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**by the Management Board of
OJSC "Dos-Credobank"
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PRIVACY POLICY OF OJSC "DOS-CREDOBANK"

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1. Introduction

This privacy Policy (hereinafter referred to as the "Policy") regulates the procedure for processing personal data by OJSC "Dos-Credobank" (hereinafter referred to as the "Bank"). This Policy has been developed in accordance with the Digital code of the Kyrgyz Republic, the Law of the Kyrgyz Republic "On banks and banking activity", regulatory acts of the National Bank of the Kyrgyz Republic, as well as other applicable laws and regulations of the Kyrgyz Republic governing legal relations in the digital environment.

2. Terms and definitions

User (data principal) – a subject of legal relations in the digital environment to whom the personal data relates and who utilizes the Bank's digital services.

Bank – the controller of personal records that determines the purposes and methods of processing personal data.

Personal data – digital data containing information of a personal nature that relates to an identified or identifiable individual.

Processing of personal data – any action (operation) or set of actions performed on personal data, including collection, recording, storage, systematization, structuring, updating, use, transfer, anonymization, blocking, and destruction.

Processor – a natural or legal person that processes personal data on behalf of the Bank based on a contract.

Third parties – legal entities, (natural persons), or individual entrepreneurs who are not employees of the Bank and who may be granted access to personal data on contractual and lawful grounds, including technological partners, processing centers, and IT service providers involved in the operation of the website, Internet Banking, mobile applications, and other digital services of the Bank.

Digital service – software and hardware solutions of the Bank, including mobile applications, Internet Banking, the website, and other digital communication channels.

Anonymization of personal data – actions resulting in the impossibility of determining the ownership of personal data by a specific data subject without the use of additional information. Anonymized data shall not be classified as personal data.

Automated decision-making – a decision made without direct human intervention based on the processing of personal data, including the use of algorithms and artificial intelligence systems.

Cross-border transfer of personal data – the transfer of personal data outside the territory of the Kyrgyz Republic.

3. General provisions

3.1. This Policy defines the procedure, conditions, and principles for processing the personal data of the Bank's service Users, as well as measures to ensure the security and confidentiality of personal data.

3.2. Acceptance of the terms of this Policy is carried out by the User through the process of registration/authorization/identification/ verification within the Bank's services, and constitutes an explicit, unambiguous, and informed consent to the processing of personal data to the extent and under the conditions provided for in this Policy.

3.3. The Bank acts as the controller of personal records. This Policy applies to all users of the Bank's digital services, including the Internet Banking system, the Bank's mobile applications, the Bank's website www.dcb.kg, and other digital services provided by the Bank.

3.4. The Bank processes personal data solely for purposes that are pre-determined and compliant with the legislation of the Kyrgyz Republic, and processes only such data as is necessary to achieve these purposes.

3.5. Personal data may be provided by the User during registration and authorization, during identification and verification procedures (including remote ones), while utilizing banking services, and during interaction with the Bank through digital and offline channels.

3.6. The Bank shall be entitled to obtain personal data from other lawful sources, including state information systems and registries, credit bureaus, and other organizations in cases provided for by the legislation of the Kyrgyz Republic.

3.7. The Bank ensures that personal data is processed based on the principles of lawfulness, fairness, transparency of processing, data minimization, storage limitation, and the assurance of security and confidentiality.

3.8. The processing of personal data is carried out both with the use of automation tools and without such tools, including within the information systems of the Bank.

4. Scope of the Policy

4.1. This Policy regulates the relations arising between the Bank and the User in the course of personal data processing during the use of the Bank's digital services, as well as during the provision of banking services through remote and offline channels.

4.2. This Policy applies to all processes of personal data processing, including its collection, storage, use, transfer, anonymization, and destruction, regardless of the form of its presentation and the method of processing.

4.3. This Policy shall be applied by the Bank, as well as by persons performing personal data processing on behalf of the Bank.

4.4. This Policy is a publicly accessible document and is published on the official website of the Bank; it may also be brought to the attention of Users by other means that ensure the opportunity for review.

4.5. In the event that specific matters regarding personal data processing are regulated by agreements concluded with the User, such agreements shall apply to the extent that they do not contradict this Policy and the legislation of the Kyrgyz Republic.

5. Purposes of collecting Users' personal information for Bank services

5.2. Identification of the User who has registered in the mobile application or at the Bank's branches for their subsequent authorization, accession to the terms of the Public offer, and the provision of banking services;

5.3. Confirmation of the accuracy, relevance, and completeness of the personal data provided by the User;

5.3. Registration, identification, verification, and authorization of the User when using the Bank's digital services, including the official website, Internet Banking, and mobile applications, as well as when contacting the Bank's branches;

5.4. Provision of effective customer and technical support, including the handling of the User's appeals, inquiries, notifications, and applications;

5.5. Establishment of feedback with the User, including the sending of notifications, inquiries, informational messages, transaction confirmations, and other messages related to the use of the Bank's services;

5.6. Determination of the User's location (in cases permitted by law to ensure security, convenience of service, and the prevention of fraudulent activities);

5.7. Informing the User about ongoing promotions, special offers, products, and services of the Bank, as well as conducting marketing activities in compliance with the legislation of the Kyrgyz Republic;

5.8. Compliance with the requirements of the legislation of the Kyrgyz Republic, regulatory legal acts, as well as the Bank's internal procedures on countering the financing of criminal activity and the legalization (laundering) of criminal proceeds;

5.9. Ensuring the security of the Bank's digital services, preventing unauthorized access, and detecting fraudulent transactions;

5.10. Other purposes necessary to ensure the operation of the Bank's services and the high-quality provision of banking services to the User, provided that such purposes do not contradict the legislation of the Kyrgyz Republic.

6. Methods and timeframes for personal information processing

6.1. The processing of the User's personal data shall be carried out by the Bank for the period necessary to achieve the processing purposes defined by this Policy, as well as within the timeframes established by the legislation of the Kyrgyz Republic, the Bank's internal regulatory documents, and the terms of agreements concluded with the User. The processing of personal data shall be performed by any lawful method, including collection, recording, systematization, storage, clarification (updating and modification), retrieval, use, transfer, anonymization, blocking, and destruction, including within personal data information systems with or without the use of automation tools.

6.2. The Bank shall be entitled to transfer the User's personal data to third parties, including credit bureaus, processing centers, IT service providers, payment system operators, and organizations ensuring information security. Such transfer shall be carried out solely for the purposes provided for in this Policy and on the basis of contracts stipulating compliance with confidentiality and personal data protection requirements.

6.3. The User's personal data may be transferred to the authorized state authorities of the Kyrgyz Republic solely on the grounds and in the manner established by the legislation of the Kyrgyz Republic.

6.4. Personal data may be transferred outside the Kyrgyz Republic, provided that an adequate level of protection for the rights of Users is ensured and the requirements of the legislation of the Kyrgyz Republic are complied with.

6.5. The Bank shall take the necessary legal, organizational, and technical measures to protect the User's personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other unlawful actions by third parties.

7. Rights and obligations of the Parties

7.1. The User is obliged to:

7.1.1. Provide and promptly update information regarding personal data if it changes or if inaccuracies are detected, which is necessary for the use of the Bank's services.

7.1.2. Introduce amendments and additions to the provided information in the event that incorrect data is detected while using the Bank's services.

7.1.3. Ensure the confidentiality of their credentials and prevent their unauthorized use by third parties.

7.2. The User shall be entitled to:

7.2.1. Gain access to their personal data, as well as submit requests for its clarification, updating, and/or editing in accordance with the procedure established by the Bank, via the mobile application, Internet Banking, and/or through the Bank's offices.

7.2.2. Demand the erasure of personal data in the absence of lawful grounds for its further processing.

7.2.3. Withdraw consent to the processing of personal data, unless otherwise provided for by the legislation of the Kyrgyz Republic.

7.2.4. Receive information regarding the transfer of personal data to third parties.

7.2.5. Demand a review of decisions made solely on the basis of automated personal data processing.

7.3. The Bank is obliged to:

- 7.3.1. Carry out the processing of the User's personal data solely for the purposes defined by this Policy and the legislation of the Kyrgyz Republic.
- 7.3.2. Ensure the confidentiality and security of the User's personal data.
- 7.3.3. Take the necessary organizational and technical measures to prevent data breaches, unauthorized access, and other personal data security violations.
- 7.3.4. Ensure the exercise of the User's rights provided for by this Policy and the legislation of the Kyrgyz Republic.
- 7.3.5. Provide the User with information regarding the processing of their personal data upon their request.

7.4. The Bank shall be entitled to:

- 7.4.1. Grant third parties access to anonymized and non-personal data of the Bank's service Users for the purposes of statistics, analytics, and advertising message optimization. The use of such data by third parties is governed by their own privacy policies, and the Bank bears no liability for its further use.
- 7.4.2. Transfer personal data to third parties solely for the purpose of providing remote banking services, as well as in cases directly provided for by the legislation of the Kyrgyz Republic.
- 7.4.3. Transfer the personal data of the Bank's service Users to the authorized state authorities of the Kyrgyz Republic solely on the grounds and in the manner established by the legislation of the Kyrgyz Republic.
- 7.4.4. Restrict the User's access to the Bank's services in the event of a breach of the terms of use or the requirements of the legislation of the Kyrgyz Republic.

8. Liability of the Parties

8.1. The Bank shall be liable for compliance with the requirements of the legislation of the Kyrgyz Republic, including requirements in the field of personal data protection, as well as for ensuring the confidentiality and security of the User's personal data.

8.2. The Bank shall take all necessary legal, organizational, and technical measures to protect the User's personal data against unauthorized access, loss, modification, distribution, and other unlawful actions.

8.3. The Bank shall be exempted from liability for the disclosure or loss of personal data in the following cases:

- 8.3.1. The personal data became public domain prior to its loss or disclosure.
- 8.3.2. The personal data was received from third parties prior to its receipt by the Bank.
- 8.3.3. The personal data was disclosed with the consent of the Bank's service User.
- 8.3.4. The disclosure of personal data is provided for by the legislation of the Kyrgyz Republic.

9. Dispute resolution

9.1. Prior to filing a lawsuit with a court regarding disputes arising from the relationship between the User and the Bank, the Parties undertake to complete a pre-trial dispute resolution procedure by sending a written claim.

9.2. The recipient of the claim shall, within 30 (thirty) calendar days from the date of receipt of the claim, notify the claimant in writing of the results of its consideration.

9.3. If an agreement is not reached, the dispute shall be subject to consideration by a judicial body in accordance with the procedure established by the effective legislation of the Kyrgyz Republic.

9.4. The effective legislation of the Kyrgyz Republic shall apply to this Policy and the relationship between the User and the Bank.

10. Additional terms

10.1. The Bank shall be entitled to introduce amendments to this Policy without the additional consent of the Bank's service User. The updated version of the Policy shall enter into force upon its publication on the Bank's official website — www.dcb.kg — or upon being brought to the User's attention, unless a different procedure is provided for by a decision of the authorized body of the Bank.

10.2. If, after the entry into force of this Policy, certain provisions hereof come into conflict with the legislation of the Kyrgyz Republic, the rules of the effective legislation of the Kyrgyz Republic shall apply until the necessary amendments are introduced to this Policy.

10.3. Matters not directly regulated by this Policy shall be governed by the relevant internal regulatory documents of the Bank and the effective legislation of the Kyrgyz Republic.



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