

INTERNAL DOCUMENT	
Name:	The list of personal data necessary and sufficient to fulfill the tasks performed by Freedom Bank Kazakhstan JSC
Owner:	Department of Banking Process Development
Approved by:	By decision of the Bank's Management Board (minutes No. 71) dated 10.06.2025
Effective date:	10.06.2025
Making the latest changes/additions	-
Cancelled/invalidated documents (if any):	-
Degree of confidentiality	For general use

The list of personal data necessary and sufficient to fulfill the
tasks performed by Freedom Bank Kazakhstan JSC
A0-08–13/115/ИД/10062025

REGISTER
of approved changes and additions to
the List of personal data

№	Document number	Details of the decision of the Bank Authority on approval of amendments and additions	The deadline for the implementation of the approved amendments and additions	The basis for making changes/additions
1				
2				
3				
4				
5				
6				

**The list of personal data necessary and sufficient to fulfill the tasks
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The name of the task, including functions, powers, and responsibilities	Purposes of collection and processing within the framework of the task being performed	Name of personal data for a specific purpose	Reference to documents or regulatory legal acts that have direct references to tasks carried out by the owner and (or) operator
<p>1. Carrying out banking and other operations, rendering services in accordance with the Bank's charter and the license issued to the Bank to carry out banking and other operations, including:</p> <ul style="list-style-type: none"> - accepting deposits, opening and maintaining bank accounts/payment card accounts of individuals and legal entities; - opening and maintaining correspondent accounts of banks and organizations carrying out certain types of banking operations; - cash transactions; - transfer operations; - accounting operations; - bank loan operations: provision of loans in cash by the bank on 	<p>Collection, processing and use of personal data of the Subject (including collection, processing and storage on paper and (or) in electronic format in arrays and (or) databases of the Operator), disclosure of information that is a banking secret and (or) a commercial secret in the securities market, is carried out, among other things, for the following purposes:</p> <p>1) to consider the Subject's application (the application of the person whose representative the Subject is) for receiving banking, brokerage or other services that may be provided by the Operator in accordance with the legislation of the Republic of Kazakhstan;</p> <p>2) to provide the Subject (the person whose representative is the Subject) with banking, brokerage or other services stipulated by the legislation of the Republic of Kazakhstan, which will be provided to the Subject (the person whose</p>	<p>1. Information required to complete the questionnaire and for proper identification/authentication/authorization (including but not limited to):</p> <p>Last name, first name, patronymic (if any). Citizenship data. Individual identification number (IIN). Identity document details: <i>name of the document; document number; date of issue of the document; validity period of the document; authority that issued the document.</i></p> <p>Birth data: <i>date of birth; place of birth.</i> Gender. Photo/video. Signature (<i>handwritten and electronic-digital, one-time (one-time) code (OTP).</i>) Biometric data: <i>facial image data of a person obtained using photo or video devices; voice</i></p>	<p>The Law of the Republic of Kazakhstan dated August 31, 1995, No. 2444 «On Banks and Banking activities in the Republic of Kazakhstan»</p> <p>The Law of the Republic of Kazakhstan dated July 26, 2016, No. 11-VI «Payments and payment systems»</p> <p>The Law of the Republic of Kazakhstan dated July 6, 2004, No. 573-II «On Credit Bureaus and Formation of Credit Histories in the Republic of Kazakhstan»</p>

The list of personal data necessary and sufficient to fulfill the
tasks performed by Freedom Bank Kazakhstan JSC
A0-08-13/115/ИД/10062025

<p>the terms of payment, urgency and repayment;</p> <ul style="list-style-type: none"> - foreign currency exchange operations, including foreign currency cash exchange operations; - acceptance of payment documents for collection (except bills of exchange); - opening (issuing) and confirmation of a letter of credit, and fulfillment of obligations under it; - issuance by the bank of bank guarantees providing for execution in monetary form; - issuance by banks of bank guarantees and other obligations for third parties, providing for execution in monetary form; - safe deposit operations; - other operations provided for by the banking legislation of the Republic of Kazakhstan. <p>2. Providing the Subject of personal data with information about the services provided by the Bank, about the development of new products and services by the Bank.</p>	<p>representative is the Subject) by the Operator under the terms of the relevant contracts (agreements), execution of transactions/payments, return of erroneously credited amounts, search for amounts, etc.;</p> <p>3) to consider the possibility of concluding and concluding transactions with the Operator, conducting operations by the Operator, performing actions (instructions) specified by the Subject by the Operator;</p> <p>4) for the execution of transactions aimed at issuing (servicing) a loan for the acquisition of a share under an agreement on shared participation in housing construction/real estate/movable property;</p> <p>5) to carry out money transfers, the personal data of the Subject may be provided by the Operator to the Subject's counterparty (the counterparty of the person whose representative the subject is) and to all banks/payment organizations/processing organizations/International Payment Systems (payment systems)/payment (mobile) service providers (Apple Pay, Samsung Pay, Google Pay, Garmin Pay, etc.) through which the transfer/routing/processing of the Subject's order (the person whose representative the subject is) takes place;</p>	<p><i>data of a person obtained using audio recording devices.</i></p> <p>Seals, facsimiles, algorithms, codes (digital, alphabetic, symbolic and combined), identifier words or identification codes and other data used for identification/authentication/authorization.</p> <p>2. Family/social status information (including but not limited to):</p> <p>Information from the State Database of Family Relationships or another State Database of Family Relationships.</p> <p>The data of the marriage certificate, surname, first name, patronymic of the spouse, passport data of the spouse.</p> <p>Presence/absence of dependents and/or other family members.</p> <p>Degree of kinship, last names, first names, patronymics and dates of birth of other family members and dependents.</p> <p>List of individuals whose official representative and/or guardian is the Subject.</p> <p>Other information that the Subject rightfully possesses and that he voluntarily and rightfully provided to the Operator.</p> <p>3. Information required for communication and</p>	<p>The Law of the Republic of Kazakhstan dated May 16, 2014, No. 202-V «On Permissions and Notifications»</p> <p>The Law of the Republic of Kazakhstan dated August 28, 2009, No. 191-IV «On Counteraction of Legitimization (Laundering) of Incomes Received by Illegal Means, and Financing of Terrorism»</p> <p>Civil Code of the Republic of Kazakhstan dated December 27, 1994, No. 268-XIII</p> <p>Labor Code of the Republic of Kazakhstan dated November 23, 2015, No. 414-V</p> <p>Code of the Republic of Kazakhstan dated December 25, 2017, No.</p>
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The list of personal data necessary and sufficient to fulfill the
tasks performed by Freedom Bank Kazakhstan JSC
A0-08-13/115/ИД/10062025

<p>3. Conclusion of any agreements with the Subject of personal data and their subsequent execution.</p> <p>4. The Bank conducts research, promotions, and surveys.</p> <p>5. Formation of management, financial and statistical reports, including for provision to third parties.</p> <p>7. Identification of cases of fraud, theft of money from an account, other illegal actions, prevention of such illegal actions in the future and localization of the consequences of such actions.</p> <p>8. Combating the legalization (laundering) of proceeds from crime and the financing of terrorism.</p> <p>9. Implementation of document flow in the Bank, including in electronic form.</p> <p>10. Implementation of administrative and economic activities by the Bank.</p> <p>11. Conducting personnel work and organizing the accounting of Bank employees, attracting and selecting Candidates.</p> <p>12. Corporate governance.</p>	<p>6) for the conclusion/ undertaking /execution of transactions/operations within the framework of instructions, orders, instructions, orders, etc., including on the organized/unorganized securities market of the Republic of Kazakhstan, the international organized/unorganized foreign market, the personal data of the Subject may be provided by the Operator to accounting/clearing organizations, depositories, custodians, foreign custodians, stock exchanges, international settlement (payment) systems, counterparties of the Subject (counterparties of the person whose representative the Subject is) and all banks/processing organizations through which the transfer/routing/processing of the instruction(s) and/or order(s) for the execution of transactions/performance of operations takes place;</p> <p>7) for internal control and accounting by the Operator, as well as for control and confirmation of the proper fulfillment by the Subject (the person whose representative the Subject is) and the Operator of their obligations under the relevant contracts (agreements);</p> <p>8) to fulfill the obligation of the Operator (as a subject of financial monitoring) to properly verify its client</p>	<p>identification/authentication/authorization purposes (including but not limited to):</p> <p>Address of place of residence/registration, date of registration at place of residence or at place of temporary stay (accommodation).</p> <p>Place of work and position.</p> <p>Phone number (home, work, mobile, ID – encrypted identifier of phone numbers).</p> <p>Email address.</p> <p>Contact phone numbers.</p> <p>IMEI code of mobile device,</p> <p>4. Information related to the provision of services by the Operator (conducting operations, concluding transactions, performing actions):</p> <p>Texts of contracts (agreements), additional agreements to them, applications and consents, correspondence, instructions on conducting transactions (payment, cash and other documents), title documents, payment card and bank account numbers.</p> <p>5. Information about the purpose and nature of the business relationship.</p> <p>6. Information about education, professional activity, official position, business reputation (including, but not limited to):</p>	<p>120-VI «On taxes and other obligatory payments to the budget (Tax Code)»</p> <p>Code of the Republic of Kazakhstan dated October 29, 2015, No. 375-V «Entrepreneur Code of the Republic of Kazakhstan»</p> <p>Resolution of the Board of the National Bank of the Republic of Kazakhstan dated August 31, 2016, No. 217 «On approval of the Rules for the functioning of the interbank payment card system»</p> <p>Resolution of the Board of the National Bank of the Republic of Kazakhstan dated August 31, 2016, No. 207 «On approval of the Rules for opening, managing and closing customer bank accounts»</p>
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The list of personal data necessary and sufficient to fulfill the
tasks performed by Freedom Bank Kazakhstan JSC
A0-08-13/115/ИД/10062025

	<p>when establishing business relations and carrying out client transactions in accordance with the legislation of the Republic of Kazakhstan, and to perform currency control functions;</p> <p>9) for the Operator to perform activities (responsibilities) related to the identification/authentication/authorization of the client, and to verify the authenticity (correctness) of the information/data/algorithms/codes/symbols /identifiers/numbers, etc. provided/used by the Subject/Operator (including by obtaining/verifying personal data and other information from the Operator's and other sources available to the Operator), in order to minimize the risk of unauthorized transactions in accordance with the legislation of the Republic of Kazakhstan and the terms of the relevant agreements;</p> <p>10) for the Operator to fulfill its obligation to store and record primary documents used in accounting within the timeframes established by the legislation of the Republic of Kazakhstan;</p> <p>11) for the Operator to fulfill its obligation to store documents, materials, and files established by the National Bank of the Republic of Kazakhstan/Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market,</p>	<p>education, profession, qualifications (including advanced training), position, academic degree, academic title, membership in professional chambers/organizations, knowledge of foreign languages and other information; data from the certificate of state registration of an individual entrepreneur, data from the license for the implementation of licensed activities, certificates, patents, diplomas, certificates; information on the presence/absence of a criminal record, criminal/administrative liability.</p> <p>7. Information on the credit (other) history of the Subject, information necessary to assess the solvency of the Subject (including, but not limited to):</p> <p>pension contributions, information on official, self-declared and other income and expenses; information on the presence/absence of bank/personal/balance sheet accounts (account numbers, special card accounts, type, placement period, amount, deposit conditions and other information); information on the presence/absence of loans (credits), bank accounts (including special card accounts), cash and securities, including those in trust management and in trust storage (contract data, including account numbers, special card accounts, payment card numbers, code information on payment cards, credit history</p>	<p>Resolution of the Board of the National Bank of the Republic of Kazakhstan dated August 31, 2016, No. 208 «On approval of the Rules for making non-cash payments and (or) money transfers on the territory of the Republic of Kazakhstan»</p> <p>Resolution of the Board of the National Bank of the Republic of Kazakhstan dated August 31, 2016, No. 212 «On approval of the Rules for providing electronic banking services by banks, branches of non-resident banks of the Republic of Kazakhstan and organizations engaged in certain types of banking operations»</p> <p>Resolution of the Board of the National Bank of the Republic of Kazakhstan dated August 31, 2016, No. 205 «On approval of</p>
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The list of personal data necessary and sufficient to fulfill the
tasks performed by Freedom Bank Kazakhstan JSC
A0-08-13/115/ИД/10062025

	<p>as well as other regulatory legal acts of the Republic of Kazakhstan;</p> <p>12) to confirm the implementation between the Operator and the Subject (the person whose representative the Subject is) of transactions under the relevant contracts (agreements) at the request of the Subject and/or third parties who have such a right in accordance with the legislation of the Republic of Kazakhstan;</p> <p>13) for judicial and extrajudicial protection of the Operator's rights: (i) in the event of a breach of obligations under existing contracts (agreements); (ii) in the event of disputes, including disputes with third parties;</p> <p>14) for the purposes of the Operator's work with collection agencies and/or other specialized persons or employees/representatives of the Operator who will be instructed to carry out debt collection activities under the relevant contracts (agreements), in the event of a breach of obligations under such contracts (agreements), as well as conducting auctions related to the sale of collateral;</p> <p>15) for posting public (disclosed) data and information in the media in compliance with the requirements of the legislation of the Republic of Kazakhstan;</p>	<p>codes, addresses of acquired real estate, loan amount and currency, loan purpose, loan terms, collateral information, account balances and amounts of movement, payment card type, limits and other information);</p> <p>8. Information necessary for the proper quality of services provided and its improvement, personalization of services provided, including remote servicing (including, but not limited to) (online processes): history of services rendered and behavioral patterns, data about the device used and from sensors on the device, information about objects around (for example, Wi-Fi access points, cellular antennas and devices with the Bluetooth module enabled), geolocation data, metadata, cookie data, cookie identifiers, pixel tags, IP addresses, information about the browser, operating system and remote control processes.</p> <p>9. Information on property (property status) (including, but not limited to): information about the property of the Subject and/or the property of third parties that serves as security for obligations, as well as about other (any) property of the Subject, an image (photo/video) of such (any) property in any format, etc., information about the presence/absence of encumbrances (arrest) on</p>	<p>the Rules for the issuance of payment cards, as well as requirements for activities related to servicing operations with their use on the territory of the Republic of Kazakhstan»</p> <p>Resolution of the Board of the National Bank of the Republic of Kazakhstan dated August 31, 2016, No. 201 «On approval of the Rules for the functioning of the interbank money transfer system».</p> <p>Resolution of the Board of the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market dated March 30, 2020, No. 29 «On approval of requirements for the own premises of banks with centralized access to the</p>
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The list of personal data necessary and sufficient to fulfill the
tasks performed by Freedom Bank Kazakhstan JSC
A0-08–13/115/ИД/10062025

	<p>16) to calculate the maximum risk per borrower and to ensure compliance with prudential and other standards and limits, and to verify “transparency”;</p> <p>17) for the interaction of the Operator with third parties (for the interaction of third parties with the Operator, third parties with each other), which are and/or may be related to the conclusion and/or execution and/or servicing of any transactions/operations concluded (which may be concluded) between the Subject (the person whose representative the Subject is) and the Operator;</p> <p>18) for the provision/receipt by the Operator of reports and/or information to/from authorized bodies, audit, appraisal and other competent organizations, credit bureaus, shareholders and/or affiliated persons of the Operator, database operators, and counterparties of the Operator;</p> <p>19) for the development, storage and application of mathematical, statistical and behavioral models, information systems, databases (including analysis, modeling, forecasting); for the implementation of risk insurance and/or other types of insurance, if such insurance is provided for by the terms of the relevant contracts (agreements), products of the Operator, for the provision</p>	<p>the property; identification data, data on the presence (absence) of registration, encumbrances; general characteristics of the property; cost; address (location) of the property, state registration data and other information).</p> <p>10. Information constituting a commercial secret in the securities market (including, but not limited to): the presence of a personal account in the accounting system of the central depository and nominal holding, on the availability, balances, movement and owners of equity securities and other financial instruments on personal accounts in the accounting system of the central depository and nominal holding.</p> <p>11. Information about digital documents obtained through the integration of the digital document service with the Bank.</p> <p>12. Other information required by the Operator, including for filling out a questionnaire, creating a dossier (client/personal file), in accordance with the requirements of the legislation of the Republic of Kazakhstan and the internal documents of the Operator (including information on the Subject's</p>	<p>automated banking information system»</p> <p>Resolution of the Board of the National Bank of the Republic of Kazakhstan dated December 26, 2016 No. 310 «On approval of the form of consent of a debtor to the provision by the bank of information about him and guarantees or sureties issued by the bank at the request of the debtor to the credit bureau and the Rules for submitting a credit report on a bank guarantee and surety»</p> <p>Resolution of the Board of the National Bank of the Republic of Kazakhstan dated January 28, 2017, No. 21 «On approval of the Rules for the issuance of bank guarantees and sureties by second-tier banks»</p>
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The list of personal data necessary and sufficient to fulfill the
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A0-08-13/115/ИД/10062025

	<p>of information to «Kazakhstan Deposit Insurance Fund» JSC;</p> <p>20) for the purposes of identification/ authentication/ authorization and provision of access to the premises/ buildings/ offices/ information systems of the Operator or third-party service providers, in the manner and taking into account the restrictions provided for by the internal documents of the Operator, to ensure the security regime of the Operator;</p> <p>21) for the exchange of information, including for the consideration and/or provision of reports on the Subject's (and/or third parties') requests, complaints, suggestions, recommendations, claims, instructions, etc., the transfer (receipt) of correspondence (mail) to the Subject's address (to the address of the person whose representative the Subject is) for sending (delivery)/receipt via courier services, courier service, express mail, etc.;</p> <p>22) for the assignment by the Operator of rights (claims) under contracts (agreements) concluded between the Subject (the person whose representative is the Subject) and the Operator, if such assignment is provided for by the terms of the relevant contracts (agreements) concluded between the Subject (the person whose representative is the Subject) and the</p>	<p>participation in the capital of legal entities - share of participation, number (share) of shares; positions held, as well as information on changes and/or additions to such data; a list of legal entities of which the Subject is a representative), for the Operator's interaction with database operators, the Operator's counterparties, third parties;</p> <p>as well as other information that forms and supplements the client profile necessary for a comprehensive assessment of potential risks</p> <p>13. Information on changes and (or) additions to the above data.</p>	<p>Resolution of the Board of the National Bank of the Republic of Kazakhstan dated November 29, 2019 No. 231 «On approval of the Rules for the implementation of cash transactions and operations for the collection of banknotes, coins and valuables in second-tier banks, branches of non-resident banks of the Republic of Kazakhstan, the National Postal Operator and legal entities whose exclusive activity is the collection of banknotes, coins and valuables»</p> <p>Resolution of the Board of the National Bank of the Republic of Kazakhstan dated November 12, 2019, No. 188 «On approval of the Rules for formation of risk management and internal control system for second-tier banks,</p>
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The list of personal data necessary and sufficient to fulfill the
tasks performed by Freedom Bank Kazakhstan JSC
A0-08-13/115/ИД/10062025

	<p>Operator (as well as for the purposes of concluding and/or implementing securitization transaction(s) by the Operator);</p> <p>23) for marketing purposes, holding promotions, providing (forwarding) to the Subject any information materials, including about the products and/or services of the Operator and/or Partners, as well as other notifications via telephone, fax, other types of communication, as well as via open communication channels (including SMS, email, fax, social networks, push notifications, etc.);</p> <p>24) for the development of marketing and advertising campaigns, further banking/brokerage services, taking into account the history of the relationship of the Subject (the relationship of the person whose representative the Subject is) with the Operator, personalization of the services provided by the Operator or the Operator's partner;</p> <p>25) for the Operator's interaction with third parties providing service to the Subject (the person whose representative the Subject is) within the framework of banking and other services;</p> <p>26) for the purpose of booking passenger transportation services and subsequent registration of electronic travel</p>		<p>branches of non-resident banks of the Republic of Kazakhstan»</p> <p>Resolution of the Board of the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market dated March 22, 2020 No. 18 «On approval of the Requirements for the Internal Control Rules in order to combat the legalization (laundering) of proceeds from crime, the financing of terrorism and the financing of the proliferation of weapons of mass destruction for second-tier banks, branches of non-resident banks of the Republic of Kazakhstan and the National Postal Operator»</p> <p>License for conducting banking and other operations provided for by the banking legislation</p>
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The list of personal data necessary and sufficient to fulfill the
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A0-08–13/115/ИД/10062025

	<p>documents, with the possible receipt of any related services, the personal data of the Subject (or the person whose representative the Subject is) may be provided by the Operator to intermediary organizations in the field of booking and/or registration of transportation services and other services, including aggregators of such services and operators of automated booking systems through which booking of transportation services, registration of electronic travel documents is carried out, as well as any service providers (services for the provision of accommodation, transport services, services for the provision of tickets for attending events and/or other forms of tourist services);</p> <p>27) to conduct due diligence in accordance with the Bank's internal documents for further employment on the Bank's staff;</p> <p>28) for other purposes that are established (may be established) by the legislation of the Republic of Kazakhstan or provided for by agreements concluded between the subject and the Operator and other documents sent by the Subject to the Operator and/or by the Operator to the Subject.</p>		<p>of the Republic of Kazakhstan dated June 25, 2024, No. 1.1.108</p> <p>License for operations in the securities market dated June 12, 2024, No. 1.2.253/45</p> <p>Other international treaties, regulatory legal acts that extend their effect/regulate the activities of the Bank, as well as those regulating the formation of the specified personal data.</p>
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The list of personal data necessary and sufficient to fulfill the
tasks performed by Freedom Bank Kazakhstan JSC
A0-08–13/115/ИД/10062025

Abbreviations	Definition
Subject	The subject of personal data is the individual to whom the personal data relates
Operator	Organizations specified in the Appendix to the Consent to the collection and processing of personal data, approved by the Authorized Body of the Bank
Bank	Freedom Bank Kazakhstan JSC
RK	Republic of Kazakhstan