

Table of Contents

I Terms Used	1
II General Provisions	2
III Legal Basis for Personal Data Processing	3
IV Personal Data Categories	4
V Rights of the Data Subject	4
VI Personal Data Recipients	6
VII Transfers of Personal Data to Third Countries	6
VIII Profiling	6
IX Storage Limitation	7
X Final Provisions	7

I Terms Used

1. **Processor** – Personal Data processor; a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller.
2. **Processing** – Personal Data processing; any operation or set of operations which is performed on Personal Data or on 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.
3. **Bank** – Signet Bank AS.
4. **Data Subject** – an identified or directly/ indirectly identifiable natural person.
5. **EEA** – the European Economic Area, which includes EU Member States as well as Iceland, Norway and Liechtenstein.
6. **Group** – within the meaning of the Policy: the Bank and the Group’s companies Signet Asset Management IPS and Citra Development SIA.
7. **Controller** – within the meaning of the Policy: the Bank/ the Group’s company, which, alone or together with other the Group’s companies, determines the purposes and means of Personal Data processing.
8. **Personal Data** – any information relating to the Data Subject.
9. **Policy** – the internal regulatory document of the Bank ‘Privacy Policy’.
10. **Consent** – Consent of the Data Subject; any freely given, specific, informed and unambiguous indication of the Data Subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data relating to him or her.
11. **Recipient** – Personal Data recipient; a natural or legal person, public authority, agency or other body to which the Personal Data are disclosed, whether a Third Party or not.
12. **Third Party** – a natural or legal person, public authority, agency or body other than the



Data Subject, Controller, Processor and persons who, under the direct authority of the Controller or Processor, are authorised to process Personal Data.

13. **Third Country** – a state not party to the EEA.

II General Provisions

14. The purpose of the Policy is to establish the basic principles applicable at the Group when processing the Personal Data of natural persons.
15. With the help of the Policy and in compliance with the regulatory enactments, the Bank provides the Data Subject with information about the processing of Personal Data carried out by it.
16. The Policy has been developed based on Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals 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) and Personal Data Processing Law.
17. The Bank implements the Group's wide personal data protection policy.
18. The Group's companies, taking into account their business models, may develop and approve their own privacy policies and other internal documents regulating in detail certain aspects related to personal data protection, observing the following principles:
 - 18.1. these internal documents are to comply with the principles described in the Policy, General Data Protection Regulation and other external regulation;
 - 18.2. policy level documents shall be consistent with the Bank in accordance with the order existing at the Group;
 - 18.3. in case, if the Group's company chooses not to develop a separate privacy policy, this Policy is binding upon it to the fullest extent.
19. The Group processes Personal Data in accordance with the principles as follows:
 - 19.1. **lawfulness, fairness and transparency.** Personal Data are processed strictly in compliance with the regulatory enactments respecting the interests and rights of the Data Subject fully and accurately informing the Data Subject about data processing and consequences thereof;
 - 19.2. **purpose limitation.** Personal Data are processed solely for the purpose for which they were obtained and are not processed in a way that does not meet this purpose. Processing of Personal Data for other purposes is prohibited. The Group does not collect or store Personal Data for uncertain future purposes;
 - 19.3. **data minimisation.** The Group achieves the above lawful purpose with the minimum amount of required data without processing more Personal Data than is necessary to achieve the intended purpose;
 - 19.4. **accuracy.** In order to achieve the purpose of the Personal Data processing concerned, the Group must have accurate and correct data at its disposal. For effective implementation of this principle, it is important that the Group cooperates with the Data Subject in order to ensure that the data at the disposal of the Group are up-to-date;
 - 19.5. **storage limitation.** Personal Data are stored for no longer than needed for the



purpose of reaching the legitimate purpose defined above. However, it should be borne in mind that, upon expiration of one purpose, other legitimate purposes may arise, which justifies the need to keep Personal Data for a longer period;

19.6. **integrity and confidentiality.** Personal Data are processed in such a way as to ensure their safety, protection against unauthorised or unlawful processing and accidental loss, destruction or damage by means of appropriate technical or organisational measures;

19.7. **accountability.** The Bank as the Controller is aware of its responsibility for the proper implementation of the Regulation by introducing and ensuring appropriate technical and organisational measures.

20. The Policy is accepted by the Management Board of the Bank and approved by the Supervisory Board of the Bank.

21. The Bank on a regular basis but not less than once a year assesses the compliance of the Policy and practice with the current and prospective development of the Group and, if required, ensure that it is updated.

22. The Policy takes effect from the moment of approval and the internal regulatory document of the Bank 'Privacy Policy' approved on 22.12.2021.. loses force upon approval hereof.

23. The Policy is binding upon all employees of the Group.

III Legal Basis for Personal Data Processing

24. The Group processes Personal Data if and only if at least one of the below legal bases applies:

No.	Legal basis	Applicability example
1.	Consent of the Data Subject	Requesting data from data registers, marketing activities.
2.	Performance or entry into a contract	Performance of a contract to which the Data Subject is a party, or taking of measures prior to the entry into a contract.
3.	Compliance with a legal obligation to which the Controller is subject	Compliance with the Bank's/ the Group's companies obligations arising from regulatory enactments, for instance, carrying out due diligence on the client and its transactions, creditworthiness assessment, etc.
4.	Legitimate interests pursued by the Controller or by a Third Party	For the Group's risk management, protection of rights, debt recovery, protection of infrastructure and other assets against unlawful conduct, preservation of evidence of the transactions made, etc.
5.	Public interest	In the field of public health: protection against serious cross – border threats to health, ensuring the restriction of the spread of infectious diseases, including informing the public about possible risks in order to protect the health of individuals.
6.	Protection of vital interests	Prevention of risks to life or health of the Data subject and other individuals, protection of life or health of the Data subject and of other individuals, for humanitarian purposes, including the monitoring of epidemics and their spread or in emergency humanitarian situations, in particular in natural and man-made disasters.



IV Personal Data Categories

25. Within the framework of services provision, the Group processes various categories of Personal Data for the purposes as follows:

<i>Personal Data Category</i>	<i>Exmaple of Personal Data falling within the Category</i>	<i>Purpose of Processing</i>
Identification data	First name, surname, identity number/ date of birth, information specified in the identification document, remote services identification tools.	To identify the Data Subject
Contact information	Telephone number, email address, actual/ declared residential address.	To contact the Data Subject
Data Subject due diligence data	The data about the Data Subject, its representatives and beneficial owners obtained as a result of its identification and due diligence.	To prevent ML/TPF and violation of sanctions/ attempts to circumvent sanctions
Data Subject's financial data relating to services	Signed contracts, account number, payment card details, transactions performed, income, obligations, data related to the provision of investment services, telephone conversation record.	To perform a contract or take pre-contractual measures for the proper provision and administration of the service; to assess the Data Subject's creditworthiness and suitability of services
Family data	Family status, spouse, dependants.	To assess the Data Subject's creditworthiness and suitability of services
Data related to the protection of the Bank's and clients' interests, including to prevent dishonest use of services	Video surveillance image, IP address, Audit Trails, other data related to the use of digital channels.	To prevent unlawful acts.
Data obtained and/ or created in the performance of the duties set out in the external legal enactments	Data resulting from the processing of requests by the state and other institutions listed in Chapter V of the Law on Credit Institutions	To comply with the obligations set out in external legal enactments

V Rights of the Data Subject

26. In relation to data processing, the Data Subject has the rights as follows:

- 26.1. **right to obtain information.** The Data Subject has the right to receive from the Controller information about the basic principles of Personal Data processing;
- 26.2. **right of access by the Data Subject.** The Data Subject has the right to receive information from the Controller as to whether the Data Subject's Personal Data is processed; if yes, the Data Subject has the right to access the relevant data and receive information about the purposes of processing, Personal Data categories, Recipients, storage limitation;



- 26.3. **right to rectification.** The Data Subject has the right to request that the Controller supplement/ rectify the inaccurate Data Subject's Personal Data without undue delay;
 - 26.4. **right to erasure** or the right 'to be forgotten' under the regulatory enactments, for instance, in cases when the Data Subject has withdrawn his or her consent, and when the Personal Data are no longer needed for the purposes for which they were collected;
 - 26.5. **right to restriction of processing** under the regulatory enactments, for instance, for a period within which the Controller performs an inspection in accordance with the data updating request received from the Data Subject;
 - 26.6. **right to Personal Data portability.** The Data Subject has the right to ask the Controller to transmit the Personal Data provided by him or her and the processing of which was done by automated means to the other controller should this be technically possible;
 - 26.7. **right to object** to processing based on the Controller's legitimate interests, including profiling for marketing purposes;
 - 26.8. **right to withdraw Consent** at any time.
27. If the Data Subject has questions regarding data processing, he or she wishes to submit a request for the exercise of his or her rights or a complaint, the Data Subject may contact with the Group's appointed data protection officer in the manner as follows:
- 27.1. by sending a free form notice via the 'Internet Bank' (<https://i.signetbank.com/>) with a note regarding data protection;
 - 27.2. in person on the Bank's/ the Group's company's premises (3 Antonijas Street, Riga, LV-1010, Latvia), having presented an ID document to enable the Bank/ the Group's company to verify the Data Subject's identity;
 - 27.3. by using a secure electronic signature and sending notice to the Group's email address: datuaizsardziba@signetbank.com.
28. The Bank/ the Group's company evaluates the request received from the Data Subject and prepares a response immediately but not later than within a month. If required, the Bank/ the Group's company may extend this period for another two months taking into account the complexity and number of requests explaining the reasons to the Data Subject.
29. If the Data Subject's requests are manifestly unreasonable or excessive, in particular because of their regular recurrence, the Bank/ the Group's company may either:
- 29.1. request a reasonable fee taking into account the administrative costs associated with the provision of information or communication or the pursuit of the requested activity; or
 - 29.2. refuse to execute a request.
30. Any disputes and uncertainties regarding data processing are settled by the Bank/ the Group's company and the Data Subject through negotiation. If agreement cannot be reached, the Data Subject has the right to submit a complaint to the Data State Inspection of the Republic of Latvia (www.dvi.gov.lv; 17 Elijas Street, Riga, LV-1050) or



file an application with a court of the Republic of Latvia.

VI Personal Data Recipients

31. The Bank/ the Group's company may transfer Personal Data to the Recipients only if there is an appropriate legal basis and only in accordance with the procedure established by the regulatory enactments subject to the rules for the use of classified information. Examples of the Personal Data Recipient categories are given below:
- 31.1. the Bank's employees and the Group's companies;
 - 31.2. counterparties meeting the Bank's/ the Group's company's standards and providing services to the Bank/ the Group's company;
 - 31.3. other financial institutions, financial intermediaries, payment system participants involved in the execution of transactions;
 - 31.4. state and other institutions listed in Chapter V of the Law on Credit Institutions, for instance, the Bank of Latvia,, the Financial Intelligence Unit of Latvia, courts, investigative authorities, the Prosecutor's Office, operating activity subjects, the Corruption Prevention and Combating Bureau, bailiffs, the State Revenue Service, notary conducting an inheritance matter, the Orphan's court, as well as competent state institutions referred to in other regulatory enactments;
 - 31.5. database/ register holders, for instance, the Bank of Latvia's Credit Register, Account Register of the State Revenue Service, Register of Enterprises of the Republic of Latvia.

VII Transfers of Personal Data to Third Countries

32. The Data Subject's Personal Data are basically processed in the EEA as well as, for the security of information systems and based on the European Commission's decision on the adequacy of the level of protection, – in Switzerland.
33. The transfer and processing of the Data Subject's Personal Data outside the EEA may take place only subject to the appropriate legal basis and under the procedures laid down by the legal enactments:
- 33.1. based on the European Commission's decision on the adequacy of the level of protection;
 - 33.2. based on appropriate guarantees;
 - 33.3. based on derogations in special situations.
34. At the request of the Data Subject, the Bank/ the Group's company provides more detailed information on the transfer of Personal Data to Third Countries.

VIII Profiling

35. Profiling is any type of automated Personal Data processing which is the use of it for the purpose of evaluating the specific personal aspects relating to the Data Subject.
36. The Bank/ the Group's company may use profiling to assess the Data Subject's creditworthiness in the field of provision of investment services, for instance, to determine the client status, the suitability and appropriateness of financial instruments.



37. If the Data Subject finds that the decision taken as a result of profiling is not justified, he or she has the right to request a revision of such decision.

IX Storage Limitation

38. Personal Data are not stored longer than is necessary to achieve a purpose. As soon as the purpose is achieved, the data are permanently deleted, destroyed or anonymised in such a way as to prevent the Data Subject from being identified.
39. However, the Bank/ the Group's company notes that, upon expiration of one purpose, new legitimate purposes may arise which may justify the need to store Personal Data for a longer period.

X Final Provisions

40. Additional information clarifying the application of the Regulation, i.e. 'Guidelines for the Application of the General Data Protection Regulation' developed by the Finance Latvia Association, is available on the website of the Finance Latvia Association at www.financelatvia.eu.

* * * * *