**APPROVED**

**Order of the Deputy Chairman of the Board of JSC Belagroprombank 27.05.2024 No. 496**

**Privacy Policy for the Mobile Application “BelAPB Business”**

1. The Privacy Policy for the mobile application “BelAPB Business” (hereinafter referred to as the Privacy Policy) is a technical local legal act (hereinafter referred to as the LLA) that defines the policy and procedures for processing the User's data obtained when the User uses the subsystem “Mobile Bank” RBSS[[1]](#footnote-1) JSC Belagroprombank (hereinafter referred to as the bank).
2. The “Mobile Bank” subsystem is software that includes the mobile application “­BELAPB Business”, designed to operate on smartphones, tablets ­and other mobile devices[[2]](#footnote-2), and for the purpose of remote automated ­servicing of the bank’s Clients.
3. Mobile application "BelAPB Business" - user interface for mobile ­devices with Android 5.0 platform and higher (operating system for other smartphones ­and tablets), also iOS 11.0 and higher (operating system for Apple smartphones and ­tablets)[[3]](#footnote-3)developed by LLC “LVO”.
4. The Client - legal entity, individual entrepreneur[[4]](#footnote-4), who has entered into a banking services agreement with the bank using the subsystem “Internet Client” RBSS and has submitted an application for connection to the “Mobile Bank” subsystem.
5. The subsystem “Internet Client” RBSS is a set of interconnected software and hardware tools from the RBSS that ensure interaction between the bank and the Client via communication channels, when conducting non-cash payments and other transactions by transmitting information to generate relevant electronic documents and related ­information on the bank's side using Internet technologies, via the Internet using the subsystem's workstation located on the bank's website at: [https://i25-client.belapb.by .](https://i25-client.belapb.by/)
6. User - Client and/or a duly authorized representative of the ­Client who has been authorized in the “Mobile Bank” subsystem.
7. The present Privacy Policy has been developed to define the list of data that may be requested from the User in connection with the use of the “­BelAPB Business” application (hereinafter referred to as the mobile application).
8. The User's information processed by the bank within the framework of this ­Privacy Policy includes personal data, financial data (Client's UNP­, name of the Client's divisions, account numbers, data on non-cash payments ­and other transactions) and other data, including automatically transmitted data during the use of the mobile application, as well indicators of device compromise, information about the platform, etc.
9. When using the mobile application, the following information may be requested from the User and received by the bank:
	1. personal data of the User. When performing banking operations, the bank may request the User's personal data: full name, ­identity ­document details , registration address, residential address, e-mail address, ­mobile phone number;
	2. information about the mobile device and operating system: data about the brand of the ­User's mobile device (manufacturer and model of the mobile device), unique ­identifiers of the mobile device, data about the mobile network operator, device screen parameter, IP address of the connection during use of the application, User-Agent;
	3. information on non-cash payments and other transactions: preparation and signing of payment documents in electronic form, receipt and transmission of electronic messages necessary for the performance of banking transactions and other activities related ­to the implementation of these transactions, receipt, at the request of the User, of statements and other information on the status of the Client's bank account at the time of the request;
	4. information about the use of the mobile application. When the ­User uses the mobile application, the bank receives information about the User's activity in the mobile application: data about the start, end and duration of the user ­session, data about transitions between screens of the mobile application, as well as about errors that occur during the use of the mobile application;
	5. information about the location (geolocation) of the User’s mobile device while using the mobile application;
	6. additionally, the bank may request other information about the User’s actions ­in the mobile application.
10. The Bank processes the User’s data, including for sending the ­User informational notifications[[5]](#footnote-5).
11. When using the User’s information, the bank is guided by this Privacy Policy, the terms of concluded agreements, LLA, and ­legislation.
12. The Bank shall not publish or disclose information provided by the User without the consent of the User, except in cases specified in this Privacy Policy­.
13. The Bank does not provide User’s information to other organizations and/or individuals­, except in the cases listed below:
	1. the User has given his consent to this. In order for the bank to provide the User's information ­to legal entities not affiliated with the bank, additional ­consent from the User is requested;
	2. in accordance with the requirements of the legislation, the bank provides ­the User's information in the event that the receipt, use and disclosure of such information ­is necessary for the purpose of complying with the requirements of the legislation and (or) identifying, preventing or otherwise preventing fraud, as well as eliminating technical ­failures or security problems, if this does not contradict the legislation.
14. The Bank stores the User's data in accordance with the LLA and legislative acts regulating the rules for the secure processing of data.
15. The Bank takes all possible measures to ensure the security and ­protection of Users' information from unauthorized attempts to access, modify, disclose or destroy, as well as other types of improper use.
16. The user must ensure the safety and confidentiality of secret parameters and other information necessary for accessing and performing transactions using ­the mobile application, in secret from third parties.
17. The User undertakes to notify immediately the Bank of any suspected ­unauthorized use of his/her account.

Compliance by the User with the bank's recommendations will ensure maximum ­security of the information provided to the bank in accordance with the requirements of the bank's LLA for organizing the work of the Client (user) in the RBSS.

The Bank has the right to amend unilaterally this Privacy Policy at any time.

Changes accepted to the Privacy Policy come into force from the date of their posting ­on the Internet on the bank’s corporate website at the address: [www.belapb.by ,](http://www.belapb.by/) unless otherwise specified by the amendments made.

Law governs all issues not covered by this Privacy Policy.

Corporate Business Digitalization Management

1. Remote banking service system for legal entities and individual entrepreneurs. [↑](#footnote-ref-1)
2. The mobile application is installed on the registered user's mobile devices. [↑](#footnote-ref-2)
3. The User independently downloads the mobile application “BelAPB Business” to the mobile device from the AppStore, GooglePlay, AppGallery. [↑](#footnote-ref-3)
4. For the purposes of these Privacy Terms, individual entrepreneurs include lawyers and notaries. [↑](#footnote-ref-4)
5. Clients who have entered into an Information Agreement with the bank in accordance with the Terms of Notification of Corporate Clients, posted on the bank's corporate website at: [www.belapb.by](http://www.belapb.by) receive informational notifications sent via RBSS channels. [↑](#footnote-ref-5)