

PRIVACY POLICY

How your personal information is processed and used by TBC Bank JSC

Who we are

JSC "TBC Bank" is a commercial bank licensed under the Georgian legislation.

Identification number: 204854595

Legal address: Marjanishvili str. №7, Chugureti region, Tbilisi, Georgia.

Your data privacy in digital banking:

- **Third party applications/services:** By using TBC mobile banking your data about Device ID, Device Model, Device Brand, Device Name, OS Version, TBC Application Version will be accessed by following applications: Google analytics, Xtremepush.com and Smartlook Mobile App Analytics. Both of the applications are in compliance with GDPR (General Data Protection Guide).
- **Retention/deletion policy:** You can revoke consent and/or request deletion of your data by sending us request via mobile banking inbox. After receiving your request we will add you to suVppression list and your data will not be transmitted to other applications.

The security of your information in digital channels

In order to improve the quality of service, TBC Bank is authorized to control the behavior of customers in the bank's digital channels (mobile and Internet banking). This monitoring does not include the collection of personal / confidential / commercial data or any other form of processing. The purpose of the monitoring process is not to analyze the identified user behavior, but to study user activity in general. This non-identifiable data may be processed by Facebook Pixel, Firebase .

Biometric data processing

The bank may process your biometric data, in order to serve you, only after getting permission from you by writing form. The purpose of processing biometric data is identification/verification of a person digitally, by voice or/and visually (Photo). In the process of visual identification, your data may be passed to Amazon or Google. After processing, your data are deleted/not saved on these 3rd party companies' side.

How we use your personal information

This notice refers to the security tools available at TBC Bank (hereinafter referred to as the Bank) against unsanctioned access to personal information. It covers the data which the Bank obtains when having you as a customer, which is also used for direct marketing purposes in line with the legislation of Georgia. The notice explains the principles we follow while processing your personal data and how the law protects you.

Privacy promise

We, the TBC Bank group, promise:

- To keep your data safe and private;
- Not to use your data unlawfully;
- To provide you with complete and exhaustive information with respect to the processing of your personal information.

How the law protects you

As well as our Privacy Promise, your privacy is protected by the Law of Georgia on the Protection of Personal Data. Pursuant to the law, you are authorized to request of us the information with regard to the use of your personal data. You can receive the following information:

- Which data are being processed with regard to you;
- What is the purpose of data processing;
- Legal basis for the data processing;
- How the data were processed; ·
- Who the data was transferred to; ·

Data issuance ground and purpose.

You can request a copy of the information processed by us. Under the law, you are authorized to require adjustment, update, addition, blockage, deletion or destruction of your personal data if they appear to be incomplete, incorrect, out-of-date or if the process of information gathering and processing is carried out illegally. We observe the requirements of the Georgian legislation, which may prevent us from an immediate deletion of your personal data. Such obligations may be stemming from the laws on antimoney laundering, tax, activities of commercial banks and consumer rights protection.

The Bank shall be obliged to supply this information if requested by you. We are authorized to use the personal data only in case specific contractual and/or relevant legal basis exist.

The Bank has a legal basis for using your data, which implies the existence of business-related and/or commercial purpose. It is important that the information processing by the Bank does not aim at harming your interests either in this case. Find below the list of goals and legal basis against which we process your personal data. We are presenting the goals of using your data and our legal basis in each particular case:

What do we use your personal information for:	Our goal:	Our legal basis:
<ul style="list-style-type: none"> · To manage our relationship with you · To meet your needs, develop new ways of cooperation and grow our business. · To develop and carry out marketing activities. · To study how our customers use products and services from us; · To receive advice or guidance about our products and services. · To develop/manage our brands, products and services. · To deliver our products and services; · To make and manage Clients' payments; · To manage fees and interest due on client's accounts; · To manage and deliver the products from Treasury and investment products · 	<ul style="list-style-type: none"> · To update data, to identify the products and services interesting for you and to supply you with relevant information; · To develop products and services; · To define the focus client groups for the purpose of offering new products and services; · To efficiently fulfill legal obligations. · To efficiently execute our legal and contractual obligations; · To ensure compliance with relevant regulations 	<ul style="list-style-type: none"> · Your consent; · Fulfillment of contractual obligations; · Our legitimate interests; · Our legal obligation. · Your consent; · Fulfillment of contractual obligations; · Our legitimate interests; · Our legal obligation

- To detect, investigate, report and prevent financial crime;
- To manage the risks of ours and those of our clients;
- To fulfill relevant laws and regulations;
- To respond to claims and find the ways of resolution.

What do we use your personal information for:

- To efficiently and properly run the business, covering the management of our financial position, business opportunities, planning, communications, corporate governance and audit management.
- To execute contractual rights and obligations

- To develop and improve our action strategies against financial crime; also, to fulfill our legal duties in this regard.

Our goal:

- To ensure compliance with relevant regulations
- To efficiently execute our legal and contractual obligations;
- To meet contractual obligations

- Our legitimate interests;
- Our legal obligation

Our legal basis:

- Our legitimate interests;
- Our legal obligation
- To ensure compliance with relevant regulations
- To efficiently execute our legal and contractual obligations;

Personal Information Groups

We use various types of personal information and classify them as follows:

Type of personal information	Description
Financial	Your financial position, status and history
Contact details	Where you live and how to contact you
Socio-demographic	Details on your job or profession; also, information on your nationality, education, social or income grouping
Transactional	Details on payments to and from your account
Contractual	Details on products and services provided to you by us

Locational Behavioural Technical	Details on your location which the Bank may obtain from your mobile phone, the address where you connect your computer to the internet, or a shop where you buy something with your card. Details on how you use our products and services. Details on the devices and technology your use.
Type of personal information	Description
Communications Social relations Documentary data	Details which the Bank obtains about you from letters, e-mails and conversations between the client and the Bank via any means of communication. Details on your family members. Details about you recorded in various types of documents and the copies thereof. To such documents belong: passport, ID card, birth certificate, driving license and other identification documents.
Special types of data	The Privacy Law of Georgia and other regulations treat some types of personal data as special. The latter can only be processed only under your written consent or in case it serves the purpose strictly defined by the law. To such data belong: <ul style="list-style-type: none"> · Information on racial or ethnic origin · Political beliefs · Religious or philosophical beliefs · Trade Union membership · Genetic and bio-metric data · Health data including gender · Information on conviction, administrative detention, preventive measure, plea-bargaining, diversion, recognition as aggrieved or victim of crime

Sources from which we obtain personal information

We can collect personal information about you from the sources provided by you and listed below:

You provide us with the data in the following cases:

- When you apply for our products and services;
- During a telephone conversation or your visit at the Branch;
- When you use our websites, mobile device apps and web chat;
- When you send letters by mail or e-mail;

When you carry out banking transactions.

Cookies

We employ Cookies and monitor our visitor behavior on our website to ensure that we provide the best practice to our users while they visit our website and are able to continuously improve the quality of our service.

We are gathering information on cookies, visitor navigation and behavior on our website, in particular:

- IP address, type of device, operating system and browser, through which the website is visited;
- Pages opened via our website, session duration and other parameters;
- Information on the actions taken on our website: filling out forms, using interactive elements of the website, etc.
- Process, time and manner of filling out the website fields

We use the obtained information for the following purposes:

- To create and maintain the website statistics for the optimization of processes, fields and website design;
- To protect the website visitors and prevent fraudulent actions;
- To detect and prevent money-laundering, terrorism financing and other criminal activities;
- To assess the control of website visitor flow and marketing campaign;
- Obtained information helps us tailor the website and its components to the needs of the users;
- To establish how our users visit our website and to draw up the Google Analytics reports.

Before you start the use of our website, you can accept cookies and have your user behavior monitored by clicking the button "approval". If you do not agree with the „Cookie Policy“, though you can continue to use our website, this action shall still be considered your approval of the mentioned action. We are not using the cookie files and the data obtained as a result of monitoring the user behavior for the purpose of gathering the personal information. If you wish to restrict the cookie or block them on our website, you can do it by changing your browser parameters. Besides, please, take it into consideration that some of the services offered by us will not be available if you block or delete the cookie files.

Information from third parties

We are authorized to request and obtain information from third parties as well, e.g. from our group member companies or CreditInfo Bureau, both positive as well as negative information stored in their electronic databases, also from that of LEPL State Service Development Agency. This is carried out pursuant to the Privacy Law of Georgia, based on your prior approval, if necessary.

Who we share your personal information with

We may have to share your personal data in the cases defined by the law of Georgia or with other companies, which are supposed to provide you with the product or service chosen by you, e.g.

- If you have a debit, credit or charge card with us, we will share transaction details with companies which help us provide this service (such as Visa and Mastercard);
- If you apply for insurance through us, we may pass your personal or business details to the insurance company, and onto any reinsurers;

- If you make an insurance claim, the information supplied by you to us or the insurer may be put on a register of claims. This information will be shared with other insurers.
- If you have a secured loan or mortgage with us, we may share the information with other creditors who also are the mortgage-holders.

We may also share your personal information if the structure of the Bank changes in the future:

- We may choose to sell, transfer, or merge parts of our business, or assets.
- If any of the above discussed processes occur, we may share your data with other parties. However, before sharing such information, the mentioned parties shall mandatorily agree to keep your data safe and confidential.
- If our group structure changes, other parties may use your data in the manner and within the frames as specified in this notification and regulated by the Law.

How we use your information to make automated decisions

For making automated decisions, we sometimes use the personal data we have, or are allowed to collect from other entities based on the legislation or under the contract signed with you. This helps us ensure that our decisions are quick, fair and efficient. These automated decisions can affect the quality of products and services offered by us now or to be offered in the future.

Here are the types of automated decision we make: Pricing

We may decide on the price of some products and services based on the information available to us.

Tailoring products and services to customers' needs

We assign our clients to relevant groups which we call customer segments. We use these groups to study our customers' needs and based on what we learn, make decisions that will be useful and favorable for you. This helps us to design products and services for different customer segments and to manage our relationships with them.

Detecting fraud

We use your personal information to help decide if your accounts can be used for fraud or money-laundering. We may detect that an account is being used in a wrongful way. If we identify the risk of fraud, we reserve the right to suspend transactions of doubtful accounts for your security or refuse access to them/deny a respective service.

Opening accounts

When you open an account with us, we check that the product or service is relevant for you, based on the information available to us. We also check that you or your business meets the conditions needed to open the account.

Approving Credit

We use a system to decide whether to approve or not your credit application, whether for a loan or a credit card. This is called credit scoring. It uses past data to predict how you are likely to act while paying back the credit.

- Credit scoring uses data from three sources:
- Your application form
- Credit reference agencies

Data available to us.

Credit Info Georgia (hereinafter "The Credit Reference Agency")

When you apply for a product or a service, we check your credit data and can contact a Credit Reference Agency. If you are our client, we can use the databases of the Credit reference Agency to facilitate the approval of the credit product you have applied for.

We can exchange the following data with the Credit Reference Agency:

- Your name, address, date of birth
- Our credit application
- Details of any shared credits
- Financial situation and history
- Public information from such sources as the Trade Registry, Public Registry, etc.

We will use the information to:

- Make sure that you can service your credit liability
- Verify the information you provided
- Help identify and prevent financial fraud

Control your credit liabilities

We will share your personal information with the Credit Reference Agency during the period you will be using our services. These data include information about closed and overdue loans. If you are a borrower, we will also share information on how you make payments – fully and in due time or with a delay. The Credit Reference Agency can share this information with other credit institutions which are interested in your credit status. We will also let the Credit Reference Agency know if you have fully settled your liability. For more information about the Credit Reference Agency, please visit www.creditinto.ge.

We reserve the right to allow law enforcement agencies to access your personal information in cases strictly defined by the law. This is to support their duty to detect, investigate and prevent crime.

If you choose not to share your personal information with us, it may delay or prevent us from meeting our obligations towards you, including performance of services to run your accounts or implementation of relevant procedures.

Marketing

We may use your personal information to tell you about relevant products and offers.

We gather your personal information from what you share with us and what we collect from the sources available to us when you use our services.

We study your data to form a view on what you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

We can only use your personal information to send you marketing messages if we have either your consent or a legitimate interest. We promise that our activities will not be unfair, incorrect or running counter your interests.

You can ask us to stop sending you marketing messages by contacting us at any time. We respect your wishes and will stop using your data for marketing purposes as soon as we receive your message.

Your security is important to us. Therefore, you will continue to receive statements regarding the changes in the facilities proposed to you and in terms of service.

How long we keep personal data

We keep your personal data throughout the whole term of service provided to you and for 15 years from the completion of the service for the following reasons:

- To respond to any questions and complaints
- To show that we treated you fairly
- To maintain records according to the regulations that apply to us

We may keep your personal information for over 15 years if we cannot delete it for legal or regulatory reasons.

If any information kept with us is inaccurate or incomplete, please contact us to check and correct the errors.

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if we do not have legitimate grounds to keep it.

Please contact us if you do not wish that your data be used by us or if you have questions or want to delete or restrict the use of your data.

How to contact us

In case of questions regarding the Privacy Policy, our common rights and responsibilities and data processing, you can reach us in either way provided below:



Online Chat
You can talk to our
Online Consultant



+(995 32) 227 27 27
You can call 24 hours a
day 7 days a week.



You can visit
our branch