**PRIVACY DISCLAIMER**
**for Processing of Personal Data within the Framework of the KLIX Financing Solution**

If you decided to buy goods or services in an online store using a loan or take a consumer loan without purchasing a particular item, the KLIX Financing solution will help you choose a lender.

With the help of Klix Financing you can:

- enter into a consumer loan contract with the lender or loan contract for the performance of commercial activities with the lender (in case this functionality is available in the respective country) in order to pay for selected goods or services in merchants' store.
- enter into a consumer loan contract with the lender without making a particular purchase (in case this functionality is available in the respective country). In this case full loan amount would be transferred to your account.
- enter into a rental service contract with the rental company for the performance of commercial activities with the rental company (in case this functionality is available in the respective country) in order to pay for selected goods or services in merchants' store.

This Privacy Disclaimer for processing of personal data within the framework of the KLIX Financing solution (hereinafter – the Privacy Disclaimer) contains information on issues related to the processing of your personal data on the KLIX solution, performing remote customer identification, filling in a loan application form, requesting loan offers, and, where no suitable loan offer is available, requesting a rental offer as an alternative to a loan. If you are offered a loan, you will receive an offer from financial institutions (lenders), reflecting the lenders' loan offers and providing an opportunity to conclude a loan contract between you and the lender of your choice. If no suitable loan offer is available and you express your wish to receive a rental offer, your personal data may be shared with the rental partner for scoring, initial rental offer preparation and conclusion of a rental agreement.

In view of the above, we will process your personal data within the framework of the KLIX Financing solution, and we would like to inform you about it in accordance with the requirements of regulatory enactments on privacy and personal data protection.

**Who will process your personal data?**

- The following controller will process your personal data in order to ensure functionality of the KLIX Financing solution:

| **Controller that ensures processing of personal data within the framework of the KLIX Financing solution:** |
|---|
| **Citadele banka AS**, registration No. 40103303559, legal address: Republikas laukums 2A, LV-1010, Riga, Latvia, telephone +371 67010000, e-mail info@citadele.lv, data protection specialist's e-mail gdpr@citadele.lv.<br><br>*You may read additional information on the processing of personal data carried out by Citadele banka AS on the KLIX solution, which is not described in this Privacy Disclaimer, in the KLIX Privacy Protection Rules on the KLIX website https://klix.app/en/legal-information/.* |

- For granting consumer loans or loans for the performance of commercial activities (the latter available only in Latvia), your personal data will also be processed by lenders as independent controllers for at least the following purposes: to assess your creditworthiness (including requesting information from public databases), to manage money laundering risks and risks related to international/national sanctions, to make loan offers and to conclude a loan contract. Your personal data will be processed by the following lenders for the purpose of granting a consumer loan or loan for the performance of commercial activities (the latter available only in Latvia):

| **Controllers that ensure processing of personal data within the framework of a consumer lending service or within the framework of lending service for the performance of commercial activities (the latter available only in Latvia):** |
|---|
| **LATVIA** |
| **Citadele banka AS**, registration No. 40103303559, legal address: Republikas laukums 2A, LV-1010, Riga, Latvia, telephone: +371 67010000, e-mail: info@citadele.lv, data protection specialist's e-mail: gdpr@citadele.lv, data protection specialist's e-mail: gdpr@citadele.lv.<br>Detailed information – Privacy Protection Rules of Citadele banka AS. |

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| **LATEKO LĪZINGS AS**, registration No. 40003366651, legal address: Katlakalna iela 1, LV-1073, Riga, Latvia, telephone: +371 67775079, e-mail: info@latekolizings.lv, data protection specialist's e-mail: datuaizsardziba@latekolizings.lv.<br>Detailed information – Privacy policy of LATEKO LĪZINGS AS. |
| **AIZDEVUMS.LV SIA,** registration No. 40003468776, legal address: Skanstes iela 25, LV-1013, Riga, Latvia, telephone: +371 67270200, e-mail: aizdevums@aizdevums.lv, data protection specialist's e-mail: datuspecialists@aizdevums.lv, data protection specialist's e-mail: datuspecialists@aizdevums.lv.<br>Detailed information – Privacy policy of AIZDEVUMS.LV SIA. |
| **ESTO LV AS**, registration No. 40103050993, legal address: Gustava Zemgala iela 74, LV-1039, Rīga, Latvia, telephone: +371 6622250, e-mail: info@esto.lv, data protection specialist's e-mail: juta.lipina@esto.eu.<br>Detailed information – Privacy policy of ESTO LV AS. |
| **LITHUANIA** |
| **AS "Citadele banka" Lietuvos filialas**, company code 304940934, legal address: Konstitucijos ave. 18B, LT-09308, Lithuania, telephone +370 5 221 9091, e-mail: info@citadele.lt, data protection specialist's e-mail: dap@citadele.lt.<br>Detailed information – AS „Citadele banka" Lietuvos filialas Personal Data Processing Principles. |
| **UAB "ESTO"**, company code 305219905, legal address: Lvivo str. g. 21-1, LT-09320, Vilnius, Lietuva, telephone +370 5 214 4362, e-mail: info@estopay.lt, data protection specialist's e-mail: anaras.basirovas@esto.eu.<br>Detailed information – Privacy policy of UAB "ESTO". |
| **UAB "Bendras finansavimas"**, company code 303259527, legal address: Latvių str. 36A, LT-08113, Vilnius, Lietuva, telephone +370 5 272 0151, e-mail: labas@savy.lt, data protection specialist's e-mail: ernesta@savy.lt.<br>Detailed information – Privacy policy of UAB "Bendras finansavimas". |
| **ESTONIA** |
| **AS "Citadele banka" Eesti filiaal**, company code 11971924, legal address: Narva mnt. 63/1, EE-10120, Tallinn, Estonia, telephone +372 77 00 000, e-mail: info@citadele.ee, data protection specialist's e-mail: gdpr@citadele.ee.<br>Detailed information – Privacy protection rules of AS "Citadele banka" Eesti filiaal. |

| **Controllers that ensure processing of personal data within the framework of rental service for the performance of commercial activities:** |
|---|
| **LITHUANIA** |
| **Nordrent UAB**, registration No. 304966459, legal address: Orša g. 4 - 102, Vilnius 09300, telephone: +370 69566777, e-mail: info@nordrent.lt, data protection specialist's e-mail: info@nordrent.lt.<br>Detailed information – Privacy Policy of Nordrent UAB. |

As this Privacy Disclaimer does not provide information on processing of personal data by each lender, we encourage you to read detailed information on processing of personal data by lenders in their privacy policies, privacy notices or other information materials on lenders' websites before receiving the service.

**Which types of your personal data we will process?**
In order to ensure functionality of the KLIX Financing solution, we will process the following personal data:

| Personal Data Category | Personal Data Type |
|---|---|
| Your identification data | - name and surname<br>- personal code |
| Your contact information | - telephone number<br>- e-mail address<br>- address of the place of residence (including the postal code) |
| Your marital status | - marital status<br>- dependents |

| | |
|---|---|
| Information on your income | - income type<br>- occupation<br>- employer's company name or registration number of the performer of commercial activities<br>- monthly income<br>- monthly credit liabilities |
| Information on your education | - level of education |
| Information on your accounts | - account number for the transfer of the loan amount |
| Information on the loans requested by you | - date of making monthly payments for loan repayment |
| Information on your confirmations/acknowledgments | - confirmation that you are a Latvian/Lithuanian/Estonian resident (respectively to the country where you are taking the loan)<br>- confirmation that you are of the age of majority<br>- confirmation that you are not a politically exposed person<br>- confirmation on the status of a politically exposed person<br>- confirmation that you have read the Privacy Disclaimer<br>- confirmation that you have read KLIX Terms of Use<br>- confirmation that you have been informed about transfer of your personal data and processing of such data by lenders |
| Information obtained during communication with KLIX | - information that we obtain when you contact KLIX specialists (for example, using a chat or by telephone) |
| Direct marketing consent | - consent to get general and personalized offers from Klix |
| Lending marketing consent | - consent to get general and personalized lending offers from Klix |
| Stream data | - IP address<br>- action logs<br>- browsing device |
| Information on your transactions (last 180 days), if required for considering the creditworthiness and issuing of loan | - Payee information<br>- Payer information<br>- Amount<br>- Currency<br>- Payment description |
| Information on accounts you have selected in financial institutions | - Account number (IBAN)<br>- Account name<br>- Account currency<br>- Owner (name surname) |

Please note that the above-mentioned types of personal data have been identified by lenders and rentals as necessary for provision of a lending and rental services. At the same time, the KLIX platform ensures that each lender or rental receives exactly the types of your personal data that it needs to provide a lending or rental services.

**How and why do we process your personal data?**

| Purpose of Processing Your Personal Data | Grounds for Processing Your Personal Data | Personal Data that Will be Processed |
|---|---|---|
| Applying for a loan/selection of a loan offer via the KLIX Financing | • For fulfilment of the contract concluded by the controller and you, or for taking measures required to conclude such contract: | • Identification data<br>• Contact information<br>• Marital status |

| | | |
|---|---|---|
| solution in accordance with the Terms of Use of the KLIX Financing solution | - when ensuring functionality of the KLIX Financing solution, Citadele banka AS carries out a number of operations (e.g., remote identification, receipt of information in the form of an application for a loan, receipt of information about transactions and account numbers via Account Information Service Provider, and required by lenders to perform a manual review of your creditworthiness, requesting a loan offer, publishing lenders' offers and options for conclusion of contracts), as a result of which the information necessary for lenders to make loan offers is received.<br>- If required by lenders, transfer of obtained information on transactions to lenders for the consumer's creditworthiness assessment preparation of loan offers<br>- Citadele banka AS provides advice to users of the KLIX Financing solution on issues related to the use of the KLIX Financing solution and receipt of services (online chat or telephone communication is provided if a user has expressed such a wish during the communication via the chat)<br>- sending reminders* about received offers or unfinished contract conclusion (only lending without purchase)<br>- sending confirmation* about accomplished purchase with KLIX Financing solution to you and merchant store representative | • Information on income<br>• Information on your education<br>• Information on the requested loans<br>• Information on confirmations/acknowledgments<br>• Information on your transactions<br>• Information on accounts you have selected in financial institutions<br>• Information obtained during communication with KLIX<br>• Stream data |
| | • Realization of legitimate interests of the controller in informing* customer on unfinished lending process:<br>- sending reminders about received offers or unfinished contract conclusion (only lending with purchase)<br>- in case of technical downtime of service, sending update that solution is available to proceed with applying once more<br>- sending reminders if customer has signed loan contract but hasn't paid mandatory down payment | |
| | ** Please be advised that E-mail, SMS messages, mobile app push notifications, and phone calls can be used as communication channels to deliver you the important information, related to the usage of Klix Financing solution.* | |
| Applying for a rental offer via the KLIX Financing | • For fulfilment of the contract concluded by the controller and you, or | • Identification data<br>• Contact information |

| | | |
|---|---|---|
| solution in accordance with the Terms of Use of the KLIX Financing solution | for taking measures required to conclude such contract:<br>- If no suitable loan offer is available and you express your wish to receive a rental offer, Citadele banka AS transfers your personal data to the rental partner in two stages: first, personal code and telephone number for scoring and assistance, if necessary; second, upon your acceptance of the rental offer, name, surname, e-mail address and home address for preparation and conclusion of the rental agreement. | |
| Implementation of marketing activities to promote Klix financing solution, services, products and other activities offered therein | • Your consent<br>• Other basis** | • Other types of information** |
| | *** Please be advised that more detailed information on your personal data processing for this purpose is revealed in 'KLIX Privacy Disclaimer for processing of personal data for receipt of notifications and offers on Klix solution services' available on the KLIX website.* | |
| Examination of claims and protection of legal interests | • Realization of legitimate interests of the controller in case of disputes over the KLIX Financing solution or processing of personal data performed within the framework of the KLIX Financing solution | • All aforementioned information |

**How do we receive your personal data?**
Only the personal data provided by you are used to ensure functionality of the KLIX Financing solution as well as for providing consultations. If you use authentication by means of Smart-ID or Mobile-ID during remote customer identification, we will receive your name and surname as well as your personal code from SK ID Solutions AS. In turn, if you use a secure electronic signature during remote customer identification, we will receive your name and surname as well as your personal code from Latvijas Valsts radio un televīzijas centrs VAS.

At the same time, we inform you that lenders may obtain your personal data from other information sources for provision of lending services, about which you can obtain more detailed information in the lenders' privacy policies, privacy notices or other information materials published on lenders' websites. Information on your transactions and information on accounts you have selected in financial institutions we will receive from the Account Information Service Provider.

**Whom do we transfer your personal data?**
Processing of your personal data within the framework of the KLIX Financing solution will be ensured by the authorized employees of Citadele banka AS. In turn, in order to provide the lending service itself, your personal data will be transferred to the lenders. If no suitable loan offer is available and you express your wish to receive a rental offer, your personal data will also be transferred to the rental partners. If required for the assessment of your creditworthiness, Citadele banka AS may transfer to potential lenders information on your transactions obtained via the Account Information Service, including account statements and transaction data, for the purpose of preparing loan offers. Such data is shared only to the extent necessary and only in cases where information on your transactions (i.e. account statement data) is required for a specific financing product, e.g. money loans and Buy Now Pay Later solutions in certain countries. While ensuring the operation of the KLIX Financing solution your personal data will not be transferred in any other way.

We provide information to merchants about concluded loans and your personal data to ensure faster goods delivery to you.

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**How long do we store your personal data?**
In order to ensure that you have the best experience in using the KLIX Financing solution, the personal data submitted by you will be stored on the KLIX platform for 5 years from the moment of submitting the personal data. For the same period, your personal data will be stored in order to protect the legal interests of Citadele banka AS in case of complaints or claims regarding the provision of the KLIX Financing solution. You may read additional information on the terms of storage of personal data on the KLIX platform in the KLIX privacy protection regulations on the KLIX website https://klix.app/en/legal-information/.

Information on your transactions received from the Account Information Service Provider will be temporarily stored for up to 30 days.

**What are your rights with regard to processing of your personal data?**
Your statutory rights are ensured in accordance with provisions of Klix Privacy protection rules that we kindly ask you to familiarize with.

If you have any questions regarding processing of personal data within the framework of the KLIX Financing solution, you can contact:
Citadele banka AS by writing to info@citadele.lv, or you can contact the data protection specialist by writing to gdpr@citadele.lv. All information will be passed to the designated officer who will respond to your request. In accordance with the requirements of regulatory enactments, Citadele banka AS provides you with the right to access your personal data, correct or delete them, restrict their processing, object to their processing, as well as transfer them. A written request must be submitted to perform any of these actions.
You can submit your request:

- in person at the customer service centers of Citadele banka AS, showing the identity document (passport or ID card), where you will be provided with all the necessary information related to the submission of your request, including answers to unclear questions;
- by e-mail, signing the request with a secure electronic signature and sending it to info@citadele.lv;
- by changing your marketing preferences in Klix User Portal https://my.klix.app/settings;
- by Online banking and/or Mobile Application request in if you are the customer of Citadele banka AS.

**What to do if you think your privacy has been violated?**
In the event of a violation of your privacy, you have the right to file a complaint with Citadele banka AS, the Data State Inspectorate, or to take a legal action to protect your legitimate interests.
**This Privacy Disclaimer informs you of issues related to the processing of your personal data within the framework of the KLIX Financing solution.**

**You may read information on processing of your personal data:**

- **on the KLIX solution you may read the information that is not provided in this Privacy Disclaimer in 'KLIX Privacy Protection Regulations' and/or regarding marketing activities in 'Privacy disclaimer for processing of personal data for receipt of notifications and offers, incl. lending offers, on Klix solution services' on the KLIX website;**
- **on the lenders' websites.**

**Citadele banka AS guarantee non-disclosure and security of your personal data, ensuring that your personal data is processed by employees who are trained in the field of processing and protection of personal data, using the latest and most modern technologies in the field of information security.**

***Yours,***
***Citadele banka AS***