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AS Expobank
Management Board meeting
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AS Expobank

**PRIVACY AND PERSONAL DATA PROTECTION
POLICY**

Riga, 2020

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1. Definitions

Bank – AS Expobank, unified registration number 40003043232, registered in the Commercial Register of the Enterprise Register of the Republic of Latvia; registered office at Krišjāņa Valdemāra Street 19, Riga, LV-1050, Latvia; home page address online www.expobank.eu, electronic mail address: info@expobank.eu. The Bank has been issued a license to carry out operations of a credit institution, and is supervised by the Financial and Capital Market Commission of the Republic of Latvia (Kungu Street 1, Riga, LV-1050, Latvia, www.fktk.lv).

processing – any activity or a set of activities involving Personal Data (or sets of Personal Data) processing performed with or without automated means, e.g., collection, registration, organization, structuring, storage, adjustment or transformation, recovery, viewing, usage, disclosure by sending, distributing or otherwise making the data available; coordination or combination, restriction, deletion or destruction.

Bank Operation – debit or credit operations initiated by the Customer, Bank, or Third Party (as set out in applicable legislature) within the framework of the Bank’s service agreements and related documents thereof.

home page of the Bank – Bank’s online home page www.expobank.eu.

Internet-Banking – authorized means of accessing of Bank’s remote account and Services management, including a communication and information channel between the Bank and the Customer, in accordance with which the Customer and the Bank exchange information, send notifications (notices), applications, submissions and other information regarding the banking Services, as well as by which the Customer and the Bank may consider any changes to the Services provided by the Bank in accordance with the applicable provisions of the Service Agreement.

Customer – a natural or legal person (entity) or a legal arrangement, or a certain grouping of such persons, or a combination of arrangements which have applied for the Bank’s Services or to whom the Bank provides banking Services, or whoever has expressed an intention to use the Bank’s Service, or a person who is linked to the Bank by means of the Operations of the Bank.

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).

Service Agreement – a written agreement entered into by the Bank and the Customer and containing the special Terms and Conditions for the provision of the Bank’s Services, and whose integral part is the Services Terms and Conditions, as well as General Terms and Conditions for the provision of the Bank’s Services.

Service Terms and Conditions – general terms and conditions of the respective Bank’s Service stipulating the procedure for the Service provision and being an integral part of the Service Agreement.

Service – any financial service as defined by the *Credit Institution Law of the Republic of Latvia*; payment service under the *Law on Payment Services and Electronic Money of the Republic of Latvia*; investment

service or ancillary investment service under *the Financial Instrument Market Law of the Republic of Latvia*; or another service provided by the Bank to the Customer.

Person – a natural person who is the Customer or Customer’s trustee, authorized person, representative, official, employee, beneficial owner, as well as any other identified or identifiable natural person related to the Customer; or other natural person whose Personal Data is processed by the Bank.

Personal Data – any direct or indirect information in relation to identified or identifiable Person whose data is processed by the Bank. Identifiable Person is a person that can be directly or indirectly identified, especially referring to an identifier, for instance, name, surname of the mentioned person, identification number (for example, personal identity number, date of birth), location data, online identifier, or one or several physical, physiological, genetic, mental, economic, cultural or social identity factors attributed to the mentioned natural person.

Policy – the Bank’s “*Privacy and Personal Data Protection Policy*”.

cookies – a small text file saved by the website in the Person’s computer or mobile device when the Person opens the site on the Bank’s home page, or the Customer opens the Internet-Banking. Cookies help the visited site to remember the user name and settings of the Person (for example, language, font size and other display settings) selected by the Person in order to view the site, so that the Person would not have to select the preferred user settings every time.

Tariffs – *Tariffs for Bank operations and other services.*

Third Party – person who is not the Customer or the Bank.

General Terms and Conditions for Service Provision – standard Terms and Conditions determining the fundamental conditions for mutual business relationships between the Bank and the Customer, and regulating the general procedure of provision of the Bank’s Services and the receipt thereof, the Terms and Conditions for executing the Bank Operations, as well as regulating the fundamental requirements of the Bank and general Customer service and transaction Terms and Conditions, communication between the Customer and the Bank, and being an integral part of the Service Agreement.

2. Applicability and Amendments to the Policy

2.1. The Policy is available on the Bank’s home page: www.expobank.eu.

2.2. The processing of Personal Data and the conditions thereof as specified in the Policy shall be applicable to personal data of natural persons who are Customers or representatives or trustees of the Customer, or other Persons. Personal Data processing and conditions thereof shall not be applicable to the data of a legal entity; however, it shall be applicable to a natural person associated with a given legal entity, for example, shareholder, an official, employee, representative, beneficial owner, as well as any other natural person associated with the Customer who is a legal entity.

2.3. The Bank shall have the right to amend the Policy unilaterally at any point in relation to changes in the operation of the Bank, General Terms and Conditions for Service Provision, terms and conditions and procedure for Service provision and execution of the Bank Operations, as well as due to changes made to the regulatory enactments and other regulatory requirements binding to the Bank. The Bank shall put out a notification regarding any amendments to the Policy on the Bank’s home page or by a notification sent via the Internet-Banking system, or in another way agreed upon by the Bank and the Customer, no later than one month prior to the effective date of the amendments.

3. General Principles and Terms and Conditions for Privacy and Personal Data Processing

3.1. Privacy

3.1.1. The Bank undertakes to protect the privacy of Personal Data when processing Personal Data. The General Data Protection Regulation, as well as the relevant national legislation shall apply to the processing of Personal Data performed by the Bank.

3.1.2. When the Person visits the Bank’s home page and the Internet-Bank, as well as other Bank’s websites, the Bank may register (gather) information regarding the Person by using cookies. The Bank may register the Person’s information regarding date and time when the Bank’s home page has been viewed, the browser used by the Person, and the Person’s IP address.

3.1.3. The Bank may use the registered information as referred to in clause 3.1.2 of the Policy for the purposes of ensuring and improving the Bank’s operation and provided services by summarizing

the statistics during visits to the Bank's home page and other Bank's websites, as well as for improving the operational quality of the Bank's home page and other Bank's websites.

- 3.1.4. When a Person communicates with the Bank by using the contact form on the Bank's home page for Suggestions/Improvements or by contacting the Bank electronically by sending the Bank an electronic mail to info@expobank.eu or to other electronic mail address, or any other form of communication, the Person discloses its Personal data (name, surname, e-mail address, telephone number or other data). The information provided by the Person shall be used by the Bank in order to process the Person's request. The Bank shall not process and shall not respond to anonymous suggestions, applications, and requests.

3.2. General Questions Regarding Personal Data Processing

- 3.2.1. The Policy describes fundamental principles for Personal Data processing, as well as fundamental terms and conditions for Personal Data Processing. More detailed terms and conditions for Personal Data protection and processing may be determined by the Bank's General Terms and Conditions for Service Provision, Service Terms and Conditions, Service Agreements, as well as documents associated with the Services and on the Bank's home page.
- 3.2.2. The Bank performs Personal Data processing for purposes of entering into the Service Agreement or when providing a specific Service, as well as the Bank may perform Personal Data processing before of establishment of a business relationship and entering into the Service Agreement, if the Person applied for said purpose to the Bank. The Bank performs the Personal Data processing during the validity term of the Service Agreement and after termination of business relationships, in order to fulfil requirements under respective laws and regulations and in order to ensure provision of Services and for protection of the Bank's legitimate interests (for example, for debt recovery). The Bank may request, obtain, collect the Personal Data from the Customer itself or their trustees, representatives, authorized persons, or other Persons, whom directly or indirectly, related to the Customer (for example, as a collateral provider), from public and private registers or other Third Parties.
- 3.2.3. The Customer may submit the Personal Data about him/herself and their activity, associated Persons by completing applications, Bank's forms, Customer questionnaire, its annexes, by submitting particular documents or information (incl., in free form) or otherwise, including verbal communication with the Bank; thus, making the Personal Data known to it.
- 3.2.4. The Bank shall ensure confidentiality of the Personal Data, protect it from unauthorized access, illegal processing – disclosure, accidental change (amendments, corrections), loss or destruction by implementing organizational and technical measures in accordance with the requirements of the law and regulatory enactments.

4. Categories of Personal Data

- 4.1. The Bank processes mostly, but not only the following **categories of Personal Data**:
- 4.1.1. Identification data: name, surname of the Person, personal identity number, national identification number, date of birth, place of birth, country of residence, registered and actual place of residence, data of identification document: number, issuing authority, issuing country and institution, date of issue, validity term, as well as the copy of the document with the digital or photo image of the person's face, person's fingerprint.
- 4.1.2. Contact information: correspondence address, if different from the registered (domicile) address; telephone number, fax number, e-mail address; communication language, other means of communication;
- 4.1.3. Data of Related Persons and family – Personal Data, information regarding family and dependent persons, heirs and other Persons related to the Customer;
- 4.1.4. Data of assessment Personal risk:
- 4.1.4.1. residence for tax purposes and taxpayer number;
- 4.1.4.2. information regarding economic, personal and professional activity;
- 4.1.4.3. information regarding transactions and partners;
- 4.1.4.4. professional curriculum vitae (CV) data, education, work experience, positions;

- 4.1.4.5. information regarding correspondence of the Person to the status of a politically exposed person in the meaning of the *Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing*;
- 4.1.5. Origin of funds and other financial information; property status and wealth of source:
 - 4.1.5.1. accounts in other credit institutions, payment institutions and other institutions;
 - 4.1.5.2. property status (ownership rights; possession rights, etc.);
 - 4.1.5.3. monthly salary and other regular or irregular income and the source thereof;
 - 4.1.5.4. credits and loans, and other payment liabilities;
- 4.1.6. Financial experience and data; information regarding the purpose of use of the Bank's services:
 - 4.1.6.1. experience in cooperation with other credit institutions and other financial institutions, used services, account turnover;
 - 4.1.6.2. experience in the use of investment services and ancillary investment services
 - 4.1.6.3. planned turnover of the account;
 - 4.1.6.4. purpose for cooperation with the Bank;
 - 4.1.6.5. planned Bank Services and purpose of use thereof;
- 4.1.7. Relationships with other Persons:
 - 4.1.7.1. information from the public and private registers and other Third Parties regarding association with other legal entities and arrangements thereof;
 - 4.1.7.2. information on participation in companies, information on representatives of companies, as well as true beneficiaries;
 - 4.1.7.3. transactions executed on behalf of the legal entities and legal arrangements;
 - 4.1.7.4. association with public procurements;
- 4.1.8. Reputation, status of a politically exposed person and other information regarding trustworthiness and compliance with the requirements of the legislation:
 - 4.1.8.1. information regarding reputation of the Customer or the Person related to the Customer;
 - 4.1.8.2. information regarding losses or damage caused to the Bank or the Third Parties;
 - 4.1.8.3. information regarding correspondence of the Person to the status of a politically exposed person, or family member of politically exposed person within the meaning of the *Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing*;
 - 4.1.8.4. other information and data requested, collected and obtained by the Bank in order to fulfil obligations to be executed by the Bank in relation to prevention of money laundering and terrorism and proliferation financing, compliance with international and national sanctions.
- 4.1.9. Personal Data and other information processed by the Bank when fulfilling the obligations set out in the laws and regulations, binding to the Bank, incl. laws and regulations, GDPR, EU legislation, regulations of the *Financial and Capital Market Commission of the Republic of Latvia, and the Bank of Latvia*; decisions of the state institutions and other documents binding to the Bank:
 - 4.1.9.1. requests for information from state institutions, incl. supervisory and law enforcement institutions, courts and other institutions or officials (in accordance with the procedures specified in the Credit Institutions Law and other legal acts);
 - 4.1.9.2. requests for information (investigation authorities, tax administration authorities, sworn notaries, sworn bailiffs, requests by the supervisory institutions);
 - 4.1.9.3. information regarding income, information regarding the spouse or partner with whom the Person has a common household;
 - 4.1.9.4. information regarding credit liabilities, debt liabilities; historical data thereof.
- 4.1.10. Data of a special category:
 - 4.1.10.1. biometric data (for example photograph of the face, digital and photo image of the face, finger print);
 - 4.1.10.2. information regarding participation in the trade union, political party;
 - 4.1.10.3. information regarding criminal record of the Person (for assessment of reputation).
- 4.1.11. Service and Bank Operations Data, data related to these:
 - 4.1.11.1. Services applied for and used;
 - 4.1.11.2. valid Service Agreements, terminated agreements and history thereof;

- 4.1.11.3. performance of Service Agreements and the quality thereof (performance, improper performance, non-performance); fees for Services and Bank Operations;
- 4.1.11.4. performed Bank Operations and transactions in the account;
- 4.1.11.5. interest shown regarding Services and Bank Operations and transactions;
- 4.1.11.6. submitted applications, submissions, suggestions, complaints, requests and claims.
- 4.1.12. Collected and processed data on visits and communication:
 - 4.1.12.1. Video surveillance (visual data), when visiting the Bank or Bank's premises at the address of Service provision;
 - 4.1.12.2. when communication with the Bank via any communication channel with Bank (in person at any place where the Bank contacts with the Customer; remotely by using remote communication means (Internet-Bank, telephone, e-mail, online form (for suggestions) on the Bank's home page;
 - 4.1.12.3. recording of conversations (audio records) for the purposes of proving the communication for protection of the Bank's legal interests;
 - 4.1.12.4. recording of conversations when providing investment and ancillary investment services (for the purposes of compliance with the requirements of regulatory enactments);
 - 4.1.12.5. when visiting the Bank's home page.
- 4.1.13. Satisfaction data:
 - Customer satisfaction, incl. Customer survey and other surveys; activity and habits in use of Services and Bank Operations.
- 4.2. The Bank may process also other Personal Data, if necessary for entering into and performance of the Service Agreement, as well as performance of the law, requirements of the regulatory enactments, for protection of the Bank activity, risk management and legal and economic interests.

5. Purpose of Personal Data Processing

- 5.1. The Bank processes and stores the Personal Data for the purpose they were collected, obtained and used for.
- 5.2. The Bank performs the processing of Personal Data in order to conduct its activities, provision of Services and execution of Bank Operations in compliance with requirements of regulatory enactments (incl. *Credit Institution Law of the Republic of Latvia, Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing of the Republic of Latvia, Law On International Sanctions and National Sanctions of the Republic of Latvia, Law on Payment Services and Electronic Money, Financial Instrument Market Law of the Republic of Latvia, Consumer Rights Protection Law of the Republic of Latvia, Civil Law of the Republic of Latvia, Commercial Law of the Republic of Latvia, Credit Register Law of the Republic of Latvia, Law on Accounting of the Republic of Latvia, Law on Taxes and Duties of the Republic of Latvia*, as well as regulations issued by the *Financial and Capital Market Commission of the Republic of Latvia, Bank of Latvia*, and other documents, instructions, orders and other documents binding to the Bank issued by institutions).
- 5.3. The Bank processes the Personal data:
 - 5.3.1. in order to enter into the Service Agreement (incl. in order to make a decision regarding initiation of business relationships and conditions for Service provision). Thus, the Bank processes Personal data for due diligence of the Customer, for identification of the beneficial owner of the Customer, for making of the decision regarding Service provision and its conditions;
 - 5.3.2. Remote identification of Customer;
 - 5.3.3. for performance of Service Agreements, provision and performance of Bank Operations, for supervision of the Service Agreement operation and performance, for quality assessment, for assessment and supervision of the Customer's solvency, creditworthiness;
 - 5.3.4. for assessment and management of money laundering and terrorism and proliferation financing risk, sanction risk, reputational risk, operational risk and other risks of the Bank as a credit institution, as well as for various reports stipulated by regulatory enactments and for preparation and sending to the competent state institutions of the lists, reports and other type of information in cases and according to procedure specified therein;
 - 5.3.5. for management of the Bank's information systems, for management of the Bank's security;

- 5.3.6. for protection of the Bank's legal interests (incl., recordings of conversations), for prevention of losses and possible illegitimacies, for protection maintenance of security of the Personal Data, investments, payments and information, for security of the Customers, Persons and the Third Parties (incl. video surveillance, recording and storage video surveillance), for debt recovery, in case of cession. In relation to the mentioned purposes the Bank may use Personal Data processors accepted by the Bank in order to process the Personal Data. In such cases the Bank implements necessary measures in order for the Personal Data processing to be done in accordance with GDPR and the requirements of the regulatory enactments and instructions of the Bank, incl. by requesting performance of security measures in accordance with the regulatory enactments;
- 5.3.7. for marketing purposes in accordance with Clause 6.4 of this Policy.
- 5.4. In relation to the purposes mentioned in this Policy, the Bank shall have the right to update and upgrade the Personal Data of the Customer and the Person related to the Customer. The Bank has right to create and maintain the lists of Customer and Personal Data, to perform Customer risk assessment and change it; to determine and withhold fees owed to the Bank in accordance with the Service Agreement and Bank's Tariffs.

6. Basis for Personal Data Processing

- 6.1. It's the Law. The Bank is entitled to and performs the Personal Data processing on the basis of laws (list of the main regulatory enactments has been provided in Clause 5.2, in order to fulfil the requirements set therein and the duties laid upon the Bank by laws and other regulatory enactments, as well as to exercise the rights at the Bank provided to it by the law. If Personal Data processing arises from the laws, the Bank does not need the Customer's consent for such Personal Data processing.
- 6.2. Agreement. The Customer agrees that the Bank processes and is allowed to process the Personal Data for the purposes of entering into the Service Agreement, for performance of obligations of the Bank and the Customer, for providing and performing of the Bank Operations within the framework of the Service Agreement; and in this case the Bank shall be entitled to transfer and receive the Personal data to the Third Parties mentioned in Clause 7 of this Policy.
- 6.3. Legitimate interest. The Bank performs Personal Data processing for protection of the legitimate interest of the Customer and/or Bank, for supervision and security of the Service provision, as well as to provide evidence to communication with the Bank (incl. conversation recordings, video surveillance, it's recording and record storage, transaction monitoring, IT system operation and security), for the Bank's legitimate interests, in order to prevent a possible use of Bank's Services for unfair and illegal purposes, as well as to perform inspections and investigations in this area.
- 6.4. With the consent of the Customer, the Bank processes Personal data for the purposes of marketing, including implementation of marketing campaigns, promotion of the Bank's Services, development and sending to the Customer of personalized offers. In this regard, the Bank shall be entitled to process, including transfer and receipt, the Personal Data to and from the Third Parties specified in Clause 7 of the Policy.

7. Processing of Personal Data (Transfer and Receipt) from the Third Parties;

- 7.1. The Bank may transfer Personal Data to the Third Party in order to comply with the requirements of the regulatory enactments binding to the Bank, as well as to perform the Service Agreement, in order to provide Services and to ensure overall Bank operations.
- 7.2. If the processing of Personal Data on behalf of the Bank is performed by Third Parties, the Bank shall engage only such Third Parties who provide sufficient guarantees for the implementation of technical and organizational measures which complies with the requirements of the GDPR and required legislation.
- 7.3. The Bank processes the Personal Data available in public and private registers, public sources and internet sites or that have been received from the Third Party and have been submitted to the Bank in compliance with the regulatory enactments binding to the Third Party.
- 7.4. For performance of the Bank's obligations set out in regulatory enactments the Bank may receive from and transfer the Personal Data in cases and according to procedure set out in the regulatory enactments:

- 7.4.1. to the *Bank of Latvia* and *Financial and Capital Market Commission of the Republic of Latvia*, as well as foreign supervisory institutions and authorities; to the organiser of regulated market related to transactions with financial instruments;
- 7.4.2. to local and foreign judiciary authorities, including within the framework of foreign requests for judicial assistance or to other competent state institutions in accordance with procedure set out in international conventions and agreements, as well as well as regulatory enactments;
- 7.4.3. Financial Intelligence Unit of Latvia;
- 7.4.4. to notaries, orphan's court;
- 7.4.5. to bailiffs, insolvency administrators;
- 7.4.6. to local and foreign tax administration institutions for the purposes of tax administration, including to the *State Revenue Service of the Republic of Latvia*, order to perform the reporting duty of the Bank about a Customer and its accounts, balance of funds in the account, registration country, etc;
- 7.4.7. to the Corruption Prevention and Combating Bureau;
- 7.4.8. to the investigation authorities, incl. within the framework of foreign requests for judicial assistance or to other competent state institutions in accordance with procedure set out in international conventions and agreements, as well as regulatory enactments; and other person, government in procedure set out in the *Credit Institution Law of the Republic of Latvia*;
- 7.4.9. to the outsourced service providers of the Bank who provide to the Bank the service for risk identification, assessment, management and monitoring, as well as in relation to calculation and observance of the requirements regulating the Bank's activities, and to other persons according to procedure and to the extent specified in the *Credit Institution Law of the Republic of Latvia*;
- 7.5. In order to fulfil obligations under the applicable laws and regulations and in order to enter and to perform the Service Agreements, the Bank may receive and process the Personal Data from
 - 7.5.1. the public state registers (for example, the commercial register, population register, credit register, The Register of Enterprises of the Republic of Latvia, Register of invalid documents, databases of State Revenue Services etc.), in case when the Bank needs to verify the correspondence of the data submitted by the Customer to the actual circumstances; as well as in case of improper performance or non-performance of obligations towards the Bank;
 - 7.5.2. foreign public and private registers, other sources for the purposes of identification and due diligence of the Customer, for Service provision, Service supervision;
 - 7.5.3. receive from and transfer the Personal Data to:
- 7.6. In order to perform the Service Agreements and ensuring of provision of the Services, as well as to ensure the Bank's activities, the Bank may process, including to receive and transfer the Personal Data to:
 - 7.6.1. provider of outsourcing services if such information is necessary for the receipt of an outsourcing service; Persons who provides service to a credit institution, which is related to identification, assessment, management and supervision of the inherent and potential risks for activities of the Bank; calculation of and compliance with the requirements governing activities of the Bank; and to other persons under procedure set out in *Credit Institution Law of the Republic of Latvia*.
 - 7.6.2. credit institutions and financial institutions, correspondent bank, for implementation of purpose of *Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing of the Republic of Latvia*;
 - 7.6.3. correspondent banks, international payment cards organization that ensures operation of payment cards and payments in relation thereto; SWIFT (Society for Worldwide Interbank Financial Telecommunication, www.swift.com), involved in execution of payment Services;
 - 7.6.4. for the post institution and post services providers in order to ensure sending and receipt of the correspondence with the Customer/its trustee or representative;
 - 7.6.5. Service providers, intermediaries, incl. for operation of the information systems and products (for instance, Internet-Banking) and provision of payment services;
 - 7.6.6. insurance service provider;
 - 7.6.7. legal and other consultants;
 - 7.6.8. for the purposes of archiving and ensuring the basic activities of the Bank;

- 7.6.9. person – creditor, if the claim rights of the Bank are assigned to such a person in relation to taking over of the Service Agreements.
- 7.6.10. Hereby the Customer has been informed and agrees that:
- 7.6.10.1. In order to perform the obligation imposed by the regulatory enactments, or in order to ensure the performance of the Service Agreement, the Bank may have a necessity to transfer the Personal data to the Third Party participating in provision of the Service performance and that may be registered and operate outside the EU or EEA and has not been included by the European Commission in the list of countries with adequate level of the Personal Data Protection;
- 7.6.10.2. Personal data may be transferred outside the EU / EEA only if it is necessary to fulfill the agreement concluded between the Customer and the Bank and provides the appropriate safeguards as required by GDPR, and there is a legal basis for such transfer.
- 7.6.10.3. The Third Party participating or related to provision of Service Performance may be obliged to reveal the information about the Customer's transaction and respectively the personal data of the Customer or related Person to the competent authority or institution of the country where this person is registered or operates in accordance with the respective regulatory enactments, for example, for tax administration and prevention of money laundering and terrorism and proliferation financing.
- 7.7. Information regarding the Third Parties – main partners with whose mediation the Bank ensures the Service provision and to whom the Personal Data may be transferred can be found at the Bank.

8. Storage and Deletion of the Personal Data

- 8.1. Personal data is stored in compliance with the requirements of the applicable laws and for no longer than necessary. The storage period of Personal Data is determined by the Bank and depends on the basis of the respective Service Agreement and / or the Personal Data Processing basis.
- 8.2. In accordance with the *Civil Law*, the Bank stores the Personal Data related to Service/Service Agreement for 10 years after termination of business relationships, and the Personal Data in the Customer Due Diligence file obtained and processed in compliance with the requirements of the *Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing* – for 5 years after termination of the business relationships as required by the mentioned law.
- 8.3. Personal Data (incl. records of telephone conversations, audio records, electronic communication, other type of communication data) in relation to provision of investment and ancillary investment services – for 5 years after termination of business relationships, in accordance with the requirements of regulatory enactments or storage for 7 years at the request of the *Financial and Capital Market Commission of the Republic of Latvia*.
- 8.4. Upon expiration of the Personal Data storage term or purpose, the Bank shall delete the Personal Data. The Bank shall have the right to determine a new purpose for certain Personal Data in certain cases, if arising due to regulatory enactments or if it may become necessary in order to protect the Bank's legal interests.

9. Profiling, Automated Decision-Making

- 9.1. The Bank may process the Personal Data for the purposes of profiling which is an automatic Personal Data processing process used in order to evaluate and analyze certain individual characteristics of the Customer. The Bank uses profiling to perform analysis, for risk management, preparation of various reports, for monitoring of the Customer and Customer's transactions, in order to prevent the use of the Bank for illegal purposes, incl. purposes of money laundering and financing of terrorism.

10. Rights of the Person as Data Subject

- 10.1. The Person shall have the right to gain insight on Personal Data processed by the Bank, for what purposes it is used and obtained for, what are the storage periods thereof and who are the receivers of the Person's Personal Data, considering the restrictions set out in the regulatory enactments. Customers may receive the Personal Data about themselves submitted by them and which the Bank processes on the basis of the Customer's consent or Service Agreement.

- 10.2. The Customer may receive information regarding automated decision-making and consequences of such a decision. The Customer is entitled to request manual processing of the assessment made on the basis of automated decision.
- 10.3. The Customer is entitled to recall at any time the Customer's consent provided for the Personal Data processing based on the Bank's legitimate interest, as well as for marketing purposes, incl. profiling for that purpose, as well as to reject advertisements and offers by informing the Bank in writing thereof, incl. by sending a respective notification in the Internet-Banking.
- 10.4. The Customer may request the Bank to correct the Personal Data if there have any changes or are not corresponding to reality due to other reasons, unless prohibited or restricted by the effective regulatory enactments and the right to process the Personal Data.
- 10.5. At any time the Customer may request the Bank to stop the Personal Data processing of the Customer or Person, except in cases if such data processing is the right of the Bank and if the obligation in relation to data processing arise due to regulatory enactments or are necessary for the Bank to perform or ensure performance of the Service Agreement and Bank's activities.
- 10.6. The Customer's rights may be restricted in relation to the Personal Data processing and receiving information regarding acquisition of data in cases specified in the regulatory enactments, as well as for provision of the confidentiality and legal interests of the Third Parties, and in relation to specifics of the Bank's activities and due to considerations regarding the Bank's practices. The Person shall not have the right to receive information regarding the Bank's technological solutions and questions, security and internal control systems, internal assessments and other questions regarding internal activity, as well as the business secret.
- 10.7. The Person may communicate in relation to the questions regarding the Personal Data Processing, recall of consent, requests, use of the data subject rights and complaints regarding Personal Data processing by sending a respective request to the Personal Data Protection Officer assigned by the Bank: data-protection-officer@expobank.eu, or to: Krišjāņa Valdemāra iela 19, Rīga, LV-1010, Latvia, with a reference "to the Data Protection Officer". The procedure of handling of claims are set out in the Bank's General Terms of Provision of Services.

VI Related Documents

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 the repealing Directive 95/46/EC (General Data Protection Regulation).

Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing.

Law on International Sanctions and National Sanctions of the Republic of Latvia.

Credit Institutions Law.

Financial Instrument Market Law.

Law on Payment Services and Electronic Money.

Consumer Rights Protection Law.

Civil Law.

The Commercial Law.

Law on credit register.

Law on Accounting.

Law on Taxes and Duties.

Terms and Conditions for the Use of the Bank's Home Page.

General Terms and Conditions of the Bank for Provision of Services.