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PRIVACY POLICY OF SIA "VIAINVEST"

This Privacy Policy establishes basic principles on personal data processing of SIA "VIAINVEST", registration No 40203015744.

The respective Policy is applicable if a Customer uses, has used or has intention to use financial services provided by VIAINVEST, including the relationship with the Customer established before this Policy enters into force.

1. FOR THE PURPOSE OF THIS POLICY THE FOLLOWING DEFINITIONS ARE USED:

1. **Customer** -any private individual who uses, has used or has intention to use financial services provided by VIAINVEST.
2. **Personal data** - means any information relating to an identified or identifiable Customer.
3. **Processing** - any operations carried out with Personal data (incl. collection, recording, storing, alteration, grant of access to, making enquiries, transfer, etc).
4. **VIAINVEST** - means a legal entity owned by JSC "VIA SMS group" with registered office in Latvia, Riga 13 janvara street 3, and who is acting as a Personal data controller.
5. **VIA SMS group** a joint stock company incorporated in Latvia and all its subsidiaries.

3. GENERAL PROVISIONS

1. This Policy describes general principles how VIAINVEST processes Personal data. Specific details on the processing of Personal data might be also included in agreements entered or to be entered between the Customer and VIAINVEST and is reflected in website www.viainvest.com;
2. VIAINVEST ensures, within the framework of applicable law, the confidentiality of Personal data and has implemented appropriate technical and organisational measures to safeguard Personal data from unauthorized access, unlawful Processing or disclosure, accidental loss, modification or destruction.
3. VIAINVEST may use authorised processors of Personal data Processing. In such cases VIAINVEST takes needed steps to ensure that such data processors Process Personal data under the instructions of VIAINVEST and in compliance with applicable law and requires adequate security measures.

3. CATEGORIES OF PERSONAL DATA

1. Personal data may be collected from the Consumer, from the Consumer's use of the financial services and from external sources such as public and private registers or other third parties.
2. Personal data categories which VIAINVEST primarily, but not only, collects and processes are the following:
 1. **Identification data** such as name and personal identification code;
 2. **Contact data** such as telephone number, email address or applying for particular products the residence address;
 3. **Professional data** such as educational or professional career;
 4. **Financial data** such as income and liabilities;
 5. **Data that enables VIAINVEST to perform its due diligence measures regarding money laundering and terrorist financing prevention** and to ensure the compliance with international sanctions, including the purpose of the business relationship and whether the Customer is a politically exposed person;
 6. **Data about the Customer's tax residency** such as data about the country of residence, tax identification number, citizenship;
 7. **Communication data** - collected when the Customer communicates with VIAINVEST via telephone, visual and/or audio recordings, e-mail, messages and other communication channels such as social media, data related to the Customer's visit at www.viainvest.com web site or communicating through other VIAINVEST channels (such as chat).

4. PURPOSES AND BASIS OF PROCESSING PERSONAL DATA

VIAINVEST processes Personal data primarily to:

- 1. Manage customer relations** in general and provide and administrate access to financial services VIAINVEST offers.
- 2. To protect the interests of the Customer and /or VIAINVEST** and examine the quality of services provided by VIAINVEST and for the purpose of providing proof of a commercial transaction or of other business communication (recorded conversations) based on performance of an agreement or in order to take steps at the request of the Customer prior entering into an agreement or compliance with a legal obligation or consent from the Client or VIAINVEST legitimate interests to prevent, limit and investigate any misuse or unlawful use or disturbance of VIAINVEST financial services or quality assurance of services.
- 3. Provide additional services**, perform customer surveys, market analyses and statistics. Offer to the Customer the services of VIAINVEST or carefully selected cooperation partners, including personalized offers, based on consent from the Customer.
- 4. Perform Customer' surveys, market analyses and statistics;** organize lotteries and campaigns for a Customer based on VIAINVEST legitimate interest to improve VIAINVEST services, improve the Customer's user experience of services and to develop new products and services;
- 5. To comply with legal obligations and verification of identity.** To comply with applicable law, prevent, discover, investigate and report potential money laundering, terrorist financing, if the Customer is subject to financial sanctions or is a politically exposed person.
- 6. To comply with legal obligations and verification of identity.** To comply with applicable law, prevent, discover, investigate and report potential money laundering, terrorist financing, if the Customer is subject to financial sanctions or is a politically exposed person.
- 7. Prevent misuse of financial services and ensure adequate provisions of services.** To authorize and control access to and functioning of digital channels, prevent unauthorized access and misuse of those and to ensure the safety of information based on: performance of an agreement or take steps at the request of the Customer prior to entering into an agreement. To improve technical systems, IT infrastructure, customizing the display of the service to the device and to develop VIAINVEST services such as by testing and improving technical systems and IT infrastructure.
- 8. To process incoming and outgoing payments.**

5. PROFILING, PERSONALIZED OFFERING Profiling refers to the automatic Processing of Personal data used to assess certain personal characteristics of a Customer. Profiling is used for direct marketing purposes.

- VIAINVEST may process Personal data to improve the user experience of the digital services. Unless direct marketing has been restricted by the Customer, VIAINVEST may Process Personal data for the purpose of providing general and personalized offers of VIAINVEST services.
- VIAINVEST always ensures that Customers can make their choices and use a convenient tools to manage their privacy settings.
- VIAINVEST may also collect statistical data regarding the Customer, such as typical behaviour and lifestyle patterns based on demographic household data. Statistical data for creating segments profiles can be collected from external sources and may be combined with VIAINVEST internal data.

6. RECIPIENTS OF PERSONAL DATA

Personal data is shared with other recipients, such as :

- Authorities (such as law enforcement authorities, tax authorities, supervision authorities);
- VIAINVEST affiliates in VIA SMS group;
- Credit and financial institutions in order to process incoming and outgoing payments;
- Auditors, legal and financial consultants, or any other processor authorized by VIAINVEST.
- Third parties maintaining registers (such as to credit bureaus, population registers, commercial registers, or other registers holding Personal data)
- Debt collectors upon assignment of claims;
- courts, out-of-court dispute resolution body and insolvency administrators.
- Other persons related to provision of services of VIAINVEST such as providers of postal services or analytical services.

7. GEOGRAPHICAL AREA OF PROCESSING

- As a general rule the Personal data are processed within the European Union/European Economic Area (EU/EEA).

7. RETENTION PERIOD

1. Personal data will be processed no longer than necessary.
2. The retention period may be based on agreements with the Customer, the legitimate interest of VIAINVEST or applicable law (such as laws related to rendering consumer loans, bookkeeping, anti-money laundering, civil law, etc).

7. CLIENT'S RIGHTS AS A DATA SUBJECT

1. A Client (data subject) has rights regarding his/her data Processing that is classified as Personal data under applicable law. Such rights are in general the following:

1. Require his/her Personal data to be corrected if it is inadequate, incomplete or incorrect.
2. Object to Processing of his/her Personal data, if the use of Personal Data is based on a legitimate interests, including profiling for direct marketing purposes (such as receiving marketing offers or participating in surveys).
3. Require the erasure of his/her Personal data, for example, that is being processed based on the consent, if he/she has withdrawn the consent. Such right does not apply if Personal data requested to be erased is being processed also based on other legal grounds such as agreement or obligations based on applicable law.
4. Restrict the Processing of his/her Personal data under applicable law, e.g. during the time when VIAINVEST assesses whether the Customer is entitled to have his/her data erased.
5. Receive information if his/her Personal data is being processed by VIAINVEST and if so then to access it.
6. Receive his/her Personal data that is provided by him/herself and were feasible transmit such data to another service provider (data portability).
7. Withdraw his/her consent to process his/her Personal data.
8. Not to be subject to fully automated decision - making, including profiling, if such decision - making has legal effects or similarly significantly affects the Customer. This right does not apply if the decision - making is necessary in order to enter into or to perform an agreement with the Customer , if the decision - making is permitted under applicable law or if the Customer has provided his/her explicit consent.
9. Lodge complaints pertaining to the use of Personal data to the Data Protection Authority at www.dvi.gov.lv if he/she considers that Processing of his/her Personal data infringes his/her rights and interests under applicable law.

7. CONTACT DETAILS

1. Customers may contact VIAINVEST with any enquiries, withdrawal of consents, requests to exercise data subject rights and complaints regarding the use of Personal data.
2. Contact details of VIAINVEST are available on VIAINVEST website www.viainvest.com.
3. VIAINVEST is entitled to unilaterally amend the Policy at any time, in compliance with the applicable law, by notifying the Customer of any amendments via website of VIAINVEST not later than one month prior to the amendments entering into force.