

## **PRIVACY POLICY**

The Privacy Policy outlines the policies and procedures adopted by Converse Bank to collect, use and identify customer information when using the services of Converse Bank CJSC by establishing the customer's rights for confidentiality of information and the legal regulations for protections of these rights.

## **TERMS AND DEFINITIONS**

### **Terms**

The capitalized words have the meaning provided that the below definitions have the same meaning irrespective of their singular or plural form.

### **Definitions**

For the purpose of the Privacy Policy:

- **Customer** (used herein as You or Your): an individual who uses any Service offered by the Bank or has applied to the Bank or has otherwise expressed an intention to use the Services of the Bank, including the company or other legal entity on whose behalf the individual acts to use the Services;
- **Bank** (used herein as We and Our): Converse Bank CJSC (16/1 Vazgen Sargsyan, 0010 Yerevan, Armenia), including its branches;
- **Website**: the official site of the Bank [www.conversebank.am](http://www.conversebank.am);
- **System**: other tools and systems offered by the Bank in internet, mobile, email and other environment, including mobile apps of the Bank enabling to use the banking services via email, phone or in other manner, without visiting the Bank. The types of systems, the terms and conditions of use are published on the Website or on other sites, software tools and apps designed for using the System and can be modified occasionally;
- **App**: software provided by the Bank to use banking services remotely, without visiting the Bank, which You can download on any electronic device and use after due registration;
- **User**: Customer of the Bank, who has registered a personal page in a certain domain to use the System;
- **Country**: Armenia;
- **Device**: any device with which You can access to the app, e.g. smart phone or digital tablet;
- **Personal data**: any information referring to the already or to-be identified person;
- **Services**: any service offered by the Bank on the terms and conditions posted on the Website, including through the System;
- **Usable data**: the data collected by the Bank, which emerged during the use of the Service or generate from the Service infrastructure or the System or App (e.g. System visit duration);
- **Affiliated company**: a company that controls or is controlled or is under common control by any party, where "control" implies 50% and more ownership of voting shares, equity or other securities to elect directors or other managers.

## **COLLECTION AND USE OF YOUR PERSONAL DATA**

### **Types of Collected Data**

#### **Personal Data**

To use our Services, we can request the disclosure of certain personal data that may be used to contact or identify You. The personal data can include but not limit to:

- Email
- First and family name
- Phone number
- Address: City Zip code, state, country
- System Use data

#### **How do we collect the data?**

We collect data from You when

- You fill in the Service Use applications (hereinafter the Applications) at the Bank or through the Systems,
- You use our official Website in the following cases:
  - You subscribe to the news
  - fill in the Feedback form
- You download the Apps offered by the Bank and get registered there.

The information obtained in this manner is deemed personal information/data.

#### **Usable Data**

The Usable Data are collected when using the Services through the Systems. The Usable Data can include information, such as Your Device's web address (e.g. IP address), type of browser, browser version, Service pages You visit, time and date of Your visit, time spent on that page, Device identifiers, System login and other identifiers. When You access the App through a mobile device, we may automatically collect certain information, including but not limited to the type of the mobile device, Your mobile device ID, Your mobile device IP address, Your mobile operator, type of mobile internet browser You are using, identifiers and other features of the device. We may also collect information that Your browser sends, when you access the System environment with the Device to use our Services.

#### **Use of Your Personal Data / Cookies**

The Bank may use Your Personal Data for the below purposes:

- To render our Services, and to oversee the use of our Services;
- To control Your user account by registering You as the System user. The personal data disclosed by You may enable You using various functions of the System that are accessible to You as a registered user;

- To perform the agreement: development of agreement(s) while You use the banking products/services, provision and commitment of compliance or entering into other agreement(s)/addenda/memoranda and/or establishing cooperation;
- To contact You by email, phone call or SMS or other equivalent means of electronic communication, such as push notifications to share updates referring to functions, products or contractual services, including security updates as required;
- To send You news about our products, Services and events, special offers and general information, especially about the products that You have already purchased or have requested, certainly unless You refuse to get such information;
- To respond to and manage Your requests addressed to us;
- To transfer the business: we can use Your data to assess or carry out merger, concession, reorganization, liquidation, sale or transfer of some or all of our assets as continuation of business, or as part of bankruptcy, liquidation or a similar procedure, where the transferred assets include the personal data held about the users of our Services;
- For other purpose: we can use Your data for other purposes, such as data analysis, identification of use trends to assess and to improve the efficiency of our promo campaigns, our Services and Your experience in using our Services.

We may transfer Your personal data in the following cases:

- We may transfer Your personal data to our service providers to oversee and analyze the use of our Services as well as to contact You;
- To transfer business: we may transfer Your personal data in the process of merger of our company assets, sale or financing or acquisition of our business totally or partially by another company or during the negotiations;
- To transfer Your personal data to the Affiliated companies or our branches/affiliated persons by demanding their compliance with the provisions of the Privacy Policy. The Affiliated companies include our founder company and any other subsidiary, branch, joint venture or other company that are controlled by us or are under common control together with us;
- We may transfer Your personal data to our partners to offer You certain products, services or promo actions;
- We may transfer Your personal data to third parties: when you share Your personal data or communicate with other users in the public domain, all users can view and obtain such information in the public domain;
- We can publicize/transfer Your personal data for any other purpose with Your consent.

### **Definition and Use of Cookies**

HTTP cookies (also called web cookies) are small blocks of data created by a web server while you are browsing a website and allow the Website or Systems recognize Your browser and remember certain information, including the number of Your visits. We can use such information to identify Your preferences based on Your previous or current actions.

**Storage of Your Personal Data**

The Bank will store Your personal data as long as it is required to achieve the goals set under the Privacy Policy. We will store and use Your personal data to the extent it is required under the RA Law on Protection of Personal Data (hereinafter the Law) to perform our obligations (e.g. when it is required to store Your data based on the Law), to settle the disputes and to implement the legal agreements and policies. The Bank can also store the Usage Data for the internal analysis purposes. The Usage Data are usually stored for a shorter period, except in cases when they are used to strengthen the security or to improve the quality of our Service, or if we have undertaken to store the data for a longer period.

**Transfer of Your Personal Data**

Your information, including the Personal Data are processed at the operational offices of the Bank and in any other location of parties involved in the processing of Personal Data. The latter implies that the information may be transferred and stored on the computers outside Your country, state, region or other government jurisdiction, where the data protection laws may differ from the laws of Your country. By accepting the Privacy Policy, and the consequent disclosure of personal data by You, You give Your consent to the transfer. The Bank undertakes to take all relevant actions to ensure the security of Your data in accordance with the Privacy Policy and assures that Your Personal Data will by no means be transferred to another company or country without the appropriate control and security.

**REMOVAL/DELETION OF YOUR PERSONAL DATA**

You can delete or request our assistance to delete the Your Personal Data. Our Systems/Apps will enable you deleting certain information about You. You can update, change or delete Your data at any time by logging into your account (if available) and managing your Personal Data by going to your account settings. You can also contact us with a request to access, correct or delete any Personal Data You have provided to us. Please note that we may need to retain certain information if we have a legal obligation or legal ground to do so.

## **DISCLOSURE OF YOUR PERSONAL DATA**

### **Business Transactions**

Your Personal Data can be transferred if Your company is involved in merger, acquisition or sale of assets. We will notify You prior to the transfer of Your Personal Data and the application of any other Privacy Policy in that connection.

### **In Cases Provided by the Law**

In a specific situation, the Bank may have to disclose Your Personal Data, if such disclosure is required by the Law or in response to the legal (lawful) request of government authorities (e.g. the court or the government agency).

### **Other Legal Requirements**

The Bank may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Perform the obligations set under the RA laws,
- Protect the rights or ownership of the Bank,
- Prevent or investigate potential legal violations related to Services, including Systems/Apps,
- Ensure the personal security of Service users, System/App users or the public,
- Protect against legal liability.

## **SECURITY OF YOUR PERSONAL DATA**

We prioritize the security of Your Personal Data and use various security measures; however, You should remember that no method of transmission over the Internet or electronic storage of data is 100% secure. Although we attempt to apply all acceptable measures to protect Your personal data, we cannot guarantee their absolute security. Your personal data are always in protected networks that are accessible only to a limited number of people who have specific access to the particular systems and are obliged to maintain the confidentiality of personal data and information in the legally defined manner.

## **CHILDREN'S PRIVACY**

Our Service is not intended for persons under the age of 14. We do not collect any personal data of persons under the age of 14. Please contact us, if you are a parent or guardian and you are aware that your child has provided us with Personal Data. Should we become aware that we have collected personal data from anyone under the age of 14 without verification of parental consent, we will take steps to

remove/delete that information from our systems. Where consent is required as a legal basis for processing Your information, and where the law requires parental consent before collecting and using such information, we may seek consent from the child's parent.

### **LINKS TO OTHER SITES**

Our Website or apps may contain links to other sites that are not managed by us. If you use a third-party link, you go to that third-party's site. We recommend carefully review the Privacy Policy of any site You visit. We do not control, neither we assume responsibility for the content, privacy policy or practice of third-party sites or services.

### **REVISION OF THE PRIVACY POLICY**

We can update our Privacy Policy occasionally. We will inform you about any change by posting our restated Privacy Policy on this page. We recommend that you periodically review the Privacy Policy to be aware of any changes. The amendments to the Privacy Policy take effect from the point they are published/posted on the site.

### **Feedback**

Should you have any questions about the Privacy Policy, please contact us by:

- Visiting our Website page <https://conversebank.am/hy/contact-us/> and/or
- Calling us at +374 10 511211