



SIA "Viainvest"

PRIVACY POLICY

VI-INA-2026/001

Version 03

02.03.2026

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| Approved by the decision of the Board of SIA "Viainvest": | 2026-10-BD; 02.03.2026 |
| Effective date: | 10.03.2026 |

SIA Viainvest (registration No. 40203015744, legal address: Roberta Hirša iela 1, Riga, LV-1045, Latvia) is an investment brokerage company licensed and supervised by the www.bank.lv (registered address: K.Valdemāra iela 2A, Riga, LV-1050, Latvia). Licence No.: 27-55/2023/2.

1. Terms and abbreviations

- 1.1. **Processor** - a person who processes Personal Data on behalf of and on the instructions of the Controller.
- 1.2. **Processing** - any operation or set of operations performed on your Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 1.3. **AS "VIA SMS group"** – a commercial company registered in the Republic of Latvia (reg. No. 40003901472, legal address Roberta Hirša iela 1, Riga LV-1045, Latvia), which is the parent company of VIAINVEST and which may act as a Joint Controller or Processor within the framework of the Policy.
- 1.4. **Data subject; You** – within the meaning of the Policy: any natural person who:
 - 1.4.1. uses, has used or intends to use the financial services provided by VIAINVEST (within the meaning of the Policy – also referred to as the Client);
 - 1.4.2. visits or has visited the Website.
- 1.5. **DORA** - Regulation (EU) 2022/2554 of the European Parliament and of the Council of 14 December 2022 on the digital resilience of the financial sector and amending Regulations (EC) No 1060/2009, (EU) No 648/2012, (EU) No 600/2014, (EU) No 909/2014 and (EU) 2016/1011.
- 1.6. **Special categories of personal data** – personal data related to the Data Subject's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data (for the purpose of uniquely identifying a natural person), data concerning health or data concerning a natural person's sex life or sexual orientation.
- 1.7. **Joint controller** – a person who, together with the Controller, determines the purposes and means of processing Personal Data.
- 1.8. **Artificial Intelligence Act** – Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules in the field of artificial intelligence and amending Regulations (EC) No. 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828.
- 1.9. **MiFID** - Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU.
- 1.10. **(A)ML/(C)FTP** – (anti)-money laundering, (counter)-terrorist financing and proliferation financing.
- 1.11. **Controller; We** – a person who, alone or jointly with others, determines the purposes and means of processing Personal Data. In the context of this policy: VIAINVEST.
- 1.12. **Personal data** – any information relating to an identified or identifiable data subject.
- 1.13. **Consent** - any freely given, specific, informed and unambiguous indication of your wishes as a Data Subject, by which you, by a statement or by a clear affirmative action, signify your agreement to the processing of your Personal Data.
- 1.14. **Policy** – this VIAINVEST internal regulatory document "Privacy Policy" together with all subsequent amendments, additions and annexes thereto, which is available on the Website.

- 1.15. **Profiling** – any form of automated processing of Personal Data that manifests itself as the use of Personal Data for the purpose of evaluating certain personal aspects relating to a natural person, in particular to analyse or predict aspects relating to the performance of that natural person at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
- 1.16. **Recipient** - a natural or legal person, public authority, agency or other body to whom your Personal Data is disclosed, whether a Third Party or not.
- 1.17. **Website** – the website <https://viainvest.com/>.
- 1.18. **Third Party** – a natural or legal person, public authority, agency or body other than the Data Subject, Controller, Joint Controller, Processor and persons who, under the direct authority of the Controller or Processor, are authorised to process Personal Data.
- 1.19. **GDPR** - 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 and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
- 1.20. **VIAINVEST** - SIA "Viainvest", a commercial company registered in the Republic of Latvia (reg. No. 40203015744, legal address Roberta Hirša iela 1, Riga LV-1045, Latvia), which maintains the website <https://viainvest.com/> and acts as the Controller.

2. Controller, its contact details

- 2.1. For the purposes of this Policy, the Controller is SIA "Viainvest", a commercial company registered in the Republic of Latvia (reg. No. 40203015744, legal address Roberta Hirša iela 1, Riga, LV-1045, Latvia), which maintains the website <https://viainvest.com/>.
- 2.2. VIAINVEST is an investment firm licensed and supervised by the Bank of Latvia (www.bank.lv; legal address: K. Valdemāra 2A, Riga, LV-1050, Latvia) (licence No. 27-55/2023/2).
- 2.3. If you have any questions regarding the processing of personal data, you can contact us:
- 2.3.1. by writing to our e-mail address info@viainvest.com ;
- 2.3.2. by writing to the e-mail address dpo@viainvest.com if you wish to contact VIAINVEST's personal data protection specialist;
- 2.3.3. by writing to our legal address: Roberta Hirša iela 1, Riga, LV-1045, Latvia.

3. Availability and updating of the Policy

- 3.1. The current version of the Policy is publicly available on the VIAINVEST Website.
- 3.2. VIAINVEST regularly assesses the Policy's compliance with legal acts and best data protection practices, and we may therefore periodically amend the Policy unilaterally, notifying the Client thereof via the VIAINVEST Website or by email.
- 3.3. VIAINVEST invites Data Subjects to periodically review the Policy in order to obtain up-to-date information on the Personal Data Processing activities carried out by VIAINVEST.

4. Scope and general provisions of the Policy

4.1. The Policy sets out the basic principles of VIAINVEST's personal data processing. The Policy applies if the Client uses, has used or plans to use the financial services provided by VIAINVEST, including relationship with the Client established before the Policy came into force.

4.2. The Policy describes how your Personal Data is processed in accordance with GDPR in connection with the use of VIAINVEST services, the legal basis and purposes (intentions) of the processing of your Personal Data, your rights as a Data Subject in the field of Personal Data protection, as well as other issues related to the Processing of Personal Data.

4.3. VIAINVEST invites you to familiarise yourself with the Policy before using VIAINVEST services.

4.4. In addition to the Policy, certain personal data processing activities carried out by VIAINVEST may be described and explained in the VIAINVEST Investment Platform Agreement Terms and conditions for Financial services, Cookie Policy, Cookie Management Tool, Website section "FAQ" and other sections, Client Profile, VIAINVEST communication with Clients via e-mail and/ or social networks, as well as other sources.

4.5. In order to receive VIAINVEST services and conclude a contract, You initially voluntarily provide Us with Your Personal Data by filling out a questionnaire/ application on our Website. The provision of Personal Data is usually a contractual requirement and a prerequisite for concluding a contract and receiving services. If the necessary Personal Data is not provided, VIAINVEST will not be able to conclude a contract with you and/ or provide the service, including fulfilling its obligations related to the provision of the service; accordingly, the service may be refused or it will not be possible to conclude the contract.

4.6. At the same time, the provision of certain categories of Personal Data is stipulated by law (statutory), for example: 1) in the field of AML/CFTP and sanctions, so that VIAINVEST can carry out the Client's identification and due diligence measures, as well as sanctions management measures; 2) in the field of MiFID, in order to assess the suitability and appropriateness of investment services and/ or financial instruments. If Personal Data is necessary for the fulfilment of legal requirements and the Client does not provide it, VIAINVEST may not be entitled to initiate or continue a business relationship with the Client and/ or provide the relevant service to the Client.

5. Involvement of Joint controllers and Processors

5.1. VIAINVEST acts as a separate Controller in relation to the Personal Data processing activities described in the Policy. However, in certain Personal Data processing processes that are group-wide processes, the Controller may, in order to ensure the quality of the performance of the contract concluded with the Client, act together with the Joint Controller – AS "VIA SMS group", which is the parent company of VIAINVEST. In such cases, the Controller and the Joint Controller jointly determine the purposes and means of processing and mutually agree on the division of responsibilities. If the Joint Controller scheme is applicable to the relevant processing operation, the Client, as the Data Subject, may exercise his/ her rights by contacting both the Controller and the Joint Controller. However, in order to ensure the prompt examination of Data Subjects' requests and the provision of responses, Data Subjects are invited to contact the

Controller in the first instance. In certain processing operations, AS "VIA SMS group" may also act as a Processor, i.e. process Personal Data on behalf of the Controller and in accordance with the Controller's instructions (rather than as a Joint Controller). The specific role (Joint Controller or Processor) depends on the relevant processing operation, the purpose of the processing and the contractual cooperation model.

5.2. In certain processing activities, VIAINVEST, acting as the Controller, may engage Processors in order to ensure the quality of performance of the contract concluded with the Client. Such Processors process Personal Data on behalf of the Controller and only in accordance with the Controller's instructions, on the basis of a concluded data processing agreement. VIAINVEST is entitled to transfer to the Processor the Clients' Personal Data necessary for carrying out these activities, to the extent required for this purpose. The Processor is obliged to ensure compliance with the requirements for the processing and protection of the Clients' Personal Data in accordance with the procedure prescribed by applicable laws and regulations and shall not use the Clients' Personal Data for any other purposes.

6. Categories of personal data

6.1. The categories of personal data that VIAINVEST primarily, but not exclusively, collects and processes are as follows:

6.1.1. Identification data: name and surname, personal identification number or date of birth, Client's number;

6.1.2. Identity document data: 1) information indicated in the photograph on the identity document, including the following personal data: name and surname, personal identification number or date of birth, photograph (face image), citizenship, type of document and issuing authority, document number, date of issue and expiry date of the document, signature; 2) electronic photograph of a self-portrait (selfie) with the following personal data: photograph with unique facial features – biometric data used for personal identification; 3) the result of comparing the photograph on the identity document and the electronic photograph (selfie) and the result of the manual verification of the result;

6.1.3. Contact details: telephone number, e-mail address, residential address, language of communication;

6.1.4. Client's tax residence data: country of tax residence, tax identification number, tax certificate data, copy of tax certificate;

6.1.5. Professional and educational data: occupation, name of workplace, position level, level of education, field of education, previous experience in transactions with financial instruments;

6.1.6. Financial data: source and level of income, supporting documents if necessary, planned investment amount, IBAN account number of the financial institution, amount of assets;

6.1.7. MiFID data: client status, answers to the suitability and appropriateness questionnaire (Financial situation assessment, Experience and knowledge assessment, Investment objectives), results of the assessment of responses, information on available services and strategies, specified investment limits or restrictions;

6.1.8. Contract and transaction data: contract number and date, information on available services and strategies, specified investment limits or restrictions, deposits made, payments

made, investments held, investment transactions made, account balances and turnover, account statements, taxes withheld, bonuses paid, regular MiFID report data;

6.1.9. AML/CFTP data: data that allows VIAINVEST to perform Client identification and research measures in relation to compliance with AML/CFTP and sanctions law requirements, including information about the Client's occupation, financial data, cash flow, Client data from databases and public sources, the purpose and nature of transactions, information obtained as a result of sanctions list checks, monitoring reports created for the Client's transactions, the Client's AML/CFTP risk level and set limits; documents submitted by the Client in connection with VIAINVEST's requests in the field of AML/CFTP; whether the Client is a politically exposed person, etc.

6.1.10. Communication data: incoming and outgoing communication with the Client through all communication channels (e.g. e-mail, online chat on the Website, social networks);

6.1.11. Marketing information: information about the Client's given and withdrawn consents to receive marketing information; information sent during the period of consent;

6.1.12. Information related to the Client's participation in VIAINVEST competitions, campaigns and promotions - information related to competitions, raffles, lotteries, campaigns and promotions, including the announcement of winners and the awarding of prizes to winners, the assignment and use of unique codes, etc.;

6.1.13. Technical information: session number, date, time, IP address, browser, operating system, device; technical event logging and monitoring records, log files/ journal files, audit records;

6.1.14. Cookie policy preferences.

6.2. VIAINVEST processes Special Category Personal Data - biometric data to perform remote identification of the Client and prevent fraud by comparing a photograph from an identity document with an electronic photograph of the Client's self-portrait, in accordance with the requirements of AML/CFTP law and the relevant Cabinet of Ministers regulations. The comparison result is also checked manually.

6.3. In certain cases, when conducting due diligence for AML/CFTP and sanction risk management purposes, VIAINVEST may also obtain other Special Category Personal Data from publicly available sources or from documents submitted by the Client. The obtaining of such data by VIAINVEST is incidental in nature, and VIAINVEST processes such data only to the extent necessary to comply with AML/CFTP and sanctions-related restrictive requirements.

6.4. In addition, when conducting due diligence for AML/CFTP purposes, VIAINVEST may also obtain data/information regarding the Client's criminal convictions and/or offences from publicly available sources or from documents submitted by the Client. The obtaining of such data by VIAINVEST is incidental in nature, and VIAINVEST processes such data only to the extent necessary to comply with AML/CFTP requirements.

7. Legal basis and purpose of Personal Data Processing

7.1. Personal Data is processed only where and to the extent necessary for the achievement of specific purposes and is based on lawful legal grounds in accordance with the GDPR.

7.2. In accordance with Article 6(1) of the GDPR, processing is lawful only if at least one of the following legal grounds applies:

- 7.2.1. Consent of the Data Subject (Article 6(1)(a) of the GDPR);
- 7.2.2. performance or conclusion of a contract with the Data Subject (Article 6(1)(b) of the GDPR);
- 7.2.3. compliance with a legal obligation applicable to the Controller (GDPR Article 6(1)(c));
- 7.2.4. protection of the vital interests of the Data Subject or another natural person (GDPR Article 6(1)(d));
- 7.2.5. performance of a task carried out in the public interest (GDPR Article 6(1)(e));
- 7.2.6. legitimate interests pursued by the Controller or by a third party (GDPR Article 6(1)(f)).
- 7.3. In practice, VIAINVEST bases the Processing of Personal Data on any of the legal grounds mentioned in the previous paragraph, except for the protection of the vital interests of the Data Subject or another natural person (GDPR Article 6(1)(d)).
- 7.4. The processing of Special Categories of Personal Data is lawful if it is carried out only in exceptional cases and only if, in addition to one of the legal bases referred to in Article 6(1) of GDPR, one of the bases set out in Article 9(2) of GDPR is applicable.
- 7.5. In its practice, VIAINVEST relies, in the area of AML/CFTP and fraud prevention, on the processing of Clients' Special Category Personal Data being necessary for reasons of substantial public interest, on the basis of law (GDPR Article 9(2)(g)). In certain cases, VIAINVEST may rely on the Data Subject's consent (GDPR Article 9(2)(a)) or on the Processing being necessary for the establishment, exercise or defence of legal claims (GDPR Article 9(2)(f)) as the legal basis for the processing of Clients' Special Category Personal Data.
- 7.6. Before VIAINVEST processes personal data, it always assesses in advance the purposes for which it will be necessary to process the Client's data, as well as the legal basis for the processing.
- 7.7. VIAINVEST processes Personal Data for at least one of the purposes listed below:
- 7.7.1. Purpose of Processing: to provide investment services and ancillary services/ to perform a contract

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| Explanation of the Personal Data Processing to be performed | VIAINVEST processes your Personal Data in order to provide you with services and perform the contract, in compliance with the requirements of applicable laws and regulations. |
| Legal basis | GDPR Article 6(1)(b) – taking steps prior to entering into a contract/ performance of a contract GDPR Article 6(1)(c) – compliance with a legal obligation: so that we, as the Controller, can provide the service in accordance with applicable laws |
| Categories of Personal Data | Identification data Identity document data Contact details Client tax residence data Contract and transaction data Professional and educational data Financial data MiFID data AML/CFTP data Communication data |

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| | Technical information |
| Retention period | We will process Personal Data necessary for the performance of contractual obligations until the contract is fulfilled/ the business relationship continues. Thereafter, their processing (including storage) will be necessary for another purpose, namely “compliance with legal obligations (including responding to requests from competent authorities), preservation of evidence and maintenance of archives, and the establishment, exercise or defence of legal claims”, with the overall retention period for Personal Data being 10 (ten) years after the performance of the contract / the end of the business relationship. |

7.7.2. Purpose of Processing: remote identification and identity verification of the Client, prevention of fraud

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| Explanation of the Personal Data Processing to be performed | VIAINVEST performs remote identification and identity verification of the Client to ensure compliance with regulatory requirements and reduce the risk of fraud, as well as to identify suspicious activities, prevent identity theft and fraudulent attempts, and to document the course and results of the checks performed in order to ensure the verifiability of compliance with legal obligations and to protect VIAINVEST's legal interests in the event of supervision or disputes. |
| Legal basis | GDPR Article 6(1)(e) – public interest (derived from the first part of Article 5 ² of the AML/CFTP Law) GDPR Article 6(1)(c) – performance of a legal obligation (AML/CFTP Law, Cabinet of Ministers Regulation No. 392 “Procedure for the remote identification of customers by subjects of the AML/CFTP Law”) GDPR Article 9(2)(g) – substantial public interest based on legislation (for the processing of biometric data) GDPR Article 6(1)(f) – legitimate interests (to ensure the storage of evidence of compliance with a legal obligation) |
| Categories of Personal Data | Identity document data Technical information Communication data |
| Retention period | Following the termination of the business relationship with the Client, VIAINVEST retains the Client’s personal data for 5 (five) years after the termination of the business relationship, in accordance with the requirements of the AML/CTPF Law. Thereafter, their processing (including storage) will be necessary for another purpose, namely “compliance with legal obligations (including responding to requests from competent authorities), preservation of evidence and maintenance of archives, and the establishment, exercise or defence of legal claims”, with the overall |

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| | retention period for Personal Data being 10 (ten) years after the performance of the contract/ the end of the business relationship. |
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7.7.3. Purpose of Processing: compliance with AML/CTPF and sanctions requirements

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| Explanation of the Personal Data Processing to be performed | VIAINVEST processes the Client's personal data in order to comply with AML/CTPF and sanctions regulatory requirements and to ensure demonstrability of compliance with legal obligations, thereby protecting VIAINVEST's legitimate interests in the event of supervision or disputes. |
| Legal basis | GDPR Article 6(1)(e) – public interest (arising from the first part of Article 5 ² of the AML/CFTP) GDPR Article 6(1)(c) – performance of a legal obligation (AML/CFTP Law, International and Latvian National Sanctions Law) GDPR Article 9(2)(g) – substantial public interest based on legislation (for the processing of biometric data) GDPR Article 6(1)(f) – legitimate interests (to ensure the storage of evidence of compliance with a legal obligation) |
| Categories of Personal Data | Identification data Identity document data Contact details Client tax residence data Contract and transaction data Professional and educational data Financial data MiFID data AML/CFTP data Communication data Technical information Data relating to criminal convictions/offences: may be processed for AML/CTPF purposes only in the cases and to the extent permitted by applicable laws and regulations. |
| Retention period | The retention period for Personal Data evidencing VIAINVEST's compliance with obligations in the area of sanctions, in accordance with the requirements of the Law on International Sanctions and National Sanctions of the Republic of Latvia, is 10 (ten) years. Following the termination of the business relationship with the Client, VIAINVEST retains the Client's Personal Data for 5 (five) years after the termination of the business relationship, in accordance with the requirements of the AML/CTPF Law. Upon request of the competent authorities, this period may be extended for a period not exceeding 5 (five) years. Thereafter, their processing (including storage) will be necessary for another purpose, namely "compliance with legal obligations (including responding to requests from competent authorities), preservation of evidence and maintenance of archives, and the establishment, |

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| | exercise or defence of legal claims”, with the overall retention period for Personal Data being 10 (ten) years after the performance of the contract / the end of the business relationship. |
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7.7.4. Purpose of Processing: compliance with MiFID requirements

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| Explanation of the Personal Data Processing to be performed | VIAINVEST processes the Client's personal data in order to comply with MiFID requirements and ensure that the Client is provided with appropriate and suitable investment services, to monitor the provision of services and prepare regular reports to ensure the verifiability of compliance with legal obligations, to protect VIAINVEST's legal interests in the event of supervision or disputes, and to ensure the proper protection of the Client's interests. In the course of communication with the Client, VIAINVEST may send/request additional information or clarifications. |
| Legal basis | GDPR Article 6(1)(b) – taking steps prior to entering into a contract/performance of a contract GDPR Article 6(1)(c) – compliance with a legal obligation (MiFID, Financial Instruments Market Law, Investment Firms Law) GDPR Article 6(1)(f) – legitimate interests (to ensure the storage of evidence of compliance with a legal obligation) |
| Categories of Personal Data | Identification data Professional and educational data Financial data MiFID data Contract and transaction data Communication data |
| Retention period | VIAINVEST will continue to process Personal Data for the purposes of compliance with MiFID requirements until the contract has been performed / for as long as the business relationship continues. In accordance with the requirements of the Investment Firms Law, VIAINVEST retains supporting documents relating to transactions in financial instruments and other services provided and transactions carried out for 5 (five) years. Thereafter, their Processing (including storage) will be necessary for another purpose, namely “compliance with legal obligations (including responding to requests from competent authorities), preservation of evidence and maintenance of archives, and the establishment, exercise or defence of legal claims”, with the overall retention period for Personal Data being 10 (ten) years after the performance of the contract/ the end of the business relationship. |

7.7.5. Purpose of Processing: to comply with regulatory requirements in the field of accounting and taxation, to ensure record keeping

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| Explanation of the Personal Data Processing to be performed | VIAINVEST processes the Client’s Personal Data in order to ensure compliance with regulatory requirements in the fields of accounting and taxation, maintain proper financial records, |
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| | provide information automatically and manually to competent public authorities, provide information to auditors/ reviewers, and ensure demonstrability of compliance with legal obligations, thereby protecting VIAINVEST's legitimate interests in the event of supervision or disputes. In the course of communication with the Client, VIAINVEST may send and/ or request additional information or clarifications. |
| Legal basis | GDPR Article 6(1)(c) – compliance with a legal obligation (CRS, Investment Firms Law, Law on Taxes and Duties, Accounting Law) GDPR Article 6(1)(f) – legitimate interests (to ensure the storage of evidence of compliance with a legal obligation) |
| Categories of Personal Data | Identification data Client tax residence data Financial data Contract and transaction data Communication data |
| Retention period | In accordance with the requirements of the Accounting Law, VIAINVEST retains accounting records for 10 (ten) years. In accordance with the requirements of the Investment Firms Law, VIAINVEST retains supporting documents relating to transactions in financial instruments and other services provided and transactions carried out for 5 (five) years. In accordance with the requirements of the Law On Taxes and Duties, VIAINVEST retains supporting documents proving the correctness of tax calculations for not less than 5 (five) years. In accordance with the requirements of the Accounting Law, VIAINVEST retains supporting documents proving the correctness of accounting calculations for not less than 5 (five) years. Thereafter, the Processing of the data (including storage) will be necessary for another purpose, namely “compliance with legal obligations (including responding to requests from competent authorities), preservation of evidence and maintenance of archives, and the establishment, exercise or defence of legal claims”, with the overall retention period for Personal Data being 10 (ten) years after the performance of the contract / the end of the business relationship. |

7.7.6. Purpose of Processing: to provide client support, communication and contact in various situations, to handle complaints

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| Explanation of the Personal Data Processing to be performed | Before the conclusion of the contract, during its performance, and also after its termination, both VIAINVEST and the Client may need to communicate with each other using various communication channels (for example, email, online chat, postal mail, etc.). Therefore, VIAINVEST may process the Client's Personal Data for the following purposes: ensuring mutual communication and correspondence; resolving issues, providing information or |
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| | processing requests; handling complaints, claims or requests; and recording the content of communications, ensuring traceability, and retaining evidence of such communications. |
| Legal basis | GDPR Article 6(1)(b) – taking steps prior to entering into a contract/ performance of a contract GDPR Article 6(1)(f) – legitimate interests (to ensure the quality of service provision, effective cooperation and to protect Our rights, to ensure the storage of evidence of the fulfilment of legal obligations) GDPR Article 6(1)(c) – compliance with a legal obligation (in relation to official complaints) |
| Categories of Personal Data | Identification data Contact details Communication data Contract and transaction data Any other personal data obtained/ disclosed during communication. |
| Retention period | Personal Data processed for the purposes of ensuring communication and correspondence is retained until the contract has been performed / for as long as the business relationship continues. Thereafter, its processing (including storage) will be necessary for another purpose, namely “compliance with legal obligations (including responding to requests from competent authorities), preservation of evidence and maintenance of archives, and the establishment, exercise or defence of legal claims”, with the overall retention period for Personal Data being 10 (ten) years after the performance of the contract / the end of the business relationship. |

7.7.7. Purpose of Processing: service security, related risk management, IT infrastructure maintenance, incident prevention, audits and quality control

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| Explanation of the Personal Data Processing to be performed | VIAINVEST processes Personal Data in order to ensure the security, stable operation and continuity of the service and ICT systems, as well as to timely detect, prevent and investigate security incidents and mitigate the risks associated with them. For this purpose, VIAINVEST carries out technical event logging and monitoring, and analyses system operation and security events in order to identify suspicious activities, errors or vulnerabilities, as well as to ensure demonstrability of compliance with legal obligations and to protect VIAINVEST’s legitimate interests in the event of supervision or disputes. VIAINVEST may carry out internal and/ or external audits to verify compliance with security requirements. In the course of communication with the Client, VIAINVEST may send and/ or request additional information or clarifications. |
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| Legal basis | GDPR Article 6(1)(c) – compliance with a legal obligation (arising from DORA, GDPR, MiFID and AML/CFTP regulations) GDPR Article 6(1)(f) – legitimate interests (to ensure the security of service provision) |
| Categories of Personal Data | Technical information Identification data, communication data, contact information, contract and transaction data (to the minimum extent necessary, if required for incident investigation) |
| Retention period | Audit logs (including records relating to access to the Client’s account on the platform) and evidence of critical actions/ changes (audit trail) are retained until the contract has been performed / for as long as the business relationship continues. Thereafter, their processing (including storage) will be necessary for another purpose, namely “compliance with legal obligations (including responding to requests from competent authorities), preservation of evidence and maintenance of archives, and the establishment, exercise or defence of legal claims”, with the overall retention period for Personal Data being 10 (ten) years after the performance of the contract / the end of the business relationship. Materials relating to incident investigations and communication with the Client related to the incident are retained for 10 (ten) years after the closure of the incident. |

7.7.8. Purpose of Processing: for internal statistics, business analytics and service improvement

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| Explanation of the Personal Data Processing to be performed | VIAINVEST processes Personal Data in order to obtain internal statistics and carry out business analytics, as well as to improve the quality, functionality and user experience of its services. This may include analysing trends in the use of the platform and services, improving the quality of the customer support process, developing new solutions and optimising existing processes. Personal Data is generally used in an aggregated or analytical manner to assess service usage patterns, demand for features and the overall effectiveness of the service. VIAINVEST may also process communication data in order to analyse the most frequent questions, reasons for complaints and the efficiency of the support process, as well as to identify the improvements needed in service provision. VIAINVEST observes the principle of data minimisation and, where possible, uses pseudonymised or anonymised data. In the course of communication with the Client, VIAINVEST may send and/ or request additional information or clarifications. |
| Legal basis | GDPR Article 6(1)(f) – legitimate interests (to improve the quality of service provision) In certain cases – Article 6(1)(a) of GDPR – consent (e.g. for participation in a survey, if not necessary for the performance of a contract) |

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| Categories of Personal Data | Technical information (in various formats) Contract and transaction data (usually aggregated/analytical) Communication data (for communication, quality analysis) |
| Retention period | As long as necessary to achieve the specific processing purpose. |

7.7.9. Purpose of Processing: sending marketing communications and managing consent

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| Explanation of the Personal Data Processing to be performed | <p>VIAINVEST processes the Client's personal data in order to send marketing communications and to manage the Client's consent given for marketing communications. Marketing communication is sent to the Client only where the Client has provided the relevant Consent, which may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of the processing of personal data carried out prior to such withdrawal.</p> <p>In order to personalise offers, VIAINVEST may carry out Profiling by analysing the Client's platform usage habits. Profiling is not used for automated decision-making producing legal effects.</p> <p>VIAINVEST retains evidence of marketing communication sent and records relating to consent management in order to ensure demonstrability of compliance and lawfulness, as well as to protect VIAINVEST's legitimate interests in the event of supervision or disputes. VIAINVEST may delegate the technical dispatch of marketing communication to a cooperation partner.</p> <p>In accordance with the Consent provided by the Client, VIAINVEST will send the Client:</p> <ol style="list-style-type: none"> 1. information about the financial services offered by VIAINVEST, including interest rates, changes thereto, and personalised offers; 2. information about promotions, campaigns and other activities intended for Clients; 3. information about VIAINVEST news, significant events and developments. |
| Legal basis | <p>GDPR Article 6(1)(a) – Consent</p> <p>GDPR Article 6(1)(c) – compliance with a legal obligation (arising from MiFID regulations requiring the registration of marketing communications; GDPR, Information Society Services Law)</p> <p>GDPR Article 6(1)(f) – legitimate interests (to prove that marketing communication has taken place and that it is lawful)</p> |
| Categories of Personal Data | <p>Identification data (in accordance with the principle of data minimisation)</p> <p>Contact details</p> <p>Marketing information (Consent/ withdrawals, sending facts)</p> <p>Communication data</p> |
| Retention period | Information regarding the giving/ withdrawal of Consent, as well as communication sent during the period in which the Consent remains valid, is retained for the entire duration of such Consent. |

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| | Thereafter, its processing (including storage) will be necessary for another purpose, namely “compliance with legal obligations (including responding to requests from competent authorities), preservation of evidence and maintenance of archives, and the establishment, exercise or defence of legal claims”, with the overall retention period for Personal Data being 10 (ten) years from the sending of the relevant marketing communication. |
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7.7.10. Purpose of Processing: management of competitions, campaigns, promotions and loyalty activities

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| Explanation of the Personal Data Processing to be performed | VIAINVEST processes the Client’s Personal Data in order to ensure the administration of contests, campaigns, promotions and loyalty activities, including: registering participants and enabling participation, communicating with participants, verifying compliance of participation with the applicable rules, determining winners, recording results, awarding and delivering prizes, assigning codes (for example, discount/ bonus codes), and, where necessary, handling disputes and proving the proper conduct of the campaign. |
| Legal basis | GDPR Article 6(1)(a) - Consent (if participation is voluntary and separate Consent is required) GDPR Article 6(1)(b) – performance of a contract (if the basis is the fulfilment of the campaign rules) GDPR Article 6(1)(f) – legitimate interests (to prove that the campaign took place and was lawful; to prevent fraud in campaigns) |
| Categories of Personal Data | Identification data (in accordance with the principle of data minimisation) Contact details Marketing information (Consent/ withdrawals, sending facts) Information about participation in promotions/ campaigns (including participation records, determination of winners, awarding of prizes, assignment of codes) Contract and transaction data (if related to bonus payments) Communication data |
| Retention period | Information regarding participation in promotions/ campaigns is retained until the end of the activity/ until the fulfilment of the relevant obligations. Thereafter, the processing (including storage) will be necessary for another purpose, namely “compliance with legal obligations (including responding to requests from competent authorities), preservation of evidence and maintenance of archives, and the establishment, exercise or defence of legal claims”, with the overall retention period for Personal Data being 10 (ten) years after the performance of the contract / the end of the business relationship. |

7.7.11. Purpose of processing: to fulfil legal obligations (including responding to requests from competent authorities), to preserve evidence and maintain archives, to bring, enforce or defend legal claims

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| Explanation of the Personal Data Processing to be performed | VIAINVEST processes the Client's personal data in order to prepare and provide responses to competent authorities in accordance with requests and applicable laws and regulations, ensure the preservation of evidence (correspondence, documents, audit records, system logs) for future inspections and compliance purposes, demonstrate compliance with legal obligations applicable to VIAINVEST, demonstrate performance of the contract, maintain archives and comply with document retention periods, prove and/ or protect VIAINVEST's rights and interests in the event of a dispute (including for the prevention of fraud and misuse of the service), as well as to establish, exercise or defend legal claims. |
| Legal basis | GDPR Article 6(1)(c) - compliance with a legal obligation (compliance with legal requirements in the areas of AML/CFTP, sanctions, MiFID, accounting, taxation, etc., obligation to respond to authorities, obligation to comply with retention periods, obligation to ensure record keeping) Article 6(1)(f) of the GDPR - legitimate interests (preservation of evidence, maintenance of archives, bringing/enforcing/defending claims). |
| Categories of Personal Data | Identification data Identity document data Contact details Client tax residence data Professional and educational data Financial data MiFID data Contract and transaction data AML/CFTP data Communication data |
| Retention period | See the Privacy Policy section "Retention period". |

7.7.12. Purpose of Processing: to ensure the operation and functionality of the Website, to administer and improve it, and to manage cookie preferences

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| Explanation of the Personal Data Processing to be performed | When you visit and browse Our Website, We process certain Personal Data in order to ensure the functionality of the Website (to make it easier to use), improve service quality, visitor experience and security, as well as to obtain statistical information about the use of the Website. For security reasons (including to prevent misuse of VIAINVEST's services), We record your IP address for the purposes of investigating potential incidents and protecting the Website. |
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| Legal basis | <p>GDPR Article 6(1)(b) – taking steps prior to entering into a contract/ performance of a contract: to enable VIAINVEST to provide the functionality of the service requested by the Website user</p> <p>GDPR Article 6(1)(f) – legitimate interests (to ensure the security, stability, continuity and functionality of the Website; to analyse information/ data in order to administer and improve the functioning of the Website; to enable VIAINVEST to prove that the functionality of the service requested by the Website user has been ensured)</p> <p>GDPR Article 6(1)(a) – Consent (for the use of non-essential cookies under the Cookie Policy)</p> |
| Categories of Personal Data | <p>Technical information</p> <p>Cookie policy preferences</p> |
| Retention period | <p>Audit logs relating to access to the Client’s account on the platform are retained until the contract has been performed / for as long as the business relationship continues. Thereafter, their processing (including storage) will be necessary for another purpose, namely “compliance with legal obligations (including responding to requests from competent authorities), preservation of evidence and maintenance of archives, and the establishment, exercise or defence of legal claims”, with the overall retention period for Personal Data being 10 (ten) years after the performance of the contract / the end of the business relationship.</p> <p>Other technical information: the retention period for audit logs is 1 (one) year after the record has been made (in accordance with Section 37, Paragraph Two of the Personal Data Processing Law), unless the record contains information necessary for achieving another purpose. In such case, the audit log is retained until the identified issue has been clarified or the relevant investigation has been completed.</p> <p>Cookie policy preferences – in accordance with the Cookie Policy.</p> |

8. Sources of Your Personal Data

- 8.1. VIAINVEST obtains the Client's Personal Data:
- 8.1.1. mainly when it is provided by the Client themselves:
- 8.1.1.1. when visiting the VIAINVEST Website and applying for services;
- 8.1.1.2. by visiting the VIAINVEST Website and using the services;
- 8.1.1.3. by contacting VIAINVEST by post, e-mail or online chat;
- 8.1.2. automatically when You visit the VIAINVEST Website:
- 8.1.2.1. by collecting information from the Client's device (computer, tablet or mobile phone), including *user agent* information, which typically includes browser type and version, device type and settings, operating system and other technical information necessary for the operation and security of the Website;

- 8.1.2.2. in accordance with VIAINVEST's Cookie Policy;
- 8.1.3. in certain cases - when provided to us by third parties:
 - 8.1.3.1. AS "VIA SMS Group" and other companies in the group;
 - 8.1.3.2. VIAINVEST cooperation partners;
 - 8.1.3.3. credit institutions, providing information about incoming payments;
 - 8.1.3.4. law enforcement agencies, courts, competent state and municipal authorities, when performing their statutory procedural or supervisory duties.

9. Cookie policy

- 9.1. Cookies are small text files that Your web browser stores on Your computer or other device when you visit the Website to ensure its functioning and improve Your user experience.
- 9.2. The information stored in cookies is used to ensure the functionality of the Website, improve Your user experience and ensure the quality of our service. The data obtained in aggregate form is used to evaluate, analyse and improve the performance of the Website.
- 9.3. Cookies are used to analyse Website visits, improve its performance and security, and provide users with personalised content and advertising, if the relevant Consent has been given.
- 9.4. VIAINVEST may use third-party cookies, which are placed and managed by partners, to provide analytics, advertising or other functions related to the operation of the Website.
- 9.5. You can manage Your cookie settings at any time using the *Cookiebot* tool available in the lower left corner of the Website, giving or withdrawing your Consent to certain categories of cookies.
- 9.6. VIAINVEST uses 4 (four) categories of cookies: 1) *necessary*; 2) *preferences*; 3) *statistics*; 4) *marketing*. Necessary cookies ensure the functioning and security of the Website, therefore their use does not require the user's consent and they are set by default.

10. Recipients of Personal Data

- 10.1. VIAINVEST may, in certain cases, transfer the Client's Personal Data to other Recipients. VIAINVEST will not transfer more Personal Data than is necessary for the specific Processing purpose.
- 10.2. Recipients may process Personal Data as Joint Controllers, Processors and/ or as independent Controllers. When a Recipient processes the Client's Personal Data on its own behalf as an independent Controller, the Recipient is responsible for ensuring that such Processing complies with applicable data protection laws, for implementing appropriate technical and organisational measures for the security of Personal Data, and for providing information to Data Subjects about such Processing of Personal Data. In such a case, VIAINVEST recommends that the Client contact the Recipient to obtain detailed information about the processing of Personal Data carried out by the Recipient.
- 10.3. Personal data may be exchanged (including transferred) with the following Recipients:
 - 10.3.1. AS "VIA SMS Group" and other companies within the group in order to ensure the provision of high-quality services;
 - 10.3.2. other service providers, based on a concluded agreement, to ensure the provision of high-quality services, for example, Client identification and verification against sanctions lists

service providers, IT service providers, IT security service providers, cloud service providers, communication and postal service providers, Website maintenance service providers, hosting service providers, analytical and statistical service providers, marketing and advertising service providers, archiving service providers, etc.;

10.3.3. supervisory authorities (for example, the Bank of Latvia, the State Revenue Service, the Data State Inspectorate, and other authorities), on the basis of written requests submitted to VIAINVEST or obligations imposed on VIAINVEST by applicable laws and regulations;

10.3.4. credit institutions and financial institutions for the processing of incoming and outgoing payments;

10.3.5. auditors, legal and financial advisors;

10.3.6. Third parties that maintain various registers (e.g., the Register of Natural Persons, the Register of Invalid Documents, the Commercial Register, or other registers containing Personal Data);

10.3.7. in cases specified by law - to competent (including law enforcement) state institutions, such as the Financial Intelligence Unit, pre-trial investigation authorities, the court, the prosecutor's office, the State Revenue Service, state security institutions, other competent (including law enforcement) state institutions specified in legislation;

10.3.8. in cases specified by law - to sworn bailiffs, notaries, insolvency administrators and other persons specified by law.

11. Automated individual decision-making and Profiling

11.1. When establishing or continuing a business relationship with a Client, or in order to provide services to a Client and improve the user experience of digital services, with the aim of reducing human error and speeding up the process, VIAINVEST uses automated systems (e.g. for the control of investment services, payment control, AML/CFTP, sanctions and other risk management, sending communication messages) and makes automated individual decisions in at least the following processes:

11.1.1. performing remote identification of a Data Subject (including Special Categories of Personal Data), ensuring verification of the actions performed and results, with human involvement;

11.1.2. when carrying out customer due diligence, transaction monitoring, identification of suspicious transactions, management of sanctions risk, operational risk, fraud risk and other risks in accordance with applicable laws and regulations, ensuring review of the actions taken, with human involvement;

11.1.3. assessing the suitability and appropriateness of investment services and/ or financial instruments in accordance with MiFID requirements;

11.1.4. providing the Client with portfolio management services using the Auto Invest tool in accordance with MiFID and VIAINVEST Portfolio Management Policy requirements;

11.1.5. sending individual automated messages to the Client depending on the Client's status and situation.

11.2. If the Auto Invest service is available to the Client and the Client has activated it, the Client authorises VIAINVEST to purchase financial instruments on behalf of the Client in accordance with the Client's pre-defined investment criteria for financial instruments and the portfolio

management service strategy selected by the Client. VIAINVEST uses automated data processing to execute Auto Invest orders. If the Client does not wish to use automated data processing in the investment process, the Client may at any time log in to their profile on the Website, stop the Auto Invest tool and continue to make investments manually.

11.3. As part of automated individual decision-making, Profiling may be carried out - any form of automated processing of Personal Data that manifests itself as the use of Personal Data for the purpose of evaluating certain personal aspects related to a natural person, in particular to analyse or predict aspects relating to the performance of that natural person at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

11.4. Unless direct marketing is restricted by the Client's wishes, VIAINVEST may process Personal Data in order to provide general and personalised offers of VIAINVEST services.

11.5. VIAINVEST may compile statistical data about the Client.

1.1. If the Client has received a decision based on automated decision-making, including Profiling, the Client has the following rights:

1.1.1. to request and receive an explanation from VIAINVEST employees about the basis for the decision (unless prohibited by law, e.g. in the field of AML/CFTP), the logic involved, the significance of such Processing and the expected consequences for the Data Subject;

1.1.2. to contact a VIAINVEST employee to verify the correctness of the decision;

1.1.3. express the opinion.

1.2. Based on reasons related to his/ her particular situation, the Client has the right to object to VIAINVEST at any time to the processing of his/ her Personal Data, including Profiling, based on Article 6(1)(e) of the GDPR (Processing is necessary for the performance of a task carried out in the public interest) or point (f) (Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party). The Controller evaluates the objection received. The Controller does not longer process the Personal Data in that context, unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Client, or for the establishment, exercise or defence of legal claims.

11.6. The Client has the right not to be subject to a decision based **solely** on automated processing, including Profiling, which produces legal effects concerning the Client or similarly significantly affects the Client. The above does not apply if the decision: a) is necessary for the conclusion or performance of a contract between the Client and the Controller; b) is authorised by law; or c) is based on the Client's explicit Consent.

11.7. If, in certain processing operations, the Controller applies **only** automated individual decision-making, and if such a decision is necessary for the conclusion or performance of a contract between the Client and the Controller or is based on the Client's Consent, the Controller provides appropriate measures to safeguard the Client's rights and legitimate interests, including at least the right for the Client to:

11.7.1. obtain human intervention on the part of the Controller,

11.7.2. express the opinion,

11.7.3. contest the decision.

11.8. The Controller does not apply the decisions referred to in the previous paragraph to Special Categories of Personal Data, unless the Client has given his/ her Consent or the Processing

is necessary for reasons of substantial public interest, based on legal acts, and appropriate measures are in place to protect the Client's rights and freedoms and legitimate interests.

11.9. As a Data Subject, you may exercise all of the above rights by contacting Us in accordance with the procedure set out in Section 2 of the Policy.

12. Geographical scope of Processing

12.1. As a general principle, VIAINVEST processes Personal Data within the European Union/ European Economic Area (EU/ EEA).

12.2. Given the global nature of financial services and technological solutions, in order to ensure the Processing of Client Personal Data for the purposes specified in the Policy, the Client's Personal Data may be transferred for Processing to recipients of Personal Data located outside the EU/ EEA (e.g. in the United States, the United Kingdom, other jurisdictions) in order to provide certain services. Such international data transfers only take place if an adequate level of personal data protection is ensured in accordance with the requirements of GDPR.

12.3. In order to guarantee an adequate level of protection, VIAINVEST only uses mechanisms permitted under GDPR for international data transfers:

12.3.1. adequacy decisions of the European Commission (EC) – in cases where the EC has officially determined, by way of a formal decision, that the relevant third country ensures an adequate level of protection of Personal Data. In such a case, the transfer of data to the respective country is permitted on the basis of that decision;

12.3.2. Standard Contractual Clauses (SCC) – EC-approved standardised contractual clauses that are included in contracts with data recipients outside the EU/ EEA to ensure an adequate level of Personal Data protection;

12.3.3. transfer in exceptional cases – in certain situations, if none of the above mechanisms are applicable, personal data may be transferred outside the EU/ EEA if one of the exceptions specified in the GDPR applies. For example, such an exception to transfer may be based on the Data Subject's unambiguous Consent, the need to transfer data for the performance (or conclusion) of a contract with the Data Subject, or another relevant condition set out in the GDPR (e.g. the existence of an important public interest).

13. Retention period

13.1. The period for which VIAINVEST retains the Client's Personal Data depends on the purposes for which VIAINVEST processes such data. Personal Data will not be processed for longer than necessary.

13.2. When determining the retention period for Personal Data, at least the following considerations are taken into account:

13.2.1. the purpose of processing and the legal basis;

13.2.2. the need to ensure the provision of services and/ or the fulfilment of contractual obligations;

13.2.3. retention periods prescribed by applicable laws and regulations (for example, in the areas of accounting, taxation, AML/CFTP, sanctions, investment services, etc.);

13.2.4. limitation periods and the need to protect VIAINVEST's legitimate interests, as well as to prepare, bring, exercise or defend legal claims;

13.2.5. the need to ensure the availability of evidence in the event of requests from supervisory authorities, auditors and other similar entities.

13.3. If the retention period for Personal Data for a specific processing purpose has expired, in certain cases it may be necessary to continue storing Personal Data for another purpose, if there is a legal basis for doing so.

13.4. Following the termination of the agreement / business relationship with the Client, VIAINVEST retains the Client's Personal Data for a further 5 (five) years in accordance with the requirements of the AML/CFTP Law. Thereafter, the Personal Data are retained for an additional 5 (five) years in order to ensure: (1) the protection of VIAINVEST's legitimate interests, including the ability to prepare, bring, exercise or defend legal claims, as well as to preserve evidence in the event of claims/ disputes, in accordance with the applicable limitation period under the Civil Law of the Republic of Latvia; and (2) compliance with legal requirements in the areas of accounting, taxation and sanctions. Overall, the retention period for the Client's Personal Data is 10 (ten) years.

13.5. Upon expiry of the above period, the Personal Data are deleted or anonymised, unless the applicable laws and regulations provide for an obligation to retain them for a longer period or retention is necessary for another lawful purpose of processing based on an appropriate legal basis.

14. Rights of the Client as a Data Subject

14.1. In accordance with GDPR, You as a Data Subject have the following rights:

14.1.1. the right to access Your Personal Data – You have the right to obtain confirmation from Us as to whether we are processing your Personal Data, as well as to access this Personal Data and receive information about what data is being processed, how long and why it is being processed, and to request a copy of the Personal Data being processed by the Controller. In cases where it is not permitted by law, VIAINVEST will not be able to provide information about the processing of your Personal Data, for example, in accordance with the requirements of the AML/CFTP law, the Data Subject will not be provided with information about the Processing of data carried out within the framework of this law in the field of AML/CFTP, except for publicly available data. In addition, by logging into your profile on the Website, you can independently access, update and manage some of Your Personal Data;

14.1.2. the right to request the correction of Your Personal Data – if You have information that the data We hold about you is inaccurate or incomplete, You have the right to request that it be corrected or supplemented. In addition, by logging into Your profile on the Website, You can independently access, update and manage some of Your Personal Data;

14.1.3. the right to request the deletion of your Personal Data ("right to be forgotten") – You may request that We delete your Personal Data held by us, for example, if the data is no longer necessary for the purposes for which it was collected or if You have withdrawn your Consent. However, please note that this right is not absolute – this means that We may not always be able to comply with a request for erasure if there is a legitimate legal reason to continue processing Your Personal Data. For example, we may retain certain Personal Data to comply with our legal

obligations (e.g. in the field of AML/CFTP, for accounting or tax purposes) or to establish, exercise or defend legal claims in court proceedings. Your request will always be carefully evaluated, and You will receive a clear answer as to whether and to what extent Your Personal Data can be deleted;

14.1.4. the right to restrict the processing of Your Personal Data – You have the right to request that We temporarily stop Processing Your Personal Data, for example, while its accuracy is being verified or Your objection to the Processing of Your Personal Data is being examined. However, please note that due to the restriction of the Processing of Personal Data and during the period of such restriction, a situation may arise where We may not be able to provide you with the service (in whole or in part);

14.1.5. the right to object to the Processing of Your Personal Data (including Profiling) where the Processing is based on Our legitimate interests - You have the right to object to the Processing of Your Personal Data where the Processing is based on Our legitimate interests. We will stop Processing Your Personal Data unless We can demonstrate compelling legitimate grounds for such Processing;

14.1.6. the right to object to the Processing of Your Personal Data for direct marketing purposes (including Profiling) if the Processing is based on Our legitimate interests – You as a Data Subject have the right to object at any time to the Processing of Your Personal Data for direct marketing purposes, and We will cease Processing Your Personal Data for this purpose;

14.1.7. the right to withdraw Your Consent to the Processing of Your Personal Data – if We process Your Personal Data based on Your Consent, You have the right to withdraw your Consent at any time, and the Processing of Your Personal Data based on Your Consent will be discontinued. However, please note that withdrawing Your Consent will not affect the lawfulness of the Processing of Your Personal Data prior to the withdrawal of Your Consent. In addition, on the VIAINVEST Website, You can independently manage Your Consent regarding the use of cookies, and by logging into Your profile on the Website, You can independently manage Your Consent regarding the receipt of marketing information from VIAINVEST.

14.1.8. the right to data portability – You have the right to request Your Personal Data in a structured, commonly used and machine-readable format so that You can transfer this data to another service provider. This right applies only to Personal Data that You, as the Data Subject, have provided to Us based on Your Consent or a contract, and if the Processing is carried out automatically. VIAINVEST will assess the possibility of satisfying Your request on a case-by-case basis;

14.1.9. the right to lodge a complaint with a supervisory authority – if You believe that the Processing of Your Personal Data violates the requirements of GDPR, You have the right to lodge a complaint with the Data State Inspectorate of the Republic of Latvia (www.dvi.gov.lv; Elijas iela 17, Riga, Latvia, LV-1050, e-mail: pasts@dvi.gov.lv; or by calling +37167223131), however, We recommend that You contact Us first so that We can resolve the issue together.

14.2. As a Data Subject, You can exercise all of the above rights by contacting Us in accordance with the procedure set out in Section 2 of the Policy. We will respond to Your request without undue delay, but no later than one month from the date of receipt of Your request. If necessary, taking into account the scope of Your request, We have the right to extend the deadline for fulfilling the request by a further two months. In this case, We will inform You of the reasons for

the extension and delay within one month of receiving Your request. In certain cases, You can independently exercise Your rights as a Data Subject on the VIAINVEST Website.

15. Security and protection of Personal Data Processing, use of technological solutions

15.1. As the Controller, We must ensure that Your Personal Data is protected in accordance with applicable laws and regulations, including GDPR and DORA.

15.2. VIAINVEST, as well as certain of its cooperation partners, uses cloud services in the Processing of Client Personal Data (e.g. for IT infrastructure, data processing, including storage and the provision other technological solutions). As part of the development of technological solutions, VIAINVEST is gradually expanding the range of cloud services it uses to ensure more efficient and secure service provision.

15.3. VIAINVEST is gradually starting to use artificial intelligence tools for the processing of Client Personal Data, including artificial intelligence tools that can be used to automate various manual tasks. Such technologies are introduced responsibly and only in accordance with applicable legislation, including the requirements of the Artificial Intelligence Act. The legal basis for the training and use of artificial intelligence tools is Article 6(1)(f) of GDPR – legitimate interests to ensure and improve process efficiency, service quality and security, as well as to develop and test artificial intelligence solutions. If necessary, upon receiving a relevant request, VIAINVEST will provide Clients with additional information about the nature of the use of artificial intelligence tools, the legal basis and the impact on the Client's Personal Data.

15.4. We implement and maintain appropriate technical and organisational security measures to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised access, disclosure or other unlawful processing.

15.5. Security measures include, but are not limited to:

15.5.1. access control systems and user authentication;

15.5.2. data encryption;

15.5.3. firewalls and anti-virus protection;

15.5.4. monitoring of IT system operations;

15.5.5. backup copying;

15.5.6. third-party service provider risk management.

15.6. Access to Personal Data is granted only to those employees and cooperation partners (outsourced service providers) who require such access for the performance of their respective duties and who have undertaken to comply with confidentiality and security requirements. In the event of a Personal Data breach that is likely to result in a significant risk to the rights or freedoms of Data Subjects, the Controller shall take all necessary measures, including, where required, notifying the Data State Inspectorate and the relevant Data Subjects.

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