

December 2020

Sberbank CIB (UK) Ltd

Privacy Notice

Data Privacy according to GDPR

Our data privacy notice has been updated according to the Data Protection Act 2018 and General Data Protection Regulation (GDPR) of the European Union.

The protection of your personal data is of great importance to us. Sberbank CIB (UK) Limited handles your personal data responsibly and in compliance with all applicable statutory data protection provisions. To provide corporate finance, investment banking services and market trade operations to its' clients, Sberbank CIB (UK) Ltd ("we", "us" or "our", "company") may collect and process personal data relating to individuals associated with corporate clients (which include individuals and representatives/contacts from corporate clients), counterparties, employees, candidates, suppliers, distributors and other business partners.

Personal data means any information identifying directly or indirectly an individual. This notice provides information as to how, when and why Sberbank CIB (UK) Ltd may process personal data.

Responsibilities and contact details

Sberbank CIB (UK) Ltd is the Data Controller within the meaning of the General Data Protection Regulation (GDPR) and is located at 85 Fleet Street, London, EC4Y 1AE, United Kingdom and is responsible for the collection and use of your personal data for the purposes described in this Privacy Notice. The Data Privacy Manager of Sberbank CIB (UK) Ltd can be contacted via email: privacy@sberbank-cib.ru and further contact details are outlined in the 'Contact Information' section.

Main Purposes of Data Processing

Processing purposes	Legal basis
Client and counterparty relationship management and account administration (including management of invoices)	<ul style="list-style-type: none">• Legal obligation• Legitimate interests to manage operations and third party relationships and to keep our records updated
Transaction processing, registering of trades, monitoring and reporting activities (e.g. management of client orders receipt, transmission, execution of clients orders, compliance with reporting obligations under Mifid II)	<ul style="list-style-type: none">• Legal obligation• Performing of a contract• Legitimate interests to provide its services and manage business operations

<p>Undertaking client due diligence checks for the prevention, detection, investigation and prosecution of financial crimes (including but not limited to money laundering, terrorism financing, fraud and other financial crimes) in any jurisdiction, identity verification, government sanctions screening and due diligence checks</p>	<ul style="list-style-type: none"> • Legal obligation • Legitimate interests to prevent and investigate fraud, money laundering, market abuse, insider dealing and other crimes and to verify the clients /counterparties' identity in order to protect our business.
<p>Compliance with applicable local or foreign law, regulation, policy, voluntary codes, directive, judgement or court order, as well as any contractual obligation pursuant to agreements between any member of Sberbank CIB (UK) Ltd and any authority, regulator or enforcement agency or body or any request coming from said entities, which it is subject to and co-operating with regulators and law enforcement bodies</p>	<ul style="list-style-type: none"> • Legal obligation
<p>Communicating with (including corporate marketing materials, market research and marketing related data processing) the client, counterparty and related parties from time to time about products, services, events offered by Sberbank CIB (UK) Ltd or Sberbank group companies and other communications such as research and insights that may be of interest to the client/counterparty and related parties.</p>	<ul style="list-style-type: none"> • Legitimate interests of the company to manage third party relationships, make suggestions and recommendations about services that may be of interest, to develop its products and services and grow its business.
<p>Monitoring and recording of communication and activity, including telephone calls, emails and premises security access controls</p>	<ul style="list-style-type: none"> • Legal obligation • Legitimate interests for provision of administration and IT services, network and premises security, to prevent fraud and criminal activity.
<p>Recruitment management, personnel management, career management and training provisions (including staff onboarding and offboarding, performance review, payroll and expenses management); management of personnel account dealing and outside business interests)</p>	<ul style="list-style-type: none"> • Legal obligation • Performing of a contract
<p>Vendor management including vendor selection, vendor screening/assessment, onboarding, offboarding, contract management, vendor performance and invoice payments)</p>	<ul style="list-style-type: none"> • Performing of a contract • Legitimate interests to manage third party relationships and to keep our records updated

Sberbank CIB (UK) Limited
85 Fleet Street, 4th Floor, London
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Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that personal data when requested, we may not be able to perform the contract we have or are trying to enter into with you. We will only use personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we plan to use the personal data provided to us for other purposes than those described above, we will provide information about that processing at the time of collection.

Web tracking-data

Our website is for information purposes only. We do not use any form of cookies and do not collect or process personal information via this website. In particular, we do not gather any data regarding your logging IP address or session information.

How we share your personal data

We may provide personal data about you to any Sberbank group companies or third parties for the purpose of processing transactions, payments or settlements, or in connection with the provision of products and services, below are the group companies with whom we may share your personal details: Sberbank CIB's offices located in Moscow, New York, Nicosia and group company Sberbank Europe AG...

We will only do this where permitted by applicable law. We may have to provide personal data to regulatory, judicial, tax and supervisory authorities to meet our legal obligations, subject to applicable law. Personal data may also be passed to law enforcement agencies if we identify or suspect criminal activity. We may provide personal data to our service providers and agents (including their sub-contractors). This includes (but is not limited to) organisations that host our IT systems and data, our legal advisors and accountants. Where we engage with a supplier or agent to process client and related parties' information on our behalf, we will undertake due diligence, monitoring and assurance activities to ensure that the personal data is appropriately protected, and contractual clauses will be agreed between the parties to ensure that data protection and confidentiality is maintained in accordance with the requirements of applicable law. In addition, we may disclose personal data in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganisation, dissolution, or liquidation).

Data transfer

We may transfer to and store the personal data we collect in countries other than the country in which the personal data was originally collected, including countries outside the European Economic Area ("EEA"), in accordance with applicable law. Those countries may not have the same data protection laws as the country in which the personal data was provided. When we transfer personal data to other countries, we will protect the personal data as described in this Privacy Notice and comply with applicable legal requirements providing adequate protection for the transfer of personal data to countries outside the EEA.

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Retention of personal data

We retain personal data for as long as necessary to fulfil the purposes for which we collect it, except if required otherwise to retain the personal data for longer for legal, regulatory and fraud prevention purposes.

Rights of individuals in relation to their personal data

Subject to applicable law, you have the right to request access to the personal data we maintain about you, rectification of your personal data if it is inaccurate or outdated, or erasure of your personal data in certain circumstances specified in the law. You may also request the restriction of the processing of your personal data or object to that processing on grounds relating to your particular situation. Also subject to applicable law, you have the right to receive a copy of your personal data in a structured, commonly used, machine-readable format, including a right to have that personal data transmitted to another organisation. Please refer to the 'Contact Information' section for details on how to exercise these rights. In order to exercise these rights we will require proof of identity.

Contact information

Below are the contact details for any complaints or any access, correction or other requests in respect of the personal data we hold about individuals:

Data Privacy Manager
Sberbank CIB (UK) Ltd
85 Fleet Street
London
EC4Y 1AE
UK
Email: privacy@sberbank-cib.ru

Complaints

Sberbank CIB (UK) Ltd is committed to working with individuals to obtain a fair resolution of any complaint or concern about privacy. If, however, individuals believe that we have not been able to assist with their complaint or concern, they have the right to make a complaint to the data protection authority, for more information please visit www.ico.org.uk.