

POLICY

Personal Data Protection

October 2023

Personal Data Protection Policy

Section I: Purpose

This document sets out the Bank's policy in relation to the Processing of Personal Data.

Section II: Definitions

Terms used in this Policy have the following meanings:

Bank or EBRD	means the European Bank for Reconstruction and Development.
Data Subject	means a living individual.
Implementing Acts	means any Directive and/or Procedure adopted by the Bank in order to implement this Policy.
Personal Data	means any information related to an identified or identifiable Data Subject; an identifiable Data Subject is an individual who can be identified directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, an online identifier or to one or more factors specific to physical, physiological, genetic, mental, economic, cultural or social identity of that Data Subject.
Policy	means this Personal Data Protection Policy.
Process(ed) or Processing	means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, which may include, without limitation, collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, forwarding, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Section III: Scope

1. Applicability

This Policy applies to all Personal Data Processed by or on behalf of the Bank, including Personal Data transferred by the Bank to third parties.

2. Policy Principles

The Bank shall Process Personal Data in accordance with the following principles:

- (a) **Lawfulness:** Personal Data shall be Processed in accordance with one of the express basis set out in the Implementing Acts.

- (b) Purpose Limitation: Personal Data shall be collected for one or more specified, and legitimate purposes and not further Processed in a manner that is incompatible with those purposes.
- (c) Minimisation Principle: The Bank shall endeavour, to the extent reasonably practicable, to Process Personal Data that is relevant and limited to what is necessary in relation to the purposes for which they are Processed.
- (d) Fairness: The Bank shall act with fairness when Processing Personal Data.
- (e) Transparency: The Bank shall Process Personal Data in a transparent manner, subject to legitimate expressly specified exceptions as set out in the Implementing Acts, and in accordance with this Policy.
- (f) Security: Personal Data shall be protected by appropriate technical and organisational safeguards against unauthorised Processing and against accidental loss, destruction or damage.
- (g) Accuracy: The Bank shall take measures to ensure that Personal Data Processed by it is as accurate as possible and updated as necessary to fulfil the purposes for which it is Processed.
- (h) Storage Limitation: The Bank shall retain Personal Data for the duration specified in its applicable retention schedule(s) adopted in accordance with the Bank's policy on information management.

3. Transfer of Personal Data

The Bank shall transfer Personal Data to third parties only for specified purposes and provided that such third parties comply with a standard of protection of Personal Data equivalent to at least the level of protection established by this Policy and the Implementing Acts.

4. Accountability and Supervision

The Bank shall establish an appropriate accountability and supervisory mechanism to oversee the implementation and on-going compliance with this Policy including, but not limited to:

- (a) providing, subject to certain limitations and conditions, Data Subjects with information about the Processing of their Personal Data when collecting or receiving their Personal Data and at other times upon Data Subjects' request;
- (b) responding, subject to certain limitations and conditions, to requests from Data Subjects regarding their Personal Data Processed by or on behalf of the Bank; and
- (c) allowing Data Subjects to submit a complaint if they reasonably believe that their Personal Data has been Processed in violation of this Policy and the Implementing Acts.

Section IV: Waivers, Exceptions and Disclosure

Waivers

Not Applicable.

Exceptions

Not Applicable.

Disclosure

This Policy will be disclosed on the Bank's website immediately upon approval.

Section V: Transitional Provisions

Not Applicable.

Section VI: Effective Date

This Policy is effective on the date of its approval.

This Policy and the Implementing Acts shall apply to the Personal Data Processed by or on behalf of the Bank on or after the effective date of this Policy.

Section VII: Decision Making Framework

The Vice President, Risk & Compliance is accountable for this Policy.

The Managing Director, Risk Management is responsible for this Policy.

Section IIX: Review and Reporting

Review

This Policy will be reviewed annually.

Reporting

Not Applicable.

Section IX: Related Documents

Not Applicable.