

Please, Carefully Review the Privacy Policy

1. General Provisions

1.1. JSC 'Liberty Bank' (hereinafter the '**Bank**' or '**We**' or '**Our**') appreciates your visit to this website (hereinafter the '**Website**') and your interest in our services and products.

1.2. In the following text, the words "**You**", "**Your**" and "**User**" means any guest visiting the **Website**.

1.3. By using **Our** services **You** fully agree on the terms and conditions of **Our** Privacy Policy (hereinafter the "**Policy**"); furthermore, If **You** do not agree on the rights and obligations defined thereby, do not use **Our** services (including not navigating to other/further web pages of the **Website**).

1.4. Unless otherwise specified by the Agreement between the **User** and the **Bank**, this **Policy** automatically applies to various banking products, which the **User** may receive in material (payments, money transfers, currency exchange, etc.) and/or electronic (Web browser, the **Website**, internet and mobile banking services as well as other Bank mobile applications, cash payment terminals, ATM and/or other means of digital data transmission) forms.

1.5. The Policy may be updated occasionally. **We**, therefore, ask **you** to consult it on a regular basis.

2. What are the purpose and scope of the Policy.

2.1. The objectives of the **Policy** are to inform that **our** services cannot be rendered without processing **Your** personal data. Data processing includes any data-related activities performed through automatic, semi-automatic or non-automatic means, namely, collecting, recording, photographing, audio and video recording, organizing, storing, manipulating, recovering, retrieving, using, or disclosing the data by sharing, distributing or otherwise making them available, as well as collating or combining, blocking, deleting or destruction thereof.

2.2. **Your** personal data processing in the e-channels (web browser, the **Website**, internet and mobile banking services, as well as other Bank mobile applications, cash payment terminals, ATM and/or other means of digital data transmission) also includes recording **your** activities (for example, identification of your location when using electronic channels, description and analysis of search terms entered in the search field, recording the frequency of product selection and/or any other statistics and analysis thereof) and/or use of other data specified by **You** (for example, your and/or third parties' contact details).

2.3. Please note that, this **Policy** is not applicable to any websites the **Website** may link to, which are controlled by third parties not affiliated with the **Bank** (hereinafter '**Third Party Sites**'). Please review the privacy statements of **Third Party Sites** as the **Bank** is not responsible for and has no influence on the content or the privacy policies of **Third Party Sites**.

3. Our Privacy and Information Security Principles

3.1. Respect and protection of **User** privacy is vital to our business. By sharing **our** privacy principles, **we** believe that **Users** will better understand **Our** methods of ensuring **User** privacy and information security principles in the course of provision of - services and products.

3.2. **We** seek to collect, use and maintain **User** information only for appropriate purposes. **We** limit the collection, use and storage of **User** information to what **we** reasonably believe will help us in delivery of high quality day to-day services, business administration, risk management, service and product marketing as well as complying with applicable laws and regulations. Note that the data provided by the **User** via electronic channels (web browser, the **Website**, internet and mobile bank services, as well as other Bank mobile applications, cash payment terminals, ATM and/or other means of digital data transmission) will be processed even after they have been deleted by the **User** from the e-channels. These data will be stored for the period corresponding to the objectives and interests of the **Bank** and/or which is provided by law.

3.3. We may disclose **Your** personal data and any other information to third parties within the limits provided for in Paragraph 4 of the present **Policy** and in line with the applicable laws.

3.4. We take the responsibility to protect **User** privacy and confidentiality with due respect and consideration. We maintain physical, electronic and procedural safeguards which comply with applicable legal standards to store and secure **User** information from unauthorized access and use, manipulation or destruction. **Our** internal policies and procedures have been developed in order to protect the **User** information confidentiality and comply with relevant rules and regulations. We deem it to be the responsibility of **Our** staff to comply with those policies, procedures, rules and regulations.

3.5. Occasionally, we enter into agreements with other companies providing third party services to the **Bank** and **Users**. Under these agreements, the third party service providing companies may obtain **User** information, but they are obliged to secure the confidentiality of the information and use it only for the purposes specified by the **Bank**.

3.6. For more information regarding personal data processing and your rights, please read our [Data Protection Policy](#)

4. Transferring/disclosing information to and from the third parties

4.1. By using **our** services, **you** vest the **Bank** with the right to:

4.1.1. Obtain, in line with the applicable laws, necessary personal data from the electronic database of LEPL State Services Development Agency for the purpose of multiple provisions of banking services and in the volume required for the implementation thereof.

4.1.2. Transfer to and/or receive from the third parties (including but not limited to, controlling/supervising agencies, auditors, potential assignees), in line with the applicable laws, the personal data necessary for the provision of multiple banking services and uninterrupted delivery thereof.

4.1.3. Transfer and/or disclose the confidential information and/or personal data to its affiliates or any other third parties for the provision of services (including, direct marketing).

4.1.4. Provide in the manner and within the terms determined at its own discretion and agreed with JSC 'Credit info Georgia' (identification code: 204470740, hereinafter 'Credit info') and/or any other entity conducting the same business, the **User** information, which without limitation includes: **User** identification data, grounds for and amount of credit indebtedness and penalty, purpose and terms of the credit, accrued interest, payments schedule, balance of debt, and the outcome of court/arbitral and enforcement proceedings in case of a legal/arbitral dispute.

4.1.5. Allow Credit info to transfer the **User's** personal data, furnished by the **Bank** to third parties provided that the above-specified data will be delivered to those parties which themselves provide data to Credit info on contractual basis.

4.1.6. Seek, obtain and use the **User** data available in Credit info's database.

5. Use of Personal Data for Marketing Purposes

5.1. When using **Our** services **You** vest the **Bank** with a right to send SMS, voice and/or other types of advertising messages to the **User's** cell number, email address recorded in the **Bank** according to the periodicity defined by the **Bank** until further notice of the **User**.

5.2. For the avoidance of any doubt, sending the advertising/information messages which are delivered to the **User** directly at service points (advertising banner, flyer, verbal offer, etc.) or via the electronic channels of the **Bank** (associated thereto) (including ATM, internet bank, mobile bank, etc.), are not considered as direct marketing and the **User** is not entitled to request the Bank to cease sending such messages

6. Maintenance of Website Information Confidentiality from Third Parties

6.1. **User** should take into account that the system does not keep logging off automatically after closing the **Website** and the data will be available to third parties before completion of the session. The **Bank** will not be held responsible for the abovementioned matter.

6.2. **We** reserve the right to determine and change the validity and terms of the session.

7. Navigation Data

7.1. IT systems and software procedures adopted for the **Website** maintenance, when functioning properly, collect different types of personal data that is transferred via the Internet (based on TCP/IP protocol).

7.2. This information is not collected in order to be linked to the specific persons it refers to. However, its nature is such that, through processing and collating of data held by third parties, it may be possible to identify the navigating users.

7.3. This class of information includes the IP addresses and the domain names of the computers of **Users** visiting the **Website**, the addresses of requested resources (in URI, Uniform Resource Identifier format), the time of the request, the method used to forward the request to the web server, the size of the file obtained as response, the numerical code indicating the status of the response provided by the web server (successful, error, etc...) and other parameters relative to the operating system and to the user's IT environment. This data is only to be used for anonymous statistical information relative to use of the **Website** and for control of correct functioning of the said **Website**.

7.4. Please note that the said data may be used for investigations directed at identifying any persons responsible for actions classed as computer crime, which are detrimental to the **Website** or to the structure of the data processing unit, or other connected or linked websites. If no such investigations are conducted, the data relative to web contacts is destroyed in a few days.

8. Data Provided Voluntarily by User

8.1. When requests are made to send e-mail messages to the addresses indicated in the address section of the **Bank Website**, this implies the acquisition of certain items of the requesting party's personal data, including the requesting party's e-mail address.

8.2. Specific notices in summary form are progressively included or displayed on the website pages hosting the specific services that may be requested.

9. Cookies

9.1. The **Bank's Website** contains cookies. Cookies are small text files saved to your computer's hard drive that track, save and store information when navigating certain websites, and ensure successful usage of the Website.

9.2. There are two types of cookies. So-called persistent cookies remain on your hard drive for a certain period of time. They are used to record information about a visitor's web browsing habits and collect statistics.

9.3. So-called session cookies are temporary cookie files, which are erased when **You** close your browser. **You** have to agree on using a session cookie in order to employ the Bank's Internet services. Session cookies enables **You** to carry out banking transactions. Session cookies expire as soon as **You** leave the **Website** or close the browser.

9.4. If **You** refuse cookies, **You** are free to change your web browser (Internet Explorer, Mozilla Firefox, Google Chrome, etc) security system. Please note that if you refuse session cookies, you will not be able to perform the banking transactions and other operations using **Bank's Website**.

10. Facultative Nature of Personal Data Transfers

10.1. Apart from the above-described navigation data, **Users** are free to enter their personal information in the electronic request forms in **Website** sections for specific requested services. Please note that it may not be possible to process **Your** requests if this data is not provided.

11. Processing Procedures and Security Measures

11.1. Personal data is processed by means of automated and non-automated equipment. It is processed only for the period of time that is required to fulfill the tasks for which the said data was collected. Conformity with specific security measures is ensured in order to prevent data losses, illicit or incorrect use, and unauthorized access. The data provided by the **User** in the **Website** sections for specific services is ciphered by using a security technology resource termed Secure Sockets Layer (SSL). SSL technology encrypts the information before it is transmitted via the Internet between the **User's** computer and the **Bank's** central systems. As a result this information is rendered incomprehensible to unauthorized parties, and the privacy is ensured. The use of SSL technology requires a compatible browser capable of permitting 'exchange' of security keys of a minimum length of 128 bits, enabling secure connection with the **Bank's** central systems.

12. What should we consider when sending data over the Internet?

12.1. The Internet is generally not regarded as a secure environment, and information sent via the Internet can be accessed by unauthorized third parties, potentially leading to disclosures, changes in content or technical failures. Even if both sender and receiver are located in the same country, information sent via the Internet may be transmitted across international borders and be forwarded to a country with a lower data protection level than exists in your country of residence.

12.2. Please note that **we** accept no responsibility or liability for the security of **your** information whilst in transit over the Internet to the **Bank**. In order to protect **Your** privacy, **we** would like to remind you that **You** may choose another means of communication with the **Bank**, where You deem it appropriate.

13. Copyright

You consent that **Your** data (printed, audio and/or visual) other than **your** personal information, which **you** have provided via the **Website**, internet bank, mobile bank, as well as mobile applications and other types of electronic channels are considered the **Bank's** property and the **Bank** fully gets intellectual property rights thereto upon placement.

14. Minors

The **Bank** does not knowingly use the Bank channels to obtain data from persons of less than 18 years of age.