Privacy Disclaimer on the processing of personal data within the framework of Citadele VISA Card Lottery "Win a family trip to Disneyland® Paris, courtesy of VISA"

About privacy

AS Citadele banka Estonian branch has prepared this Privacy Disclaimer to explain what personal data we collect, how and why we process it, and the measures we take to protect it when you participate in the Lottery.

This information is provided in accordance with the laws and regulations of the European Union and the Republic of Estonia, as well as best practices.

Terms used in Privacy Disclaimer

Citadele – AS Citadele banka Estonian branch.

Personal data – any information that concerns or could relate to you, such as your name, surname, personal identification number, telephone number, e-mail address, visual appearance, etc.

Counterparty – in specific cases, processes personal data on behalf of Citadele to ensure the Lottery.

Visa – Visa Europe Limited.

Who is responsible for the processing of personal data?

Responsible and controller of personal data is AS "Citadele banka", unified registration No. 40103303559, address: Republikas laukums 2A, Riga, Latvia, LV-1010, acting in Estonia through its AS Citadele banka Estonian branch, registry code 11971924, address Narva mnt 63/1, Tallinn 10120, Estonia, e-mail: info@citadele.ee, phone: +372 7700000.

You can contact Citadele's data protection officer and ask additional questions about the processing of personal data by e-mail: gdpr@citadele.ee.

What kind of personal data can we process?

We may process personal data necessary to verify your eligibility for the Lottery, administer your participation, select winners, fulfill legal obligations, and protect our legitimate interests. Such data may include:

- name, surname;
- identification number;
- phone number;
- e-mail address;
- transaction data;
- payment card data.

Why will we process personal data and what is the justification for that?

Purpose of personal data processing	*Reasons (arguments) of personal data processing*	*What kind of personal data will be processed*
Lottery administration and participant registration	To register participants for the Lottery, manage participation, and ensure the proper administration of the Lottery in accordance with the Lottery Terms & Conditions.	Name, surname, personal identification number, phone number, e-mail address.
Verification of eligibility and qualifying transactions	To verify that participants meet the eligibility criteria and that qualifying transactions have been completed in accordance with the Lottery Terms & Conditions.	Name, surname, personal identification number, payment card data, transaction data.
Winner and and reserve-winner selection and winner notification	To conduct the prize draw, identify the winner and reserve-winners, and notify them about the results of the Lottery.	Name, surname, phone number, e-mail address.

Purpose of personal data processing	*Reasons (arguments) of personal data processing*	*What kind of personal data will be processed*
Contacting the winner and prize administration	To communicate with the winner or reserve-winners, verify their identity, collect the information required to claim the prize, and coordinate prize fulfilment.	Name, surname, personal identification number, phone number, e-mail address, information regarding accompanying guests.
Announcement of the winner	To ensure transparency regarding the outcome of the Lottery and announce that the prize has been awarded.	Winner's first name, first letter of surname and partially masked phone number.
Prize administration and data transfer to Visa	To transfer the personal data necessary for Visa to arrange and fulfil the prize.	Name, surname, phone number, e-mail address.
Compliance with legal and regulatory obligations	To comply with applicable laws, regulatory requirements, tax obligations, and requests from competent authorities.	Data listed above to the extent necessary for compliance with legal and regulatory obligations.
Record keeping and audit purposes	To maintain records and supporting documentation demonstrating compliance with the Lottery Terms & Conditions and applicable legal requirements.	The data listed above, to the extent necessary.
Calculation of taxes	To comply with applicable tax, accounting, and reporting obligations.	Name, surname, identification number.
Handling complaints and (or) defending legal claims	To review, investigate, and respond to complaints, claims, disputes, and inquiries related to the Lottery and its administration.	Data listed above to the extent necessary for handling complaints and legal claims.
Protection and defense of legal rights and interests	To establish, exercise, protect, or defend the legitimate rights, interests, and legal position of Citadele in connection with the Lottery.	The data listed above, to the extent necessary to defend a legal claim.

Who will we transfer your personal data to?

The processing of your personal data for the purposes described above will be carried out only by authorized employees of Citadele.

In certain cases, Citadele may engage counterparties to perform specific activities on its behalf. Where such counterparties are involved in the processing of your personal data, you will be informed accordingly.

Please note that, in the case of Lottery winners, personal data necessary for prize fulfilment will be disclosed to Visa. Visa, together with its partners and service providers, may process such personal data for the purpose of arranging and fulfilling the prize. In this respect, Visa acts as an independent data controller and processes personal data in accordance with Visa's Privacy Notice.

If you have any questions regarding the processing of your personal data by Citadele, please contact us. If your inquiry relates to the processing carried out by Visa as an independent data controller, we will assist you in directing your inquiry to the appropriate party where necessary.

How long will we retain your personal data?

Citadele will store your personal data for the purposes of administering the Lottery and related taxes for 5 years after the Lottery ends, and for 10 years following the termination of the business relationship to protect its interests in the event of potential claims, in accordance with the general limitation period.

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

Should you have questions relating to the processing of your personal data, you may contact us either by emailing to the above indicated email addresses, including by contacting the personal data protection officer and you will get all required information relating to the processing of your personal data, including answers to unclear issues.

Additional information regarding your rights is available in Citadele's Privacy Protection Rules.

What to do if you think your privacy has been violated?

If your privacy has been violated, you have the right, in order to protect your statutory interests, to file a complaint with Citadele by submitting a written request to the email addresses mentioned here in above, with Data Protection Inspectorate of the Republic of Estonia (*Andmekaitse Inspektsioon*) or to bring a court action.