



# PRIVACY PROTECTION RULES

Comes into force on 25th of May 2018  
(with amendments entered into force on the 12.02.2021)

Taking care of your privacy and personal data protection, including your right to information, we, AS Citadele banka Eesti filiaal, have developed the below AS Citadele banka Eesti filiaal 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.

The following Privacy Protection Rules specify the Privacy Protection Rules applied for AS Citadele banka Estonian branch. The following Privacy Protection Rules apply to OÜ Citadele Leasing & Factoring.

In the Privacy Protection Rules, you will find information about the processing of your personal data, i.e. any information directly or indirectly relating to you, your right to privacy and its protection.

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## TERMS

- You** – you as a natural person whose Personal Data we process.
- Bank or we** – AS Citadele banka Estonian branch.
- Citadele Group** – AS Citadele banka and all its foreign branches and subsidiaries.
- Processing** – any actions we do with your Personal Data, for instance, collection, recording, storage, viewing, use, disclosure of your Personal Data by transmission, dissemination or otherwise making available, consultation, erasure or destruction, and otherwise.
- Rules** – these Privacy Protection Rules.
- Personal Data** – any information that relates or may be related to you, for instance, your first name, surname, identity 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.

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**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 Inspectorate** – the institution monitoring compliance with the Regulation in the Republic of Estonia. Andmekaitse Inspektsioon, [www.aki.ee](http://www.aki.ee), Väike-Ameerika 19, Tallinn 10129, [info@aki.ee](mailto:info@aki.ee), 627 4135

### WHO PROCESSES YOUR PERSONAL DATA?

Your personal data controller is:

1. AS Citadele banka Estonian branch: registry code 11971924, address Narva mnt 63/1, 10152, Tallinn, Estonia, +372 770 0000, [info@citadele.ee](mailto:info@citadele.ee);
2. OÜ Citadele Leasing & Factoring: registry code 10925733, address Narva mnt 63/1, 10152, Tallinn, Estonia.

### WHAT KIND OF YOUR PERSONAL DATA DO WE PROCESS?

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

Personal Data sets (categories)	Description
<b>Your identification data</b>	First name, surname, identity number, date of birth, information specified in your identification document (passport or ID card).
<b>Your contact information</b>	Information to contact you, residential address, correspondence address, telephone number, email address.
<b>Your financial information</b>	Your bank account number, cash flow, i.e. incoming and outgoing payments and information included thereof, transaction history, loan obligations and other obligations; personal and real property owned by you.
<b>Information relating to your tax residence</b>	Your country of birth, residence, taxpayer number, nationality, place of tax residence.
<b>Information relating to your education and family</b>	Information about your education, family status and family members.
<b>Information relating to your professional activity</b>	Your place of work, profession, position, occupation, trade union membership, length of service.
<b>Information relating to the research conducted on you as the Bank's client</b>	Information obtained through your in-depth customer research, including if transactions are detected in your account, for which there is additional investigation required by law - about your business partners and business activity, cash flow, reliable information publicly available in social networks, information obtained in screenings against sanction lists, PEP status.
<b>Information relating to your contractual obligations with the Bank</b>	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, ATM use, submitted requests, claims, complaints.
<b>Information relating to the use of the Bank's services and their compliance with your needs, lifestyle and habits</b>	Information about our products and services used by you, your purchasing habits and other habits, interests, consumed goods and structure of related proceeds and expenses, your satisfaction with the services provided by us.
<b>Information relating to your participation in our</b>	Information relating to the course of contests, drawings, lotteries and campaigns, including announcement of winners and awarding

<b>contests, drawings, lotteries and campaigns</b>	of prizes to the winners.
<b>Information obtained through communication with the Bank</b>	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.
<b>Information obtained about you from different public registers</b>	Information we obtain from publicly available registers in the context of the provision of services and customer research, for instance, Population Register, aktsiaselts CREDITINFO EESTI.
<b>Information available in the documents</b>	Information about you which is stored in physical and electronic documents.
<b>Your special category personal data</b>	Legal enactments provide for the special category Personal Data types which we will process if allowed by the legal enactments. This is the special category Personal Data disclosing: - racial or ethnic origin; - religious or philosophic beliefs; - political opinions; - genetic, biometric data; - health state data; - data relating to criminal convictions and offences.
<b>Information obtained online</b>	We use cookies and process data relating to the visitors of our website, mobile application: your location, your device, IP address and browser used, website from which you came to our website, views of our online ads; more detailed information is available in our rules <a href="#">Use of cookies in homepages of Citadele group companies</a> .
<b>Information obtained as a result of video surveillance</b>	Information about you obtained through video surveillance on our premises and in our area, at the ATMs, i.e. your video image, time and place when you were in the CCTV area.

### 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 enter into and perform a contract** in order to provide the respective service to you or;
- **for the Bank to perform the legal obligation** or;
- **based on your Consent** or;
- **to implement the legitimate interests of the Bank or a third party** in order to provide the service specified in the contract, ensure the legitimate interests of the Bank or third parties arising from the legal enactments assessing whether the Bank's interests to process your Personal Data are proportionate to your rights to privacy.

For what purposes do we process your Personal Data?	On what grounds do we process your Personal Data?
<b>To provide our services</b>	<ul style="list-style-type: none"> <li>• Within the framework of <b>entering into and performing a contract</b> to provide the respective financial services to you - deposit services (including opening and maintenance of accounts, providing local and international payments, cash and non-cash transactions), issuing and</li> </ul>

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	<p>maintenance of payment cards/credit cards, provision of lending services, currency exchange services, the Bank's remote services, i.e. Online Banking, telephone banking, mobile application services;</p> <ul style="list-style-type: none"> <li>- to contact you and inform about any changes in our services;</li> <li>- to inform and provide assistance in relation to unfinished applications completed by you online to receive our services;</li> <li>- to get commissions and other payments;</li> <li>• For the <b>Bank to perform the legal obligation</b></li> <li>- to inform you about changes in the Processing of your Personal Data;</li> <li>- to process the requests and complaints received from you;</li> <li>- to verify your identification and research in the framework of AML/CTF, including your research as a potential client or client, including 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, to provide information to the supervisory authorities and investigative authorities in the cases provided by legal enactments, ensure the maintenance of registers;</li> <li>- to ensure automatic exchange of financial account information and account register maintenance, prepare and provide information about you, the beneficial owner to the Tax and Customs Board of the Republic of Estonia if, under the procedure set out by the regulatory enactments, signs have been identified proving the tax resident status of you or the beneficial owner as the foreign jurisdictions involved in the automatic exchange of financial account information about whose residents we are required to provide information to the Tax and Customs Board of the Republic of Estonia for the further transfer of information to the state concerned;</li> <li>- to report on your loan obligations and their fulfilment to the aktsiaselts CREDITINFO EESTI;</li> <li>- to execute the requests of the state/investigation and other law enforcement agencies, sworn bailiffs and other state institutions and officials specified in laws;</li> <li>• For the <b>implementation of the Bank's or third party's legitimate interests</b></li> <li>- within the AML/CTF framework to verify information relating to you against credible publicly available information sources;</li> <li>- to ensure supervision over contract performance and loan repayment;</li> <li>- to exchange information about your loan obligations and their fulfilment;</li> <li>- to verify information relating to you against public debt history databases.</li> </ul>
<p><b>To assess and prevent risks in transactions with clients</b></p>	<ul style="list-style-type: none"> <li>• For the <b>performance of the legal obligation</b></li> <li>- to ensure management of the Bank's risks;</li> <li>- to ensure assessment of your creditworthiness as the client, guarantor;</li> <li>- to ensure assessment of the pledged asset.</li> <li>• For the <b>implementation of the Bank's or third party's legitimate interests</b></li> <li>- to ensure assessment of your creditworthiness and offer services and/or products suitable for you prior to the entering into contractual obligations and during contractual obligations, perform assessment and research of potential clients and client groups, i.e. analyse and predict personal preferences, interests, behaviours, reliability, attitude;</li> <li>- 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 credible information</li> </ul>

	sources.
<b>To implement client acquisition marketing measures</b>	<ul style="list-style-type: none"> <li>• <b>On grounds of your Consent</b> <ul style="list-style-type: none"> <li>- to provide financial service offers to you, including personalised offers and other communications;</li> <li>- to provide personal credit limit offers to you.</li> </ul> </li> <li>• For the <b>implementation of the Bank's or third party's legitimate interests</b></li> </ul>
<b>To carry out business and administrative activities</b>	<ul style="list-style-type: none"> <li>• For the <b>performance of the legal obligation</b> <ul style="list-style-type: none"> <li>- to ensure compliance with the solvency criteria determined by the Bank, auditing, corporate management.</li> </ul> </li> <li>• For the <b>implementation of the Bank's or third party's legitimate interests</b> <ul style="list-style-type: none"> <li>- with the help of video surveillance to ensure your and our security on the Bank's premises and within its territory as well as property protection to provide:               <ul style="list-style-type: none"> <li>-the prevention and detection of criminal offenses and other illegal activities related to your and Citadele safety and protection of property;</li> <li>-the protection of legal interests of Citadele;</li> </ul> </li> <li>- in defending our rights, if you have failed to fulfil your contractual obligations, we will ensure the recovery of debts and enforcement actions;</li> <li>- with the help of audio recordings, to ensure and improve the quality of service provision, provide evidence of transactions and communication with you;</li> <li>- to test new products;</li> <li>- to summarise statistics.</li> </ul> </li> <li>• <b>Protecting your vital interests</b> <ul style="list-style-type: none"> <li>- with the help of video surveillance to ensure the protection of your vital interests, including life and health, in the event of criminal offenses, other illegal activities and emergencies.</li> </ul> </li> </ul>

### HOW DO WE OBTAIN YOUR PERSONAL DATA?

We obtain your Personal Data:

- when you provide it to us:
  - while applying for products and services;
  - while addressing us by mail, email, over the phone, using chats or in person at our client service centres;
- when you use our products and services,
  - while providing information relating to payments,
  - while visiting our homepages and using remote services – Online Banking and mobile application, i.e. your profile and use data, how you use these services, obtaining information from your devices – computer, mobile telephone, with the help of cookies or Internet monitoring software; more detailed information is available in our rules [Use of cookies in homepages of Citadele group companies](#).
- when third parties provide it to us:
  - our counterparties which provide to us information relating to you, conduct market research, provide services within the framework of loyalty programmes;
  - Citadele Group companies;
  - database maintenance companies, registers specified in the legal enactments;
  - state institutions and law enforcement agencies and officials thereof;
  - persons in relation to contracts and transactions which these persons intend to conclude or have concluded with the Bank.

## 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 instance, to ensure your payments, identification, sending correspondence, recovery of debts, performance of marketing activities sending different offers and other notifications to you; implementation of our client acquisition marketing measures (including campaigns, lotteries, drawings, contests), conducting of client satisfaction researches, information system development, maintenance and service, development and/or maintenance of homepages, mobile applications;
- **other credit institutions and financial institutions, insurance service providers and financial service agents, third parties** involved in the execution of transactions;
- **supervisory authorities** (Financial Supervision Authority, Consumer Rights Protection Board, Data Protection Inspectorate, Tax and Customs Board of the Republic of Estonia and other institutions) based on written requests or the duties binding upon the Bank stipulated by the legal enactments;
- **in the specific cases to execute requests of the competent state institutions**, for instance, court, investigation bodies, the Prosecutor's Office, operational entities, Estonian Financial Intelligence Unit, National Audit Office of Estonia, Tax and Customs Board of the Republic of Estonia, Financial Supervision Authority and other statutory persons, for instance, sworn bailiffs, notaries, bankruptcy trustees;
- **companies maintaining the databases created under the procedure specified in the legal enactments;**
- **in the cases specified in the legal enactments** to state/law enforcement agencies, investigation bodies, courts, sworn bailiffs, sworn notaries;
- **participants of the European and international payment systems and their related parties;**
- **Rating agencies;**
- **Bank's audit firms, legal service providers, translators.**

Within the framework of your Personal Data processing, access to your Personal Data will be granted only to the authorised employees of the Bank and our counterparties who need it to perform their work duties and who process your Personal Data only in accordance with the Personal Data processing purposes and grounds specified in these Rules 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 the Bank's internal legal enactments.

## DO WE CARRY OUT AUTOMATED DECISION-MAKING AND PROFILING?

When entering into cooperation or in order to provide services to you as the existing Bank'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, personal preferences, interests, reliability, and behaviour.

We make automated individual decisions, including carry out Profiling, in relation to your creditworthiness assessment and direct marketing so that, for instance, not to bother you with the sending of faulty offers; instead, having analysed the various types of information available to us, we could make automated predictions as to the offers most appropriate and relevant for your needs.

We carry out Profiling to evaluate whether a product or service is appropriate for your personal

preferences and needs, assess risks and give lending service-related advice to you, offer products and services to the specific segmented client groups.

For instance, in calculating the credit limit that the Bank could offer you, the Bank's system automatically analyses information relating to you, such as loan history, habits that we have identified in connection with the use of our services or information that we are authorised to obtain from third parties. It allows us to carry out faster, more efficient and better decision-making based on our knowledge about you. If as a result of such Personal Data Processing and after the Bank's automated system has evaluated your Personal Data, your submitted loan application is rejected or you are offered a loan interest rate which you consider to be too high, you have the right not to rely on the automated decision of the Bank's system but, having contacted us, give your own opinion and receive an explanation from the Bank regarding the automated decision taken as well as request that the automated decision taken be reviewed involving our employees in the decision-making process.

### **DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE EU/EEA?**

We ensure that your Personal Data is 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 Rules, 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 instance, 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 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](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm);
- transfer 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 execute the contract entered into by and between you and the Bank;
- 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 instance, for the purpose of legal proceedings).

You may obtain the general information about data transfer outside the EU and the EEA, including the decision about the countries providing the level of data protection which meets the

respective data protection level effective in the Republic of Estonia, on the homepage of the [Data Protection Inspectorate](http://www.aki.ee/en) at <http://www.aki.ee/en>.

## HOW LONG DO WE STORE YOUR PERSONAL DATA?

The period for which we store your Personal Data depends on the purposes for which we process it and under which criteria we assess your Personal Data storage periods.

When determining your Personal Data storage periods, we assess:

- the need to store your Personal Data to ensure performance of a valid service contract;
- the need to store your Personal Data for the Bank to fulfil its legal obligations, for instance, within the 5-year period stipulated in the Money Laundering and Terrorist Financing Prevention Act and within the different storage periods specified in other legal enactments;
- storage of your Personal Data to safeguard our interests in different claims in case of termination of business relationships with you;
- our legitimate interests or those of a third party that might be offended in the event of erasure of your Personal Data, for instance, with respect to your right to restrict data processing;
- the need to store your Personal Data in order to provide proof of the legitimate Processing of Personal Data in the previous period, for instance, 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 storage periods, we take into account the guidelines developed by the European Commission and Data Protection Inspectorate determining the storage periods for different documents. If, in the course of the assessment, we identify different reasonable periods for storing your Personal Data, for instance, between the statutory storage period and the timeframe for protecting our interests, this will be a reasonable basis to store your Personal Data for a longer period.

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

## 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 the privacy and personal data protection, we guarantee you the right, after you have submitted a written request to us:

- **to withdraw your Consent to the Processing of your Personal Data** at any time, having informed us about that via:
  - Online Banking;
  - mobile application;
  - email;
  - in person at our client service centres.

In some cases, for instance, 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 our Online Banking, application or in person at our client service centres) to give your Consent to the Processing of your Personal Data for the purpose of getting such notifications and offers.



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 get 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 the legal enactments.

In some cases, we may ask you to define the scope of your request more accurately to specify in more details as to what information and to which Processing operation the request applies as well as explain the justification of the request. For instance, in the case of a video surveillance record request, we have the right to specify the scope of information you requested, the particular date and time when you were in the CCTV area, your appearance, description of the garment as well as other information that might be useful to us to fulfil your request. You should take into account that in this case you will receive an edited video surveillance record which will only apply to the Processing of your Personal Data and will not display other persons unless they will have given their Consent to that.

In cases where this is not permitted by the legal enactments, we will not be able to provide you with any information about the Processing of your Personal Data, for instance, within the framework of the AML/CTF Law we are prohibited to inform you about the provision of information to the Control Service; 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 is inaccurate as well as, taking into account the purposes for which your Personal Data is 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, the Bank is entitled to request you to submit documents supporting rectifications.

• **to erase your Personal Data**, if:

- you believe that it is no longer required or unusable for the initial purposes of Processing of your Personal Data;
- you reasonable believe that your Personal Data is processed illegitimately, for instance, 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 storage periods determined for us in the legal enactments.

We will ensure that your Personal Data available to us is erased, including erased by our counterparties, if Personal Data is no longer necessary for the purposes for which we were processing it. We will not be able to ensure that your Personal Data is erased if we need to ensure such Processing in the cases stipulated by law providing for the information or document storage periods which, for instance, are set out in Money Laundering and Terrorist Financing

Prevention Act. Likewise, the Bank 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 it is 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 based 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 instance, 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 is 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.

• **to object to the Processing of your Personal Data** which is based on the legitimate interests of the Bank. The Bank will immediately terminate such Processing but only for the period while the Bank carries out an assessment and does not demonstrate compelling legitimate grounds for the Processing of Personal Data overriding your interests, rights and freedoms. The Bank 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 the Bank to fulfil its legal obligations.

• **to refuse from the automated individual decision-making, including Profiling**

With regard to the automated individual decision-making, including Profiling, which can have legal consequences for you, including negative consequences, such as the automatic rejection of your online loan application, you have the right not to be subject to a decision based on automated processing, including Profiling, requesting to involve the Bank's employee to review such automated individual decision-making. You will be entitled to the latter right in the cases when we will need it to enter into or perform a contract with you, in the cases specified by law as well as you will have given your explicit Consent to such processing of your Personal Data.

**How to submit the request?**

You may submit your request:

- in person at our 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 Online Banking;
- via mobile application.

Upon receipt of your request, we will evaluate it and, if need be, 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 give you the answer to your request without undue delay no later than within one month from receipt of your request; if need be 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 by visiting our client service centres, via encrypted electronic mail, Online Banking or application 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 find out 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 Fee Schedule, or we will refuse to execute your request, having informed you about that in advance.

### **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 these Rules; 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 the Bank, Data Protection Inspectorate or bring legal action in accordance with law.

### **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 and environmental security of your Personal Data, 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 for the performance of their work duties and who process your Personal Data in

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compliance with the technical and organisational requirements for the Processing of Personal Data specified in the 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 the legal enactments.

To ensure qualitative and prompt fulfilment of the obligations under the contract entered into with you, we may authorise Citadele Group companies or 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 the legal enactments and that they will not use your Personal Data for other purposes.

### HOW TO CONTACT US?

Should you have questions relating to the Processing of your Personal Data, please contact us either by emailing to [info@citadele.lv](mailto:info@citadele.lv) or to our designated data protection officer at [gdpr@citadele.ee](mailto:gdpr@citadele.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.

### 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 the legal enactments, will make sure that these Rules and AS Citadele banka Privacy Protection Rules are reviewed and updated on a regular basis. Therefore, we encourage you to read, from time to time, the latest version of the Rules on our website, via Online Banking, application, at client service centres and via e-mail. We will notify you of amendments to the Rules one month prior to their entry into force.