

Cookies Terms of Use

1. General Provisions

- 1.1. Cookies Terms of Use (hereinafter, the Terms) means a document of Sberbank (hereinafter, the Bank) developed in accordance with the requirements of Federal Law No. 152-FZ On Personal Data dated July 27, 2006 (hereinafter, 152-FZ), as well as [Sberbank's Personal Data Processing Policy](#)¹, which is designed to uphold the rights of the Users of the Website, available at the Internet address: <https://aij.ru>, to obtain information about the processing of personal data contained in Cookies.
- 1.2. The Terms apply exclusively to the processing of the Website Users' personal data contained in Cookies.
- 1.3. The Terms establish the legal grounds for and the purposes of processing personal data contained in Cookies, operations performed, the specific types of personal data contained in Cookies, the processing periods, as well as the principles adhered to by the Bank when processing personal data contained in Cookies.
- 1.4. Furthermore, the Terms outline the procedures for restricting, disabling (blocking), or deleting Cookies, and the consequences of such actions.

2. Terms and Definitions

- 2.1. **Cookies** are text files that are stored on a user's device (a computer or mobile device) when the User visits the Website and interacts with it. Cookies allow the Website to "remember" certain information about the User and the actions they perform while using the Website. The Website uses several different types of Cookies — see clause 2.2 of the Terms.
- 2.2. **Types of Cookies** mean Technical (Essential), Analytical Cookies used on the Website:
 - 2.2.1. **Technical (Essential) Cookies** are cookies that are essential for ensuring smooth and proper functioning of the Website, its individual pages, correct transmission of information between the User's device and the Bank's technical means used to ensure the functionality of the Website, as well as for providing the User with specific functions of the Website that they use. These Cookies are essential because without them the User will not be able to use the Website, individual pages of the Website and its functionalities in a familiar and convenient manner.
 - 2.2.2. **Analytical Cookies** are cookies that are used to improve and develop the Bank's products, services, and offerings, including the enhancement of the Website's interface and functionality.

In detail: Analytical Cookies gather information about how the User interacts with the Website (for example, they track how frequently the User visits the Website, as well as which features or sections of the Website are of particular interest to the User, or, on the contrary, present some difficulties). By using Analytical Cookies, the Bank can understand how to improve the Website or the Bank's products, services, and offerings provided via the Website (for example, how to modify the Website's interface to make it more intuitive and user-friendly, introduce additional settings or features that are of interest to the User, etc.). Furthermore, the information gathered via these Cookies can help in making effective decisions on whether to develop new or improve the Bank's existing products, services, and

¹ Published on the Bank's information resource at: <https://www.sberbank.ru/privacy/policy>.

offerings (including those offered through channels other than the Website), and to directly support the development and enhancement of such products, services, and offerings.

2.3. Types of Cookies are Session and Persistent Cookies:

- 2.3.1. **Session Cookies** mean Cookies that become active from the moment the User starts using the Website/a separate page thereof within one browser session (i.e., until the User closes the Website and/or a separate page thereof, and/or the browser).
- 2.3.2. **Persistent Cookies** mean Cookies that are active from the moment the User starts using the Website and do not get deleted after the User's session is completed. The processing periods for personal data contained in such cookies are specified in Section 6 of the Terms.
- 2.4. **Processing of personal data contained in Cookies** means an action or a set of actions specified in Section 6 of the Terms performed with personal data contained in Cookies with the use of IT resources.
- 2.5. **Metric Service** means a tool for collecting and analyzing data on users' behavior on the Website, which is integrated into the Website by installing the counter code of a specific Metric Service.
- 2.6. **Personal Data** mean any information relating to a directly or indirectly identified or identifiable natural person (Personal Data Subject).
- 2.7. **User** means a Personal Data Subject who is a visitor of the Website (including a client, a potential client of the Bank, or any other visitor of the Website who has gained access to the Website and uses its functionality).
- 2.8. **Website** means the Bank's website on the Internet: <https://aij.ru>

3. Legal grounds for processing personal data contained in Cookies

- 3.1. Collection and subsequent processing of personal data contained in the Technical Cookies is carried out for the purposes specified in Section 6 of the Terms, on the grounds provided for in Clause 7, Part 1, Article 6 of Federal Law No. 152-FZ.
- 3.2. The collection and subsequent processing of personal data contained in Analytical Cookies is carried out for the purposes specified in Section 6 of the Terms, based on the User's consent, that is, if the User has allowed and/or not prohibited the use of Cookies in their browser settings (in particular, if the use of Cookies is enabled or not blocked). By remaining on the Website and continuing to use it, the User confirms that they have read and agree to these Terms.
- 3.3. If the User does not agree to the processing of personal data contained in Cookies, taking into account the above information, they may adjust their browser settings accordingly, to restrict or completely disable (block) their use, as well as delete Cookies. For information on how to restrict or disable the use of Cookies or delete Cookies, as well as about the possible consequences of restricting or disabling the use of or deleting Cookies, please see Section 4.

4. Procedures for restricting, disabling or deleting Cookies and the consequences of such actions.

- 4.1. The User can, at any time, independently limit or fully disable (block) the use of Cookies and delete them in their browser settings. The procedure for restricting, disabling, or deleting

Cookies is determined by the instructions or other user documentation for the specific browser.

4.2. The Bank shall not be liable for any specific functioning characteristics of the User's browser, the accuracy and relevance of the information provided in the browser settings, or any errors related to the operational specifics of the browser used by the User. If the User, acting in accordance with the instructions or other user documentation for the browser, has restricted or disabled Cookies in their settings, but the use of Cookies has not actually ceased, the User should contact the developer or the right holder of the respective browser. The Bank also draws the User's attention to the fact that simply deleting Cookies from the User's device may not result in full subsequent restriction or inability to use them by the Bank. For this purpose, the User should use the functionality of their browser to restrict or disable the use of Cookies as provided for in the instructions or other user documentation for such a browser.

4.3. Restricting, disabling the use of or deleting Cookies may lead to, among others, the following consequences:

Actions with Cookies	Consequences
Restricting or disabling the use of Technical Cookies	• Inaccessibility of the Website, of its certain pages, authorization forms, feedback forms, and other forms. • Inability to ensure the correct display of information on the Website and/or its specific pages, or to provide other functionality of the Website. • Inability to automatically populate authentication forms.
Restricting or disabling the use of Analytical Cookies	• Restriction or cessation of data collection on actions performed by the User on the Website, including the number of page views, pages where the User spent the most time, and information that interested the User.
Deleting Technical, Analytical Cookies	• Deletion from the User's device of the history of using the Website by the User, including information about actions performed by the User on the Website, such as the number of page views, pages where the User spent the most time, and information that interested the User.

4.4. If the User has restricted or disabled (blocked) the use of Cookies in the browser settings in accordance with clauses 3.2, 3.3, 4.1 of the Terms, then, due to the technical nature of Cookies—which involves the creation and subsequent processing of information contained therein on the User's device, without the Bank having access to that device's settings and the inability to reliably verify the User's identity for processing a request to withdraw the consent to the processing of personal data specified in clause 3.2 of the Terms, the actions described above in this clause, performed by the User using their device, shall be deemed a valid withdrawal of such consent, executed in accordance with Part 2 of Article 9 of Federal Law No. 152-FZ, effective from the moment the User performs these actions. The above

withdrawal shall be in effect until the User removes any restrictions and/or prohibitions set by them in the browser settings (including those made before the second visit to the Website). In the cases specified in this clause, the Bank shall be entitled to continue processing personal data contained in the Cookies files collected by the Bank before the moment the User performs the actions specified above in this clause, until the expiration of the periods specified in Section 6 in relation to the relevant data. If the above withdrawal ceases to be effective according to the rules specified above, then the period specified in Section 6 shall resume from the moment when the Bank again receives the relevant personal data contained in the Cookies files, subject to the rules for calculating such periods as provided for in Section 6. For the avoidance of doubt, this clause and the conditions set forth herein shall be deemed another agreement between the operator (the Bank) and the data subject (the User) regarding the procedure for ceasing the personal data processing, as provided for in Part 5 of Article 21 of Federal Law No. 152-FZ.

5. Metric services used on the Website

The Bank uses the following Metric Services to collect and analyze data on the Users' behavior on the Website:

- External Metrics Services:
 - Яндекс.Метрика (more information about how this service works and what data it collects is available at <https://metrika.yandex.com>)
 - Mail.ru Rating (more information about how this service works and what data it collects is available at <https://top.mail.ru>)

6. List of personal data contained in Cookies, purposes of collection and other information about their processing

Information regarding which Metric Service is used for data collection, the purposes for collecting and subsequent processing of personal data contained in Cookies, what personal data is contained in such Cookies, what actions are performed with the personal data, and the processing periods are presented in the table below:

Metric Service whose counter code enables data collection	Purpose of data collection and subsequent processing	Cookie type	Cookie Category	List of personal data	Actions performed with personal data	Period of personal data processing
Yandex.Metrika	Identification of users' interests	Analytical	Session	Visit identifier, identifier of the active debug mode	Collection, recording, systematization, storage, destruction	During a user session
Yandex.Metrika	Identification of users' interests	Analytical	Persistent	Browser and its version, operating system and its version, device, time zone, browser language, visitors' gender and age, visitors' interests, geographical data, page views, visit, clicking on an external link, file	Collection, recording, systematization, storage, destruction	Up to 2 years

				download, denial, time on the website, depth of view		
Mail.ru Rating	Identification of users' interests	Analytical	Persistent	Browser name and version, operating system, language and time zone, page loading time, type of connection and Internet speed, ad blocking, page viewing time, local user identifier (ClientID), visitor's gender and age, hit and user parameters, website version, goals achievement, forms sending, files downloading	Collection, recording, systematization, storage, destruction	Up to 2 years
Not applicable	Technical support for the operation of the Website, its individual pages, and forms	Analytical	Session	Session ID, user actions in the current session	Collection, recording, systematization, storage, destruction	During the user session
Not applicable	Technical support for the operation of the Website, its individual pages, and forms	Analytical	Persistent	User interests, behavioral data, audience segmentation, visit history, return frequency, user behavior models, user segment data	Collection, recording, systematization, storage, destruction	Up to 2 years

Not applicable	Technical support for the operation of the Website, its individual pages, and forms	Technical	Persistent	Storage of user consent data for cookie processing, hashed data to identify a unique user, storage of unique identifiers of users using Datatracker service from Oracle, user consent to privacy policy, user region, and language localization	Collection, recording, systematization, storage, destruction	Up to 2 years
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The processing periods for Persistent Cookies specified above are calculated from the moment the Bank receives the data indicated in the corresponding column of the table. For Session Cookies, the start and end dates of processing periods are determined in accordance with Clause 2.3.1 of the Terms.

7. Transfer of personal data contained in Cookies²

The table³ below provides information on whom, within what types of Cookies, for what purposes and to what extent personal data contained in Cookies may be transferred:

Information on personal data recipient	Purpose of personal data transfer	Cookie type	List of personal data
Name: Yandex LLC INN: 7736207543 OGRN/OGRNIP: 102770022919	Identification of users' interests	Analytical	Visit identifier, identifier of the active debug mode, browser and its version, operating system and its version, device, time zone, browser language, visitors' gender and age, visitors' interests,

² This Section shall be included in the Terms if third-party Metrics Services are incorporated on the Website.

³ The table should contain the Cookies Types used on the Website. For example, if only Technical and Analytical Cookies are used, but no Marketing Cookies are used, Marketing Cookies shall not be included in the table.

Reg. address: 119021 Moscow, Lva Tolstogo St. 16 Service owned by the recipient: Yandex. Metric			geographical data, page views, visit, clicking on an external link, file download, denial, time on the website, depth of view
Name: VK LLC INN: 7743001840 OGRN/OGRNIP: 1027739850962 Reg. address: 125167, Moscow, Leningradsky Prospekt 39, building 79 Service owned by the recipient: Mail.ru Rating	Identification of users' interests	Analytical	Browser name and version, operating system, language and time zone, page loading time, type of connection and Internet speed, ad blocking, page viewing time, local user identifier (ClientID), visitor's gender and age, hit and user parameters, website version, goals achievement, forms sending, files downloading

8. Security of Personal Data

- 8.1. Personal data protection is a key priority for the Bank. The Bank continuously improves its cybersecurity system in compliance with legal requirements and best global practices. For more information about the measures taken by the Bank to ensure the security of personal data, as well as other information on personal data processing procedures, please see Sberbank's Personal Data Processing Policy, available at the following address: <https://www.sberbank.ru/privacy/policy/>.

9. Final Provisions

- 9.1. The Terms shall come into force from the moment they are published on the Website.
- 9.2. This Terms may be amended at any time at the discretion of the Bank.
- 9.3. If, for whatever reason, one or more of the provisions of these Terms are deemed invalid or unenforceable, such circumstances shall not affect the validity or enforceability of the remaining provisions of these Terms.