PRIVACY DISCLAIMER

for the processing of personal data by OÜ Citadele Leasing & Factoring:

- ✓ when applying for lease via an electronic application form at www.citadele.ee;
- √ when jointly processing applications involving the transfer of personal data to SIA
 Citadele Leasing Estonian branch.

When you apply for the lease service (hereinafter – Lease) of OÜ Citadele Leasing & Factoring (hereinafter – Citadele or we) remotely, Citadele will process your personal data, therefore, pursuant to the laws and regulations governing the privacy and protection of personal data, we would like to inform you about the processing of your personal data that we require.

Who will process your personal data?

The joint controllers of your personal data processed for Lease purposes to ensure the joint processing of Lease applications will be the following:

- OÜ Citadele Leasing & Factoring (OÜ "Citadele Leasing & Factoring"), uniform reg. No.10925733, address: Narva mnt 63/1, 10152, Tallinn, Estonia, tel.: +372 7700 000, email: info@citadele.ee, Data Protection Officer's email: gdpr@citadele.ee;
- SIA Citadele Leasing Estonia branch (*SIA "Citadele Leasing"*), uniform reg. No.11453650, address: Liivalaia 13, Tallinn, 10118, tel.: +3726222 100, email: info@citadeleleasing.ee, Data Protection Officer's email: privacy@citadeleleasing.ee.

IMPORTANT: We cooperate with SIA Citadele Leasing Estonian branch and process personal data as joint controllers within the framework of joint processing of Lease applications. After applications are processed Citadel and SIA Citadele Leasing Estonian branch review applications, prepare Lease offers and enter into Lease contracts as well as administer further contractual relationship as independent controllers each pursuant to their own regulations for the protection of privacy available on each company's website.

In what way will we process your personal data?

- If you apply for the Lease as a private person: Yours as the applicant's name, telephone, email, personal identification number, date of birth, name of employer, net monthly salary, amount of other income, period of employment for the current employer, information about the Lease object (including the price), amount of the first instalment, Lease term, information about the potential guarantor.
- If you apply for the Lease as a representative of a company: Yours as the company representative's name, telephone No. (if you indicate your private number), email (if you indicate your private email).

Why will we process your personal data and on what grounds?

Purpose of processing of	Grounds for processing of	Personal data to be
your personal data	your personal data	processed
Application for Leasing	• To pursue Citadele's	If you apply for the Lease as a
	(including Citadele Group	private person:
	company's SIA "Citadele	• Your name, telephone No.,
	Leasing" Estonian branch)	email
	legitimate interests	• Your personal
		identification number, date of
		birth
		 Name of your employer,
		net monthly salary, amount of
		other income, period of
		employment for the current
		employer
		• Information about the
		Lease object (including the
		price), amount of the first

		instalment, Lease termInformation about the potential guarantor
		If you apply for the Lease as a representative of a company: • Your name • Your telephone No., email, if private
Review of claims and submission of evidence	When Citadele's legitimate interests are pursued, if disputes regarding the submission of the Lease application arise	All of the personal data above may be used, if the same is submitted in the process of application

Who will we transfer your personal data to?

Your personal data may be transferred to Citadele Group company SIA Citadele Leasing Estonian branch within the framework of joint processing of Lease applications.

Your personal data will be processed for the above purposes by specially authorised employees of Citadele or SIA Citadele Leasing Estonian branch only, who will contact you to keep you up to date about the progress of your Lease application and/or the decisions made.

How long will we retain your personal data?

The process of receiving and joint processing of Lease applications described in this Privacy Disclaimer does not require the retention of your personal data. Personal data submitted by you in the course of filing the Lease application may be retained in the following stages of the Lease application process: review of the application, preparation of the Lease offer and entry into the Lease contract as well as administration of the further contractual relationship that Citadele and SIA Citadele Leasing Estonian branch perform as independent controllers. Therefore, the retention periods of personal data stipulated by each company or the principles behind them are outlined in their regulations for the protection of privacy available on each company's website.

What are your rights as to the processing of your personal data?

If you have any questions with regard to the processing of personal data described in this Privacy Disclaimer, i.e., processing of your personal data in the course of receiving and joint processing of Lease applications, please email Citadele: info@citadele.ee or Citadele's Personal Data Protection Officer: gdpr@citadele.ee. All information will be forwarded to the employee in charge who will then respond to your request.

In the subsequent stages of your Lease application, you can also ask questions about the processing of personal data in the course of receiving and joint processing of Lease applications to SIA Citadele Leasing Estonian branch under the procedure for submitting requests laid down in the Privacy Policy of SIA Citadele Leasing Estonian branch.

Upon a written request, pursuant to the provisions of laws and regulations, Citadele and SIA Citadele Leasing Estonian branch will ensure your right to access, correct or delete your personal data, to limit, object to the processing thereof as well as to transmit the data. The written request concerning the exercise of your rights may be submitted with both Citadele and SIA Citadele Leasing Estonian branch under the procedure for submitting such requests laid down in the regulations for the protection of privacy of each company.

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 file a complaint with Citadele, SIA Citadele Leasing Estonian branch, Estonian Data Protection Inspectorate (Andmekaitse Inspektsioon) or bring an action in order to protect your interests laid down in the laws and regulations.

This Privacy Disclaimer informs you about the matters concerning the process of receiving Lease applications and the joint processing thereof.

For information about the further processing of personal data in the course of receiving services from Citadele or SIA Citadele Leasing Estonian branch see:

- Regarding the services supplied by Citadele: <u>Regulations for the Protection of Privacy</u> available on the Citadele website;
- Regarding the services supplied by SIA Citadele Leasing: <u>Privacy Policy</u> 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.