



**BANK OF GEORGIA**

## **Privacy Notice**

Bank of Georgia Group PLC (“we”, “us”, “our”) is committed to protecting the privacy and security of your personal data. This privacy notice aims to give you information on how we collect and processes your personal data when you interact with us, including any data you may provide to us.

*For the purposes of EU data protection laws, Bank of Georgia Group PLC is the data controller. This means that we are primarily responsible for making determinations about how and why we process your personal data.*

### **The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you, without limitation, all personal data provided by you such as:

- Name and contact details
- Nationality and national identity number(s)
- Tax status, tax identification number (such as National Insurance Number)
- History of employment
- Director or officer roles and income
- Bank account details, and
- Information on investigations, litigation, court proceedings, civil liabilities or criminal convictions against you.

### **How is your personal data collected**

We use different direct interactions to collect data from and about you. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise.

### **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

## **Disclosures of your personal data**

We may disclose certain personal data:

- To other affiliates in Bank of Georgia Group. Bank of Georgia Group consists of Bank of Georgia Group PLC and its subsidiary JSC Bank of Georgia (a company registered in Georgia), and any of their direct or indirect subsidiaries and/or holding companies;
- To our professional advisors, receivers and administrators (where applicable), and external third party service providers (including, information technology systems providers and registrars);
- To your professional advisors and any other organisations party to a financing deal;
- To courts, governmental and non-governmental regulators and ombudsmen;
- To law enforcement agencies;
- To third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice; and
- As is required and/or permitted by law.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **Transfer of personal data outside the European Economic Area (“EEA”)**

We may transfer your personal data to recipients (including affiliates in Bank of Georgia Group) located in countries outside of the EEA, including in Georgia, which may not have data privacy laws equivalent to those in the EEA. In those instances, we will take all necessary steps to protect your personal data in accordance with applicable data privacy laws.

## **Security and data retention**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

### **Your rights**

Under applicable EU data privacy laws, you may have a right to:

- Request access to and rectification or erasure of your personal data;
- Obtain restriction of processing or to object to processing of your personal data; and
- Data portability (i.e. to request the transfer of personal data from one data controller to another in certain circumstances).

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Changes to this Data Protection Notice**

We may revise and/or supplement our Data Protection Notice from time to time to reflect (including but not limited to), any changes in our business, law, markets and/or the introduction of any new technology.

### **Enquiries, requests or concerns**

All enquiries, requests or concerns regarding this Notice or relating to the processing of your personal data, should be sent Bank of Georgia Group PLC, 42 Brook Street, London, W1K 5DB or by email to [skelleher@bgeo.com](mailto:skelleher@bgeo.com).