

Privacy Protection Rules

Processing of personal data related to legal entities

Entry into force: 10th April 2026.

Taking care of the protection of your privacy and personal data, including your right to access information, we have developed these Privacy Protection Rules. These rules are designed according to:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.04.2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data;
- other requirements specified in the legal acts of the European Union and the Republic of Lithuania;
- financial sector recommendations and good practice guidelines.

These rules will provide you with the necessary information about the processing of your personal data and your rights if you are:

- a manager (general manager), member of the management board of a legal entity (company, association, etc.), a member of the council, a shareholder, a beneficial owner, a procurator, another authorized person (for example, an accountant) – in cases when the legal entity has applied for or uses the services of one or more Citadele Group companies;
- guarantor who provides surety (guarantees) for the obligations of the legal person – in cases where the legal person has applied for or uses services with credit risk;
- a person related to a legal entity – in cases where the legal entity provides services to one or more Citadele Group companies (for example, the person responsible for the performance of the service contract).

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1. Terms

You – you as a natural person whose personal data we process.

Citadele or we are the Citadele Group companies referred to in Paragraph 2 of these Rules.

Company – a legal entity (joint stock company, limited liability company, association, etc.) that has applied for or uses the services of one or more Citadele Group companies or provides services to one or more Citadele Group companies.

Processing – any actions we perform with your personal data.

Rules – these Privacy Protection Rules.

Personal data – the information referred to in Paragraph 3 of these Rules and any other information relating to you that is processed by Citadele within the framework of these Rules.

Profiling – the use of your personal data referred to in Clause 7 of these Terms in order to evaluate or predict your possible impact on your actions, in particular in relation to your economic situation or behavior. For instance, your behavior is evaluated in the digital environment when you access services provided by Citadele to prevent cases of fraud.

Regulation – 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).

Supervisory authority – the authority that monitors the application of the Regulation; In Lithuania – State Data Protection Inspectorate (<https://vdai.lrv.lt/lt/>).

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2. Who processes your personal data?

The controller of your personal data is the Citadele Group company that processes your personal data when establishing a business relationship with the company you represent or within the framework of an existing business relationship with the company you represent. Accordingly, the controller of your personal data is one or more of the following Citadele Group companies:

- AS Citadele banka Lietuvos filialas (Lithuanian branch), registration No. 112021619, address: Konstitucijos Ave. 18B, LT-09308 Vilnius, Lithuania, phone: +370 52219091, e-mail: info@citadele.lt, Data protection officer's email: dap@citadele.lt.
- IPAS CBL Asset Management, registration No. 40003577500, address: 2A Republikas laukums, Riga, Latvia, LV-1010, phone: +371 67010810, e-mail: asset@cbl.lv, Data protection officer's email: gdpr@citadele.lv.
- UAB Citadele Factoring, registration No. 126233315, address: Konstitucijos Ave. 18B, LT-09308 Vilnius, Lithuania, phone: +370 52219091, e-mail: lizingas@citadele.lt.
- SIA Citadele Leasing Lietuvos filialas (Lithuanian branch), registration No. 302629475, address: Konstitucijos Ave. 18B, LT-09308 Vilnius, Lithuania, phone: +370 65008888, email: lizingas@citadele.lt, Data Protection Officer's email: privacy@citadele.lt.

3. What personal data do we process?

We process the following your personal data:

#	Categories of personal data	Description
1.	Identification data	<ul style="list-style-type: none">• Name, surname• Personal identity number and date of birth• Information specified in the passport or identity card, or drivers licence
2.	Contact information	<ul style="list-style-type: none">• Address of residence• Phone number• E-mail address
3.	Information about the relationship with a legal entity	<ul style="list-style-type: none">• Your position or type of commitment• Basis or power of attorney for representation• Number of shares
4.	Information for credit risk assessment	<ul style="list-style-type: none">• Your credit obligations and other liabilities• If you are a guarantor (surety provider) – the amount of income, and the movable and immovable property owned• Insolvency register data• Information on enforcement cases or court rulings of sworn bailiffs
5.	Information related to customer research, management of compliance with sanctions and payment of taxes	<ul style="list-style-type: none">• Nationality (citizenship)• Place of birth• Place of tax residence• Taxpayer number• Reliable information publicly available in the media indicating the potential risks of cooperation• Information obtained from the lists of sanctions and politically exposed persons

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6.	Information obtained through communication with us	Information we obtain from your letters, e-mail correspondence, telephone conversations, as well as information about the devices and technologies you use in communication.
7.	Personal data of your special categories, including criminal record data	The law defines the types of special categories of personal data that we will process if the law allows us to do so. These are special categories of personal data: data revealing political beliefs, but only if this information indicates your status as a politically exposed person; criminal records.

4. Why and on what basis do we process personal data?

Before we start processing your personal data, we evaluate the lawfulness of the processing and the purposes for which we will process the personal data.

For what purposes do we process your personal data?	On what basis do we process your personal data?	Category of personal data #
To provide or receive services	<p>For the implementation of the legitimate interests of Citadele</p> <ul style="list-style-type: none"> to provide services to the Company you represent; inform and assist with pending applications that you have filled out on behalf of the Company to receive our services; to ensure monitoring of the performance of the contract and the repayment of the loan; check information about You as a representative of the Company in public databases - for example, the right of representation in the database of the VĮ Registrų centras Company Register; receive services from the Company You represent. <p>For the conclusion and performance of the contract (only for guarantors (surety providers))</p> <ul style="list-style-type: none"> conclude a guarantee (surety) agreement with You, contact you and inform you of any changes to the terms of the contract <p>For the fulfilment of the obligations specified by law</p> <ul style="list-style-type: none"> report on your obligations as a guarantor (surety provider) and the progress of their execution to the Loan risk data base of the Bank of Lithuania; comply with requests from state/investigative and other law enforcement agencies, sworn bailiffs, and other state authorities and officials specified in the legislation. 	1. 2. 3. 6.
Implementation of customer due diligence and sanctions compliance and tax payment management measures	<p>For the fulfilment of the obligations specified by law</p> <ul style="list-style-type: none"> within the framework of the prevention of money laundering and terrorism financing, identify you and perform due diligence actions in relation to you as a representative or guarantor of the Company; within the framework of the prevention of money laundering and terrorism financing, check information about you in various sources of information (for example the databases of Politically Exposed Persons); implementation of measures for compliance with national and international sanctions; reporting of the balance of the payment account and certain types of income to tax authorities (dividends, etc.) 	1. 2. 3. 5. 6. 7.

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<p>For the assessment and prevention of risks in business relations with customers</p>	<p>For the implementation of the legitimate interests of Citadele</p> <ul style="list-style-type: none"> implement credit risk management measures, including assessing your creditworthiness as a representative or guarantor of the Company, if the Company applies for a service related to credit risk or is already using it; check the information in the Loan risk data base of the Bank of Lithuania or other databases on Your obligations as a representative or guarantor of the Company, if the Company applies for a service related to credit risk or is already using it; check the details of You as a representative of the Company or guarantors in the registers, as well as reliable sources of information, to prevent fraudulent use of services. <p>For the fulfilment of the obligations specified by law</p> <ul style="list-style-type: none"> to ensure the risk management of the Citadele Group; to provide information in the Loan risk data base of the Bank of Lithuania or other databases about your obligations (only to the surety provider (guarantor)), if a loan has been issued to the company for whose liabilities you have provided surety (guaranteed) 	<p>1. 3. 4. 7.</p>
<p>Customer attraction for marketing activities*</p>	<p>Marketing activities based on your consent</p> <ul style="list-style-type: none"> send You personalised offers and other communications as surety provider(guarantor); send You personal credit limit offers as surety provider (guarantor). <p>For the implementation of the legitimate interests of Citadele</p> <ul style="list-style-type: none"> To provide the Company You represent with the most up-to-date information about the services provided by Citadele Group to legal entities; to identify potential clients and groups of clients, to evaluate and research them, i.e. to analyse and predict personal preferences, interests, behavior, reliability, attitudes. 	<p>1. 2.</p>
<p>For the performance of economic and administrative activities</p>	<p>For the fulfilment of the obligations specified by law</p> <ul style="list-style-type: none"> carry out audits and revisions For the realization of the legitimate interests of Citadele to organise the fulfilment of contractual obligations if the Company You represent provides services to Citadele to defend the rights of Citadele if the Company You represent has not fulfilled its obligations under the contract, we will ensure the recovery of debts and the performance of collection actions, legal proceedings; to ensure and improve the quality of service by means of audio recordings, to provide evidence of transactions and communication with You; test new products; compile statistics. 	<p>1. 2. 3. 4. 5. 6. 7.</p>

* Performance of customer attraction marketing activities in relation to You as a natural person is implemented at the level of Citadele Group, providing that Your rights are exercised in accordance with the Privacy Disclaimer for processing of personal data for receipt notifications and offers available on the Bank's website [Privacy protection rules | Citadele bank](#).

5. How do we obtain personal data?

When you provide personal data to us and use our services:

- when applying for the services for the Company You represent;
- becoming a surety provider (guarantor);
- by contacting us by mail, e-mail, phone, chat or in person, arriving at our customer service centres;
- by submitting various additional information at our request;
- providing services to us.

When personal data are provided to us by third parties:

- form Company – by applying for or using Citadele services, or providing them to Citadele;

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- from our cooperation partners – for example, marketing service providers;
- from Citadele Group companies – within the framework of information exchange;
- from maintainers of registers or databases specified in legal acts – for example, the Loan risk data base of the Bank of Lithuania;
- from state institutions and law enforcement agencies and their officials – for example, requests from the State Police, courts;
- from companies or persons in connection with contracts and transactions that these companies or persons wish to conclude or have concluded with Citadele.

6. To whom do we transfer personal data?

We transfer your personal data:

- **to Citadele Group companies** within the framework of information exchange;
- **to our business partners** who use the services we provide or provide services to us;
- **to other credit and financial institutions, insurance service providers and financial intermediaries, third parties** involved in the business relationship;
- **to supervisory authorities** (the State Data Protection Inspectorate, the State Tax Inspectorate, etc.) on the basis of written requests or obligations binding to Citadele specified in the legal acts;
- **in certain cases, to competent State institutions for the execution of their requests**, such as the Financial Intelligence Unit, court, investigative institutions, state prosecutor's office, subjects of operational activities, the State Tax Inspectorate, the Bank of Lithuania and other persons specified in legal acts, such as bailiffs, notaries, insolvency administrators;
- **to maintainers of databases established in accordance with the procedures laid down in the legal acts** (Loan risk data base of the Bank of Lithuania, credit information bureaus, VĮ Registrų centras Company Register, etc.);
- **to auditing companies, legal service providers, interpreters.**

Within the framework of the processing of Your personal data, access to Your personal data is limited to our authorized employees and our cooperation partners, who need it for the performance of their work duties and who process Your personal data only in accordance with the purposes and grounds of personal data processing specified in these Rules, in compliance with the technical and organizational requirements for the processing of personal data specified in the legal acts in the field of personal data protection, as well as in Citadele's internal legal acts.

7. Do we perform automated decision-making and profiling?

When entering cooperation or to provide services to a Company You represent, we may process your personal data in an automated way for the purpose of making a decision that would be binding on the Company You represent. Within the framework of making such decisions, profiling may be performed, which takes the form of processing your personal data to assess and predict the financial situation, reliability and other indicators of Your Company. At the same time, such automated processing of Your personal data or profiling is not aimed at making decisions that should cause legal consequences to You as a natural person (private individual) or that similarly significantly affect you as a natural person (private individual).

If the Company You represent has applied for the Citadele service related to credit risk or is already using such service, as well as if You are a guarantor, we make automated individual decisions, including profiling, in connection with the assessment of your creditworthiness, in order to automatically predict Your ability to influence the fulfilment of the Company's credit obligations or, for guarantor – to fulfil the obligations of the Company in full by analysing various types of information available to us. You have the right not to rely on the decision taken automatically by the Citadele system, but to express your opinion and receive an explanation from Citadele regarding the automated decision taken by contacting us, as well as to ask for a review of the automated decision taken, involving our employees in the revision of such automated decision.

Please note: If you are a guarantor, please read our Privacy Disclaimer to see how we create personal credit-limit offers—this includes profiling and automated individual decisions. You can find it on our website [Privacy protection rules | Citadele bank](#).

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8. Do we transfer personal data outside the European Union?

We ensure the storage of your personal data in the territory of the European Union and the European Economic Area.

Taking into account the global nature of financial services and technological solutions, in order to ensure the processing of your personal data for the purposes specified in these Rules, your personal data may be transferred for the provision of certain services to the recipients located outside the territory of the European Union and the European Economic Area, for example, if the provision of certain service is ensured by a cooperation partner (processor, separate controller, joint controller). Any such international transfer of personal data is carried out in compliance with the requirements of the Regulation and in such cases, we ensure the legal procedure for ensuring a level of protection equivalent to that established by the Regulation.

When transferring your personal data outside the European Union and the European Economic Area, we comply with one of the listed conditions:

- we carry out the transfer to a country that has been recognized by the European Commission as a country that ensures an adequate level of protection of personal data – i.e. if the European Commission has decided that the territory of a particular country, or a relevant international organization, ensures an adequate level of protection of your personal data;
- we conclude the standard clause agreement approved by the European Commission with the recipient of your personal data in a third country.

9. How long do we retain personal data?

Retention period of Your personal data depends on the purposes for which we process it and by what criteria we evaluate the storage periods of Your personal data.

When determining the terms of retention of Your personal data, we evaluate:

- the need to store Your personal data to ensure the performance of a valid service (or guarantee) contract;
- the need to store Your personal data for the fulfilment of the obligations specified in legal acts, for example, in accordance with the term specified in the Law on the Prevention of Money Laundering and Terrorism Financing of 5 to 8 years or within the retention periods specified in other legal acts;
- retention of Your personal data to protect our interests in the event of various claims after the termination of the business relationship with the company you represent, for example, in accordance with the statutory limitation period for the right to plead wrongful performance of the contract. The general retention period of company data set by Citadele is 10 years after the termination of the business relationship with the respective company – i.e. your personal data as a representative of the company will be stored with Citadele in connection with the company for this period.

If one or more of the specified criteria for deletion are met, we will ensure that Your personal data is deleted or anonymized.

10. What are the rights over processing of personal data?

Under privacy and data-protection laws, You can exercise the following rights by sending us a written request:

To withdraw your consent to the processing of Your personal data at any time:

- by e-mail;
- in person at customer service centres;
- on the internet bank, if You are its user;
- on the mobile app, if You are its user;
- on the leasing portal.

In certain cases, for example, in order to provide You with an offer about our products and services and receipt of other notifications, before sending them, we will ask You to fill in the relevant form in the Internet Banking, mobile application or in person with us and in the Bank's customer service centres, providing Consent to the processing of Your personal data for the purpose of receiving notifications and offers.

To access Your personal data and receive from us:

- confirmation or rejection of whether we are processing Your personal data;
- information about your Personal data that we process;

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- additional information about the processing of Your personal data to verify the accuracy of Your personal data and whether we process Your personal data in accordance with the requirements of the legislation.

We may, in certain cases, ask you to specify the scope of Your request to specify which information and to which processing operations the request relates, as well as to ask You to explain the reasons for the request.

In cases where it is not allowed by law, we will not be able to provide You with information about the processing of Your personal data, for example, within the framework of the requirements of the Law on the Prevention of Money Laundering and Terrorism Financing, we are prohibited from informing You about the provision of information to the Financial Intelligence Unit, as well as if the information has been provided to law enforcement agencies, the prosecutor's office, the court.

To correct Your personal data if You reasonably believe that Your personal data is inaccurate, as well as, taking into account the purposes of the processing of Your personal data, to supplement incomplete personal data.

In the event of changes in Your personal data, as well as if you have established that we are processing inaccurate or incomplete personal data, please inform us of the necessity for rectification. In such a case, Citadele is entitled to require you to present documents justifying the correction.

To delete Your personal data if:

- You believe that they are no longer necessary or usable for the original purposes of the processing of personal data;
- You reasonably believe that Your personal data is being processed unlawfully, for example, for the purpose of receiving notifications and offers, because You have withdrawn Your consent, on the basis of which we processed Your personal data, and we have no other basis to process Your personal data;
- deletion of Your personal data is determined by the data storage periods specified for us by law.

We will ensure deletion of Your personal data, including deletion by our cooperation partners, if the personal data is no longer necessary for the purposes for which they were processed. We will not be able to ensure the deletion of Your personal data if we have to ensure such processing in the cases specified by law, ensuring the storage periods of information or documents, which, for example, are specified in the Law on the Prevention of Money Laundering and Terrorism Financing or the accounting laws. Citadele is also entitled to refuse you the deletion of Your personal data if it requires disproportionate effort.

To restrict the processing of Your personal data if:

- You dispute the accuracy of Your personal data; the restriction will only apply to the period during which we can verify the accuracy of Your personal data;
- You believe that the processing of Your personal data is unlawful and You object to the deletion of personal data by requesting instead the restriction of the use of personal data; the restriction will apply only to the term reasonably specified by You;
- we no longer need Your Personal data, but they are necessary for You to exercise or defend legal rights and interests, bring claims, etc.; the restriction will apply only to the term reasonably specified by You;
- You object to the processing of Your personal data by us on the basis of our legitimate interests, but the limitation only applies to the time we carry out a reassessment of such legitimate interests.

By exercising these rights, however, we will have the right to process Your personal data, for example, to exercise or defend legitimate rights and interests, to bring claims, the rights of another natural person or legal entity. We will ensure the restriction of Your personal data held by us and our cooperation partners if this does not require us to make a disproportionate effort.

To transfer Your personal data, which we have obtained from You based on the consent and the established contractual obligations and which we process using automated means for personal use or handover to another service provider if there is no hindrance to such transmission of personal data. Please be advised that information subject to Your personal data portability may also contain third parties' personal data; therefore, we will assess the impact of such personal data transfer in relation to the rights and freedoms of third parties.

To object to the processing of Your personal data based on Citadele's legitimate interests. Citadele shall immediately terminate such processing, but only for the period until Citadele conducts an assessment and does not indicate compelling legitimate reasons for processing that are more important than your interests, rights and freedoms.

Citadele will have the right to process personal data if it is necessary to exercise or defend legitimate rights and

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interests, to bring claims (e.g. for the purpose of legal proceedings).

You will not be able to exercise this right if you have given Your consent to processing or if we need processing for the conclusion or performance of a contract, or for Citadele to fulfil its obligations under the legislation.

To refuse automated individual decision-making, including profiling

As for automated individual decision-making, including profiling, which may cause you legal consequences, including negative consequences, You have the right to refuse an automated individual decision made in this way, requesting the involvement of a Citadele employee, and reviewing the adoption of such an automated individual decision. You will not be able to exercise these rights in cases where processing is specified in the legal acts binding on Citadele.

How to submit a request?

You can submit Your request:

- in person, at our customer service centres, presenting an identity document (passport or identity card, or acceptable drivers licence), where You will be provided with all the necessary information related to the submission of Your request and answers to any unclear questions;
- in the form of electronic mail by signing the request with a secure electronic signature;
- on internet bank, if You are an internet bank user;
- on the mobile app if You are a mobile app user.

Upon receipt of Your request, we will evaluate it and, if necessary, ask You to specify the scope of the request, for which information and to which processing operations the request relates, as well as to ask You to explain the reasons for the request.

How long will it take to process Your request?

We will provide You with a response to request without undue delay no later than within one month from the moment of receipt of Your request, if necessary, taking into account the amount of requested information, we have the right to extend the deadline for the execution of the request by two months. In this case, we will inform You about the reasons for the extension and delay within a month from the moment of receipt of the request.

How will we provide information on Your request?

We will provide You with information on the provision of Your request in the form of encrypted e-mail, via internet bank or mobile app, if You are a user of them, or in exceptional cases – in person at our customer service centres, taking into account as much as possible the method of receiving the response to the request specified by You.

Will You have to pay for the processing of the request?

Your request is processed free of charge.

However, in the event that we conclude that Your requests are regularly repeated, manifestly unfounded or excessive, we will, taking into account the administrative costs associated with providing information or communication or performing the requested action (t.sk. employee resource costs), in accordance with an approved price, require You to pay a reasonable fee for the processing of Your request or refuse to comply with Your request after informing You in advance.

11. What to do if you believe your rights have been violated?

We ensure the processing of Your personal data in accordance with the Regulation and other requirements specified in the legal acts of the European Union and the Republic of Lithuania, however, if You believe that we have violated Your right to privacy by processing Your personal data, You have the right to submit a complaint for consideration to Citadele, the State Data Protection Inspectorate or to submit a claim to a court in accordance with the law in order to protect your interests specified by law.

12. How do we ensure the security of personal data?

We guarantee non-disclosure and security of Your personal data by taking appropriate technical and organisational measures, ensuring physical security of Your personal data and safe environment for processing, limiting the access rights to Your personal data, encrypting Your personal data, providing computer network protection, personal device protection, data backup and other protection measures, thus also protecting Your personal data against unauthorised access, use or disclosure.

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Within the framework of processing, access to Your personal data is restricted to our authorised employees and authorised employees of our service providers/partners who need it to perform their work duties and who process Your personal data in compliance with the technical and organisational requirements for processing specified in legal enactments.

The service providers (processors) to whom we have entrusted processing have, prior to the commencement of cooperation, been thoroughly assessed and informed about the set of measures that they must take to ensure processing, confidentiality and protection of Your personal data in accordance with the requirements of legal enactments.

To deliver our contract with you quickly and properly, we may ask other Citadele Group companies or our service providers/partners to carry out certain tasks. When they do, they may act as our data processors. We may share your personal data with them only to the extent necessary for those tasks.

Our service providers/partners and Citadele Group companies will ensure that processing and personal data protection requirements are fulfilled in accordance with legal enactments and that they will not use Your personal data for other purposes.

13. How to contact us?

If You have questions about processing of Your personal data, You can contact us – the Citadele Group company with which the Company You represent or You have a business relationship by writing to the e-mail address specified in Paragraph 2 of these Rules or a data protection officer appointed by us by writing to the e-mail address dap@citadele.it, or at our customer service centres, where You will be provided with all the necessary information related to processing of Your personal data, including answers to unclear questions.

14. How do we ensure up-to-date information on processing?

To always have up-to-date information about the processing of Your personal data, we will ensure regular review and updating of these Rules in accordance with the requirements of law. Therefore, we invite You to get acquainted with the current version of these Rules from time to time on our website - [Privacy protection rules | Citadele bank](#). We may as well inform You on substantial amendments to these Rules by sending information to the company You represent or to You by e-mail or via the Internet bank or mobile app, if You are a user of them. Amendments to these Rules shall come into force on the third business day after their publication on the Citadele website.