

## **PRIVACY DISCLAIMER**

### **for Processing of Personal Data within the Framework of the KLIX Financing Solution**

If you decided to buy goods or services in an online store using a loan, the KLIX Financing solution will help you choose a lender to pay for these goods or services as well as enter into a consumer loan contract with the lender.

This Privacy Disclaimer for processing of personal data within the framework of the KLIX Financing solution (hereinafter – the Privacy Disclaimer) contains information on issues related to processing of your personal data on the KLIX platform, performing remote customer identification, filling in a loan application form, requesting loan offers, and if you are offered a loan, you will receive an offer from financial institutions (lenders), reflecting the lenders' loan offers and providing an opportunity to conclude a loan contract between you and the lender of your choice.

In view of the above, we will process your personal data within the framework of the KLIX Financing solution and we would like to inform you about it in accordance with the requirements of regulatory enactments on privacy and personal data protection.

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

- The following controllers will process your personal data in order to ensure functionality of the KLIX Financing solution:

#### **Controllers that ensure processing of personal data within the framework of the KLIX Financing solution:**

**Citadele banka AS**, registration No. 40103303559, legal address: Republikas laukums 2A, Rīga, Latvia, LV-1010, telephone +371 67010000, e-mail [info@citadele.lv](mailto:info@citadele.lv), data protection specialist's e-mail [gdpr@citadele.lv](mailto:gdpr@citadele.lv).

*You may read additional information on the processing of personal data carried out by Citadele banka AS on the KLIX platform, which is not described in this Privacy Disclaimer, in the KLIX [Privacy Protection Rules](https://klix.app/en/buyer/) on the KLIX website <https://klix.app/en/buyer/>.*

**Moneycare SIA**, registration No. 42103096183, legal address: Piestātnes iela 11A, Jurmala, LV-2015, data protection specialist's e-mail [privacy@mconline.eu](mailto:privacy@mconline.eu).

*You may read additional information on the processing of personal data carried out by Moneycare SIA on the KLIX platform, which is not described in this Privacy Disclaimer, in the Privacy Policy of Moneycare SIA on the KLIX website <https://klix.app/en/buyer/>.*

Citadele banka AS and Moneycare SIA carry out processing of personal data within the framework of the KLIX Financing solution as joint controllers, with regard to which a personal data processing contract has been concluded, the key points of which are reflected in this Privacy Disclaimer.

- For granting consumer loans, your personal data will also be Processed by lenders as independent controllers for at least the following purposes: to assess your creditworthiness (including requesting information from public databases), to manage money laundering risks and risks related to international/national sanctions, to make loan offers and to conclude a loan contract. Your personal data will be processed by the following lenders for the purpose of granting a consumer loan:

#### **Controllers that ensure processing of personal data within the framework of a consumer lending service:**

**Citadele banka AS**, registration No. 40103303559, legal address: Republikas laukums 2A, Rīga, Latvia, LV-1010, telephone +371 67010000, e-mail [info@citadele.lv](mailto:info@citadele.lv), data protection specialist's e-mail [gdpr@citadele.lv](mailto:gdpr@citadele.lv).

Detailed information – [Privacy Protection Rules](#) of Citadele banka AS.

**ViziaFinance SIA**, registration No. 40003040217, legal address: Skanstes iela 50A, Rīga, LV-1013, telephone +371 67600777, e-mail [info@vizia.lv](mailto:info@vizia.lv), data protection specialist's e-mail [dati@vizia.lv](mailto:dati@vizia.lv).

Detailed information – [Privacy Policy](#) of ViziaFinance SIA.

**Bigbank AS Latvian branch**, registration No. 40103200513, legal address: Gustava Zemgala gatve 78-1, Riga, LV-1039, telephone +371 67116063, e-mail [info@bigbank.lv](mailto:info@bigbank.lv), data protection specialist's e-mail [data.protection@bigbank.eu](mailto:data.protection@bigbank.eu).

Detailed information – [Customer Data Processing Principles](#) of Bigbank AS Latvian branch.

As this Privacy Disclaimer does not provide information on processing of personal data by each lender, we encourage you to read detailed information on processing of personal data by lenders in their privacy policies, privacy notices or other information materials on lenders' websites before receiving the service.

### Which types of your personal data we will process?

In order to ensure functionality of the KLIX Financing solution, we will process the following personal data:

Personal Data Category	Personal Data Type
Your identification data	<ul style="list-style-type: none"><li>- name and surname</li><li>- personal code</li><li>- information specified in the ID document (passport or ID card) – document type, number, term of validity</li></ul>
Your contact information	<ul style="list-style-type: none"><li>- telephone number</li><li>- e-mail address</li><li>- address of the place of residence (including the postal code)</li></ul>
Your marital status	<ul style="list-style-type: none"><li>- marital status</li><li>- dependents</li></ul>
Information on your income	<ul style="list-style-type: none"><li>- income type</li><li>- employer's company name</li><li>- monthly income</li><li>- monthly expenditure</li></ul>
Information on the loans requested by you	<ul style="list-style-type: none"><li>- date of making monthly payments for loan repayment</li><li>- password for communication with the lender</li></ul>
Information on your confirmations/acknowledgements	<ul style="list-style-type: none"><li>- confirmation that you are a Latvian resident</li><li>- confirmation that you are of the age of majority</li><li>- confirmation that you have regular income</li><li>- confirmation that you are not a politically exposed person</li><li>- confirmation on the status of a politically exposed person</li><li>- confirmation that you have read the Privacy Disclaimer</li><li>- confirmation that you have read KLIX Terms of Use</li><li>- confirmation that you have been informed about transfer of your personal data and processing of such data by lenders</li></ul>

Please note that the abovementioned types of personal data have been identified by lenders as necessary for provision of a lending service. At the same time, the KLIX platform ensures that each lender receives exactly the types of your personal data that it needs to provide a lending service.

**How and why do we process your personal data?**

Purpose of Processing Your Personal Data	Grounds for Processing Your Personal Data	Personal Data that Will be Processed
Applying for a loan/selection of a loan offer via the KLIX Financing solution in accordance with the Terms of Use of the KLIX Financing solution	<ul style="list-style-type: none"> <li>• For fulfilment of the contract concluded by the joint controllers and you</li> <li>- when ensuring functionality of the KLIX Financing solution, Citadele banka AS and Moneycare SIA carry out a number of operations (e.g., remote identification, receipt of information in the form of an application for a loan, requesting a loan offer, publishing lenders' offers and options for conclusion of contracts), as a result of which the information necessary for lenders to make loan offers is received</li> </ul>	<ul style="list-style-type: none"> <li>• Identification data</li> <li>• Contact information</li> <li>• Marital status</li> <li>• Information on income</li> <li>• Information on the requested loans</li> <li>• Information on confirmations/acknowledgements</li> </ul>
Examination of claims and protection of legal interests	<ul style="list-style-type: none"> <li>• Realization of legitimate interests of the joint controllers in case of disputes over the KLIX Financing solution or processing of personal data performed within the framework of the KLIX Financing solution</li> </ul>	<ul style="list-style-type: none"> <li>• All aforementioned information</li> </ul>

**How do we receive your personal data?**

Only the personal data provided by you are used to ensure functionality of the KLIX Financing solution. If you use authentication by means of Smart-ID during remote customer identification, we will receive your name and surname as well as your personal code from SK ID Solutions AS. In turn, if you use a secure electronic signature during remote customer identification, we will receive your name and surname as well as your personal code from Latvijas Valsts radio un televīzijas centrs VAS.

At the same time, we inform you that lenders may obtain your personal data from other information sources for provision of lending services, about which you can obtain more detailed information in the lenders' privacy policies, privacy notices or other information materials published on lenders' websites.

**Whom do we transfer your personal data?**

Processing of your personal data within the framework of the KLIX Financing solution will be ensured by the authorized employees of Citadele banka AS and Moneycare SIA. In turn, in order to provide the lending service itself, your personal data will be transferred to the lenders. While ensuring the operation of the KLIX Financing solution your personal data will not be transferred in any other way.

### **How long do we store your personal data?**

In order to ensure that you have the best experience in using the KLIX Financing solution, the personal data submitted by you will be stored on the KLIX platform for 5 years from the moment of submitting the personal data. For the same period, your personal data will be stored in order to protect the legal interests of Citadele banka AS and Moneycare SIA in case of complaints or claims regarding the provision of the KLIX Financing solution. You may read additional information on the terms of storage of personal data on the KLIX platform in the KLIX [Privacy Protection Rules](#) on the KLIX website <https://klix.app/en/buyer/> or in the Privacy Policy of Moneycare SIA on the KLIX website <https://klix.app/en/buyer/>.

### **What are your rights with regard to processing of your personal data?**

If you have any questions regarding processing of personal data within the framework of the KLIX Financing solution, you can contact:

- Citadele banka AS by writing to [info@citadele.lv](mailto:info@citadele.lv), or you can contact the data protection specialist by writing to [gdpr@citadele.lv](mailto:gdpr@citadele.lv). All information will be passed to the designated officer who will respond to your request; or
- the data protection specialist of Moneycare SIA by writing to [privacy@mconline.eu](mailto:privacy@mconline.eu).

In accordance with the requirements of regulatory enactments, Citadele banka AS and Moneycare SIA provide you with the right to access your personal data, correct or delete them, restrict their processing, object to their processing, as well as transfer them. A written request must be submitted to perform any of these actions.

You can submit your request:

- in person at the customer service centres of Citadele banka AS, showing the identity document (passport or ID card), where you will be provided with all the necessary information related to the submission of your request, including answers to unclear questions;
- by e-mail, signing the request with a secure electronic signature and sending it to [info@citadele.lv](mailto:info@citadele.lv) or [privacy@mconline.eu](mailto:privacy@mconline.eu).

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

In the event of a violation of your privacy, you have the right to file a complaint with Citadele banka AS or Moneycare SIA, the Data State Inspectorate, or to take a legal action to protect your legitimate interests.

### **What are the terms of the data processing contract entered into Citadele banka AS and Moneycare SIA as joint controllers?**

The Personal Data Processing Contract stipulates that two controllers shall cooperate to ensure the maintenance and use of the KLIX platform, as well as to jointly take all necessary steps to offer the most convenient and advantageous loan offers and to further develop lending practices based on good faith principles.

Within the framework of cooperation, Citadele banka AS performs remote identification (via the mobile application of Citadele banka AS, Smart-ID or secure electronic signature) and registration of users of the KLIX platform, collects information necessary for lenders obtained from users of the KLIX platform, receives and publishes lenders' offers supplied by Moneycare SIA, etc. In its turn, Moneycare SIA maintains and develops the technical solution of the KLIX platform as well as ensures the transfer of personal data between the KLIX platform and KLIX users and/or lenders.

The Personal Data Processing Contract stipulates that the controllers shall fully exercise the rights of users of the KLIX platform provided for in the regulatory enactments in the field of lawfulness and protection of processing of personal data, as well as shall closely cooperate in ensuring the lawfulness and protection of processing of personal data. In addition, the Personal Data Processing Contract stipulates that each controller shall prepare information on processing of personal data, which can be obtained in accordance with this Privacy Disclaimer, as well as each controller shall respond to requests of users of the KLIX platform (questions, applications,

complaints) and the controllers shall carry out actions provided for in regulatory enactments within the framework of their cooperation.

**This Privacy Disclaimer informs you of issues related to processing of your personal data within the framework of the KLIX Financing solution.**

**You may read information on processing of your personal data:**

- on the KLIX platform; you may read the information that is not provided in this Privacy Disclaimer in KLIX Privacy Protection Rules on the KLIX website <https://klix.app/en/buyer/>;
- on Moneycare SIA <https://klix.app/en/buyer/>;
- on the lenders' websites.

**Citadele banka AS and Moneycare SIA guarantee non-disclosure and security of your personal data, ensuring that your personal data is processed by employees who are trained in the field of processing and protection of personal data, using the latest and most modern technologies in the field of information security.**

*Faithfully yours,  
Citadele banka AS*