



KLIX PRIVACY PROTECTION REGULATIONS

Enter into effect on 12th May 2022

In order to care for your privacy and personal data protection, we have developed these Privacy Protection Regulations which provide information regarding the processing of your personal data, i.e., any information that is directly or indirectly associated with you, your right to privacy and its protection, and also to your right to the availability of information.

We provide you the following information in accordance with 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, hereinafter – the Regulation, and requirements of other European Union and national laws and regulations, good practice guidelines and our internal regulatory enactments.

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You – you as a natural person whose Personal Data we are processing.

Klix or us – provider of the Klix solution *Citadele banka, AS*.

Processing – any actions taken with your Personal Data, for example, the collection, registration, storage, viewing, use, or disclosure, by sending, disseminating, or otherwise making available, coordination, deletion, or destruction of your Personal Data, and more.

Regulations – these Klix Privacy Protection Regulations.

Personal Data – any information which refers or might refer to you, for example, your name, surname, personal identity number, address, telephone number, electronic mail address, your interests, behaviour, and actions.

Confirmation – any approval provided freely and consciously by you with which you consent to the Processing of Personal Data for a specific purpose(s).

Profiling – use of your Personal Data to evaluate the personal activities related to you especially by analysing and predicting your personal wishes, interests, behaviour, and location.

Data State Inspectorate – independent institution which monitors the application of the Regulation in the Republic of Latvia.

WHO PROCESSES YOUR PERSONAL DATA?

The controller of your Personal Data is the joint stock company (AS) *Citadele banka*, registration No. 40103303559, legal address Republikas laukums 2A, Rīga, Latvia, LV-1010, telephone +371 67010000, e-mail info@citadele.lv.

WHAT TYPE OF YOUR PERSONAL DATA DO WE PROCESS?

In accordance with the purposes indicated in the Regulations and to the extent necessary for them, we process the following sets of your Personal Data indicated below:

Set of personal data (categories)	Description
Your identification data	Name, surname, personal identity number and the identification number assigned to you as the Klix profile user.
Your contacts	Telephone number, electronic mail address.
Information related to making purchases, payments and deliveries	Transaction history – incoming and outgoing payments, information indicated therein – recipient of the transfer, payment card number, amount of transfer, purpose of the transfer, purchased goods and services, addresses of the places where the good were purchased, IP address of the device from which the purchase was made, and also the time of the purchase.
Information related to the contacts	Name, surname, e-mail address, and telephone number.
Information related to your interests, use of a service and its relevance to your needs, lifestyle and habits	Information regarding the service which we provide and you receive, your purchasing and other habits, interests, your satisfaction with the services provided by us.
Information obtained in communication with Klix	Information which Klix obtains from your letters (submissions, applications, requests, complaints submitted in electronic or paper form), communications with Klix by telephone (with or without audio recordings), and also information from devices and technologies which you use to communicate through the Klix website or Klix mobile application.
Information related to violations	Information regarding the established violations of contractual obligations and other violations, imposed sanctions.
Information related to participation in lottery	Information regarding participation in lottery, prize information, unique code of Klix lottery and other information.

WHY DO WE PROCESS YOUR PERSONAL DATA AND UNDER WHAT JUSTIFICATION?

Before commencing the Processing of your Personal Data, we always evaluate the purposes for which your Personal Data will be needed to be processed. The processing of your Personal Data is lawful if we carry it out based on at least one of the following grounds, i.e. we Process your Personal Data:

- **for the conclusion and execution of a contract**, to provide a service to you, or
- **for the fulfilment of the obligations specified for us in the laws and regulations**, or
- **based on your Consent**, or
- **for the pursuit of our or third party lawful (legitimate) interests** upon previous evaluation of whether these interests in the processing of your personal data are proportionate to your right to privacy, or



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- **for the protection of your or third party interests of vital importance, or**
- **in order to perform a task carried out in the public interest or in the exercise of official authority vested in the KlIX.**



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The purpose for the Processing of your Personal Data	Justification and sub-purposes for the Processing of your Personal Data	Sets of Personal Data (categories) which we process
Ensuring of the Klix service	<ul style="list-style-type: none"> • For the conclusion and execution of a Contract <ul style="list-style-type: none"> ➤ Ensuring of the processing orders and payment by Klix sellers ➤ Obtaining of delivery information and its transfer to Klix sellers ➤ Provision of information regarding any changes in the Klix service 	<ul style="list-style-type: none"> • Your identification data • Your contacts • Information related to making purchases, payments and deliveries • Information related to the contacts • Information obtained by communicating with Klix
	<ul style="list-style-type: none"> • For the conclusion and execution of a Contract <ul style="list-style-type: none"> ➤ Creation and maintenance of a Klix used profile for buyers who choose it 	<ul style="list-style-type: none"> • Your identification data • Your contacts • Information related to making purchases, payments and deliveries • Information related to the contacts • Information related to your interests, use of the service and its relevance to your needs, lifestyle and habits • Information obtained by communicating with Klix
	<ul style="list-style-type: none"> • Fulfilment of the obligations laid down in the regulatory enactments of Klix <ul style="list-style-type: none"> ➤ Processing of the applications, requests and complaints received from you 	<ul style="list-style-type: none"> • Your identification data • Your contacts • Information related to making purchases, payments and deliveries • Information obtained in accordance with Klix • Information related to violations
Investigation, establishment of violations	<ul style="list-style-type: none"> • Pursuit of the lawful (legitimate) interests of Klix or third person <ul style="list-style-type: none"> ➤ Establishment of possible violations of the contract with Klix, fraud or other criminal offences, their investigation and submission of materials to the law enforcement institutions. 	<ul style="list-style-type: none"> • Information related to violations
Bringing of claims arising from contractual obligations or other type of obligations	<ul style="list-style-type: none"> • Pursuit of the lawful (legitimate) interests of Klix or third person <ul style="list-style-type: none"> ➤ Resolution of disputes between you and a Klix seller or Klix 	<ul style="list-style-type: none"> • Your identification data • Your contacts • Information related to making purchases, payments and deliveries • Information obtained in communication with Klix



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		<ul style="list-style-type: none"> • Information related to violations • Information related to participation in lottery
<p>Processing of request from State/investigative and other law enforcement institutions and other State institutions and officials specified in laws and regulations</p>	<ul style="list-style-type: none"> • Fulfilment of the obligations laid down in the regulatory enactments of Klix <ul style="list-style-type: none"> ➤ Provision of information to State or local government institutions and their officials, investigative and other law enforcement institutions 	<ul style="list-style-type: none"> • Your identification data • Your contacts • Information related to making purchases, payments and deliveries • Information obtained in communication with Klix • Information related to violations
<p>Archiving</p>	<ul style="list-style-type: none"> • Fulfilment of the obligations laid down in the regulatory enactments of Klix 	<ul style="list-style-type: none"> • All sets of Personal Data (categories) indicated in the Regulations
<p>To implement marketing measures for attracting customers</p>	<ul style="list-style-type: none"> • Based on your Consent <ul style="list-style-type: none"> ➤ Sending of offers, including personalised offers, and other notifications 	<ul style="list-style-type: none"> • Your identification data • Your contacts • Information related to your interests, use of the service and its relevance to your needs, lifestyle and habits • Information obtained in communication with Klix
	<ul style="list-style-type: none"> • Pursuit of the lawful (legitimate) interests of Klix or third person <ul style="list-style-type: none"> ➤ Identification of potential customers and customer groups to survey them, including to analyse and predict their individual wishes, interests, behaviour, and attitude 	<ul style="list-style-type: none"> • Your identification data • Your contacts • Information related to making purchases, payments and deliveries • Information related to your interests, use of the service and its relevance to your needs, lifestyle and habits • Information obtained in communication with Klix
<p>Communication in relation to the provision of the Klix service, quality assessment and provision of evidence</p>	<ul style="list-style-type: none"> • Pursuit of the lawful (legitimate) interests of Klix or third person <ul style="list-style-type: none"> ➤ Upon the use of audio recordings, we ensure evaluation of communication regarding the quality of the provision of the Klix service and evidence of communicating with you 	<ul style="list-style-type: none"> • Your identification data • Your contacts • Information related to making purchases, payments and deliveries • Information related to your interests, use of the service and its relevance to your needs, lifestyle and habits



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		<ul style="list-style-type: none">• Information obtained in accordance with Klix
Ensuring Klix lottery	<ul style="list-style-type: none">• Pursuit of the lawful (legitimate) interests of Klix or third person<ul style="list-style-type: none">➤ With the help of Klix lottery to ensure the increase of the number of Klix profile users and the recognition of Klix services (<i>the actions for achieving of the said legitimate interest shall be performed at least for the following sub-purposes - organizing the lottery, determining the winners, announcing the winners and ensuring the receipt of the prize</i>)	<ul style="list-style-type: none">• Your identification data• Your contacts• Information related to participation in lottery

HOW DO WE ACQUIRE YOUR PERSONAL DATA?

We acquire your Personal Data:

- when you provide them to us while using Klix:
 - upon creating the Klix profile in the website or mobile application;
 - upon processing a purchase from a Klix seller;
 - upon fulfilling payment commitments;
 - when contacting us through mail or e-mail, telephone, chat or by visiting us in person;
 - upon agreeing to receive Klix offers and other types of notices from us;
 - when visiting our website and using or mobile application, i.e., your profile and usage data on how you use our services by collecting information from your devices – computer, mobile phone, through the use of cookies or other technological solutions, detailed information is provided in our [Cookie Terms and Conditions on Citadele websites](#);
- when they are provided to us by our cooperation partners (for instance, Klix lottery cooperation partner), State authorities and law enforcement institutions and their officials.

WHO DO WE TRANSFER YOUR PERSONAL DATA?

We transfer your Personal Data to:

- **our cooperation partners (processors, individual or joint controllers)** which are related to the provision of the Klix service (incl. Klix lottery) and cooperation with which we have closely examined before commencing the cooperation, for example, ensuring of your payments, taking of marketing activities by sending you different offers and notifications of other types, ensuring the prize of the Klix lottery and its delivery, and also development, maintenance and servicing of the information system;
- **credit institutions and finance institutions, and third persons** involved in the execution of payment transactions;
- **in the cases specified in laws and regulations**, to State/local government institutions, law enforcement institutions (investigating institutions, Office of the Prosecutor, bodies performing operational activities), courts, supervisory institutions (Consumer Rights Protection Centre, Data State Inspectorate, State Revenue Service and other institutions), based on written submitted requests or regulations specified in laws and regulations that are binding to Klix, and to other persons indicated in the laws and regulations;
- **members of the European and international settlement systems and persons associated therewith;**
- **Klix audit companies.**

Within the framework of your Personal Data Processing, your Personal Data can be accessed only by our employees and employees authorised by or cooperation partners who need it for the fulfilment of their work duties and who process your Personal Data only for the purposes and upon the grounds for the Personal Data processing laid down in these Regulations, and in compliance with the technical and organisational requirements for the Personal Data processing specified in the laws and regulations regarding Personal Data protection and also internal regulatory enactments of Klix.

DO WE MAKE AUTOMATED DECISIONS, INCLUDING PROFILING?

We take automated individual decisions, including perform profiling, in relation to direct marketing so that, instead of burdening you with sending, for example, useless offers, we would predict in an automated manner the offers that are most suitable and relevant for your needs by analysing different types of information at our disposal.

DO WE TRASFER YOUR PERSONAL DATA OUTSIDE OF THE EU/EEA?

We ensure the Processing of your Personal Data only within the territory of the European Union and European Economic Area.

HOW LONG DO WE STOR YOUR PERSONAL DATA?

The length for which we store your Personal Data without ensuring their deletion depends on the purposes for which we store it, and the criteria by which we evaluate the time periods for the storage of your Personal Data.

When determining deadlines for the storage of your Personal Data, we evaluate the need for the storage of your Personal Data:

- within the framework of the various document storage periods laid down in the regulatory enactments of Klix, for example:
 - in order to protect our interests in cases of different claims, information regarding the provision of the Klix service shall be stored for 5 (five) years after the termination of business relations with you;
 - information related to making purchases and transactions shall be stored for 5 (five) years from making the last transaction;
- pursuit of the lawful (legitimate) interests of the the Klix and/or third persons, for example:
 - audio recordings in relation to the communication within the framework of the provision of the Klix service in order to assess quality, and communication of evidence to you, shall be stored for 5 (five) years from making the audio recording;
 - information related to participation in Klix lottery shall be stored for 3 (three) months from the moment the draw has been completed in order to provide evidence within the process of handling claims;
- if your Personal Data is Processed based on your Consent, for example, for the receipt of notifications and offers, Klix shall store the information related thereto for 5 (five) years from the moment when the Consent has been withdrawn in order to provide evidence of the lawful Processing of Personal Data in the previous period.

When evaluating deadlines for the Personal Data protection, we take into consideration the recommendations developed by the Finance Latvia Association, requirements of the laws and regulations, and also the lawful (legitimate) interests of Klix in determining time periods for the storage of various documents. If during the evaluation we find different justification for the determination of the Personal Data storage periods, for example, there are differences between the storage period specified in a law or regulation and the time period determined for the protection of our interests, it shall serve as sufficient grounds to store your Personal Data for the longest of the two terms.

If at least one of the specified criteria sets in, we shall ensure the deletion or anonymisation of your Personal Data.

WHAT WILL HAPPEN IF YOU WILL NOT PROVIDE US YOUR PERSONAL DATA?

We ask you to provide Personal Data only because we need them for any of the purposes indicated in these Regulations. If you do not provide Personal Data to us, it may restrict cooperation with you or prevent from it, for example, Klix will not be able to ensure you the provision of the service.

We process your Personal Data only for the respective purpose and to the extent necessary for it in accordance with the requirements of laws and regulations. We do not request you to provide more Personal Data than we need. Furthermore, we guarantee the confidentiality and safety of your Personal Data.

WHAT ARE YOUR RIGHTS REGARDING THE PERSONAL DATA PROCESSING UNDERTAKEN BY US?

Within the framework for the fulfilment of the requirements of the laws and regulations governing the privacy and Personal Data protection, we provide you the rights to the following by submitting a written request to us:

- **To access your Personal Data** and receive from us:
 - confirmation of whether Klix performs or does not perform the Processing of your Personal Data;
 - information regarding your personal data which we process;
 - additional information regarding the Processing of your Personal Data within the framework of your right to be informed.

In separate cases we might ask you to specify the extent of your request so that we could understand to which information and Processing activities the request refers, and also request to explain the grounds for the request.

In cases when prohibited by the laws and regulations, we will not be able to provide you information regarding separate activities of your Personal Data Processing, for example, if such information is provided to the law enforcement institutions.

- **To correct your Personal Data** if you reasonably believe that your Personal Data are inaccurate, and also to supplement incomplete Personal Data considering the purposes for your Personal Data Processing.

- **To delete your Personal Data (right to be forgotten)** if:
 - you believe that your Personal Data are not anymore needed or unusable for the initial purposes for the Processing of these Personal Data;
 - you reasonably believe that your Personal Data are Processed unlawfully, for example, in the respective case your Consent has not been received for the Processing of Personal Data;
 - the deletion of your Personal Data is specified by document storage periods laid down in our internal and external regulatory enactments.

We shall ensure deletion of your Personal Data that is at our disposal, and also that is at the disposal of our cooperation partners, from our records and Processing systems, if the Personal Data will no longer be needed for the purposes for which they are processed. We will not be able to provide you deletion of Personal Data if we need to continue processing of such data, for example, in accordance with that specified in laws and regulations, ensuring the storage of information or documents.

- **Restrict the Processing of your Personal Data**, including – also deletion of Personal Data, if:
 - you contest the accuracy of your Personal Data, the restriction shall apply only to the time period within which we will be able to examine the accuracy of your Personal Data;
 - you believe that the Processing of your Personal Data is unlawful and you oppose to the deletion of Personal Data, requesting the restriction of the use of Personal Data instead, the restriction shall refer only to the time period justifiably indicated by you;

- we no longer need your Personal Data, but you need them to exercise or defend legal rights and interests, bring claims etc., the restriction shall refer only to the time period justifiably indicated by you;
- you oppose to the Processing of your Personal Data carried out by us based on our legal interests, the restriction refers only to the time period while we make repeated evaluation of such lawful interests.

If you have submitted a request to Klix for the restriction of the Processing of your Personal Data in accordance with the procedures provided for in the Regulations, we, however, will have the right to process your Personal Data, for example, to execute or protect legal rights and interests, including, the rights of another natural person or legal person, bring claims.

- **To transfer your Personal Data** which we have received from you based on the Consent and established contractual obligations, and the Processing of which we carry out with automated means, for your personal use or transfer to another service provider, if there are no barriers to the transfer of Personal Data. We inform you that the information subject to the transfer of your Personal Data may include Personal Data of third parties, therefore, when transferring Personal Data, we shall evaluate the influence of the transfer of the Personal Data requested by you on the rights and freedoms of third parties.

- **Object to the Processing of your Personal Data** justified with the lawful (legitimate) interests of Klix. Klix shall immediately stop such Processing, but only temporary, while Klix makes the evaluation and does not indicate towards compelling lawful (legitimate) purposes for the Processing of Personal Data which are more important than your interests, rights and freedoms. Klix will have the right to Process Personal Data if it will be needed, for example, in order to execute or protect legal rights and interests, bring claims (for the purpose of legal proceedings).

If you will have objected to the Processing of your Personal Data within the Klix lottery, we shall permanently terminate Processing of your Personal Data for this purpose and you will be excluded from further participation in the Klix lottery.

- **Refrain from automated individual decisions, including Profiling**

You will not be able to use the aforementioned rights, if you will have provided a clear Consent to such Processing of your Personal Data.

- **To withdraw your Consent to the Processing of your Personal Data** for the purpose of receiving offers and notifications at any time:

- in the Klix mobile application;
- e-mail.

In order to provide you offers for our services and receipt of other notifications, before their sending we shall request you to fill in the appropriate form in the Klix mobile application, providing Consent to the Processing of your Personal Data for the purpose of receipt of notifications and offers.

If you withdraw your Consent to the Processing of your Personal Data, we shall discontinue the Processing of your Personal Data. However, you must remember that such withdrawal of the Consent will not affect the lawfulness of the Processing of your Personal Data before the withdrawal of the Consent.

HOW TO SUBMIT A REQUEST?

You can submit your request:

- in person by visiting the Klix office (Republikas laukums 2A, Rīga, LV-1010), presenting identification document (passport or identity card), the office shall provide you all the necessary information regarding the submission of your request, including, answers to unclear questions;
- through electronic mail, signing the request with a secure electronic signature;
- via Online Banking or mobile application if you are AS "Citadele banka" client.

Upon receipt of your request we shall request additional information from you to identify you as a user of the Klix service, evaluate the request, where appropriate requesting to specify the extent of the request as to which information and Processing activities it refers, and we shall also request to explain the grounds for the request if it can help us to provide you an answer of higher quality.

Over what period shall we examine your request?

We shall reply to your request not later than within a month after receipt of your request, and, where appropriate, we have the right to extend the time period for the execution of the request for two months considering the extent of your request. In such case we shall inform you of the extension of the time period and reasons for the delay within a month from the receipt of the request.

How will we provide information for your request?

We shall ensure the issue of information regarding your request to you in person at the Klix office, in encrypted electronic form, in the Klix profile on the website or mobile application, taking into account where possible the type of receipt of a reply to the request indicated by you.

Will you have to pay for the examination of the request?

The examination of your request shall be provided free of charge.

However, if we will conclude that your requests are regularly recurring, clearly unfounded or excessive, we shall, considering the administrative costs related to the ensuring of information or communication or taking of the requested action (including staffing resources costs) in accordance with the approved price list, have the right to request from you a reasonable fee for the examination of your request, or we will refuse to execute your request by notifying you thereof in advance.

WHAT TO DO WHEN YOU BELIEVE THAT YOUR PRIVACY HAS BEEN INFRINGED?

Klix certifies that it ensures the Processing of your Personal Data in accordance with the requirements of the Regulation and other European and national laws and regulations, and these Regulations. However, if you believe that we have violated your rights to privacy while processing your Personal Data, you have the right to submit a complaint for examination to Klix or Data State Inspectorate, or bring an action to the court in order to defend your interests.

HOW DO WE ENSURE SAFETY OF YOUR PERSONAL DATA?

We guarantee the confidentiality and safety of your Personal Data by implementing appropriate technical and organisational measures, ensuring the physical and environmental safety of your Personal Data, restricting access rights to your Personal Data, sending your Personal Data in encrypted form, if necessary, ensuring protection of the computer network and/or personal devices, backing up of data, and other safety measures, thus also ensuring protection of your

Personal Data against unauthorised access, undesirable changes, losses of Personal Data and unlawful disclosure.

Within the framework of Personal Data Processing carried out by us, your Personal Data may be accessed only by our authorised employees and employees authorised by our cooperation partners who need it to fulfil their work duties and who Process your Personal Data in conformity with the technical and organisational requirements specified in laws and regulations for the Processing of Personal Data.

The cooperation partners whom we have entrusted the Processing of your Personal Data are carefully evaluated before the commencement of cooperation and are informed of the set of measures they must implement to ensure the Processing, confidentiality and protection of your Personal Data in accordance with the requirements of laws and regulations.

In order to ensure qualitative and immediate fulfilment of the commitments of the contract concluded with you, we may authorise our cooperation partners to fulfil separate tasks or provide individual services. If during the fulfilment of these tasks the cooperation partners process your Personal Data that are at our disposal, the respective partners are considered processors or separate controllers/joint controllers, and we have the right to transfer to cooperation partners your Personal Data that are necessary for taking such actions to the extent necessary for their performance.

Our cooperation partners shall ensure the fulfilment of the requirements for the processing and protection of your Personal Data in accordance with the procedures specified in laws and regulations, and shall not use your Personal Data for other purposes.

HOW TO CONTACT US?

If you have questions regarding the Processing of your Personal Data, you can contact us through e-mail info@citadele.lv or by getting in touch with our Personal Data Protection Officer through e-mail gdpr@citadele.lv, or by visiting the Klix office where you will receive all the necessary information regarding the Processing of your Personal Data, including answers to unclear questions. All information shall be transferred to the responsible employee who will provide an answer to your request.

HOW WILL WE ENSURE UP-TO-DATE INFORMATION REGARDING THE PROCESSING OF YOUR PERSONAL DATA?

So that you would always have the up-to-date information regarding the Personal Data Processing at your disposal, we shall, in accordance with the requirements of laws and regulations, ensure regular review and update of these Regulations. Therefore, we urge you to, from time to time, review the current wording of these Regulations on our website www.klix.app or mobile application. We will notify you of any amendments to the Regulations on our website, and if the amendments are substantial, we will notify you (if you are Klix profile user) via email or SMS message, giving 3 business days to familiarize with amendments before entry into force.