

## **PRIVACY DISCLAIMER FOR PROCESSING OF PERSONAL DATA FOR RECEIPT OF NOTIFICATIONS AND OFFERS**

Take effect as of 9<sup>th</sup> of February 2021

By using the services of Citadele Group companies, clients are entitled to receive various benefits such as more favourable conditions on financing, higher interest rates on deposits, special offers from Citadele Group companies, discounts on payment card 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 Citadele Group companies 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, including individual offers of credit limits, if you have given your consent thereto.

### **WHAT KINDS OF NOTIFICATIONS AND OFFERS WILL YOU RECEIVE FROM US?**

Based on your consent we will send you:

- **Notifications and offers**
  - up-to-date information about our financial services provided by Citadele Group companies, such as account opening, payment card processing, deposit services, mortgage or consumer loan services and other services and related offers, including personalised offers within the client loyalty programmes;
  - other types of notifications on opportunities to participate in our contests, draws, lotteries, campaigns and other events for our clients organised by us; greetings on your birthday, name's day and on other festivities (e.g., Independence Day, Easter, Christmas, Midsummer's and other celebrations); our comments on the latest developments in the Latvian and global economy; opportunities to express your opinion about the services provided by us and the quality of our customer service by participating in our customer surveys; social responsibility and support projects; our financial indicators, awards and special occasions.
- **Individual offers of credit limits**
  - up-to-date information about the credit limits (for instance, credit limits for payment cards or consumer loans) available to you, prepared by financial consultants of AS Citadele banka Estonian branch upon the assessment of your financial situation.

### **WHO PROCESSES YOUR PERSONAL DATA WITHIN THE FRAMEWORK OF RECEIVING NOTIFICATIONS AND OFFERS?**

In order to receive notifications and offers, including personalised offers and individual offers of credit limits, your personal data will be processed by the following Citadele Group companies as individual or joint controllers:

#### **Citadele Group company/-ies that ensure the sending of notifications and offers**

AS Citadele banka Estonian branch, registry code 11971924, address: Narva mnt 63/1, Tallinn 10152; phone: +372 7700000; e-mail: [info@citadele.ee](mailto:info@citadele.ee), Data Protection Officer's email: [gdpr@citadele.ee](mailto:gdpr@citadele.ee).

AS Citadele banka (AS "Citadele banka"), registration No. 40103303559, registered office: Republikas laukums 2A, Rīga, Latvia, LV-1010 (Republikas laukums 2A, Rīga, Latvija, LV-1010), tel.: +371 67010000, email: [info@citadele.lv](mailto:info@citadele.lv), Data Protection Officer's email: [gdpr@citadele.lv](mailto:gdpr@citadele.lv).

OÜ Citadele Leasing & Factoring, registry code 10925733, address: Narva mnt 63/1, Tallinn 10152; phone: +372 7700000; e-mail: [info@citadele.ee](mailto:info@citadele.ee), Data Protection Officer's email: [gdpr@citadele.ee](mailto:gdpr@citadele.ee).

SIA Citadele Leasing (SIA "Citadele Leasing") Estonian branch, registration No. 11453650, registered office: Liivalaia tn 13 Kesklinna linnaosa, Tallinn Harju maakond 10118, tel.: +372 6222100, email: [info@citadeleleasing.ee](mailto:info@citadeleleasing.ee), Data Protection Officer's email: [privacy@citadeleleasing.ee](mailto:privacy@citadeleleasing.ee).

Your personal data will be processed for the purpose of sending notifications and offers by duly authorised employees of Citadele Group companies and/or cooperation partners in accordance to your consent. We evaluate our cooperation partners carefully before we entrust them the processing of your personal data.

### **WHAT TYPES OF YOUR PERSONAL DATA DO WE PROCESS WITHIN THE FRAMEWORK OF NOTIFICATIONS AND OFFERS, WHY AND ON WHAT GROUNDS?**

Citadele Group companies will, based on your consent to receive notifications and offers, process the following types of your personal data:

- **For the purpose of receiving notifications and offers**
  - your identification data: first name, surname personal identity number and date of birth, client number/contract number;
  - your contact information: telephone number, email address, social medial public profile;
  - information relating to the use of the Citadele Group company's services and their compliance with your needs, lifestyle and habits;
  - your financial information – credit obligations and other obligations; depending on the services you use: financial experience; if you are a client of AS Citadele banka Estonian branch: bank account number, cash flow information – incoming and outgoing payments, transaction history;
  - information relating to your contractual obligations – information about the products and services we provide to you, interests, information about the fulfilment or non-fulfilment of contractual obligations;
  - information obtained through communication with the Citadele Group company – information obtained from your letters, emails, telephone conversations (with or without audio recording) when you contact with the Bank as well as information about the devices and technologies used by you for communication.
- **For the purpose of receiving individual offers of credit limits**
  - your identification data: first name, surname personal identity number and date of birth, client number/contract number;
  - your contact information: telephone number, email address, social media public profile;
  - information relating to the use of the Bank's services and their compliance with your needs, lifestyle and habits;
  - your financial information – credit obligations and other obligations; if you are a client of AS Citadele banka Estonian branch: bank account number, cash flow information – incoming and outgoing payments, transaction history; 6-months' bank account statement; employment information; information on monthly net income; relations with politically exposed persons;
  - information relating to your contractual obligations – 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;

- information obtained about you from different public registers\* – information for the assessment of creditworthiness provided by credit information providers (AS Creditinfo); Population register; AS Pensionikeskus; politically exposed persons register, incl the register kept by Fico Tonbeller (*\*the list of public registers used to assess creditworthiness may change*);
- information obtained through communication with the Citadele Group company – information obtained from your letters, emails, telephone conversations (with or without audio recording) when you contact with the Bank as well as information about the devices and technologies used by you for communication.

We will send you notifications and offers by email, SMS, social media (e.g., Facebook, Google), we will call you on the phone, and for clients of AS Citadele banka Estonian branch – also via online banking or mobile app, as long as the following is valid:

- consent given by you;
- activities and offers to which you gave your consent.

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

Actions for the processing of your personal data	Grounds for the processing of your personal data	Personal data to be processed
<ul style="list-style-type: none"> <li>• Selection of recipients of notifications and offers, preparation of lists</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent</li> </ul>	<ul style="list-style-type: none"> <li>• First name, surname</li> <li>• Personal identity number or date of birth</li> <li>• Client number/contract number</li> <li>• Information relating to the use of the Bank's services and their compliance with your needs, lifestyle and habits</li> <li>• Financial information</li> <li>• Information related to your contractual obligations</li> </ul>
<ul style="list-style-type: none"> <li>• Sending/placement of notifications and offers (email and SMS, social media)</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent</li> </ul>	<ul style="list-style-type: none"> <li>• First name, surname</li> <li>• Telephone number</li> <li>• Email address</li> <li>• Social media public profile</li> <li>• Information obtained through communication</li> </ul>
<ul style="list-style-type: none"> <li>• Placement of notifications and offers on the online banking platform or mobile app</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent</li> </ul>	<ul style="list-style-type: none"> <li>• First name, surname</li> <li>• Client number</li> <li>• Information obtained through communication</li> </ul>
<ul style="list-style-type: none"> <li>• Delivering notifications and offers via the telephone conversation</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent</li> </ul>	<ul style="list-style-type: none"> <li>• First name, surname</li> <li>• Personal identity number or date of birth</li> <li>• Client number/contract number</li> <li>• Telephone number</li> <li>• Information obtained through communication</li> </ul>

<ul style="list-style-type: none"> <li>• Evaluation of the results of receiving notifications and offers</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent</li> </ul>	<ul style="list-style-type: none"> <li>• First name, surname</li> <li>• Telephone number</li> <li>• Email address</li> <li>• Information obtained through communication</li> </ul>
<ul style="list-style-type: none"> <li>• Protection of legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• Implementation of legitimate interests to ensure evidence in legal proceedings</li> </ul>	<ul style="list-style-type: none"> <li>• All of the above-mentioned personal data may be used, if required for the protection of legitimate interests</li> </ul>
<ul style="list-style-type: none"> <li>• Fulfilment of the data subject's requests</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilment of the obligations laid down in laws and regulations</li> </ul>	<ul style="list-style-type: none"> <li>• All of the above-mentioned personal data may be used, if required to fulfil the data subject's request</li> </ul>

**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 (i) *information relating to the use of the Bank's services and their compliance with your needs, lifestyle and habits*, (ii) *financial information*, and (iii) *information related to your contractual obligations* for the purpose of evaluation of certain personal aspects relating to you, in particular to analyse or predict aspects concerning your economic situation, personal preferences and habits. We do not perform automated individual decision-making regarding you.

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

Actions for the processing of your personal data	Grounds for the processing of your personal data	Personal data to be processed
<ul style="list-style-type: none"> <li>• Selection of recipients of individual offers of credit limits, preparation of lists</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent</li> </ul>	<ul style="list-style-type: none"> <li>• First name, surname</li> <li>• Personal identity number or date of birth</li> <li>• Client number/contract number</li> <li>• Information relating to the use of the Bank's services and their compliance with your needs, lifestyle and habits</li> <li>• Financial information</li> <li>• Information related to your contractual obligations</li> </ul>
<ul style="list-style-type: none"> <li>• Assessment of creditworthiness by requesting information from the public registers</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent</li> <li>• Fulfilment of the obligations laid down in laws and regulations</li> </ul>	<ul style="list-style-type: none"> <li>• First name, surname</li> <li>• Personal identity number or date of birth</li> <li>• Information obtained about you from public registers</li> </ul>
<ul style="list-style-type: none"> <li>• Sending out individual offers of credit limits (email and SMS)</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent</li> </ul>	<ul style="list-style-type: none"> <li>• First name, surname</li> <li>• Telephone number</li> <li>• Email address</li> <li>• Information obtained through communication</li> </ul>
<ul style="list-style-type: none"> <li>• Placement of individual offers of credit limits on the online banking platform or mobile app</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent</li> </ul>	<ul style="list-style-type: none"> <li>• First name, surname</li> <li>• Information obtained through communication</li> </ul>
<ul style="list-style-type: none"> <li>• Delivering individual offers of credit limits via the telephone conversation</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent</li> </ul>	<ul style="list-style-type: none"> <li>• First name, surname</li> <li>• Personal identity number or date of birth</li> <li>• Client number/contract number</li> <li>• Telephone number</li> <li>• Information obtained through communication</li> </ul>
<ul style="list-style-type: none"> <li>• Evaluation of the results of receiving individual offers on credit limits</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent</li> </ul>	<ul style="list-style-type: none"> <li>• First name, surname</li> <li>• Telephone number</li> <li>• Email address</li> <li>• Information obtained through communication</li> </ul>
<ul style="list-style-type: none"> <li>• Protection of legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• Pursuing legitimate interests as to ensuring evidence in legal proceedings</li> </ul>	<ul style="list-style-type: none"> <li>• All of the above-mentioned personal data may be used, if required for the protection of legitimate interests</li> </ul>
<ul style="list-style-type: none"> <li>• Fulfilment of the data subject's requests</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilment of the obligations laid down in laws and regulations</li> </ul>	<ul style="list-style-type: none"> <li>• All of the above-mentioned personal data may be used, if required to fulfil the data subject's request</li> </ul>

**FOR YOUR INFORMATION:** In the course of processing your personal data within the framework of selecting the recipients of individual offers of credit limits and assessing creditworthiness, we will

perform the automated processing of (i) *information relating to the use of the Bank's services and their compliance with your needs, lifestyle and habits*, (ii) *financial information*, and (iii) *information related to your contractual obligations*, (iv) *information obtained about you from public registers* for the purpose of evaluation of certain personal aspects relating to you, in particular to analyse or predict aspects concerning your economic situation, creditworthiness, personal preferences and habits. In the course of the processing of information obtained about you we perform automated individual decision-making regarding you. Automated individual decision-making allows us to ensure faster and more effective provision of services.

#### **WHO WILL WE TRANSFER YOUR PERSONAL DATA TO?**

- To Citadele Group companies, if required to prepare notifications and offers relevant to you.
- To partners, if required to ensure that notifications and offers are sent.
- To public registers, if required to assess your creditworthiness when preparing individual offers of credit limits.
- To public authorities/law enforcement agencies, investigative institutions, courts in the cases prescribed by laws and regulations for the purpose of protecting our legitimate interests.

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?**

We will retain your consent for a period of 5 (five) years from the date of its revocation. At the end of the retention period of the consent we will ensure that your personal data is deleted unless retention of the consent is necessary to pursue Citadele Group company's legitimate interests to ensure evidence in legal proceedings.

We will delete the information processed to prepare the most relevant notifications and offers to you when the respective purpose of processing is fulfilled.

However, if you have accepted the individual offer of credit limits and, if necessary, signed a respective contract, we will retain the information processed within the framework of selecting the recipients of individual offers of credit limits and assessing creditworthiness according to the retention periods or the principles behind them outlined in AS Citadele banka Estonian branch's Privacy Protection Rules available on AS Citadele banka Estonian branch's website.

#### **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 at any time in the following ways:

- By email;
- By calling the telephone number indicated by the Citadele Group company;
- On the online banking platform, if you are a client of AS Citadele banka Estonian branch;
- On the mobile app, if you are a user of Citadele bank's app.

Citadele Group company 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 of the respective Citadele Group company, 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.

Citadele Group companies will, in accordance with the requirements of the legal enactments and subject to submission of a written request, 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. In the case of automated

individual decision-making you have the right to ask AS Citadele banka Estonian branch to review this decision, involving the officials of AS Citadele banka Estonian branch in the decision-making. Such a request shall be made in writing to the Citadele Group company of which you are a client.

**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 the respective Citadele Group company, the [Data Protection Inspectorate](#), or bring legal action in accordance with law.

**This Privacy Disclaimer informs you about matters concerning the processing of your personal data for the purpose of receiving notifications and offers, including individual offers of credit limits.**

**For information about the further processing of personal data in the course of receiving services from Citadele Group companies see:**

- With regard to the services provided by Citadele Group companies, except for the services provided by SIA Citadele Leasing Estonian branch: [Privacy Protection Rules](#) available on the AS Citadele banka Estonian branch's website;
- With regard to the services provided by SIA Citadele Leasing Estonian branch: [Privacy Policy](#) available on the SIA Citadele Leasing Estonian branch website.

**Citadele guarantees the non-disclosure and safety of your personal data as the processing of your personal data is performed by Citadele 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.**