



**ГАЗПРОМБАНК**  
Gazprombank (Joint Stock Company)  
Bank GPB (JSC)

APPROVED BY  
Deputy Chairman of the Management Board  
of Bank GPB (JSC)

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approved in electronic format**

**DEDICATED POLICY**  
**on Personal Data Processing and Protection at**  
**Gazprombank (Joint Stock Company)**

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## 1. General

1.1. This Dedicated Policy determines the main provisions implemented during the Processing of Personal Data at the Bank and elaborates on the provisions of the Information Security Policy of Gazprombank (Open Joint-stock Company) approved by the Resolution of the Management Board of GPB (OJSC) dated September 24, 2008 (Minutes No. 35) (as amended).

1.2. The list of terms and abbreviations is given in Attachment No. 1.

1.3. The purpose of this Dedicated Policy adoption is to comply with the requirements of the laws of the Russian Federation on Personal Data.

1.4. This Dedicated Policy has been developed with the consideration of the recommendations given by the Federal Service for Supervision of Communications, Information Technology and Mass Media of July 31, 2017 “Recommendations for Preparation of the Document Determining the Provider’s Policy with Regard to the Processing of Personal Data According to the Procedure Established by the Federal Law “On Personal Data”.

1.5. This Dedicated Policy applies to all core, supporting and management business processes of the Bank, as well as technological processes, sub-processes, procedures and operations within which the Processing of Personal Data is performed.

1.6. This Dedicated Policy does not apply to the relations arising during:

- Processing of Personal Data by individuals for personal and family needs only provided that the rights of the Personal Data subjects are not violated;
- organization of storage, compilation, registration and use of the documents from the Archive of the Russian Federation and other archival documents containing Personal Data in accordance with the laws on archives of the Russian Federation;
- Processing of Personal Data classified as information that constitutes a state secret according to the established procedure.

This Dedicated Policy does not govern relationships with regard to the application of the provisions of EU General Data Protection Regulation No. 2016/679 dated April 27, 2016 (GDPR) and standards of the Payment Card Industry Security Standards Council (PCI SSC).

1.7. This Dedicated Policy is mandatory for all employees of the headquarters, branches and representative offices of the Bank, regardless of their position, including management, as well as customers/users of the information resources of the Bank.

1.8. This Dedicated Policy, as well as all amendments hereto, shall be adopted and approved according to the procedure established by the Bank and remain valid until replaced with the new ones.

1.9. The head of the autonomous business unit of the Bank in charge of the organization of Personal Data Processing shall be responsible for updating this Dedicated Policy.

1.10. Amendments to this Dedicated Policy can be made in case of changes in the laws of the Russian Federation on Personal Data and regulations adopted in accordance with such laws, substantial changes in the structure of technological and business processes within which the Processing of Personal Data is performed, changes in the organizational structure of the Bank and powers of the Participants of the process, as well as based on the results of the analysis of information security incidents, relevance, sufficiency and effectiveness of the information security measures being used, based on the results of internal information security audits and other control measures.

1.11. In case of changes in the laws of the Russian Federation on Personal Data and regulations adopted in accordance with such laws, amendments to or introduction of standards, regulatory guidelines, requirements of the authorized agencies, this Dedicated Policy shall apply insofar as it does not conflict with the newly adopted statutes and regulations.

1.12. Internal regulatory and executive documents of the Bank related to the Processing and Protection of Personal Data shall be developed with the consideration of the provisions of this Dedicated Policy and shall comply with the same.

1.13. This Dedicated Policy is publicly available and shall be published on the Bank’s official website.

1.14. The documents listed in Attachment No. 2 were used in the course of this Dedicated Policy development.

## 2. Purposes of Collection and General Principles of Personal Data Processing

2.1. Personal Data Processing shall be limited to the achievement of legal, specific and pre-determined purposes. It is prohibited to perform Personal Data Processing when such processing is contradictory to the purposes of the Personal Data collection.

2.2. The Bank performs Personal Data Processing for the following purposes:

- to comply with the requirements of the laws of the Russian Federation;
- to perform bank transactions and other activities in accordance with the Articles of Association and the licenses issued to the Bank;
- to conclude any contracts with Personal Data subjects, including at the initiative of Personal Data subjects and to perform the same<sup>1</sup>;
- to run promotions, conduct surveys, marketing and other research;
- to invite Personal Data subjects to participate in loyalty programs, promotions, surveys, marketing and other research organized by the Bank and/or third parties either jointly or independently, to ensure that the privileges and special offers are received according to the terms of such programs, promotions and other marketing events;
- to promote services (products, works, property interest) of the Bank, as well as the persons included in the Bank's group, and other third persons based on the contracts signed with them (Bank's partners), notification of Personal Data subjects of the offers with regard to the products and services of the Bank and/or the Bank's partners, including notification of Personal Data subjects of changes in the product line, provision of personalized product packages;
- to perform personnel management activities and organize personnel accounting at the Bank;
- to govern labor relations and other relations directly related to them, including provision of incentives for employees;
- to distribute Personal Data of the Bank's employees<sup>2</sup>, provided that the Personal Data are distributed only with the written consent of the employee to the Processing of Personal Data that may be distributed.
- to attract and select job applicants;
- to maintain a corporate telephone directory and corporate email directory on the Bank's corporate information portal;
- to organize and implement access control procedures and site security regulations;
- to generate reports, including for submission to the government bodies;
- to perform management and administrative and economic activities of the Bank, including technical management of the Bank's internet services, and to perform analysis of operation and to take measures to ensure improvement in operation of the Bank's internet services;
- to maintain profiles (personal profiles) of the Bank's customers in the applications and internet services of the Bank;
- to check credit rating in order to make a lending decision;
- to identify cases of fraud, misappropriation of funds from the accounts, other unlawful actions, to prevent such unlawful actions in the future and localize the consequences of such actions;
- to achieve other purposes provided for by the laws of the Russian Federation and to perform functions, exercise powers and responsibilities imposed on the Bank by the laws of the Russian Federation (including, but not limited to, those provided for by the laws of the Russian Federation on anti-money laundering and terrorist financing, unified identification and authentication system and unified biometric system).

2.3. The Bank performs Personal Data Processing based on the following principles:

- legality, good faith, justice and confidentiality during Personal Data Processing;
- legality of purposes and methods of Personal Data Processing;

<sup>1</sup> Including credit rating/scoring during the review of the Personal Data subject's application for the provision of bank services.

<sup>2</sup> Note that Personal Data of other categories of the Personal Data subjects are not distributed by the Bank.

- correspondence of the purposes of Personal Data Processing with the purposes that were pre-determined and announced during collection of the Personal Data, as well as the Bank's powers;
- correspondence of the scope and nature of the Personal Data being processed, methods of Personal Data Processing with the purposes of Personal Data Processing;
- reliability of Personal Data, their sufficiency for the purposes of Processing, prohibition of processing of excessive Personal Data with regard to the purposes announced during collection of the Personal Data;
- prohibition of integration of databases of the Personal Data Information Systems created for conflicting purposes;
- compliance with the requirements in regards to the prohibited activities and conditions established by the Bank's employee within the consent to the Processing of Personal Data that may be Distributed in accordance with the Federal Law "On Personal Data".

2.4. The Bank keeps Personal Data in the form providing for the identification of the Personal Data subject for the period not to exceed the period required in accordance with the purposes of their Processing unless otherwise provided for by the laws of the Russian Federation or the contract the party to which, the beneficiary or the surety under which is the Personal Data subject, and the Personal Data shall be Destroyed upon achievement of the Processing purposes or if there is no further need to achieve the purposes.

### **3. Purposes, Objectives and General Principles of Personal Data Protection**

3.1. Personal Data (except Personal Data subject to disclosure in accordance with the requirements of the laws of the Russian Federation and Personal Data that may be Distributed in accordance with the Federal Law "On Personal Data") processed by the Bank are considered confidential information in accordance with the list of information, in regards to which the Bank has set confidentiality restrictions, officially approved by the Bank and are subject to protection.

3.2. The main purpose of ensuring Personal Data security is to minimize the risks and potential damage (loss) due to the risk materialization as a result of potential materialization of internal and external threats to the Personal Data information security and vulnerability of the assets to be protected.

3.3. The main purpose of ensuring Personal Data security during their Processing by the Bank is to counter threats to the Personal Data information security, including prevention of the Personal Data breach via technical channels, unauthorized access to data, prevention of intentional software and hardware attacks with the purpose of their damage (Destruction); distortion in the course of processing, disclosure, transfer and storage.

3.4. The main prerequisite for the achievement of goals and objectives of ensuring Personal Data security is provision of the required and sufficient level of Personal Data protection.

3.5. Personal Data protection is provided by the Bank on the basis of the following principles:

3.5.1. Legality – Personal Data protection is based on the provisions and requirements of the applicable laws, subordinate laws, standards, guidelines and regulations on Personal Data protection.

3.5.2. Systematic approach – systematic approach to the creation of the Personal Data protection system includes integration of all related, interacting and time-dependent elements, conditions and factors essential for understanding of and finding a solution to the problem of ensuring Personal Data security by the Bank.

3.5.3. Integrated approach – Personal Data security is ensured with a number of legal, administrative and technical measures implemented by the Bank.

3.5.4. Timeliness – the measures taken by the Bank to ensure Personal Data security must be of preventive nature.

3.5.5. Continuity – Personal Data protection is ensured at all stages of their processing and in all functioning modes of the Personal Data Processing systems, including during repair and maintenance work.

3.5.6. Consistency and continuous improvement – continuous improvement of the measures and means of Personal Data protection based on the results of analysis of functioning of the Personal Data protection system and automated information systems, taking into account the newly identified methods and means of materialization of threats to the Personal Data security, successful experience in

Personal Data protection both in Russia and abroad. The Bank shall determine the actions required for the elimination of the causes of potential non-compliance with the requirements for Personal Data security in order to prevent their re-occurrence. The preventive actions being taken shall address the potential negative impact.

3.5.7. Reasonable sufficiency and adequacy – status and cost of the implementation of protective measures shall be scaled to the risks connected with the Processing and nature of the Personal Data to be protected.

3.5.8. Personal accountability – each Bank employee is accountable for ensuring Personal Data security within the limits of their powers. Distribution of responsibilities and powers of the Bank employees shall provide for identification of the liable persons in case of a breach of the Personal Data security. The roles and responsibilities of employees shall be determined and documented.

3.5.9. Minimization of powers – provision and use of rights of access to Personal Data shall be controllable and limited. Access to Personal Data shall be provided to the Bank employees only to the extent required for them to perform their duties.

3.5.10. Professionalism and specialization – only qualified Bank employees shall be allowed to implement the measures for ensuring Personal Data security and operate the protection system.

3.5.11. Knowledge and motivation of persons admitted to Personal Data Processing – the Bank shall have the information about its employees (applicants) and users of its information resources in order to minimize the risks of potential materialization of threats to the Personal Data security, the sources of which are related to the human factor. The Bank shall implement the personnel policy (thorough selection of personnel and motivation of employees) providing for the elimination or minimization of the risks of breach of Personal Data security by its employees.

3.5.12. Visible and measurable Personal Data security arrangements – measures taken by the Bank to ensure Personal Data security shall be planned in such a way as to make the results of their implementation transparent and provide for their evaluation by the Regulatory Authorities within the limits of their powers.

3.5.13. Mandatory evaluation and control – evaluation of the effectiveness of the Personal Data protection system is an indispensable part of work on Personal Data protection. In order to promptly identify and prevent the attempts of breach of the established rules for ensuring Personal Data information security, the Bank shall have procedures in place to ensure continuous control of the use of Personal Data Processing and Protection systems, and the results of such control shall be analyzed on a regular basis.

#### **4. Volume and Categories of Personal Data being Processed, Categories of Personal Data Subjects**

4.1. The contents and volume of Personal Data being processed shall correspond to the declared purposes of processing. Personal Data being processed shall not be excessive in relation to the declared purposes of processing.

4.2. In accordance with the Federal Law “On Personal Data” and the degree of severity of impact from the loss of Personal Data security features for the Personal Data subjects, the Bank recognizes the following categories of Personal Data:

- Personal Data classified as biometric Personal Data (information that characterizes physiological and biological details of a person, based on which it is possible to confirm identity, and which are used by the Bank for confirming the identity of a Personal Data subject).

- Personal Data classified as special categories of Personal Data (race, nationality, political views, religious or philosophical views, state of health, personal life).

- Personal Data that may be Distributed with the approval of the Personal Data subject in accordance with the procedure provided for by the Federal Law “On Personal Data”.

- Personal Data that may not be classified as biometric data, special categories or data that may be Distributed with the approval of the Personal Data subject.

4.3. The Bank establishes the rules of (procedure for) Personal Data handling, including cases when special category and biometric Personal Data may be processed, determines the contents of Personal Data to be processed by the Bank for each processing purpose and category of Personal Data subjects and approves the lists of Personal Data by means of individual local documents.

4.4. The Bank processes Personal Data of the following categories of the Personal Data subjects:

- individuals that are members of the governance bodies of the Bank;
- individuals that are Bank employees<sup>3</sup> and their close relatives<sup>4</sup>;
- individuals that are candidates to fill a vacancy;
- individuals whose Personal Data are processed in order to be included in the reporting documents about the Bank activities in accordance with the requirements of the laws of the Russian Federation: affiliated persons or a manager/employee of a legal entity that is an affiliated person in relation to the Bank, insiders, shareholders, etc.;
- individuals that are counterparties (partners, customers) of the Bank and their beneficiaries and/or beneficial owners, pledgors, sureties, principals and/or other persons participating in contractual relations on conclusion, performance and termination of contracts with counterparties (partners, customers) of the Bank;
- individuals that intend to purchase products and/or services of the Bank and those who have purchased or intend to purchase products and/or services of third parties through the Bank;
- individuals whose Personal Data are processed by the Bank for the purposes provided for by the laws of the Russian Federation or for accomplishment or performance of functions, powers and responsibilities imposed on the Bank by the laws of the Russian Federation;
- individuals that are subject to access procedures and procedures for control of access to the Bank's facilities (territory);
- individuals – visitors/users of the Bank's official website in the information and telecommunication network Internet;
- individuals that have other relationships with the Bank, who have given their consent to the Bank for Personal Data Processing;
- individuals that used to be classified as one of the categories above if it is established by the laws of the Russian Federation or international laws and for the period established by the laws;
- individuals that are representatives of the individuals and legal entities specified above.

## **5. Rights of Personal Data Subjects**

5.1. The right of the Personal Data subject to access their personal data

5.1.1. The Personal Data subject shall have the right to receive the information specified in clause 5.2., except for the cases provided for by clause 5.3. The Personal Data subject shall have the right to demand that the Bank correct their Personal Data, Block or Destroy the data if the Personal Data are incomplete, outdated, inaccurate, obtained illegally or are not required for the declared purpose of processing and to take measures to protect their rights in accordance with the laws.

5.1.2. The information specified in clause 5.2 shall be provided by the Bank to the Personal Data subject in accessible terms and it shall not contain Personal Data pertaining to other subjects of Personal Data, except for the cases when there are legal grounds for the disclosure of such Personal Data.

5.1.3. The information specified in clause 5.2 shall be provided by the Bank to the Personal Data subject or their representative if requested or upon receipt of the request from the Personal Data subject or their representative. The request shall include the number of the primary ID of the Personal Data subject or their representative, the information about the date of issue of the document specified and the issuing authority, the information confirming the relationship between the Personal Data subject and the Bank (contract number, contract date, verbal mark and/or other information) or the information that otherwise confirms the fact of Personal Data Processing by the Bank, signature of the Personal Data subject or their representative. The request may be sent in the form of an electronic document and signed with an electronic signature in accordance with the laws of the Russian Federation.

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<sup>3</sup> Including Bank employees whose Personal Data may be Distributed with their approval and the Processing of which does not violate their rights and is in compliance with the requirements established by the laws of the Russian Federation on Personal Data.

<sup>4</sup> In accordance with the requirements of the Labor Laws of the Russian Federation.

5.1.4. If the information specified in clause 5.2 and the Personal Data being processed were provided to the Personal Data subject for information purposes at their request, the Personal Data subject may inquire with the Bank again or send a request to the Bank again in order to receive the information specified in clause 5.2 and receive such Personal Data for information purposes no sooner than thirty days after their initial inquiry or initial request unless a shorter period of time is established by the federal law, the respective regulation or contract the party to which or the beneficiary or surety under which is the Personal Data subject.

5.1.5. The Personal Data subject may inquire with the Bank again or send a request to the Bank again in order to receive the information specified in clause 5.2 and in order to review the Personal Data being processed prior to the expiration of the term specified in clause 5.1.4 if such information and/or Personal Data being processed were not provided to them for information purposes in full scope based on the results of the review of the initial request. The repeated request along with the information specified in clause 5.1.3 shall include a justification for sending the repeated request.

5.1.6. The Bank may refuse to handle the repeated request sent by the Personal Data subject if it fails to comply with the terms specified in clauses 5.1.4 and 5.1.5. Such refusal must be motivated. The Bank shall be responsible for providing a justification for their refusal to handle the repeated request.

5.2. The Personal Data subject has the right to receive the information regarding their Personal Data Processing, including that containing:

5.2.1. Confirmation of the fact of Personal Data Processing by the Bank.

5.2.2. Legal basis and purposes of Personal Data Processing.

5.2.3. Purposes and methods applied by the Bank for Personal Data Processing.

5.2.4. Name and location of the Bank, information about the persons (except for the Bank employees) that have access to personal data or who may receive personal data on the basis of the contract with the Bank or on the basis of the federal law.

5.2.5. Personal Data being Processed and pertaining to the respective Personal Data subject, their source unless there is another procedure in place for such data provision in accordance with the Federal Law "On Personal Data".

5.2.6. Timeframe for Personal Data Processing, including the period of their storage.

5.2.7. Procedure according to which the Personal Data subject may exercise their rights provided for by the Federal Law "On Personal Data".

5.2.8. Information about the performed or planned cross-border transfer of Personal Data.

5.2.9. Name or full name and address of the person processing Personal Data as instructed by the Bank if such person is or will be instructed to perform the Processing.

5.2.10. Other information provided for by the Federal Law "On Personal Data" or other federal laws of the Russian Federation.

5.3. The right of the Personal Data subject to access their personal data may be limited in accordance with the federal laws, including if:

5.3.1. Personal Data Processing is performed in accordance with the laws on anti-money laundering and terrorist financing.

5.3.2. Personal Data Subject's access to their Personal Data violates the rights and legal interests of third parties.

5.4. The rights of Personal Data subjects during their Personal Data Processing for the purpose of promotion of goods, works, services

5.4.1. Personal Data Processing for the purpose of promotion of goods, works, services in the market through direct contacts with the potential consumer with the use of the means of communication is allowed only subject to the prior consent of the Personal Data subject. The specified Processing of Personal Data is considered performed without the preliminary consent of the Personal Data subject unless the Bank can prove that such consent was provided.

5.4.2. At the request of the Personal Data subject, the Bank shall immediately stop processing their Personal Data specified in clause 5.4.1.

5.5. The rights of Personal Data subjects during decision making based on the entirely Automated Processing of their Personal Data

5.5.1. It is prohibited to make decisions based on the entirely Automated Processing of Personal Data that would result in legal consequences for the Personal Data subject or otherwise affect their rights and legal interests, except for the cases provided for by clause 5.5.2.

5.5.2. The decision resulting in legal consequences for the Personal Data subject or otherwise affecting their rights and legal interests may be made on the basis of the entirely Automated Processing of their Personal Data only provided that there is a written consent of the Personal Data subject or in cases provided for by the federal laws that also establish the measures for ensuring that the rights and legal interests of the Personal Data subject are observed.

5.5.3. The Bank shall explain the procedure for the decision making on the basis of the entirely Automated Processing of their Personal Data and potential legal consequences of such decision to the Personal Data subject, provide them with an opportunity to oppose such decision and explain the procedure for the protection of their rights and legal interests.

5.5.4. The Bank shall review the objection specified in clause 5.5.3 within thirty days of its receipt and notify the Personal Data subject of the results of such review of the objection.

5.6. The right to challenge the Bank's actions or inaction

5.6.1. If the Personal Data subject thinks that the Bank performs the Processing of their Personal Data in violation of the requirements of the Federal Law "On Personal Data" or otherwise violates their rights and freedoms, the Personal Data subject shall have the right to challenge the Bank's actions or inaction by filing their complaint to an authorized body in charge of the protection of rights of Personal Data subjects or the court.

5.6.2. The Personal Data subject has the right to defend their rights and legal interests, including to receive indemnification and/or compensation for moral harm through a legal action.

5.7. The rights of the Bank employees during the Processing of Personal Data that may be Distributed with their consent

The Bank employee may allow the Bank to Distribute their Personal Data with the consideration of the prohibited activities specified in relation to the transfer and processing/conditions of processing of the disclosed data<sup>5</sup> (except for provision of access) by the public by submitting their separate written consent to the Distribution directly to the Bank, as well as to prohibit the Bank from Distributing the Personal Data by submitting a written request to the Bank to stop the transfer (distribution, provision, access) of Personal Data the Distribution of which was previously allowed.

## **6. Responsibilities of the Bank during Collection of Personal Data**

6.1. During collection of Personal Data, at the request of the Personal Data subject, the Bank shall provide the latter with the information specified in clause 5.2.

6.2. If the provision of Personal Data is mandatory in accordance with the federal laws, the Bank shall explain the legal consequences of the refusal to provide their Personal Data to the Personal Data subject.

6.3. If the Personal Data are received from a person other than the Personal Data subject, except for the cases provided for by clause 6.4, prior to the beginning of such Personal Data Processing, the Bank shall provide the following information to the Personal Data subject:

- name and address of the Bank;
- purpose of Personal Data Processing and the legal basis;
- intended users of Personal Data;
- rights of the Personal Data subject established by the Federal Law "On Personal Data";
- source of the Personal Data.

6.4. The Bank shall be released from the obligation to provide the Personal Data subject with the information specified in clause 6.3 in the following cases:

- if the Personal Data subject was notified by the Bank of the Processing of their Personal Data;

<sup>5</sup> The Bank may not refuse to accept the employee's requirement to prohibit the transfer and processing/conditions of processing of the disclosed data by the public, except for the cases provided for by the laws of the Russian Federation.

- if Personal Data were received by the Bank on the basis of the federal laws or in connection with the performance of a contract, to which the Personal Data subject is a party or under which they are a beneficiary or a surety;
- if Processing of Personal Data, the Distribution of which was allowed, is performed in observance of the prohibited actions and conditions provided for by Article 10.1 of the Federal Law “On Personal Data”;
- if the Bank performs the Processing of Personal Data for statistical or other research purposes or scientific or other creative activity, provided that no rights and legal interests of the Personal Data subject are being violated;
- if provision of the information provided for by clause 6.3 to the Personal Data subject violates the rights and legal interests of third parties.

6.5. During collection of Personal Data, including through the information and telecommunication network Internet, the Bank shall ensure recording, systematization, accumulation, storage, destruction (updating, amendment), extraction of Personal Data of the citizens of the Russian Federation with the use of the databases located on the territory of the Russian Federation, except for the cases specified in clauses 2, 3, 4, 8 of Part 1 of Article 6 of the Federal Law “On Personal Data”.

## **7. Legal Basis of Personal Data Processing**

7.1. The legal basis of Personal Data Processing is a set of laws and regulations in compliance and in accordance with which the Bank performs Personal Data Processing, including the following:

- The Constitution of the Russian Federation;
- The Civil Code of the Russian Federation;
- The Tax Code of the Russian Federation;
- The Labor Code of the Russian Federation;
- Federal Law No. 395-1 dated December 2, 1990 “On Banks and Banking Activity”;
- Federal Law No. 208-FZ dated December 26, 1995 “On Joint Stock Companies”;
- Federal Law No. 27-FZ dated April 1, 1996 “On Individual (Personified) Accounting in the Compulsory Pension Insurance System”;
- Federal Law No. 39-FZ dated April 22, 1996 “ On the Securities Market”;
- Federal Law No. 115-FZ dated August 7, 2001 “On Countering the Legalization of Illegal Earnings (Money Laundering) and the Financing of Terrorism”;
- Federal Law No. 218-FZ dated December 30, 2004 “On Credit Histories”;
- Federal Law No. 224-FZ dated July 27, 2010 “On Countering the Illegal Use of Insider Information and Market Manipulation and on Amending Certain Legislative Acts of the Russian Federation”;
- Federal Law No. 161-FZ dated June 27, 2011 “On the National Payment System”;
- Federal Law No. 402-FZ dated December 6, 2011 “On Accounting”;
- Federal Law No. 353-FZ dated December 21, 2013 “On Consumer Credit (Loan)”;
- Federal Law No. 149-FZ dated July 27, 2006 “On Information, Information Technologies and on Information Protection”;
- regulatory guidelines for complying with the requirements during Personal Data Processing by the institutions of the banking system of the Russian Federation developed together with the Bank of Russia, Association of Russian Banks and Association of Regional Banks of Russia (Association “Russia”) and published in Joint Letter No. 01-23/3148 dated June 28, 2010 “On Implementation of Standards and Recommendations for Standardization by the Bank of Russia in Relation to Information Security of the Banking Institution of the Russian Federation”;
- Articles of Association of Gazprombank (Joint Stock Company) Bank GPB (JSC) approved by the Resolution of the General Meeting of Shareholders dated September 3, 2020 (Minutes No. 02) (as amended);
- contracts (agreements) concluded with the Bank, to which the Personal Data subject is a party or under which the latter is the beneficiary/surety;
- and other laws and regulations applicable to the Bank’s activities.

7.2. In addition, Personal Data Processing is allowed in the following cases:

7.2.1. Personal Data Processing is required for exercising rights and legal interests of the Bank or third parties or to achieve publicly significant goals, provided that the rights and freedoms of the Personal Data subject are not violated.

7.2.2. Processed Personal Data are to be published or are subject to mandatory disclosure in accordance with the federal laws and the related laws and regulations.

7.2.3. Personal Data Processing is required for the performance of the contract a party to which or the beneficiary or surety under which is the Personal Data subject, as well as for conclusion of the contract at the initiative of the Personal Data subject or the contract under which the Personal Data subject is the beneficiary or surety.

7.2.4. Personal Data Processing is performed in connection with the participation of the person in constitutional, civil, administrative, criminal court proceedings, legal proceedings in arbitration courts.

7.2.5. Personal Data Processing is required for execution of a court order, order of another body or official to be executed in accordance with the laws of the Russian Federation on execution.

7.2.6. Personal Data Processing is required for the protection of life, health or other vital interests of the Personal Data subject if the consent of the personal data subject cannot be obtained.

7.2.7. Personal Data Processing is required for the achievement of purposes provided for by the international treaty of the Russian Federation or the law, for accomplishment or performance of functions, powers and responsibilities imposed on the provider by the laws of the Russian Federation.

7.3. Personal Data Processing may take place when the Personal Data subject has given their consent to Personal Data Processing, including a separate consent to Distribution.

7.3.1. The Personal Data subject makes a decision on providing their Personal Data and gives their consent to their processing freely, of their own free will and in their interest. The consent to Personal Data Processing, including to Distribution, shall be specific, informed and voluntary.

7.3.2. The consent to Personal Data Processing may be given by the Personal Data subject or their representative in any form providing for confirmation of the fact of its receipt<sup>6</sup> unless otherwise provided for by the federal laws or regulations of the Bank. If the consent to Personal Data Processing is received from the representative of the Personal Data subject, the powers of the representative as of the date of the consent on behalf of the Personal Data subject must be verified by the Bank.

7.3.3. The Personal Data subject may withdraw their consent to Personal Data Processing. In case of a withdrawal of the consent to Personal Data Processing by the Personal Data subject, the Bank may continue Processing Personal Data without the consent of the Personal Data subject provided that there are grounds for this as specified in clauses 2–11 of Part 1 of Article 6, Part 2 of Article 10 of the Federal Law “On Personal Data”.

## **8. Personal Data Processing Procedure and Conditions**

8.1. Personal Data Processing by the Bank may be performed in the form of the Automated Processing of Personal Data, processing without the use of automation tools and using combined methods of Personal Data Processing.

8.2. The contents and volume of Personal Data being processed shall correspond to the declared purposes of processing. Personal Data being processed shall not be excessive in relation to the declared purposes of processing.

8.3. During Personal Data Processing, it is necessary to ensure the accuracy of Personal Data, their sufficiency and, if necessary, their relevance in relation to the purposes of Personal Data Processing. The Bank shall take the necessary measures or ensure that the measures are implemented in order to delete or correct the incomplete or inaccurate data.

8.4. Personal Data are stored and processed by the Bank for the periods of time required for the achievement of the purposes of Personal Data Processing or until there is no further need to achieve the purposes (unless otherwise provided for by the federal laws), specified in the consent of the Personal Data subject, performance of the functions, powers and responsibilities imposed on the Bank by the laws of the Russian Federation, protection of rights and legal interests of the Bank and third parties, including during court and administrative proceedings.

<sup>6</sup> In this case the consent to the Processing of Personal Data that may be Distributed shall be given by the employee directly to the Bank separately from other consents to the Personal Data Processing and in writing only.

8.5. Personal Data may be transferred (including cross-border transfer) to third parties with the consent of the Personal Data subject, including through the assignment for Personal Data Processing given by the Bank to a third party, or in accordance with the federal law or for the performance of the contract, a party to which/the beneficiary or surety under which is the Personal Data subject, or to another provider with the consent of the Personal Data subject. The cross-border transfer of the Personal Data on the territory of foreign countries that do not provide adequate protection of the rights of the Personal Data subjects may be performed provided that the written consent of the subject to the cross-border transfer of their Personal Data has been obtained.

8.6. The Bank has the right to transfer Personal Data to government bodies, investigative authorities, other authorized bodies on the basis of the grounds provided for by the current legislation of the Russian Federation.

8.7. The Bank may assign Personal Data Processing to a third party with the consent of the Personal Data subject unless otherwise provided for by the laws of the Russian Federation. The Bank determines the purpose(s) of Personal Data Processing, the contents of Personal Data to be processed, the actions (operations) performed with the Personal Data and such determination cannot be assigned to the third party. If the subjects' Personal Data Processing is assigned to another person, the contract (agreement) shall establish the purpose(s) of Personal Data Processing, the contents of Personal Data to be processed, the actions (operations) performed with the Personal Data, the requirements for the protection of the Personal Data being processed in accordance with Article 19 of the Federal Law "On Personal Data" and the responsibility of the person in charge of Personal Data Processing as instructed by the Bank; it is necessary to ensure confidentiality of the Personal Data and protection of the Personal Data during their processing, as well as the principles and rules of Personal Data Processing provided for by the Federal Law "On Personal Data" must be observed.

8.8. Personal Data Processing may be terminated when the purposes of Personal Data Processing have been achieved, when the consent to Personal Data Processing has expired or has been withdrawn by the Personal Data subject, when the request to terminate the Processing of Personal Data that may be Distributed has been sent, based on the court decision and upon discovery of the fact of unauthorized Processing of Personal Data.

## **9. Procedure for Personal Data Updating, Correction, Removal or Destruction**

9.1. If the fact of unauthorized Processing of Personal Data is identified following the inquiry made by the Personal Data subject or their representative or the authorized body in charge of the protection of rights of Personal Data subjects, the Bank shall Block the Personal Data being processed without authorization and pertaining to the Personal Data subject or ensure their Blocking (if Personal Data Processing is performed by another person acting as instructed by the Bank) from the moment of such inquiry or receipt of the said request for the period of verification. The procedure for responding to the inquiries and requests sent by the Personal Data subjects and their representatives, authorized bodies on the matters relating to Personal Data Processing shall be established through a separate regulatory document of the Bank in accordance with this Dedicated Policy.

9.2. In case of the confirmation of the fact that the Personal Data are inaccurate, based on the information provided by the Personal Data subject or their representative or based on other required documents, the Bank shall correct personal data or ensure their correction (if Personal Data Processing is performed by another person as instructed by the Bank) within seven business days from the date of such information provision and Unblock Personal Data.

9.3. If the fact of unauthorized Processing of Personal Data by the Bank or a person acting as instructed by the Bank is identified, the Bank shall terminate the unauthorized Processing of Personal Data or ensure termination of the unauthorized Processing of Personal Data by the person acting as instructed by the Bank within three business days from the date of such event.

9.3.1. If it is impossible to ensure legality of Personal Data Processing, the Bank shall destroy such Personal Data or ensure their Destruction within ten business days from the moment of identification of the fact of the unauthorized Processing of Personal Data.

9.3.2. The Bank shall notify the Personal Data subject or their representative or the authorized body in charge of the protection of rights of Personal Data subjects, if the inquiry or the request of the Personal Data subject or their representative or the authorized body on the protection of rights of

Personal Data subjects was sent by the latter, of the elimination of the committed violations or the Destruction of the Personal Data.

9.4. In case of the achievement of the purpose of Personal Data Processing, the Bank shall terminate Personal Data Processing or ensure the termination thereof (if Personal Data Processing is performed by another person acting as instructed by the Bank) and destroy Personal Data or ensure their Destruction (if Personal Data Processing is performed by another person acting as instructed by the Bank) within thirty days from the date of achieving the purpose of Personal Data Processing unless otherwise provided for by the contract, a party to which, the beneficiary or surety under which is the Personal Data subject, other agreement between the Bank and the Personal Data subject or if the Bank is not authorized to perform Personal Data Processing without the consent of the Personal Data subject based on the grounds provided for by the federal laws.

9.5. In case of a withdrawal of the consent to Personal Data Processing by the Personal Data subject, the Bank shall terminate their Processing or ensure the termination thereof (if Personal Data Processing is performed by another person acting as instructed by the Bank) and, if the Personal Data are no longer required to be stored for the purposes of Personal Data Processing, destroy Personal Data or ensure their Destruction (if Personal Data Processing is performed by another person acting as instructed by the Bank) within thirty days from the date of receiving such withdrawal unless otherwise provided for by the contract, a party to which, the beneficiary or surety under which is the Personal Data subject, other agreement between the Bank and the Personal Data subject or if the Bank is not authorized to perform Personal Data Processing without the consent of the Personal Data subject based on the grounds provided for by the federal laws.

9.6. If it is impossible to Destroy the Personal Data within the period of time specified in clauses 9.3, 9.4, 9.5, the Bank shall Block such Personal Data or ensure their Blocking (if Personal Data Processing is performed by another person acting as instructed by the Bank) and ensure the Destruction of the Personal Data within six months unless otherwise provided for by the federal laws.

9.7. The Bank shall terminate the Processing of Personal Data that may be Distributed within three business days of the receipt of the written request of the Bank employee or within the period of time specified in the legally effective court decision, and if such period of time is not specified in the court decision, within three business days from the date of the court decision becoming legally effective.

## **10. Information about the Requirements Implemented for Ensuring Personal Data Security**

10.1. In order to perform their obligations provided for by the Federal Law “On Personal Data” and the related laws and regulations, in particular for ensuring security and protection of Personal Data from unauthorized or accidental access thereto, Destruction, amendment, Blocking, copying, Provision, Distribution of Personal Data, as well as from other unauthorized actions in relation to the Personal Data, the Bank shall take the following legal, administrative and technical measures:

- inventory checking of the Personal Data Information Systems, databanks and card files containing Personal Data;
- verification of the grounds for Personal Data Processing for each category of subjects and each category of data;
- appointment of persons in charge of the organization of Personal Data Processing (and their protection) and persons in charge of each Personal Data Information System;
- issuance and publication of this Dedicated Policy for the public;
- development of the set of local regulations on Personal Data Processing and protection, familiarization of the Bank employees (their representatives), users of the Personal Data Information Systems with the same and/or training of the persons specified;
- adjustment of business processes related to Personal Data Processing;
- identification of immediate threats and protection level;
- threat modeling for each Personal Data Information System;
- evaluation of the effectiveness of measures taken for ensuring Personal Data security prior to putting the Personal Data Information System into operation;
- detailed design and deployment of the Personal Data protection system;

- application of the information security tools that have been checked for compliance in accordance with the established procedure. When selecting the information security tools for the Personal Data protection system, the Bank shall be guided by the laws and regulations of the Regulatory Authorities in accordance with Part 4 of Article 19 of the Federal Law “On Personal Data”.
- identification of the facts of unauthorized access to Personal Data and adoption of follow-up measures;
  - identification, prevention and mitigation of the consequences of computer attacks on the Personal Data Information Systems and response to the computer incidents therein;
  - establishment of the rules of access to Personal Data processed in the Personal Data Information System, in Personal Data Information Systems and arrangements for registration and monitoring of all actions performed with the Personal Data;
  - registration of persons admitted to Personal Data Processing;
  - registration of Personal Data media;
  - control of the measures taken for ensuring Personal Data security.

10.2. All internal regulatory and executive documents of the Bank related to Personal Data Processing and protection must be approved by the subdivisions responsible for the organization of Personal Data Processing and ensuring Personal Data security, as well as by other subdivisions the area of expertise of which includes the matters addressed within the said internal regulatory and executive documents of the Bank.

## **11. Roles, Functional Responsibilities and Liability of the Participants of Personal Data Processing and Protection**

The main Participants of the process of Personal Data Processing and protection are:

11.1. The subdivision responsible for the organization of Personal Data Processing is appointed by the Order of the Chairman of the Management Board of the Bank or the executive document issued by the authorized Chief Executive.

The subdivision responsible for the organization of Personal Data Processing performs the following functions:

- development, organization and control of the process of Personal Data Processing in accordance with the laws of the Russian Federation on Personal Data, this Dedicated Policy and internal regulatory documents of the Bank;
- management and continuous improvement of the process of Personal Data Processing according to the uniform rules, standardization and replication of the process;
- enforcement of compliance with the laws of the Russian Federation on Personal Data by the Bank and its employees (their legal representatives);
- control of performance of executive and internal regulatory documents of the Bank on the organization of Personal Data Processing;
- interaction with the authorities with regard to Personal Data Processing;
- methodological support to the structural units of the Bank on the matters of interaction with the authorities and supervisory bodies regarding Personal Data Processing;
- monitoring of the laws of the Russian Federation on Personal Data Processing and provision of information about amendments to the legal regulations to the respective subdivisions of the Bank;
- development and/or updating of the internal regulatory documents on Personal Data Processing;
- organization of provision and/or provision of information to the Bank employees (their legal representatives) about the provisions of the laws of the Russian Federation on Personal Data, documents determining the Bank’s policy with regard to Personal Data Processing, local regulations on Personal Data Processing and/or training of the said employees;
- organization of performance and/or performance of regular assessments of knowledge of employees processing Personal Data and enforcement of compliance with the requirements of regulatory documents on Personal Data Processing by such employees;

- analysis, assessment and prediction of risks related to Personal Data Processing and protection by the Bank, development of risk mitigation measures;
- assessment of impact of the processes on the rights and freedoms of the Personal Data subjects;
- analysis of automated information systems and processes of Personal Data Processing in order to check for compliance with the established mandatory requirements of the laws of the Russian Federation on Personal Data Processing and protection;
- negotiation of commission agreements for Personal Data Processing;
- performance of other functions provided for by executive and internal regulatory documents of the Bank on Personal Data Processing;
- delegation of functions or part of functions assigned to the responsible subdivision herein to the branches, representative offices, relevant subdivisions of the Bank.

11.2. The subdivision responsible for Personal Data security is appointed by the Order of the Chairman of the Management Board of the Bank or the executive document issued by the authorized Chief Executive.

The subdivision responsible for ensuring Personal Data security performs the following functions:

- development, organization and control of the process of Personal Data protection in accordance with the laws of the Russian Federation on Personal Data, this Dedicated Policy and internal regulatory documents of the Bank;
- management and continuous improvement of the process of Personal Data protection according to the uniform rules, standardization and replication of the process.
- control of the measures implemented at the Bank for ensuring Personal Data security and protection, implemented as part of the Personal Data protection system with the consideration of immediate threats to the Personal Data security and applied information technologies, as well as performance of the evaluation of their effectiveness (including with the engagement on contractual basis of legal entities and individual entrepreneurs licensed to perform activities on the technical protection of information confidentiality);
- interaction with the authorities with regard to Personal Data protection;
- methodological support to the structural units of the Bank on the matters of interaction with the authorities and supervisory bodies regarding Personal Data protection;
- monitoring of the laws of the Russian Federation on Personal Data protection and provision of the information about amendments to the legal regulations to the respective subdivisions of the Bank;
- organization of provision and/or provision of information to the Bank employees (their legal representatives) about the provisions of the laws of the Russian Federation on Personal Data protection during their Processing, documents determining the Bank's policy with regard to the Personal Data protection, local regulations on Personal Data protection and/or training of the said employees;
- organization of performance and/or performance of regular assessments of knowledge of employees processing Personal Data and enforcement of compliance with the requirements of regulatory documents on Personal Data protection by such employees;
- development and/or updating of the internal regulatory documents on Personal Data protection;
- planning and organization of actions intended for the prevention of unauthorized access to Personal Data or their transfer to third parties with no access to such information;
- planning and organization of engineering support activities aimed at Personal Data security during their Processing in the Personal Data Information Systems;
- other functions provided for by executive and internal regulatory documents of the Bank on Personal Data Processing;
- delegation of functions or part of functions assigned to the responsible subdivision herein to the branches, representative offices, relevant subdivisions of the Bank.

11.3. The person responsible for the organization of Personal Data Processing is appointed by the Order of the Chairman of the Management Board of the Bank or the executive document issued by the authorized Chief Executive.

The functions of the person responsible for the organization of Personal Data Processing at the Bank include the following:

- knowledge of and strict adherence to the provisions of the laws of the Russian Federation, this Dedicated Policy, internal regulatory documents of the Bank on Personal Data Processing;
- organization of internal control of compliance with the laws of the Russian Federation on Personal Data Processing by the Bank and its employees (their legal representatives) and control of performance of executive and internal regulatory documents of the Bank on the organization of Personal Data Processing;
- provision of information to the Bank employees (their legal representatives) about the provisions of the laws of the Russian Federation on Personal Data, local regulations on Personal Data Processing;
- organization of acceptance and processing of inquiries and requests sent by Personal Data subjects or their representatives and/or control of acceptance and processing of such inquiries and requests;
- other functions assigned to the person responsible for the organization of Personal Data Processing specified in the job description.

11.4. The person responsible for ensuring Personal Data security is appointed by the Order of the Chairman of the Management Board of the Bank or the executive document issued by the authorized Chief Executive.

The functions of the person responsible for ensuring Personal Data security during their Processing by the Bank include the following:

- knowledge of and strict adherence to the provisions of the laws of the Russian Federation, this Dedicated Policy, internal regulatory documents of the Bank on Personal Data protection;
- organization of internal control of compliance with the laws of the Russian Federation on ensuring Personal Data security by the Bank and its employees (their legal representatives) and control of performance of executive and internal regulatory documents of the Bank on ensuring Personal Data security;
- organization of provision and/or provision of information to the employees (their legal representatives) about the provisions of the laws of the Russian Federation, local regulations on ensuring Personal Data security, requirements for Personal Data protection;
- organization of monitoring of Personal Data protection level and effectiveness of the implemented Personal Data protection measures during Personal Data Processing by the Bank;
- review and approval of proposals for corrective measures and prevention of violations related to ensuring Personal Data security, control of the elimination of violations;
- review and approval of proposals for the improvement of the Personal Data security system at the Bank;
- other functions assigned to the person responsible for ensuring Personal Data security specified in the job description.

11.5. Person admitted to Personal Data Processing. The functions of the person admitted to Personal Data Processing at the Bank include the following:

- knowledge of and strict compliance with the requirements of the laws of the Russian Federation on Personal Data, this Dedicated Policy, internal regulatory documents of the Bank governing the procedure for and methods of Personal Data Processing and protection;
- awareness of immediate threats to Personal Data security and adoption of measures for their prevention and mitigation;
- processing of Personal Data only as part of their official job duties;
- nondisclosure of the Personal Data received as a result of the performance of their official job duties and data that became known to them in the course of their activities;
- prevention of the actions of other persons that may result in the disclosure (Destruction, distortion) of Personal Data;
- identification of the facts of disclosure (Destruction, distortion) of Personal Data and notification of the responsible subdivisions thereof;
- other functions assigned to the person admitted to Personal Data Processing specified in the job description.

11.6. Roles for additional Participants of the Process of Personal Data Processing and protection at the Bank are established by separate local regulations according to the procedure established by the Bank.

11.7. Responsibilities and liability of the Participants of the Process are governed by the job descriptions and internal regulatory/executive documents of the Bank establishing the rules for handling confidential information at the Bank.

## **12. Final Provisions**

12.1. This Dedicated Policy shall come into force seven business days after its approval date.

12.2. From the effective date of this Dedicated Policy, the following shall become null and void:

Dedicated Policy on Personal Data Protection at Gazprombank (Open Joint-stock Company) No. И/42 dated July 27, 2011.

– Amendments No. И/18 dated April 11, 2012 to Dedicated Policy on Personal Data Protection at Gazprombank (Open Joint-stock Company) No. И/42 dated July 27, 2011.

– Amendments No. И/1 of 16.01.2014 to Dedicated Policy on Personal Data Protection at Gazprombank (Open Joint-stock Company) No. И/42 dated July 27, 2011.

**Attachment No. 1**

to Dedicated Policy on Personal Data Processing and Protection at Gazprombank (Joint Stock Company)

No. И/69 dated May 25, 2021

**List of Terms and Abbreviations**

**Automated Processing of Personal Data** shall mean Personal Data Processing with the use of the computer equipment.

**Bank** shall mean Gazprombank (Joint Stock Company), Bank GPB (JSC).

**Personal Data Blocking** shall mean temporary termination of Personal Data Processing (except for the cases when processing is required for the correction of Personal Data).

**Chief Executive** shall mean a Chief Executive of the Bank.

**Personal Data Information System** shall mean a set of Personal Data contained in the databases and information technologies and technical means ensuring their processing.

**Personal Data Processing** shall mean any action (operation) or a set of actions (operations) performed with Personal Data with or without the use of automation means. Personal Data Processing by the Bank includes, in particular, collection, recording, systematization, accumulation, storage, correction (updating, amendment), extraction, use, transfer (Distribution, provision, access), Blocking, removal, Destruction of Personal Data.

**Personal Data** shall mean any information explicitly or implicitly related to an identified or identifiable individual (Personal Data subject).

**Personal Data that may be Distributed with the approval of the Personal Data subject** shall mean personal data, public access to which is allowed by the Personal Data subject through the provision of their consent to the Processing of Personal Data that may be distributed with the approval of the Personal Data subject according to the procedure provided for by the Federal Law “On Personal Data”.

**Personal Data Distribution (Distribution)** shall mean actions intended for the disclosure of Personal Data to the public.

**Regulatory Authorities** – in accordance with the Federal Law “On Personal Data”, the functions of relevant regulatory authorities are performed by the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor), Federal Security Service of the Russian Federation (FSB of Russia), Federal Service for Technical and Export Control (FSTEC of Russia).

**Personal Data Destruction** shall mean actions as a result of which it becomes impossible to restore the contents of Personal Data in the Personal Data Information System and/or as a result of which the Personal Data media are destroyed.

**Participants of the Process** shall mean autonomous structural units of the headquarters, branches, representative offices of the Bank (their employees) that participate in the process of Personal Data Processing and/or protection, i.e. have certain rights and obligations.

**Federal Law “On Personal Data”** shall mean Federal Law No. 152-FZ dated July 27, 2006 “On Personal Data”.

**Attachment No. 2**

to Dedicated Policy on Personal Data Processing and Protection at Gazprombank (Joint Stock Company)

No. И/69 dated May 25, 2021

**List of Documents Used in the Course of this Dedicated Policy Development**

1. Federal Law No. 395-1 dated December 2, 1990 “On Banks and Banking Activity”.
2. Federal Law No. 208-FZ dated December 26, 1995 “On Joint Stock Companies”.
3. Federal Law No. 149-FZ dated July 27, 2006 “On Information, Information Technologies and on Information Protection”.
4. Federal Law No. 152-FZ dated July 27, 2006 “On Personal Data”.
5. Decree of the President of the Russian Federation No. 188 dated March 6, 1997 “On Approval of the List of Confidential Information”.
6. Regulation of the Government of the Russian Federation No. 512 dated July 6, 2008 “On Approval of the Requirements to Physical Media of Biometric Personal Data and Storage Technologies for Such Data outside Personal Data Information Systems”.
7. Regulation of the Government of the Russian Federation No. 687 dated September 15, 2008 “On Approval of the Statute on Special Aspects of Personal Data Processing without the Use of Automation Technology”.
8. Regulation of the Government of the Russian Federation No. 1119 dated November 1, 2012 “On Approval of the Requirements to Personal Data Protection in the course of Their Processing in Personal Data Information Systems”.
9. Regulatory guidelines for complying with the requirements during Personal Data Processing by the institutions of the banking system of the Russian Federation, developed together with the Bank of Russia, Association of Russian Banks and Association of Regional Banks of Russia (Association “Russia”) and published in Joint Letter No. 01-23/3148 dated June 28, 2010 “On Implementation of Standards and Recommendations for Standardization by the Bank of Russia in Relation to Information Security of the Banking Institution of the Russian Federation”.
10. Order of FSB of Russia and FSTEC of Russia No. 416/489 dated August 31, 2010 “On Approval of the Requirements for the Protection of Information Contained in Public Information Systems”.
11. Administrative Rules for the performance of the public function by the Federal Service for Supervision of Communications, Information Technology and Mass Media for the performance of state control (supervision) of compliance of personal data processing with the requirements of the laws of the Russian Federation on Personal Data approved by Order of the Ministry of Communications and Mass Media of the Russian Federation No. 312 dated November 14, 2011.
12. Order of FSTEC of Russia No. 21 dated February 18, 2013 “Structure and Content of Organizational and Technical Measures for Ensuring Personal Data Security during their Processing in PDIS”.
13. National Standard of the Russian Federation. “System of Standards on Information, Librarianship and Publishing. Document Control and Archiving. Terms and Definitions” GOST R 7.0.8-2013 approved by Order of Rosstandart No. 1185-st. dated October 17, 2013.
14. Standard of the Bank of Russia “Maintenance of Information Security of the Russian Banking System Organizations. General Provisions” STO BR IBBS-1.0-2014 adopted and implemented by Order of the Bank of Russia No. R-399 dated May 17, 2014.
15. “List of Typical Administrative Archival Documents Generated in the Course of Activities of State Bodies, Local Governments and Organizations and Their Retention Periods” approved by Order of Rosarchiv No. 236 dated December 20, 2019.
16. “Information Security Policy of Gazprombank (Open Joint-stock Company)” approved by the Resolution of the Management Board of GPB (OJSC) dated September 24, 2008 (Minutes No. 35) (as amended).

17. “Articles of Association of Gazprombank (Joint Stock Company) Bank GPB (JSC)” approved by the Resolution of the General Meeting of Shareholders dated September 3, 2020 (Minutes No. 02) (as amended).