客户个人信息隐私保护政策（对公业务）

Privacy Policy (Corporate Business)

更新日期：2025 年 1 月【24】日

Update: January [24th], 2025

生效日期：2025 年 1 月【24】日

Effective date: January [24th], 2025

俄罗斯外贸银行公众股份公司上海分行（下称“我行”，“我们”）制定并发布《客户个人信息隐私保护政策（对公业务）》（下称“本政策”），向对公客户（下称“贵司”、“相关客户”）及相关人士（以下统称为“相关人士”或“您”）说明我行关于个人信息的保护的做法。您可以通过本政策了解我行收集、使用个人信息的目的、方式、范围，了解与您有关的个人信息的权益以及维护您权益的方式。

The Shanghai Branch of VTB Bank (PJSC) (hereinafter referred to as "the Bank", "we" or "us") has formulated and issued the Privacy Policy (Corporate Business) (hereinafter referred to as "this Policy"), to our corporate customers (hereinafter referred to as "You", "Relevant Customers") and related persons (hereinafter collectively referred to as "Relevant Persons" or "You") describes our practices regarding the personal information protection. You can use this policy to understand the purpose, manner and scope of the Bank's collection and use of personal information, your rights and interests with respect to your personal information, and the manner in which your rights and interests will be safeguarded.

本政策既构成我们与贵司的法律协议，也构成我们与个人信息保护主体之间的协议。为了在向贵司提供服务的同时保护个人信息主体的权利，贵司与我行建立业务关系、使用我们的产品和服务前，贵司和相关人士均需仔细阅读并同意本政策的内容。如贵司使用我们的产品和服务或向我们提供个人信息，即视为相关人士已经同意我们根据本政策收集、使用、加工、存储、披露传输和以其

他方式传输个人信息。贵司应确保在提供相关人士的个人信息时已取得相关人士的同意和授权并应配合我们的相关措施以获取和记录相关人士的单独同意。

This Policy constitutes both a legal agreement between us and your company and an agreement between us and the subject of personal information protection. In order to protect the rights of the subject of personal information while providing services to you, both you and the relevant person are required to read and agree to the contents of this Policy before you enter into a business relationship with us, use our products and services. By using our products and services or providing us with personal information, you shall be deemed to have consented to the collection, use, processing, storage, disclosure of transmission and other transfer of personal information in accordance with this Policy. You should ensure that you have obtained the consent and authorization of the relevant persons when providing them with personal information and should cooperate with our measures to obtain and record the relevant persons' individual consent.

定义：

Definition:

“相关人士”指为了满足适用法律的规定、国家金融监督管理总局、中国人民银行、国家互联网信息办公室的要求及/或银行向对公客户提供服务前的尽职调查等目的，对公客户需要收集并向银行提供的、对公客户的个人股东、法定代表人、联系人等自然人。

“Relevant Persons” refers to the natural persons of the corporate customer, such as individual shareholders, legal representatives, and contacts, who need to be collected and provided to the bank by the corporate customer for the purposes of meeting the requirements of applicable laws, the requirements of the China Banking Regulatory Commission, the People's Bank of China, and the Cyberspace Administration of China, and/or the bank's due diligence before providing services to corporate customers.

“个人信息”指以电子或者其他方式记录的与已识别或者可识别的自然人有关的各种信息，但不包括匿名化处理后的信息。

“Personal information” refers to all kinds of information about an identified or identifiable natural person recorded electronically or otherwise, but does not include information that has been anonymized.

“个人信息的处理”指个人信息的收集、存储、使用、加工、传输、提供、公开、删除等。

“Processing of personal information” refers to the collection, storage, use, processing, transmission, provision, disclosure, erasure, etc., of personal information.

本政策以分层形式提供，您可以点击进入具体章节。

This policy is provided in a layered format, and you can click to enter specific sections.

一、我们如何收集个人信息

How We Collect Personal Information

我们收集与我们业务相关、基于我们履行法定义务所需或其他适用的法律法规允许收集的个人信息。我们收集的个人信息类型可能包括但不限于：

We collect personal information that is relevant to our business, necessary for us to fulfill our legal obligations or permitted by other applicable laws and regulations. The types of personal information we collect may include, but are not limited to:

（1） **个人基本信息，包括个人姓名、国籍、电话、邮箱、通讯地址、出生日期、出生地；**

Basic personal information, including the individual's name, nationality, telephone number, e-mail address, mailing address, date of birth, and place of birth;

（2） **个人身份信息，包括身份证件信息（包括证件种类、证件号码、签发地、签发机关、签发日期、证件有效期）；**

Personal identification information, including identification document information (including ID type, ID number, place of issuance, issuing authority, date of issuance, and expiration date);

（3） **与我们之间的通信和其他通讯记录（录音录像、通话记录、通信记录和内容等）；**

Records of correspondence and other communications with us (audio and video recordings, call logs, correspondence records and contents, etc.);

（4） **为了履行合同、法律和监管合规义务，在建立、维持业务关系过程中获取的其他信息，如：您提供的文件中包含的其他个人信息；发现、调查任何可疑和异常活动所需的个人信息。**

In the course of establishing and maintaining a business relationship, we may obtain other information to fulfill contractual, legal, and regulatory

compliance obligations. This includes other personal information contained in documents provided by you, as well as personal information required to detect and investigate any suspicious and unusual activity.

我们收集的个人信息可能包括纸质、电子（包括但不限于通过网站、网上银行、电子邮件渠道收集的信息）或其他任何形式的信息。

The personal information we collect may be in paper, electronic (including, but not limited to, information collected through websites, online banking, e-mail channels) or any other form.

2. 我们获得您的个人信息的途径：

The method by which we collect your personal information:

（1） 客户填写、提交产品或服务申请书等资料时（含 KYC 资料）向我行提供；

Provided to the Bank by the customer when filling out or submitting information such as application forms for products or services (including KYC information);

（2） 客户使用我行如下产品、服务，在办理各项业务过程中，基于业务需要向我行提供；

The customer uses the following products and services of the Bank and provides them to the Bank based on business needs in the course of handling various businesses:

- 跨境及境内支付 Cross Border and Domestic Payments
- 国际单证业务 Documentary Operations
- 短期贸易融资和出口信贷 Short-term trade and export finance
- 信贷业务 Credit Service
- 卢布/人民币、外币/人民币外汇交易 Foreign Exchange

- 衍生产品交易业务 Derivative Transactions

（3） 通过政府公示系统、媒体网络等合法的公开信息渠道获得。

Obtained through legal public information channels such as government public notification systems and media networks.

3. **如果我们收集敏感个人信息，我们将仅基于特定目的并以符合《中华人民共和国个人信息保护法》（以下简称：《个保法》）和其他适用法律要求的方式进行使用。**

If we collect sensitive personal information, we will use it only for the specific purpose and in a manner that complies with the requirements of the PRC Personal Information Protection Law ('PIPL') and other applicable laws.

4. **请您知悉，以下情形中，我们收集个人信息无需征得您的授权同意：**

Please be aware that we do not require your authorized consent to collect personal information in the following circumstances:

（1） 根据您的要求签订或履行合同所必需的；

Necessary to enter into or perform a contract at your request;

（2） 与我们履行法律、法规规定的义务相关的；

Related to the fulfillment of our obligations under laws and regulations;

（3） 与国家安全、国防安全有关的；

Related to national security and national defense security;

（4） 与公共安全、公共卫生、重大公共利益有关的；

Related to public safety, public health, and significant public interests;

（5） 与犯罪侦查、起诉、审判和判决执行等有关的；

Related to crime investigation, prosecution, trial and judgment execution;

（6） 出于维护您或者其他个人的生命、财产等重大合法权益但又很难得到您

同意的；

For the purpose of safeguarding your life, property and other important legal rights and interests or those of other individuals, but it is difficult to obtain your consent;

（7） 所收集的个人信息是您自行向社会公众公开的；

The personal information collected is disclosed to the public by you;

（8） 从合法公开披露的信息中收集的您的个人信息的，如合法的新闻报道、政府信息公开等渠道；

Your personal information collected from legitimate public disclosure of information, such as legitimate news reports, government information disclosure and other channels;

（9） 为检查、处理产品或服务存在的缺陷，维持产品或服务稳定运营所必需的；

Necessary for checking and dealing with defects in products or services and maintaining stable operation of products or services;

（10）法律、行政法规规定的其他情形。

Other cases stipulated by laws and administrative regulations.

二、我们如何使用个人信息

How We Use Personal Information

1. 当您以访客身份访问、浏览我们的网站时，我们不会收集、使用您的信息。

When you visit and browse our website as a guest, we will not collect or use your information.

2. 当您在申请、成为本行对公客户的相关人士时，我们会基于下述目的、用途使用您的信息：

When you apply to become a Relevant Person of our corporate customer, we will use

your information for the following purposes:

（1） 向相关客户提供产品或服务，识别、验证您或相关客户的身份，审批、管理、处理、执行或实现您或相关客户要求或授权的任何交易；

Providing products or services to relevant customers, identifying and verifying your or relevant customers' identity, approving, managing, processing, executing or realizing any transaction requested or authorized by you or relevant customers;

（2） 维护我行业务、服务的正常、安全运行和防范；

Maintaining the normal and safe operation and prevention of our business and services;

（3） 遵守或执行任何适用规范（“适用规范”指适用于任何我行的法律、法规、条例、规章、判决、裁定、自律守则、指令、制裁制度、法院命令、任何我行与权力机关之间的协议，或权力机关之间达成的适用于本行或我行成员的协议或条约）或任何权力机关的命令或要求；

Complying with or enforcing any Applicable Regulations (where Applicable Regulations means any law, statute, ordinance, regulation, judgment, ruling, self-regulatory code, directive, sanctions regime, court order, agreement between us and a Competent Authority, or agreement or treaty between Competent Authorities that is applicable to us or our members); or any order or request of a Competent Authority;

（4） 履行我行的合规责任（包括监管合规、税务合规及在任何适用规范项下或任何权力机关要求的合规责任）或执行我行为履行合规责任而制定的政策和程序；

To fulfill our compliance obligations (including regulatory compliance, tax compliance and compliance with any applicable regulations or requirements of any Authority) or to implement our policies and procedures for compliance with our compliance obligations;

（5） 为履行银行法定义务或法定职责的目的（包括但不限于客户尽职调查、持续尽职调查、制裁和反洗钱调查、监管报告、可疑交易调查等）；

For the purpose of fulfilling our statutory obligations or duties under banking laws (including but not limited to customer due diligence, ongoing due diligence, sanctions and anti-money laundering investigations, regulatory reporting, suspicious transaction investigations, etc.);

（6） 保障金融服务的安全、稳定，预防或禁止非法或违规活动、控制或降 低风险，侦测、调查及预防任何现实、涉嫌或潜在的金融犯罪活动（包括洗钱、恐怖主义融资、贿赂、贪污、逃税、欺诈、逃避经济或贸易制裁及/或违反有关此等事宜的任何适用规范，或旨在规避或违反有关此等事宜的任何适用规范的任何行为或企图），管理金融犯罪风险；

To safeguard the security and stability of financial services, prevent or prohibit illegal or irregular activities, control or reduce risks, detect, investigate and prevent any actual, suspected or potential financial crime (including money laundering, terrorist financing, bribery, embezzlement, tax evasion, fraud, evasion of economic or trade sanctions and/or any violation of any applicable regulations relating to such matters, or any act or attempt to circumvent or violate any applicable regulations relating to such matters), and managing financial crime risks;

3. 鉴于我行提供的业务模式是不断发展变化的。如果将您的个人信息用于本政策未载明的用途，我们会另行征求您的同意。若对于前述个人信息收集、使用的内容另有约定，我们按照您或相关客户与我们另行特别约定的用途使用您的信息。

Given that the business model provided by our bank is subject to constant evolution, we may seek consent separately if we wish to use your personal information for any unlisted purposes. If a separate written agreement exists detailing the collection and use of personal information, that agreement will take precedence.

三、委托处理、共享、转让及公开个人信息

Delegate Processing, Sharing, Transferring and Disclosure of Personal Information

1. 委托处理、共享：为实现本政策前述目的与用途，我们在必要时可能将您的相关个人信息部分或全部提供给第三方接收者，包括但不限于：

Delegate processing and sharing: To achieve the purposes and uses of this policy as described above, we may provide some or all of your relevant personal information to third-party recipients as necessary, including but not limited to:

（1） 俄罗斯外贸银行公众股份公司（下称“总行”）及其成员；

VTB Bank (PJSC) (the “Head Office”) and its Members;

（2） 任何我行或总行的监管机构或其他权力机关，或监管机构或其他权力机关指定的机构或人士；

Any regulatory or other authority of, or anybody or person designated by a regulatory or other authority of, our bank or the Head Office;

上述个人信息的对外提供可能发生个人信息的跨境传输，包括传输至境外或受到来自于境外的访问。关于信息跨境传输的具体规则，请参阅本政策“四、个人信息的跨境传输”部分。无论是在境内或境外处理个人信息，根据适用的法律法规，您的个人信息将受到我行以及接收方的保护。

The external provision of the aforementioned personal information may result in cross-border transmission of personal information, including transfer abroad or access from abroad. For specific rules on cross-border transfer of information, please refer to the "IV. Cross-Border Transfer of Personal Information" section of this policy. Whether personal information is processed domestically or abroad, it will be protected by us and the recipient in accordance with applicable laws and regulations.

若您就个人信息的对外提供需要获取进一步详情，可以通过本政策“八、如何联

系我们”中的联系方式联系我们，我们将及时向您告知相关事项。

If you have any further questions about the external provision of personal information, please contact us using the contact information provided in the "VIII. Contact Information" section of this policy. We will promptly provide you with the relevant information.

2. 转让：除非获得您或相关客户的单独同意，我们不会将您的个人信息转让给任何公司、组织或个人，但在涉及我们的任何业务/资产转让、重组、处置、合并、分立、收购时需要转让的除外。在该等情况下，我们会按照适用的法律法规要求向您或相关客户告知个人信息接收方的身份和联系方式，并要求其继续接受本政策的约束，如果个人信息接收方变更本政策有关个人信息处理目的、处理方式，其应当重新取得您或相关客户的同意。

Transfer: We will not transfer your personal information to any company, organization or individual except with your or the relevant customer's separate consent, except when it is necessary in connection with any transfer of our business/assets, reorganization, disposal, merger, division or acquisition. In such cases, we will notify you or the relevant customer of the identity and contact information of the recipient of the personal information and require them to continue to be bound by this Policy in accordance with applicable laws and regulations. If the recipient of the personal information changes the purposes or methods of processing of personal information in this Policy, it shall obtain yours or the relevant customer's consent again.

3. 公开披露：除非获得您的单独同意，我们不会对外公开披露您的个人信息。

Public disclosure: We will not publicly disclose your personal information without your separate consent.

四、个人信息的跨境传输

Cross-Border Transfer of Personal Information

我行是一家在中国境内运营的外资金融机构。**在遵守适用法律法规及监管要求，以及为实现或提供本政策“二、我们如何使用个人信息“所述目的和服务的前提下，我行可能在必要时，将您的个人信息披露给境外的总行或其他第三方。**

Our bank is a foreign financial institution operating in mainland China. **Subject to compliance with applicable laws and regulations and regulatory requirements, and for the purpose of achieving or providing the purposes and services described in "II. How We Use Personal Information" of this policy, our bank may, where necessary, disclose your personal information to our head office abroad or other third parties.**

当适用的法律法规要求时，我们将告知您关于我们向总行或其他第三方提供个人信息相关的事项，包括接收方的姓名或名称、联系方式、处理目的、处理方式、处理的个人信息的种类（有关接收方的具体信息，请见本政策的附录 1），并通过您取得相关人士的单独同意。

When required by applicable laws and regulations, we will inform you of matters related to our provision of Personal Information to our relevant entities, vendors and other third parties, including the name, contact information, processing purposes and methods of the recipients, type of Personal Information to be processed (for specific information of the recipients, please refer to Appendix 1), and obtain the separate consent of Relevant Persons through you.

如果我们与其他国家或地区的服务提供商合作，我们将以合同性承诺的方式要求他们达到与《个保法》所要求的相等的个人信息保护水平。我们将遵守《个保法》有关知情同意的要求。

Should we collaborate with service providers based in other countries or regions, we will include contractual obligations mandating that they adhere to a personal information protection standard on par with that stipulated by the PIPL. We will comply with the requirements of the PIPL in relation to informed consent.

我们承诺遵守国家网络信息监管机构和其他机关/监管机构可能发布的有关跨境

转移个人信息的任何要求或条件，并在必要时对本部分进行更新，无论是通过修改本政策，还是通过其他方式。

We are committed to complying with any requirements or conditions that may be issued by national network information regulators and other authorities/regulators in relation to cross-border transfers of personal information. We will update this section as necessary, whether by amending this policy or by other means.

五、我们如何存储和保护个人信息

How We Store and Protect Personal Information

1. 我行在中华人民共和国境内收集和产生的个人信息，将存储在中华人民共和国境内。

The personal information we collect and generate within the People's Republic of China will be stored within the People's Republic of China.

2. 由于我行为一家在中国境内运营的外资金融机构，您的个人信息可能会被转移到境外司法管辖区，或者受到来自境外司法管辖区的访问。

As a foreign-funded financial institution operating in mainland China, we may transfer your personal information to or access it from overseas jurisdictions.

3. 我行向境外传输您的个人信息时将遵守适用法律法规关于数据跨境传输的相关要求，见本政策“四、个人信息的跨境传输”。

When we transfer your personal information overseas, we will comply with the relevant requirements of applicable laws and regulations regarding cross-border data transfers. Please refer to the section titled "IV. Cross-Border Transfer of Personal Information" in this policy.

4. 我们将从技术和组织管理方面实施一切合理可行的安全措施，以阻止所收集的个人信息遭受未经授权的访问、非法公开披露、滥用、丢失或毁坏。我们的措施包括但不限于数据加密传输、防火墙、加密存储、物理访问控制及信息访问授权控制、不定期审计制度等。

We will implement all reasonable and feasible technical and organizational security measures to prevent the personal information collected from being subject to unauthorized access, unlawful public disclosure, misuse, loss, or destruction. These measures include encrypted data transmission, firewalls, encrypted storage, physical access control, information access authorization control, and an unscheduled audit system.

5. 我们依法建立了信息保护的管理体系，包括制定信息管理制度和操作规程、实行信息分类管理、合理确定内部人员对个人信息处理的操作权限、定期对内部员工进行安全交易并提供相关培训，以保护您的个人信息安全。

We have established a management system for information protection in accordance with the law, including formulating information management systems and operating procedures, implementing classified information management, reasonably determining the operating authority of internal personnel for handling personal information, regularly conducting secure transactions with internal employees, and providing relevant training to protect the security of your personal information.

6. 我们已制定个人信息安全事件应急预案，并定期组织内部人员进行应急响应培训和应急演练。如果发生个人信息安全事件，导致信息被非授权访问、公开披露、篡改或毁坏，导致您的合法权益受损，我们会及时按照公司内部政策启动应急预案，采取合理必要的措施，以尽可能降低影响，并将在法律法规要求时，及时向贵司告知相关信息（包括安全事件的基本情况和可能的影响、我们已采取或将要采取的处置措施、您可自主防范和降低风险的建议及补救措施等）。如果难以告知贵司，我们会采取合理、有效的方式公布公告。同时，我们还将按照监管部门要求进行处置情况的上报。

We have established emergency response measures for personal information security incidents. In the event of a personal information security incident, we will, when required by laws and regulations, inform you in a timely manner at of the relevant information (including the basic situation and possible impact of the security incident, the measures we have taken or will take to deal with the incident, and the suggestions

and remedial measures that you can take on your own to prevent and minimize the risks, etc.). If it is difficult to inform your company, we will take a reasonable and effective way to publish an announcement. At the same time, we will also report the disposal situation in accordance with the requirements of the regulatory authorities.

7. 我行收集或处理您的个人信息时，我们将依据法律法规、监管规定，以及档案、会计、审计、报告要求以及本政策所述之目的、用途，将您的信息保存至满足信息收集目的、用途所需的最短保存时间。在决定数据存储期限时，我们考虑以下因素：

When we collect or process your personal information, we will store it for the shortest period of time necessary to fulfill the purpose and use of the information collection in accordance with applicable laws and regulations, regulatory requirements, and archival, accounting, auditing, and reporting requirements, as well as the purposes and uses described in this policy. When determining the data storage period, we consider the following factors:

（1） 相关合同或业务关系的终止日期；

the termination date of the relevant contract or business relationship;

（2） 任何法律、法规或内部政策规定的存储期限；以及

the storage period specified by any applicable laws, regulations, or internal policies; and

（3） 任何为了处理现有或潜在的审计、税务事项或法律诉讼而超出上述期限的保留记录的需求。

any need to retain records beyond the aforementioned periods for the purpose of dealing with existing or potential audits, tax matters, or legal proceedings.

例如：根据《中华人民共和国反洗钱法》《金融机构客户身份识别和客户身份资料及交易记录保存管理办法》《人民币银行结算账户管理办法》等监管规定以及《企业文件材料归档范围和档案保管期限规定》，根据不同业务场景和不同文件

性质，客户资料需要至少保存 5 年至 30 年甚至更长时间。

For instance, regulatory provisions such as the *Administrative Measures for the Identification of Clients and the Keeping of Clients' Identity Information and Transaction Records by Financial Institutions* and *Administrative Measures for RMB Bank Settlement Accounts*, as well as the *Provisions on Archiving Scope of Corporate Documents and Period of Archive Keeping*, stipulate that customer information must be retained for a minimum of 5 to 30 years, or even longer in certain circumstances.

六、个人信息相关权利

What Data Protection Rights Do You Have

1. 您有权要求我们按照法律法规及本政策的要求，保障个人信息安全，并依法行使适用的法律法规赋予的个人信息相关权利。

You have the right to require us to protect Personal Information in accordance with laws and regulations and the requirements of this Policy, and to exercise the rights with respect to Personal Information conferred by applicable laws and regulations in accordance with the law.

2. 您有权依据法律法规向我们查询我们是否持有您的个人信息及查阅、复制您所提供的个人信息。

You have the right to inquire from us, in accordance with laws and regulations, whether we hold your personal information and to access and copy the personal information you have provided to us.

3. 您有权依据法律法规改变授权同意的范围或撤回授权，并按本政策“八、如何联系我们”所列方式进行操作。当您改变授权范围后，我们将不再处理相应的个人信息。但您收回同意的决定，不会影响我们此前基于您的授权而开展的个人信息处理活动。

You have the right to change the scope of the authorization or withdraw your authorization in accordance with laws and regulations, in the manner described in

"VIII. Contact Information" of this Policy. Once you have changed the scope of the authorization, we will no longer process the corresponding personal information. However, your decision to withdraw your consent will not affect our previous processing activities based on your authorization.

4. 您有权也有义务及时更新提供给我行的个人信息，以确保相关信息是准确和最新的。您有权要求我们为更新个人信息提供便利，有权要求我们更正任何有关您的不准确的信息。

You have the right and obligation to promptly update the personal information provided to us to ensure that it is accurate and up to date. You have the right to request that we facilitate the updating of your personal information and the right to request that we correct any inaccurate information about you.

5. 您有权要求我们根据法律法规、本政策及您与我们之间的约定，删除您的个人信息（除我行根据监管要求在业务资料归档、审计、监管协查等领域继续使用此前收集的您的相关信息），我行会按照法律法规和监管要求妥善处理您的个人信息。

You have the right to request that we delete your personal information in accordance with laws and regulations, this Policy and your agreements with us (except that we may continue to use your previously collected information in accordance with legal requirements in the areas of business data archiving, auditing and regulatory investigations). We will properly handle your personal information in accordance with laws and regulations and regulatory requirements.

6. 您有权向我行查明我行对于个人信息和隐私保护的政策。当您对本政策存在疑问时，有权要求我们进行说明、解释，以帮助您进一步了解我们有关个人信息及隐私保护的做法和可能的后果，以及您根据本政策享有的有关个人信息及隐私的权益。

You have the right to ask the Bank about the Bank's policy on personal information and privacy. If you have any questions about this Policy, you have the right to request that we provide you with clarifications and explanations to help you better understand

our personal information and privacy practices and possible consequences, as well as your personal information and privacy rights and interests under this Policy.

7. 您可通过本政策“八、如何联系我们”中的联系方式联系我们并依法行使您的权利。

You may contact us using the contact information in "VIII. Contact Information" in this Policy and exercise your rights under the law.

七、本政策的制定、生效、更新及其他

Changes to This Privacy Policy

1. 我行制定并在网站发布本政策。本政策于发布之日起生效。本政策可能不时修改、更新。

This Policy is formulated and published on our website. This Policy shall take effect on the date of publication. This Policy may be revised and updated periodically.

2. 本政策以英文和中文形式提供，中英文版本如有不一致，以中文版本为准。

This Policy is available in both English and Chinese. In the event of any discrepancy between the two versions, the Chinese version shall prevail.

3. 为给贵司提供更好的服务以及随着我们业务的发展或者适用法律法规的变化，本政策可能不时修改、更新（包括修订本政策名称），尤其是发生下列重大变化情形时：

As our business evolves and relevant laws and regulations are amended, this Policy may be revised and updated periodically, including changes to its title. In particular, this Policy may be revised and updated in the following major circumstances:

（1） 我们的服务模式发生重大变化，如处理个人信息的目的、处理的个人信息类型、个人信息的使用方式和保存期限等；

Significant changes to our service model, such as the purpose of processing personal information, the types of personal information processed, how

personal information is used, and retention periods;

（2） 我们在所有权结构、组织架构等方面发生重大变化，导致实际收集和处理您的个人信息的主体发生变化，如业务调整、破产并购等引起的所有者变更等；

Significant changes in our ownership structure, organizational structure, etc. This could result in a change in the entity that actually collects and processes your personal information, such as changes in ownership due to business adjustments, bankruptcy, mergers and acquisitions, etc.;

（3） 个人信息共享、转让或公开披露的主要对象发生变化；

A change in the main object of sharing, transferring or publicly disclosing personal information;

（4） 您参与个人信息处理方面的权利及其行使方式发生重大变化；

A significant change in your rights and how they can be exercised with regard to the processing of personal information;

（5） 我们负责处理个人信息安全的联络方式及投诉渠道发生变化时；

A change in the contact details and complaint channels for handling personal information security;

（6） 其他可能对您的权益产生重大影响的变化。

Other changes that may have a significant impact on your rights.

4. 我们会通过网站公告、电子邮件、信函、电话、短信等适当方式提醒您相关内容的更新，以便您及时了解本政策的最新版本。

We will notify you of relevant content updates through appropriate channels such as website announcements, emails, letters, phone calls, and text messages so that you can remain informed about the latest version of this policy.

5. 请注意，若您继续使用我们的产品或服务，即表示您充分阅读、理解并同意

接受更新后的本政策的约束。

Please be advised that your continued use of our products or services indicates your full readership and understanding of, and agreement to be bound by, this Policy as updated.

您与本行之间的所有沟通、交易均应适用届时有效的本政策的最新版本。您对本政策的后续更新有任何疑问，请联系通过本政策“八、如何联系我们”中的联系方式联系我们。

Please be advised that all communications and transactions between you and the Bank shall be subject to the latest version of this Policy then in effect. If you have any questions about subsequent updates to this Policy, please contact us using the contact information in "VIII. Contact Information" of this Policy.

6. 本政策及其更新可在以下俄罗斯外贸银行公众股份公司上海分行的网站上被获取：

This Policy and its updates can be obtained from the following website of VTB Bank (PJSC) Shanghai Branch:

https://www.vtbbank.cn/privacy/

八、如何联系我们

Contact Information

若您想了解我们有关个人信息保护相关政策，或行使适用法律法规赋予您的个人信息相关权利，向我们提出有关个人信息保护隐私的合理建议、意见、疑问、反馈或投诉，可光临我行营业网点或通过下述联系方式与我们取得联系：

If you would like to inquire about our policies on personal information protection, or if you wish to exercise the rights granted to you by applicable laws and regulations, please direct your inquiries to us. You may visit our branch or contact us using the following information:

公司名称：俄罗斯外贸银行公众股份公司上海分行

Company name: Shanghai Branch of VTB Bank (PJSC)

地址：上海市浦东新区银城中路 501 号上海中心大厦 2503-2505 室

Address: No. 501, Yincheng Middle Road, Pudong New Area, Shanghai, China, Room 2503-2505, Shanghai Center Building

请在如下链接中获取具体联系方式：

Please find the details of contact information through the below link:

https://www.vtbbank.cn/cn/contacts/

我们将会在收到您的投诉、意见或建议后的 30 个工作日内，验证您的身份并向您做出回复。

We will verify your identity and respond to you within 30 working days of receiving your complaint, comment or suggestion.

附录 1 个人信息跨境传输清单 Cross Border Transfer of Personal Information List

境外接收方名称 Overseas Recipient Name	**联系方式 Contact Information**	**处理目的 Purpose of Processing**	**处理方式 Method of Processing**	**个人信息的种类 Types of Personal Information**	**保存期限 Retention Period**	**行使权利的方式和程序 Methods and Procedures of Exercising Rights**
俄罗斯外贸银行公众股份公司 VTB Bank (PJSC)	https://www.vtbbank.cn/cn/contacts/	用于开户资料的审核、本地和俄罗斯反洗钱筛查及打击金融犯罪审查、本地和俄罗斯税务机关报备 For account opening document review, local and Russian anti-money laundering screening and financial crime review, and local and Russian tax authority reporting.	个人信息处理者：从客户或其他可靠的第三方、公开网站收集个人信息，以录入境外系统或邮件发送方式传输至境外； Personal information Handler: Collects personal information from customers or other reliable third parties or public websites, and transmits it offshore by entering it into an offshore system or sending it by email; 境外接收方：通过系统或邮件接收个人信息，进行业务和风险管理 Overseas recipients: Receive personal information through systems or emails for business and risk management.	个人基本信息：个人姓名、国籍、电话、邮箱、通讯地址、出生日期、出生地； Personal basic information: individual's name, nationality, telephone number, e-mail address, mailing address, date of birth, and place of birth; 个人身份信息：身份证件种类、**证件号码、签发地、签发机关、签发日期、证件有效期** Personal identification information: ID type, **ID number, place of issuance, issuing authority, date of issuance, and expiration date**.	个人信息出境后的保存期限依据俄罗斯外贸银行公众股份公司相应的记录保管政策以及适用的服务合约中的约定。在实现相关处理目的的必要时间内保存 Personal information is retained after its transit in accordance with the corresponding record-keeping policy of VTB Bank (PJSC) and as agreed in the applicable service contract. It is kept for the time necessary to fulfill the purpose of the processing.	您可以通过本政策所列的联系方式直接与我们联系，以行使您的权利 You may contact us directly through the contact information listed in this Policy to exercise your rights.

上述清单中所涉及的敏感个人信息跨境提供系为处理目的所必需，且对相关人员的个人权益无不利影响。The cross-border provision of the Sensitive Personal Information mentioned in the above list is necessary for the purpose of processing and has no adverse impact on the personal rights and interests of the Relevant Person(s).