

This document specifies how AS "PrivatBank" (hereinafter – the Bank) processes the personal data of its customers, customer representatives and contact persons, as well as website visitors.

The Privacy Policy applies only to the personal data of individuals.

The Bank is entitled to unilaterally amend the Privacy Policy at any time by notifying the customers thereof on the Bank's website at least one month before the amendments take effect.

INFORMATION ABOUT THE PROCESSOR OF PERSONAL DATA

Your personal data is processed by AS „PrivatBank“ (registration number: 50003086271, legal address: 1 Muiņas Street, Riga, LV-1134).

You can contact the Bank:

- by calling: 8515 or +37167041300 for calls from abroad;
- sending an e-mail to: welcome@privatbank.lv.

CONTACT INFORMATION FOR COMMUNICATION ON PERSONAL DATA PROTECTION

If you have any questions regarding the information provided in this document or the processing of your personal data, you can contact the Bank:

- using the aforementioned channels of communication;
- by sending an e-mail to: datu_specialists@privatbank.lv.

WHY THE BANK PROCESSES YOUR PERSONAL DATA?

The Bank processes your personal data in order to provide financial services, ensure the security of your financial funds, fulfil the contracts concluded with you, and comply with the requirements of regulatory enactments.

Personal data processing for the performance of contracts

In order to ensure the performance of the contracts, the Bank processes your personal data:

- to perform activities at your request before concluding the contract (for example, to review a loan application or to open an account with the Bank, etc.);
- for the provision of financial services in accordance with the concluded contracts (for example, in order to execute a payment order);
- for the administration and management of the provision of services (for example, for the administration of the authorisation of internet bank users).

Processing of personal data subject to consent

In individual cases, the Bank will request your consent to the processing of personal data (for example, to receive a reference on income from the State Social Insurance Agency). In such cases, you will be informed separately of the specific purpose of the data processing. In addition, you have the right to withdraw such consent at any time.

Processing of personal data for compliance with legal obligations

Regulatory enactments may impose obligations on the Bank, for compliance with which the Bank processes your personal data. For example, legal obligations of the Bank that may require the processing of personal data are specified in the following regulatory enactments:

- Credit Institution Law;
- The Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing;
- The Law "On Taxes and Duties";
- The Law "On Accounting";
- The Law on Payment Services and Electronic Money;
- The Financial Instrument Market Law;
- The Consumer Rights Protection Law.

Personal data processing for protection of legitimate interests of the Bank or a third party

The Bank processes personal data in order to protect the legitimate interests of the Bank or third parties, for example,

to prevent illegal activities and losses, to ensure the security of IT and payments or for direct marketing purposes.

In this case, the Bank processes personal data only if the legitimate interests of the Bank or a third party are in balance with your interests as a data subject.

Processing of personal data in the public interest

Pursuant to Section 5², Paragraph one of the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing processing of personal data for the achievement of the purpose of this Law is performed in the interests of the society.

The Bank constantly processes personal data in order to prevent money laundering and financing of terrorism and proliferation, as well as fulfils other legal obligations specified by this Law.

WHAT PERSONAL DATA DOES THE BANK PROCESS?

Depending on the financial services you use or wish to use, the Bank processes various types of personal data, including the following:

Basic data, such as name, surname, personal identification number, date of birth, place of birth, citizenship;

Contact details, such as correspondence or declared address, telephone number, e-mail address, language of communication;

Identification document data, such as passport or ID card data;

Digital identification data, such as internet bank user access parameters, IP address;

Tax data, such as information on tax residence countries, taxpayer number, statements provided by the SRS and SSIA on the tax payments made;

Financial data, such as accounts, ownership, transactions, loans, income, liabilities;

Professional data, such as education, place of employment, positions held in institutions or companies;

Data on related parties, such as details of the customer's family members, heirs and other related parties (including legal entities);

Service data, such as information about the financial services provided by the Bank to you, information about how you use these financial services, and your personal preferences regarding them;

Contract data, for example, data on contracts concluded between the Bank and the customer;

"Know Your Customer" data – data, which allow the Bank to perform the customer due diligence measures in relation to anti-money laundering and counter-terrorism and proliferation financing and to make sure that international sanctions are being complied with, including objectives of cooperation, and whether the customer is a politically exposed person;

Economic activity data – for example, data on business partners and economic activity.

DOES THE BANK PROCESS SENSITIVE PERSONAL DATA?

The Bank does not process sensitive data relating to your membership of trade unions, information about your health or heredity, or political and religious beliefs, unless you personally disclose such information when using the financial services provided by the Bank.

HOW THE BANK OBTAINS PERSONAL DATA?

The Bank usually obtains personal data directly from you, for example, in the following cases:

- when you fill in applications and other forms to apply for financial services;

- when you submit certain documents to the Bank;
- when you contact the Bank by phone. The Bank will inform you if the respective telephone call will be recorded;
- when you use the Bank's website or financial services;
- when you participate in advertising campaigns or surveys organised by the Bank.

However, in certain cases the Bank also obtains personal data from third parties, for example:

- points of sale, credit institutions, payment service providers – when you make payments from your account, the Bank receives and processes personal data in order to execute payments and prepare account statements;
- data registers, such as the Commercial Register, the Population Register, the CSDD database, the Credit Register and other registers, in order for the Bank to verify the accuracy of the data and assess the suitability of the financial service;
- In accordance with the regulatory enactments governing the prevention of money laundering and proliferation and terrorism financing, the Bank receives and processes information from other credit institutions, as well as from public authorities.

DOES THE BANK TRANSFER PERSONAL DATA TO THIRD PARTIES?

In certain cases, the Bank transfers personal data to third parties, for example:

- the payment intermediary, correspondent banks, insurer, guarantor, pledger, and the operator of settlement system of the point of sale, the postal service provider and others involved in the performance of the services provided by the Bank;
- the Credit Register, the Account Register or the private payment default registers, if the customer has not fulfilled its financial obligations to the Bank in a timely manner;
- to the extent specified in the Credit Institution Law, the Bank is obliged to transfer your personal data to state institutions, including the Financial and Capital Market Commission, the Financial Intelligence Unit, courts, prosecutor's offices, sworn bailiffs, the State Revenue Service, and other institutions;
- persons who, on the basis of an agreement, provide services to the Bank that are necessary for the provision of financial services offered to you – IT service providers, companies conducting customer surveys, sworn notaries, debt collection service providers, etc.;
- the assignee of the claim, in so far as it relates to the assignment of the right of claim or the transfer of the credit institution's undertaking or a part thereof to the potential counterparty and its advisers.

DOES THE BANK USE PROFILING AND AUTOMATED DECISION-MAKING?

Profiling

The Bank may use your personal data for automated processing in order to, inter alia, offer financial services that meet your needs, to prevent money laundering, to set prices for financial services, to detect fraud and the risk of fraud, to assess your ability to meet obligations, and for marketing purposes.

Automated decision-making

The Bank uses information technology to make automated decisions based on the data about you available to the Bank. The Bank can use automated decision-making, for example, to approve the issuance of consumer loans, as well as to prevent fraud. Automated decision-making helps the Bank to ensure fast, objective and efficient decision-making based on the information at its disposal.

DOES THE BANK PROCESS DATA OUTSIDE THE EUROPEAN UNION?

The Bank processes your data in Latvia, however, in certain cases personal data may be transferred and processed in a country outside the European Union or the European Economic Area.

If the processing of personal data is intended outside the European Union or the European Economic Area, the Bank ensures an equivalent protection of your rights and the necessary level of personal data protection, for example, using standard agreements approved by the European Commission.

HOW LONG DOES THE BANK STORE PERSONAL DATA?

The period of storage of your personal data by the Bank depends on the purposes for which the Bank processes

them, and according to what criteria assesses the terms of storage of your personal data.

When determining the terms of storage of your personal data, the Bank evaluates the need for storage of your personal data in order to:

- ensure the performance of the existing service contract;
- fulfil the obligation regarding data storage specified in regulatory enactments (for example, in accordance with the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing, the Bank is obliged to store all information related to customer due diligence for five years after termination of business relations);
- protect the legitimate interests of the Bank or a third party during or after the validity of the transaction (for example, taking into account the ten-year limitation period for claims specified in the Civil Law, the Bank is entitled to keep personal data during this term to protect its legitimate interests in case of claim);
- provide proof of lawful processing of personal data during the previous period (for example, the existence of your consent to previous personal data processing activities).

When evaluating the storage periods of personal data, the Bank takes into account the guidelines developed by the Finance Association Latvia for determining the retention periods of various documents.

WHAT ARE MY RIGHTS?

Pursuant to the General Data Protection Regulation you have the following rights in connection with the processing of personal data by the Bank:

- right to access your personal data;
- right to rectification or erasure of personal data;
- right to restriction of the processing of personal data;
- right to object to the processing of personal data;
- right to withdraw consent to the processing of personal data;
- right to manual processing of personal data;
- right to data portability.

RIGHT TO ACCESS YOUR PERSONAL DATA

Upon your request, the Bank provides information on what personal data the Bank processes. In addition, you may receive information on how long the Bank intends to store your data, as well as on who the recipients of your data are, to the extent permitted by the regulatory enactments of the Republic of Latvia.

Your rights may be restricted in cases specified by the regulatory enactments in order to ensure the confidentiality of other persons. You are not entitled to receive information about our technological solutions, trade secrets, as well as internal evaluations.

RIGHT TO RECTIFICATION OR ERASURE OF PERSONAL DATA

If the data is incorrect, complete or inaccurate, you have the right to request that it be corrected (for example, to correct the provided contact information).

Unless restricted by applicable regulatory enactments or the legitimate interests of the Bank or a third party, you have the right to request the erasure of your personal data. This right is also called the "right to be forgotten".

RIGHT TO RESTRICTION OF PROCESSING OF PERSONAL DATA

You can request that the Bank restricts the use of this data if you believe that:

- the data available to the Bank is incorrect;
- the processing of your personal data is unlawful;
- your rights to data protection overrides the Bank's legitimate interests.

In this way, the use of the data will be limited only for the time during which the justification of the request will be verified.

In addition, you have the right to ask the Bank to keep (not delete) your personal data if you need personal data to defend your legal rights.

RIGHT TO OBJECT TO THE PROCESSING OF PERSONAL DATA

You have the right to object to the processing of your personal data if you consider that your right to data protection overrides the legitimate interests of the Bank. In this case, the Bank is obliged to substantiate why its legitimate interests override your right to the processing of personal data.

You also have the right to object to the use of your personal information for direct marketing purposes, including profiling for that purpose.

RIGHT TO WITHDRAW CONSENT TO THE PROCESSING OF PERSONAL DATA

You may withdraw your consent to the processing of personal data at any time, if the Bank does so on the basis of your consent.

Please note that if you withdraw your consent, the Bank may not be able to offer you certain financial services. In addition, the Bank will continue to process your personal data to the extent necessary to fulfil the contract concluded with you, to fulfil legal obligations or to protect its legitimate interests.

RIGHT TO MANUAL PROCESSING OF PERSONAL DATA

If the Bank makes an automated decision, you can receive information on how this decision was made, as well as you have the right to request manual processing of any automated decision.

RIGHT TO DATA PORTABILITY

You have the right to receive a copy of your personal data in digital format or to transmit data to another organisation, provided that:

- the processing is carried out by automated means;
- the Bank carries out processing in accordance with your consent or on the basis of a contract.

HOW CAN I SUBMIT A REQUEST TO EXERCISE RIGHTS?

You can submit a request:

- in person by visiting the Bank's Head Office at 1 Muitas Street, Riga, upon production of a personal identification document (a passport or an identity card);
- by sending a request signed with a secure electronic signature to the Bank's e-mail: welcome@privatbank.lv;
- by sending a request to the Bank via the internet bank.

HOW LONG WILL THE BANK CONSIDER THE REQUEST?

The Bank will provide you with a reply no later than within one month from the date of receipt of your request, however, if necessary, taking into account the nature of your request, the Bank has the right to extend the term of execution of the request by two months. In this case, the Bank will inform you about the reasons for the extension and delay within one month from the date of receipt of your request.

HOW WILL THE BANK PROVIDE A REPLY TO THE REQUEST?

The Bank will provide the information regarding your request to you in person at the Bank's Head Office at 1 Muitas Street, Riga, in the form of an encrypted e-mail or via the internet bank, taking into account, as far as possible, the preferred method of receiving the reply indicated by you.

IS THE PROCESSING OF REQUEST A PAID SERVICE?

Processing of your request in the Bank is provided free of charge.

However, if requests recur regularly, are manifestly unfounded and excessive, the Bank, taking into account the administrative costs related to the provision of information or communication or the performance of the requested action, may charge an additional fee for processing the request or will refuse to execute a repeated request.

WHAT ARE COOKIES?

The Bank uses cookies on its website. More information about the cookies used is available here: <https://www.privatbank.lv/noteikumi/personal-data-processing/>.

VIDEO SURVEILLANCE

In order to perform video surveillance as part of security measures, video surveillance cameras are used in the Bank's premises and ATMs. The areas of operation of the surveillance cameras are marked accordingly with an information sign. Personal data that is processed during video surveillance is included in visual images and video recordings. The Bank performs video surveillance on the basis of legal interests in order to ensure the security of visitors, employees, premises and property, to protect legal claims and legitimate interests, to detect and prevent illegal activities.