



## **Privacy disclaimer for processing of personal data for receipt of notifications and offers on Klix solution services**

Takes effect as of 01.03.2022.

By using the Klix solution services, clients are entitled to receive various benefits such as more favourable conditions on financing from lenders, special offers from Klix partners, discounts on 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 Klix 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, only if you have given your consent thereto.

### **Who will process your personal data?**

Your personal data controller is the provider of the Klix solution – AS "Citadele banka", Single Reg. No. 40103303559, address: 2A Republikas laukums, Riga, LV-1010, phone: +371 67010000, e-mail: info@citadele.lv, e-mail of the data protection officer: gdpr@citadele.lv.

### **What kinds of notifications and offers will you receive from us?**

We will send you information:

- on Klix services and related offers, including personalised offers;
- on special offers from Klix partners by using the Klix solution. You can see the list of Klix partners on the website <https://klix.app/klix-partneri/>;
- on opportunities to participate in contests, raffles, lotteries, promotions and other events organised by Klix;
- to invite you to assess Klix user and shopping experience.

Klix will send you offers and notifications via e-mail, SMS and as mobile app notifications.

### **What type of personal data will we process within the framework of receiving notifications and offers, how do we obtain it and what action do we perform?**

Based on your consent for receipt of Klix offers and notifications, Klix will process the following personal data about you:

- identification data – name, surname;
- contact information – phone number, e-mail address;
- information regarding your interests, use of services and their relevance to your needs, lifestyle and habits for receipt of personalised offers;
- information obtained through communication – information, that allows us to evaluate effectiveness of communication.

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We obtain personal data directly from you, i.e. we use the personal information you provide to us by using Klix solution services.

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

<b>Actions for the processing of your personal data</b>	<b>Grounds for the processing of your personal data</b>	<b>Personal data to be processed</b>
Selection of recipients of notifications and offers, preparation of lists	Your consent	<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> </ul>
Sending/placement of notifications and offers (email and SMS)		<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>
Placement of notifications and offers on the Klix mobile app (incl. push notifications)		<ul style="list-style-type: none"> <li>• First name, surname</li> <li>• Client number</li> <li>• Information obtained through communication</li> </ul>
Evaluation of the results of receiving notifications and offers		<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>
Protection of legitimate interests	Implementation of legitimate interests to ensure evidence in legal proceedings	<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>
Fulfilment of the data subject's requests	Fulfilment of the obligations laid down in laws and regulations	<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 information relating to the use of the Klix solution services and their compliance with your needs, lifestyle and habits for the purpose of evaluation of certain personal aspects relating to you, in particular to analyse or predict aspects concerning your abilities, personal preferences and habits. We do not perform automated individual decision-making regarding you.

**Who will we transfer your personal data to?**

Offers and notifications will be sent by Klix or a partner selected by Klix (processor) in accordance with your consent by processing the following personal data about you: name, surname, contact information (phone number, e-mail address). Klix carefully examines their partners before entrusting them with processing of personal data about you. Klix guarantees non-disclosure and safety of your personal data.

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?**

Klix will store your consent and the related information for the period specified by legislation – five (5) years after withdrawal of consent or from the moment the subject of the consent has expired to provide proof of legal processing of your personal data in the previous period.

## **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;
- On the mobile app, if you are a user of Klix mobile app.

We 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 [support@klix.app](mailto:support@klix.app), 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.

In accordance with the requirements of the legal enactments and subject to submission of a written request, we do 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.

## **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 AS “Citadele banka”, the Data State 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 on Klix solution services.

**For information about the further processing of personal data in the course of receiving Klix solution services see informative materials on privacy protection matters available on the Klix website.**

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

*Feel free,  
Your Klix*