granted with the access to personal data and/or to which personal data are transferred*) of this Notification.

5. Grounds for processing of personal data

The personal data is processed by the Bank on the grounds stipulated by Article 11 of the Law of Ukraine "On Personal Data Protection", including:

- 1) consent of the personal data subject for the processing of his/her personal data;
- 2) a permission for processing of personal data granted to the Bank in accordance with the laws solely for the purpose of exercising the powers of the Bank;
- 3) entering into and performance of a transaction by the Bank to which a personal data subject is a party or which is entered into in favor of a personal data subject, or to perform actions leading to the entering into a transaction at the request of a personal data subject;
- 4) protection of vital interests of a personal data subject;
- 5) a necessity to perform the obligation of the Bank, defined by the laws of Ukraine;
- 6) a necessity to protect the legitimate interests of the Bank or third parties to which the Bank transfers personal data except for cases when the needs related to protection of the basic rights and liberties of the personal data subject in relation to the processing of their data prevail over the respective interests.

The Bank also processes the personal data that are public information and/or information in the form of open data (Article 10¹ of the Law of Ukraine "On Access to Public Information") received from public sources, including from public state registers, without the consent of the personal data subject. The respective information may be copied, published, disseminated and used in other ways by the Bank, including for commercial purposes in combination with other information or by including into own product of the Bank, only in the scope corresponding to the above purpose of processing and with the mandatory reference to the source from which such information was received.

Certain categories of personal data, processing of which constitutes a particular risk for rights and liberties of personal data subjects shall be processed by the Bank only on the special legal grounds, defined in the laws of Ukraine, in particular:

- 1) if the personal data subject provided an explicit consent for processing of the respective personal data;

or
- 2) if processing of the respective data is required to exercise the rights and fulfill the obligations of the Bank in the area of labor relations according to the laws of Ukraine with the provision of the proper protection of the data of the personal data subject;

or
- 3) if processing of the respective data is required to protect the vital interests of the personal data subject or other person, in case of lack of legal capacity or restriction of legal capacity of the personal data subject;

or
- 4) if processing of the respective data is required to substantiate, satisfy or protect the legal claim;

or
- 5) if processing concerns the data that were explicitly made public by the personal data subject.

6. Rights of individuals - personal data subjects

According to Article 8 of the Law of Ukraine "On Personal Data Protection" the personal data subject shall have the right to:

- 1) Know about the sources of collection, location of personal data, purpose of the processing, location and/or place of residence (staying) of the controller or processor of such personal data, or to issue a respective order to the authorized persons regarding the receipt of this information, except for cases established by the laws of Ukraine.
- 2) Receive the information concerning the conditions of provision by the Bank of access to personal data, in particular information about third persons to which the Bank transfers his/her personal data.
- 3) Access his/her personal data, processed by the Bank.
- 4) Receive a response with regard to whether his/her personal data is processed by the Bank as well as to receive the content of his/her personal data, not later than 30 calendar days from the moment the request was received by the Bank unless otherwise is prescribed by the laws of Ukraine.
- 5) Submit motivated requests to a personal data controller objecting against processing his/her personal data.
- 6) Provide a motivated request with regard to change or destruction of his/her personal data by any controller and processor of such personal data, if such data are processed illegally or are inaccurate.
- 7) Protection of his/her personal data from illegal processing and accidental loss, destruction, damage due to a deliberate concealing, failure to provide or provision of such data with delay, as well as to

protection from provision of information which is inaccurate or are disgraceful for the honor, dignity and business reputation of an individual.

- 8) Submit complaints regarding the processing of his/her personal data to the Ukrainian Parliament Commissioner for Human Rights or directly to a court.
- 9) Apply measures of legal protection in case of violation of legislation on protection of personal data.
- 10) When granting consent, make reservations to restrict the right to process his/her personal data.
- 11) Withdraw consent to personal data processing.
- 12) Be informed on the procedure for automated processing of personal data.
- 13) Be protected from an automated decision having legal implications for such individual.

The personal data subject shall have the right to receive from the Bank any information about him/her given that the Bank is able to identify the personal data subject that made the respective request. If the Bank processes the personal data of certain personal data subject, his/her request regarding the provision of the access to his/her personal data shall be fulfilled within 30 calendar days from the date of receipt of the respective request, unless otherwise stipulated by the laws of Ukraine. Provision of the access to the personal data to the personal data subject may not be delayed. The copy of the personal data processed by the Bank shall be provided to the personal data subject in form of the extract, drafted according to the procedure defined by the Bank independently. The access to the personal data (including the provision of the extract) shall be provided to the personal data subject by the Bank free of charge.

7. Persons granted with the access to personal data and/or to which personal data are transferred

Within the Bank, access to personal data is granted to units and/or specific employees of the Bank for performance of their service (job) duties related to performance of contractual, legal and/or regulatory obligations of the Bank and exercising of Bank's legal interests. Each employee of the Bank signs an undertaking on non-disclosure of the information, to which he/she has an access.

An access to personal data of individuals is provided by the Bank to private persons and organizations (including personal data controllers) in order to ensure exercising of their functions or provision of services to the Bank (including IT and back-offices), as well as to companies ensuring the implementation of the joint with the Bank promotional programs, loyalty programs and other advertisement events, the right for participation in which is provided to personal data subjects, according to agreements executed between such persons (organizations, companies) and the Bank for that period and to that extent as they need the data in order to provide their respective service, holding joint promotional programs, loyalty programs and other advertisement events. All personal data controllers granted with the right to process such data on behalf of the Bank undertake to process such data confidentially and only for the purpose to provide the Bank with the respective services.

The Bank transfers personal data of individuals or provides access to these data to state authorities and persons listed in Article 62 of the Law of Ukraine "On Banks and Banking Activity", upon the occurrence of grounds established by the legislation of Ukraine for disclosure of bank secrecy to third parties, as well as to other persons on the basis of duly executed written permission of these personal data subjects or terms and conditions of agreements entered into with the Bank and other transactions.

In particular, the Bank's discloses (transfers) information constituting banking or trade secrecy, other confidential information that became known to the Bank in the process of servicing of and receiving services by the Corporate Client to:

- 1) the National Bank of Ukraine, the Antimonopoly Committee of Ukraine, other authorized bodies that in accordance with the legislation inspect the Bank's activities;
- 2) service providers that perform services on behalf of the Bank (for example IT services, logistics, printing services, telecommunications, data processing and analysis, advisory and consultancy services, distribution and marketing) - individuals and legal entities (organizations) to ensure their performance of functions or provision of services by the Bank in accordance with the agreements executed between the Bank and the Corporate Client and under their counter-obligations not to disclose information, as well as to other persons in connection with the entering into/performance of the entered into with the Corporate Client or in favor of the Corporate Client transaction, to exercise or protect the rights and obligations of the parties under such transactions;
- 3) banking and commercial partners, independent agents, intermediaries or brokers, financial institutions, counterparties with which the Bank has a legal relationship, if such transfer is necessary so the Bank could provide services and products to Corporate Clients or perform its contractual obligations or transaction (for example, to persons involved in the transfer of funds, in particular, correspondent banks, payment systems and their participants, senders and recipients of transfers, other institutions that carry out the identification, authorization or processing of transfers, depositories, custodians, issuers of securities, paying agents, exchange platforms, insurance companies, payment systems operators, issuers or intermediaries of payment cards);
- 4) local or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or intermediaries, law enforcement agencies, state authorities to whom the Bank or any member of the DB Group is obliged to disclose in accordance with:
 - a. their request;
 - b. providing an explanation or responding to a request made during the proceedings or investigation; and
 - c. following the rules or instructions from the authorized bodies applicable to the Bank or any member of the DB Group;
- 5) DEUTSCHE BANK AKTIENGESELLSCHAFT (Frankfurt am Main, Germany) and any persons belonging to the DB Group both in Ukraine and abroad by the nature of corporate relations;
- 6) in cases of non-performance or late performance of the obligations of the personal data subject/Corporate Client to the Bank - by transferring or disclosing information to persons and in a manner determined by the Bank itself;
- 7) in carrying out measures to prevent and combat money laundering, terrorist financing and the proliferation of weapons of mass destruction;
- 8) for purposes of the Bank's compliance with the Agreement between the Government of Ukraine and the Government of the United States of America to improve the implementation of tax rules and the application of the provisions of the US Law "On Tax Requirements for Foreign Accounts" (FATCA) requirements, in particular, in reporting to the US Internal Revenue Service in the manner and to the extent specified by FATCA, as well as in other cases provided by FATCA;

- 9) for the purpose of submitting information by the Bank to the credit register of the National Bank of Ukraine in accordance with the requirements of the legislation of Ukraine;
- 10) to certain categories of employees and external consultants, such as lawyers, notaries, rating agencies or auditors, when necessary in specific circumstances (litigation, audit, etc.), as well as the actual or proposed buyer of companies or enterprises of the DB Group;
- 11) in other cases established by the legislation of Ukraine and the terms of the agreements executed by Corporate Clients with the Bank.

The Bank transfers personal data of individuals to the credit register of the National Bank of Ukraine according to the procedure and in scopes provided for by the legislation of Ukraine; and is also permitted to transfer data to third parties/owners and participants in payment systems (service providers) for provision of electronic remote identification of individuals, pursuant to the requirements of the laws of Ukraine (upon request and confirmation of the consent for the transfer of personal data owner's data), as well as to insurers for the purpose of exercising rights and/or performing Bank's obligations as a beneficiary.

The Bank is part of the DB Group, which is an integrated group of banks, namely a group of banks and companies that closely cooperate around the world to create and distribute various banking, financial, insurance services and products.

The Bank transfers personal data of individuals to its shareholder - DEUTSCHE BANK AKTIENGESELLSCHAFT (Frankfurt am Main, Germany) and/or other member companies of the DB Group and managers of personal databases belonging to the Bank, DEUTSCHE BANK AKTIENGESELLSCHAFT and/or the DB Group, and any persons belonging to the DB Group in Ukraine and abroad by nature of corporate relations, or subcontractors of such managers, including those located outside Ukraine in other countries. Such share of the personal data with the DB Group is conducted for commercial and efficiency purposes, such as:

- 1) based on legal and regulatory obligations:
 - a. exchange of data collected during anti-money laundering, sanctions, embargoes and customer due diligence ("Know your customer"/KYC);
 - b. risk management, including credit and operational risks (risk rating/credit assessment/etc.);
- 2) based on a legitimate interest:
 - a. fraud prevention, detection and control;
 - b. activities in the field of research and development, in particular for compliance, risks and communication and marketing purposes;
 - c. global and consistent review of our clients;
 - d. opportunity to offer a full range of the DB Group's products and services so that customers can use them;
 - e. legal and regulatory obligations of personalization of the content of goods and services and prices for the customer.

The Bank may also share aggregated (information collected from various sources and summarized according to a given criterion) or anonymized (information from which information that can be used to identify a person was extracted) information within the DB Group and beyond with such partners as research groups, universities or advertisers, and, as appropriate, with auditors and other service providers. Personal data subjects will not be able to be identified by this information.

Data of personal data subjects may also be combined into anonymized statistics, which may be transferred to the Bank's and/or the DB Group's consultants and service providers to help them develop

the DB Group's business. In this case, the personal data of personal data subjects will never be disclosed, and those who receive these anonymized statistics will not be able to identify any personal data subjects.

The processing and storage of personal data and information collected by the Bank may take place in countries where the law provides for a lower level of protection of personal data than in Ukraine. The Bank provides guarantees of non-interference in the personal and family life of the personal data subject in case of transfer of personal data and information collected by the Bank to foreign subjects of relations related to personal data.

The transfer by the Bank and/or the DB Group of personal data of the personal data subject to the Bank and/or the DB Group, any third parties does not require the Bank to provide such personal data subject with a written notice.

The transfer of personal data of any other individuals (including family members, employees of the personal data subject) by the personal data subject to the Bank shall be carried out by the personal data subject in compliance with the requirements of the legislation of Ukraine and does not violate the rights of such persons. The personal data subject shall independently inform such persons about the composition and content of personal data transferred by such personal data subject to the Bank, about the purpose of the Bank's collection of their personal data and about the persons to whom their personal data are transferred, as well as about the procedure for realization by them of the rights established by the Law of Ukraine "On Personal Data Protection".

8. Terms of personal data storage

The Bank processes personal data as and when required within the whole duration of all business relationships with Corporate Clients and respective personal data subjects (starting from entering into agreement/ordering of service, their performance and ending with the termination of the respective agreement, servicing of Bank's Corporate Clients), as well as until the expiration of terms of information storage (documents with such information) defined by the terms of the executed agreements or the Ukrainian legislation, including by the Law of Ukraine "On Prevention and Counteraction to Legalization (Laundering) of the Proceeds from Crime, Terrorist Financing and Financing of the Proliferation of Weapons of Mass Destruction", Rules of using the list of documents created in the activity of the National Bank of Ukraine and Ukrainian banks, as approved by the Resolution of the Board of the National Bank of Ukraine No. 130 of dated 27 November 2018, by internal documents of the Bank and the DB Group. Taking into account the requirements of Article 268 of the Civil Code of Ukraine regarding the non-application of the limitation period to the depositor's demand to the bank (financial institution) on deposit repayment, all information related to the Corporate Clients' accounts and operations under the deposits shall be stored by the Bank on the permanent basis.

9. On mandatory provision of personal data to the Bank

Within the framework of business relations, Corporate Clients and personal data subjects have to provide the Bank with all personal data necessary for the Bank to make a decision on entering into the relevant agreement (performance of the transaction) and for its further performance, including those personal data that the Bank collects to meet the requirements of the Ukrainian legislation. If Corporate Clients or personal data subjects refuse to provide the Bank with the data requested by it, the Bank shall have the right to refuse to execute the agreement or ceases to perform its obligations under the previously executed agreement (transaction), or the Bank terminates the agreement, if the Corporate Client or personal data subject's failure to provide the personal data requested by the Bank deprives the Bank of the possibility to perform the agreement in future. Personal data subjects are not required to provide their personal data to the Bank, if such data are not necessary for the execution and performance of the agreement with the Corporate Client or are not required by the law and internal documents of the Bank and the DB Group.

Execution and performance of the agreement between the Bank and the Corporate Client is an independent ground for processing of personal data of the personal data subject by the Bank, so provision to the Bank by the personal data subject of the separate consent for personal data processing is not required for execution of the agreement between them.

In cases when the Bank processes personal data on the basis of the consent of the personal data subject, the personal data subject may partially or fully withdraw his/her consent to the personal data processing provided to the Bank by his/her corresponding request in a form, which allows identification of this individual.

If the personal data subject withdraws his/her consent to the processing of personal data, but at the same time the Bank has other legitimate grounds for processing of data of this individual, the Bank continues processing of personal data of such individual in the scope, content and manner that are necessary for exercising the rights, performance of obligations arising from such grounds for personal data processing by the Bank (performance of the agreement entered into with the Corporate Client, exercising of rights and performance of obligations under such agreement, performance of the Bank's obligations stipulated by the laws, protection of the legitimate interests of the Bank or a third party, to which the Bank transfers personal data, etc.).

10. Specifics of using the Bank's website

The Bank's website uses social plugins ("plugins") from the social networking sites of Twitter, Facebook, LinkedIn and XING. If a personal data subject accesses the Bank's website using such a plugin, their browser will contact the server of the main social networking site and upload a visual image of the plugin.

While this is happening, the social networking site receives information about your visit to the Bank's website, as well as additional data related to personal data subjects, such as IP address. To ensure the proper level of data confidentiality, the Bank deactivated the relevant plugins with a button and posted a short note on data confidentiality, which can be read before activating the plugin.

The Bank's website also contains links to the social networking sites such as Facebook, Flickr, Instagram, LinkedIn, Twitter, XING or YouTube.

The Bank does not influence the data that social networking websites collect using the active plugin or at the link. For more information, please refer to the relevant data privacy notice:

- a. [Facebook](#)
- b. [Instagram](#)
- c. [LinkedIn](#)
- d. [Twitter](#)
- e. [XING](#)
- f. [YouTube](#)

General information on using the website is available at: <https://www.db.com/legal-resources/privacy-notice>.

11. Cookie files

Given the importance of data confidentiality and the Bank's commitment to transparency, the Bank discloses below information about cookies as the Bank uses them on its own website.

Cookies are small text files that are sent to users' computers to ensure the technical functionality of the website. The Bank and the DB Group use cookies in some sections of the website, on the platform of users of the services of the Bank and/or the DB Group (including, without limitation, <https://autobahn.db.com/>), mobile applications, the system of online banking of the Bank and the DB Group, application programming interfaces and applications, etc. to make it easier for users to use the pages and make them more personalized.

General information on the use of cookies by the Bank is available at: <https://www.db.com/legal-resources/privacy-notice>.

12. **Regulatory acts related to the protection of personal data**

[Constitution of Ukraine](#)

[Law of Ukraine "On Personal Data Protection" dated 01 June 2010 No. 2297-VI](#)

[Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data dated 28 January 1981](#)

[Additional Protocol to the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data regarding supervisory authorities and transborder data flow dated 08 November 2001](#)