



Privacy disclaimer for processing of personal data for receipt of notifications and offers, incl. lending offers, on Klix solution services

Takes effect as of 03.07.2024.

By using the Klix solution services, clients are entitled to receive various benefits such as more favorable conditions on financing from lenders, incl. lending (credit) offers, if consented by you, special offers from Klix partners, discounts on purchases etc.

We want to offer you the best and make sure you always get the most beneficial offers and are informed about your possibilities. Everyone's habits change over time, therefore, we ask for your consent to the processing of your personal data so that we can inform you about important current events concerning Klix and the best offers available to you.

We will monitor the situation on a regular basis to ensure that you receive only the information that is truly essential and relevant to you. Should you change your mind, you will be able to revoke your consent for the purpose of receiving notifications and offers at any time.

We will only process your personal data for the purpose of receiving notifications and offers, incl. lending (credit) offers, only if you have given your consent thereto.

Who will process your personal data?

Your personal data controller is the provider of the Klix solution – AS "Citadele banka", Single Reg. No. 40103303559, address: 2A Republikas laukums, Riga, LV-1010, phone: +371 67010000, e-mail: info@citadele.lv, e-mail of the data protection officer: gdpr@citadele.lv.

What kinds of notifications and offers will you receive from us?

We will send you information:

- on Klix services and related offers, including personalised offers;
- on special offers from Klix partners (lenders and merchants) by using the Klix solution. You can see the list of Klix partners on the website <https://klix.app/klix-partneri/>;
- on opportunities to participate in contests, raffles, lotteries, promotions and other events organized by Klix;
- to invite you to assess Klix user and shopping experience;
- on lending (credit) offers, if separately consented by you.

IMPORTANT NOTICE:

If you have provided consent before July 3rd, 2024, Klix may send you offers and notifications via e-mail*, SMS* and as mobile app notifications**.

If you have provided consent on or after July 3rd, 2024, Klix may communicate you offers and notifications via e-mail*, SMS*, mobile app notifications**, web push notification*, telephone calls*, robocalls**, postal delivery mail**, Meta* (Facebook, Instagram, Messenger, WhatsApp), Google* (including YouTube), LinkedIn**, X**.

*Communication means currently used by Klix to deliver you commercial offers and notifications.

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***Communication means planned to be used by Klix to deliver you commercial offers and notifications. The usage of said means shall not be announced separately.*

What type of personal data will we process within the framework of receiving notifications and offers, how do we obtain it and what action do we perform?

Based on your consent for receipt of Klix offers and notifications, Klix will process the following personal data about you:

- identification data – name, surname;
- contact information – phone number, e-mail address;
- information regarding your interests, use of services and their relevance to your needs, lifestyle and habits for receipt of personalized offers. For instance, we will process:
 - information on Multilink or payment card purchases;
 - Klix Pay Later loan repayment status;
 - the credit rating assigned to you by the lender;
- information obtained through communication – information, that allows us to evaluate effectiveness of communication.

We obtain personal data directly from you, i.e. we use the personal information you provide to us by using Klix solution services. We also use the personal data we receive from lenders.

If you give consent **for the purpose of receiving notifications and offers**, we will process your personal data for the following:

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Actions for the processing of your personal data	Grounds for the processing of your personal data	Personal data to be processed
Selection of recipients of notifications and offers, preparation of lists	Your consent	<ul style="list-style-type: none"> • First name, surname • Personal identity number or date of birth • Client number/contract number • Information relating to the use of the Bank's services and their compliance with your needs, lifestyle and habits
Sending/placement of notifications and offers (email, SMS, postal services)		<ul style="list-style-type: none"> • First name, surname • Telephone number • Email address • Postal address • Information obtained through communication
Placement of notifications and offers on the Klix mobile app or website (incl. push notifications)		<ul style="list-style-type: none"> • First name, surname • Client number • Information obtained through communication
Communication of notifications and offers via telephone conversation (incl. robocalls)		<ul style="list-style-type: none"> • First name, surname • Telephone number • Information obtained through communication
Communication of notifications and offers via social networks, search engines and other types of global networking resources		<ul style="list-style-type: none"> • First name, surname • Telephone number • Email address • Information obtained through communication
Evaluation of the results of receiving notifications and offers		<ul style="list-style-type: none"> • First name, surname • Telephone number • Email address • Information obtained through communication
Protection of legitimate interests	Implementation of legitimate interests to ensure evidence in legal proceedings	<ul style="list-style-type: none"> • All of the above-mentioned personal data may be used, if required for the protection of legitimate interests
Fulfilment of the data subject's requests	Fulfilment of the obligations laid down in laws and regulations	<ul style="list-style-type: none"> • All of the above-mentioned personal data may be used, if required to fulfil the data subject's request

If you give your consent **for the purpose of receiving lending (credit) offers**, we will process the aforementioned personal data for the same activities as mentioned above, only for the purpose of preparing and sending lending (credit) offers. Due to the requirements of regulatory acts, we are obliged to separate offers related to lending (credit) from the flow of general offers, and to provide you with the opportunity to express your consent to this type of offer separately - there are no differences in terms of

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the amount of personal data to be processed and in terms of actions to be performed with personal data between lending (credit) offers and other offers.

FOR YOUR INFORMATION: In the course of processing your personal data within the framework of selecting recipients of communications and offers, we may perform the automated processing of information relating to the use of the Klix solution services and their compliance with your needs, lifestyle and habits for the purpose of evaluation of certain personal aspects relating to you, in particular to analyze or predict aspects concerning your abilities, personal preferences and habits. We do not perform automated individual decision-making regarding you.

Who will we transfer your personal data to?

Offers and notifications will be sent by Klix or a partner selected by Klix (processor) in accordance with your consent by processing the following personal data about you: name, surname, contact information (phone number, e-mail address). Klix carefully examines their partners before entrusting them with processing of personal data about you. Klix guarantees non-disclosure and safety of your personal data.

Your personal data will be processed within the European Union and will not be transferred to countries other than member states of the EU or European Economic Area.

How long will we retain your personal data?

Klix will store your consent and the related information for the period specified by legislation – five (5) years after withdrawal of consent or from the moment the subject of the consent has expired to provide proof of legal processing of your personal data in the previous period.

What are your rights as to the processing of your personal data within the framework of receiving notifications and offers?

You can revoke your consent for the processing of your personal data for the purpose of receiving notifications and offers, incl. lending (credit) offers, at any time in the following ways:

- By email;
- On the mobile app, if you are a user of Klix mobile app (*temporarily disabled*).

We will make sure that the revocation of consent is recorded in the information system within 5 (five) business days from the date of revocation. Revocation of consent(s) will not affect the legality of the processing of your personal data before the revocation.

If you have any questions regarding the processing of personal data performed based on consent, please write to the email address support@klix.app, incl. contact the Data Protection Officer, and you will receive all the information necessary regarding the processing of your personal data, including answers to your questions. All information will be forwarded to the employee in charge, who will then respond to your request.

In accordance with the requirements of the legal enactments and subject to submission of a written request, we do ensure that you have the right to access your personal data, rectify or erase it, restrict its processing, object to its processing, and transfer it.

What should you do, if you believe your privacy has been violated?

In the event of a violation of your privacy, you have the right to lodge a complaint with AS “Citadele banka”, the Data State Inspectorate, or bring legal action in accordance with law.

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This Privacy Disclaimer informs you about matters concerning the processing of your personal data for the purpose of receiving notifications and offers, incl. lending (credit) offers, on Klix solution services.

For information about the further processing of personal data in the course of receiving Klix solution services see informative materials on privacy protection matters available on the Klix website.

Klix guarantees the non-disclosure and safety of your personal data as the processing of your personal data is performed by employees who have received training on the protection of personal data, and the latest and most state-of-the-art information security technologies are used in the processing thereof.

*Feel free,
Your Klix*