

Privacy Disclaimer for the Processing of Personal Data Carried out by OÜ Citadele Factoring within the Framework of Leasing Services Provision



Effective date: 01.09.2022

The range of OÜ Citadele Factoring (former name up to 18 May 2021 was OÜ Citadele Leasing & Factoring) services include only the provision of factoring services to companies registered in Estonia, while leasing services are no longer provided. At the same time, OÜ Citadele Factoring are still servicing the valid leasing contracts with natural persons and legal entities which have been signed beforehand.

Taking care of your privacy and personal data protection, including your right to information, we, OÜ Citadele Factoring, have developed these Privacy Protection Rules under Regulation (EU) 2016/679 of the European Parliament and of the Council (of 27 April 2016) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the 'Regulation') and in accordance with other requirements set out by the legal enactments of the European Union and the Republic of Estonia, financial sector recommendations and best practice guidelines.

In the Privacy Disclaimer, we provide you with information about the processing of your personal data, i.e. any information that directly or indirectly relates to you, your right to privacy and its protection.

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1. Terms

You – you as a natural person whose Personal Data we process.

Factoring or we – OÜ Citadele Factoring.

Bank – AS Citadele Banka Estonian branch (address: Narva mnt. 63/1, Tallinn 10120, Estonia).

Citadele Group – AS Citadele Banka, all its foreign branches and subsidiaries.

Processing – any actions we do with your Personal Data, for example, collection, recording, storage, viewing, use, disclosure of your Personal Data by transmission, dissemination or otherwise making available, consultation, erasure or destruction, and otherwise.

Privacy Disclaimer – this Privacy Disclaimer for the Processing of Personal Data Carried out by OÜ Citadele Factoring to provide leasing services.

Personal Data – any information that relates or may be related to you, for example, your first name, surname, personal number, address, telephone number, email address, economic and other activity typical of you.

Consent – any your confirmation given freely and knowingly by which you consent to the Processing of your Personal Data for the specific purpose.

Profiling – use of your Personal Data to evaluate certain personal aspects relating to you, in particular to analyse or predict aspects concerning your economic situation, personal preferences, interests, reliability, behaviour, location.

Data Protection Authority – the institution monitoring compliance with the Regulation in the Republic of Estonia.

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2. Who processes your personal data?

Your Personal Data controller is OÜ Citadele Factoring, unified registration No. 10925733, legal address: Narva mnt. 63/1, Tallinn 10120, Estonia, telephone +372 77 00 000, email: info@citadeleleasing.ee.

3. What kind of your personal data do we process?

For the purposes specified in the Privacy Disclaimer and within the scope of the intended purposes, we process your Personal Data sets (categories) as follows:

Personal Data set (category)	Description
Your identification data	First name, surname, personal identity number, date of birth, information specified in your identification document (passport or ID card).
Your contact information	Information to contact you, residential address, correspondence address, telephone number, email address.
Your financial information	Your bank account number, cash flow, i.e. incoming and outgoing payments and information included therein, transaction history, loan obligations and other obligations; personal and real property owned by you.
Information relating to your tax residence	Your country of birth, residence, taxpayer number, nationality, place of tax residence.
Information relating to your education and family	Information about your education, family status and family members.
Information relating to your professional activity	Your place of work, profession, position, occupation, trade union membership, length of service.
Information relating to enhanced due diligence performed on you as Factoring's client	Information obtained through performing enhanced due diligence on you as the client – about your counterparties and business activity, cash flow, reliable information publicly available in social networks, information obtained in screenings against sanction lists, PEP status.
Information relating to your contractual obligations with Factoring	Information about the products and services we provide to you, interests, information about the fulfilment or non-fulfilment of contractual obligations, active or inactive obligations, submitted requests, claims, complaints.
Information obtained through communication with Factoring	Information obtained from your letters, emails, telephone conversations (with/without audio recording) when you contact Factoring as well as information about the devices and technology used by you for communication.
Information relating to you obtained from different public registers	Information we obtain from publicly available registers in the context of provision of services and customer due diligence (hereinafter - CDD), for example, Creditinfo Eesti AS, the Centre of Registers and Information Systems, the Population Register.
Information available in the documents	Information about you stored in physical and electronic documents.
Your special category personal data	Legal enactments provide for the special category Personal Data types which we will process if allowed by legal enactments. These are the special category Personal Data disclosing: <ul style="list-style-type: none">• racial or ethnic origin;• religious or philosophic beliefs;• political opinions;• genetic, biometric data;• health state data;• data relating to criminal convictions and offences.

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4. For what purposes and on what grounds do we process your personal data?

Before we start processing your Personal Data, the first thing we do is evaluate the purposes for which it will be necessary to process your Personal Data. Processing of your Personal Data is legitimate if we do it based on at least one of the following grounds, i.e. we process your Personal Data:

- **to perform a contract** in order to provide the respective service to you, or
- **to fulfil Factoring's obligations specified by law**, or
- **based on your consent**, or
- **to implement the legitimate interests of Factoring or a third party** in order to provide to you the service specified in the contract, ensure the legitimate interests of Factoring or third parties arising from legal enactments assessing whether Factoring's interests to process your Personal Data are proportionate to your right to privacy.

For what purposes do we process your Personal Data?	On what grounds do we process your Personal Data?
To provide our services	<p>Within the framework of performing a contract</p> <ul style="list-style-type: none"> • to provide the respective financial services to you – leasing services; • to contact you and inform about any changes in our services; • to contact you within the framework of performance of a contract of guarantee; • to get commissions and other payments. <p>For Factoring to implement its legitimate interests</p> <ul style="list-style-type: none"> • to inform you about changes in the Processing of your Personal Data; • to process the requests and complaints received from you; • to verify your identity and perform CDD on you within the framework of AML/CTFP, including perform CDD on you as a client, client's representative or guarantor which includes identification of the origin of funds, screening against sanction lists, publicly available registers in accordance with the procedure established by legal enactments, identification of the beneficial owner and PEP status, to provide information to the supervisory authorities and investigative authorities in the cases provided by legal enactments, ensure the maintenance of registers; • to provide information about your loan obligations or your obligations as a guarantor and fulfilment thereof; • within the framework of AML/CTPF, to check information relating to you in publicly available reliable information sources; • to execute the requests of state/investigation and other law enforcement agencies, sworn bailiffs and other state institutions and officials specified in laws. <p>To implement the legitimate interests of Factoring or a third party</p> <ul style="list-style-type: none"> • to ensure the supervision of contract performance and loan repayment; • to check information relating to you as a company representative in public databases, for example, the right of representation in the database of the Commercial Register; • to check information relating to you in public credit history databases.
To assess and prevent risks in transactions with clients	<p>For the performance of legal obligations</p> <ul style="list-style-type: none"> • to ensure management of Factoring's risks; • to exchange information relating to your loan (contractual) obligations and fulfilment thereof through credit information offices; • to ensure assessment of your creditworthiness/to ensure assessment of a pledged asset in case of additional lending. <p>Within the framework of contract performance</p>

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	<ul style="list-style-type: none">to ensure the assessment of your ability as a guarantor to fulfil borrower's obligations in case of additional lending or by taking credit risk management measures. <p>To implement the legitimate interests of Factoring or a third party</p> <ul style="list-style-type: none">within the framework of fraud prevention related to the use of services or prevention of the abuse of our services, to check information relating to you in publicly available registers and publicly available reliable information sources.
To implement client acquisition marketing activities*	<p>On grounds of your consent</p> <ul style="list-style-type: none">to provide personalised offers and give other notifications to you;to provide you with personal credit limit offers. <p>For Factoring to implement its legitimate interests</p> <ul style="list-style-type: none">to provide the company you represent with the most up-to-date information on the services provided by Citadele Group to legal entities, identify potential clients and client groups, evaluate and research them, i.e. analyse and predict their personal preferences, interests, behaviour, reliability, attitude.
To carry out business and administrative activities	<p>For the performance of legal obligations</p> <ul style="list-style-type: none">to ensure auditing and auditing revision, corporate management. <p>To implement the legitimate interests of Factoring or a third party</p> <ul style="list-style-type: none">in defending our rights, if you (or the company you represent) have failed to fulfil your contractual obligations, we will ensure the recovery of debts and enforcement actions, litigation;with the help of audio recordings, to ensure and improve the quality of service provision, provide evidence of transactions and communication with you;to test new products;to summarise statistics.

* Client acquisition marketing activities in relation to you as a natural person are implemented at the Citadele Group level given that your rights are exercised under the Privacy Disclaimer for Processing of Personal Data for Receipt of Notifications and Offers available on the Bank's website at www.citadele.ee.

5. How do we obtain your personal data?

When you provide them to us:

- when you contact us by mail, email, over the phone, using chats or in person at our client service centres;
- when providing different additional information at our request.

When you use our products and services:

- providing information on payments.

When they are provided to us by third parties:

- Citadele Group companies;
- database maintenance companies, registers specified in legal enactments;
- state institutions and law enforcement agencies and officials thereof;
- persons in relation to contracts and transactions which these persons have concluded with Factoring.

6. Who do we transfer your personal data to?

We transfer your Personal Data to:

- Citadele Group companies;**
- our counterparties (processors or separate controllers)** related to the provision of our products and services and which we have thoroughly assessed prior to cooperation. For example, to send correspondence, recover debts, implement marketing activities sending different offers and other notifications to you or the company you represent; implement our client acquisition marketing activities (including sales promotions, lotteries, drawings, contests), conduct client satisfaction researches; develop, maintain and service information systems; develop and/or maintain mobile applications;
- other credit institutions and financial institutions, insurance service providers and financial service agents, third parties** involved in the execution of transactions;

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- **supervisory authorities** (European Central Bank, Financial Supervision Authority, Consumer Rights Protection Board, Data Protection Authority, Tax and Customs Board of the Republic of Estonia and other institutions) based on written requests or obligations binding upon Factoring and/or Citadele Group under legal enactments;
- **in the specific cases to execute requests – to the competent state institutions**, for example, Estonian Financial Intelligence Unit, National Audit Office of Estonia, Tax and Customs Board of the Republic of Estonia, Financial Supervision Authority, court, investigative authorities, the Prosecutor's Office and other statutory persons, for example, sworn bailiffs, notaries, insolvency administrators;
- **companies/institutions maintaining the databases created under legal enactments** (Creditinfo Eesti AS, the Centre of Registers and Information Systems, the Population Register etc.);
- **in the cases specified in legal enactments** – to state/law enforcement agencies, investigative authorities, courts, sworn bailiffs, sworn notaries;
- **participants of the European and international payment systems and their related parties;**
- **rating agencies;**
- **Factoring's audit companies, legal service providers, translators.**

Within the framework of your Personal Data Processing, access to your Personal Data will be granted only to the employees authorised by us and our counterparties who need it to perform their work duties and who process your Personal Data only for the Personal Data processing purposes and on the grounds specified in this Privacy Disclaimer in compliance with the technical and organisational requirements for the processing of Personal Data specified in the data protection legal enactments as well as in Factoring's internal legal enactments.

7. Do we carry out automated decision-making and profiling?

To provide services to you as the existing Factoring's client, we can make automated individual decisions relating to you. Within the framework of such automated individual decision-making, Profiling can be carried out in the form of Processing of your Personal Data in order to evaluate and predict your financial situation, reliability, and behaviour. We make automated individual decisions, including carry out Profiling, in connection with the assessment of your creditworthiness within the framework of credit risk management.

You have the right not to rely on the automated decision made by Factoring's system and contact us to express your opinion and receive an explanation from Factoring regarding the automated decision made, as well as to request a review of the automated decision by involving our employees in the decision-making.

If you are a guarantor, we make automated individual decisions, including carry out Profiling, in connection with the assessment of your creditworthiness, to automatically predict by analysing the various types of information available to us your ability to fulfil borrower's obligations. You have the right not to rely on the automated decision made by Factoring's system and contact us to express your opinion and receive an explanation from Factoring regarding the automated decision made, as well as to request a review of the automated decision by involving our employees in the decision-making.

For information: The procedure for preparing personal credit limit offers, including profiling and making automated individual decisions, is described in the Privacy Disclaimer for Processing of Personal Data for Receipt of Notifications and Offers available on the Bank's website at www.citadele.ee.

8. Do we transfer your personal data outside the EU/EEA?

We ensure that your Personal Data are stored in the territory of the European Union and the European Economic Area.

Given the global nature of financial services and technological solutions and to process your Personal Data for the purposes specified in the Privacy Disclaimer, for the provision of individual services your Personal Data may be transferred for Processing to the Personal Data receivers located outside the European Union and the European Economic Area, for example, if their services are provided by a counterparty (processor, separate controller, joint controller). Any such international transfer of Personal Data is done in compliance with the requirements of the Regulation, and in such cases we will ensure the procedures provided for by the legal enactments for securing the level of Personal Data Processing and protection which is equivalent to that specified in the Regulation.

When transferring your Personal Data outside the EU and the EEA, we will observe at least one of the below conditions:

- transfer to a country recognised by the European Commission as a country providing the appropriate Personal Data protection level; if the European Commission has decided that the territory of a particular country or separate sectors or the

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respective international organisation provides an adequate level of protection for your Personal Data. You may obtain general information about the decisions taken by the European Commission on the European Commission's website http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm;

- transfer Personal Data to a country or international organisation providing appropriate guarantees between public authorities or bodies;
- transfer in accordance with the supervising authority's authorisation relating to contractual clauses between the controller or processor and the controller, processor or the recipient of the personal data in the third country or international organisation;
- if your explicit Consent to the transfer of Personal Data has been received;
- transfer is required to perform a contract entered into by and between you and Factoring;
- transfer is required to enter into a contract between us and the processor or a separate controller, joint controller for your benefit or performance of the contract;
- transfer is required to exercise or protect legitimate rights and interests, file claims (for example, for the purpose of legal proceedings).

9. How long do we retain your personal data?

Your Personal Data retention period depends on the purposes for which we process them and the criteria under which we assess your Personal Data retention periods.

When determining your Personal Data retention periods, we assess:

- the need to retain your Personal Data to ensure performance of a valid service contract;
- the need to retain your Personal Data for Factoring to fulfil its legal obligations, for example, within the 5-year period stipulated in the AML/CTPF Act and within the different retention periods specified in other legal enactments;
- retention of your Personal Data to safeguard our interests in different claims in case of termination of business relationships with the company you represent, for example, 5 years in accordance with the general limitation period for liability;
- our legitimate interests or those of a third party that might be offended in the event of deletion of your Personal Data, for example, with respect to your right to restrict data processing;
- the need to retain your Personal Data in order to provide proof of the legitimate Processing of Personal Data in the previous period, for example, your Consent to the previous Processing operations;
- if your Personal Data Processing is performed based on the Consent, until your Consent for the respective Personal Data Processing purpose is in force given that there is no another basis for the Processing of your Personal Data.

In assessing the Personal Data retention periods, we take into account the guidelines developed by industry authorities. If, in the course of the assessment, we identify different reasonable periods for your Personal Data retention, for example, between the statutory retention period and the timeframe for protecting our interests, this will be a reasonable basis to retain your Personal Data for a longer period.

If one or more of the specified criteria occur, we will ensure that your Personal Data are deleted or anonymised.

10. What are your rights in relation to the personal data processing carried out by us?

Within the framework of complying with the requirements of the legal enactments governing privacy and personal data protection, subject to your written request submitted to us, we will guarantee you the right:

To withdraw your Consent to the Processing of your Personal Data at any time, having informed us about that:

- by email;
- in person at our and the Bank's client service centres;
- via the Bank's Online Banking if you are the Bank's client;
- via the Bank's mobile application if you are the Bank's client.

In some cases, for example, in order to offer our products and services to you and ensure that you receive other notifications, prior to sending them, we will ask you to fill out the respective form via the Online Banking, mobile application or in person at our and the Bank's client service centres to give your Consent to the Processing of your Personal Data for the purpose of getting such notifications and offers.

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Once you have withdrawn your Consent to the Processing of your Personal Data for the intended purpose, we will no longer process your Personal Data. However, you must take into account that such withdrawal of your Consent will not affect the legitimacy of your Personal Data Processing before the withdrawal of the Consent.

To access your Personal Data and receive from us:

- confirmation or rejection of whether we process your Personal Data or not;
- information relating to your Personal Data that we process;
- additional information relating to the Processing of your Personal Data in order to verify the accuracy of your Personal Data and whether we process your Personal Data in accordance with the requirements of legal enactments.

In some cases, we may ask you to define the scope of your request more accurately to specify, in more details, to what information and to which Processing operation the request applies as well as explain the justification of the request.

In cases where this is not permitted by legal enactments, we will not be able to provide you with any information about the Processing of your Personal Data, for example, within the framework of the AML/CTPF Act we are prohibited to inform you about the provision of information to the Estonian Financial Intelligence Unit; also, if information is provided to law enforcement institutions, the Prosecutor's Office, court.

To rectify your Personal Data if you reasonably believe that your Personal Data are inaccurate as well as, taking into account the purposes for which your Personal Data are processed, to supplement incomplete Personal Data.

In the event of any change in your Personal Data as well as if you have identified that we are processing inaccurate or incomplete Personal Data, please inform us of the need for rectifications. In this case, Factoring is entitled to request you to submit documents supporting rectifications.

To erase your Personal Data, if:

- you believe that they are no longer required or unusable for the initial purposes of Personal Data Processing;
- you reasonable believe that your Personal Data are processed illegitimately, for example, for the purpose of receiving notifications and offers since you have withdrawn your Consent based on which we were processing your Personal Data, and we have no other basis to process your Personal Data;
- erasure of your Personal Data is specified in the data retention periods determined for us in legal enactments.

We will ensure that your Personal Data available to us are erased, including erased by our counterparties, if Personal Data are no longer necessary for the purposes for which we were processing them. We will not be able to ensure that your Personal Data are erased if we need to ensure such Processing in the cases stipulated by law providing for the information or document retention periods which, for instance, are set out in the AML/CTPF Act, Accounting Act. Likewise, Factoring is entitled to refuse to erase your Personal Data if it requires disproportionate effort.

To restrict processing of your Personal Data, if:

- you dispute the accuracy of your Personal Data; the restriction will only apply to the time at which we will be able to verify the accuracy of your Personal Data;
- you believe that the processing of your Personal Data is illegitimate and you object to the erasure of Personal Data requesting instead to restrict the use of Personal Data; the restriction will only apply to the period specified by you on reasonable grounds;
- we do not need your Personal Data anymore, but they are necessary for you to exercise or defend legitimate rights and interests, raise claims, etc.; the restriction will only apply to the period specified by you on reasonable grounds;
- you object to the processing of your Personal Data that we do base on our legitimate interests, but the restriction will only apply to the period during which we carry out a reassessment of such legitimate interests.

By exercising said rights, we will still have the right to process your Personal Data, for example, in order to exercise or defend legitimate rights and interests, raise claims, rights of another natural person or legal entity. We will ensure that your Personal Data available to us and our counterparties are restricted if this does not require disproportionate efforts from us.

To transmit your Personal Data which we have obtained from you based on the Consent and the established contractual obligations and which we process using automated means for personal use or handover to another service provider if there is no any hindrance to such transmission of Personal Data. Please be advised that information subject to your Personal Data portability may also contain third parties' Personal Data; therefore, we will assess the impact of such Personal Data transfer in relation to the rights and freedoms of third parties.

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To object to the Processing of your Personal Data which is based on Factoring's legitimate interests. Factoring will immediately terminate such Processing, but only for the period while Factoring carries out an assessment and does not demonstrate compelling legitimate grounds for the Processing of Personal Data overriding your interests, rights and freedoms.

Factoring will have the right to process Personal Data if this is required to exercise or defend legitimate rights and interests, raise claims (for instance, for the purpose of legal proceedings). You will not be able to exercise such your right if you gave your Consent to the Processing of your Personal Data, or we will need the Processing of your Personal Data for the purpose of entering into or performance of a contract, or for Factoring to fulfil its legal obligations.

To refuse from automated individual decision-making, including Profiling

With regard to automated individual decision-making, including Profiling, which can have legal consequences for you, including negative consequences, you have the right to refuse from such automated individual decision-making, including Profiling, requesting to involve Factoring's employee and to review such automated individual decision-making. You will not be able to exercise this right in the cases when the Processing of Personal Data is specified in the legislation binding upon Factoring.

How to submit the request?

You can submit your request:

- in person at our office or at the Bank's client service centres, having presented your ID document (passport or ID card), where you will be given all required information in relation to the submission of your request, including answers to unclear issues;
- via email, having signed the request with a secure electronic signature;
- via the Bank's Online Banking if you are the Bank's client;
- via the Bank's mobile application if you are the Bank's client.

Upon receipt of your request, we will evaluate it and, if necessary, ask you to specify the scope of your request as to what information and to which processing operation it applies as well as ask to explain the justification of your request.

How long will we consider your request?

We will reply to your request without undue delay no later than within one month from receipt of your request; if necessary and taking into account the scope of your request, we have the right to extend the term for execution of the request by two months. In this case, we will inform you about the reasons for extending and delaying the term within one month from the date of receipt of the request.

How will we provide information to your request?

We will ensure that you obtain information in relation to your requests in person at our office or at the Bank's client service centres, via encrypted electronic mail, via the Bank's Online Banking or the Bank's mobile application, if you are the Bank's client, taking into account, as far as possible, the mode to receive the replies to requests specified by you.

Will you be charged for the consideration of your request?

Your request will be considered free of charge.

However, if we identify that you submit requests repeatedly, your requests are obviously unreasonable or excessive, we, taking into account the administrative costs associated with the provision of information or communication or the performance of the requested activity (including employee resource costs), request a reasonable fee for the consideration of your request in accordance with the approved Schedule of Fees and Charges, or we will refuse to execute your request, having informed you about that in advance.

11. What to do if you believe that we have violated your rights while processing your personal data?

We ensure the Processing of your Personal Data in accordance with the requirements of the Regulation, other legal requirements of the European Union and the Republic of Estonia, and this Privacy Disclaimer; however, if you believe that in the Processing of your Personal Data we have violated your right to privacy, in order to protect your statutory interests you are entitled to file a complaint with Factoring, Data Protection Authority or bring legal action to court in accordance with law.

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12. How do we ensure the safety of your personal data?

We guarantee non-disclosure and security of your Personal Data by taking appropriate technical and organisational measures, ensuring physical security of your Personal Data and safe environment for Processing, limiting the access rights to your Personal Data, encrypting your Personal Data, providing computer network protection, personal device protection, data backup and other protection measures, thus also protecting your Personal Data against unauthorised access, use or disclosure.

Within the framework of Processing of your Personal Data, access to your Personal Data is restricted to our authorised employees and authorised employees of our counterparties who need it to perform their work duties and who process your Personal Data in compliance with the technical and organisational requirements for the Processing of Personal Data specified in legal enactments.

The service providers (processors) to whom we have entrusted the Processing of your Personal Data have, prior to the commencement of cooperation, been thoroughly assessed and informed about the set of measures that they must take to ensure the Processing, confidentiality and protection of your Personal Data in accordance with the requirements of legal enactments.

To ensure qualitative and prompt fulfilment of the obligations under the contract entered into with you, we may authorise Citadele Group companies, our counterparties to execute specific tasks or provide services. If, in the performance of these tasks, Citadele Group companies or counterparties process your Personal Data available to us, the respective Citadele Group companies or counterparties are considered to be the processors, and we have the right to transfer your Personal Data to Citadele Group companies or counterparties to perform said activities to the extent required to do that.

Our counterparties and Citadele Group companies will ensure that your Personal Data processing and protection requirements are fulfilled in accordance with legal enactments and that they will not use your Personal Data for other purposes.

13. How to contact us?

Should you have questions relating to the processing of your Personal Data, please contact us either by emailing to info@citadeleleasing.ee or to our designated data protection officer at privacy@citadeleleasing.ee or visit our client service centres where all required information relating to the processing of your Personal Data, including answers to unclear issues will be given to you. All information will be transferred to the designated employee who will reply to your request.

14. How will we provide the latest information about your personal data processing?

To ensure that the most recent information about the Processing of your Personal Data is always available to you, we, in accordance with the requirements of legal enactments, will make sure that this Privacy Disclaimer is reviewed and updated on a regular basis. Therefore, we encourage you to read, from time to time, the latest version of the Privacy Disclaimer on our website, at our and the Bank's client service centres and via e-mail. We will notify you of amendments to the Privacy Disclaimer three business days prior to their entry into force.
