

In this policy, on the website www.citadele.lt, you will find out what information we collect about you, what we do with it and in which cases we disclose it to others. We always protect your information and update this privacy policy regularly. We will notify you of any amendments to the privacy policy on our website, and if the amendments are substantial, we will notify you via email, giving 3 business days to familiarize with amendments before entry into force. SIA Citadele Leasing Lithuania branch, registered in the Republic of Lithuania under registration number: 302629475, address: Konstitucijos Ave. 18B, LT-09307 Vilnius Lithuania, is responsible for processing of your data.

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1. How do we collect information about you?

We collect information about you in cases where:

- You use our website or provide personal data in the forms on it;
- You apply for or repay leasing, loan or insurance (hereinafter collectively referred to as leasing);
- You are a co-borrower of the leaseholder;
- You guarantee the leaseholder's obligations;
- You are unable to repay your obligations.

1.1. What is the personal data you provide:

- Name, surname, personal identity number;
- Postal and declared address of residence;
- Mobile phone number;
- Employer, position, duration of employment;
- E-mail address;
- Monthly net income;
- Monthly expenses;
- Additional sources of income;
- Information on other existing obligations;
- Bank account number;
- Bank account statement for the last 12 months;
- Amount of state social insurance contributions for the last 6 months;
- Marital status and number of dependents;
- copy of ID or passport;
- Relationship with politically exposed persons.

1.2. Information we receive about you:

1.2.1. Credit history

According to the Consumer Rights Protection Law, we are obliged to assess your creditworthiness at the time we receive a leasing application. We receive information from credit registers to assess your creditworthiness.

1.2.2. Information provided by Citadele Group companies

As a Citadele Group company, we may receive leasing applications from other Citadele Group companies and consider them in accordance with the terms of this Privacy Policy for the processing of your personal data. Also, by ensuring the progress of

consideration of the leasing application, we can receive information from other companies of the Citadele Group that is necessary for considering and approving the leasing application.

We may receive information from other Citadele Group companies to mitigate or prevent money laundering, terrorism and proliferation financing, violations of international and national sanctions, fraud and other risks of the Citadele Group. Also in this case, we will process your personal data in compliance with the requirements of regulatory enactments and the conditions provided for in this Privacy Policy for the processing of your personal data.

1.2.3. Actions on our website

In order to improve the quality of our services and speed-up the performance of our website as well as the loan granting process, we, together with our partners, collect anonymous cookies and store them for a maximum of 12 months. This information is anonymous.

2. Why do we process information about you?

We process information about potential and existing customers, as well as customer co-borrowers or guarantors for the following purposes:

Data Type	Processing Purpose	Legal Grounds	Can you receive leasing if you do not provide us with this information?	How long will we keep this information about you?	Can you ask us to delete or stop using this information at any time?	Can you ask us to correct this information?
Name, surname, personal identity number	Ensure operation of customer portal	Fulfilment of the Terms of Use and Servicing of Citadele Leasing Customer Portal	No	1 year if there is no active leasing contract; or 1 years after the leasing contract has expired	Yes	Yes
Name, surname, personal identity number, telephone number and e-mail of the potential customer and co-borrower or guarantor	Preparation of a leasing offer	Legitimate interest in preparing a leasing offer; Implementation of measures before the conclusion of the agreement	No	10 years after fulfilment of the agreement or 5 years have passed from the date of refusal to grant leasing	No	Yes
Name, surname, personal identity number of the potential customer and co-borrower or guarantor	Creditworthiness assessment	Consumer Lending Law; Civil Code; Legitimate interest in assessing the guarantor's ability to fulfill the debtor's obligations	No	10 years after fulfilment of the agreement	No	Yes
Information on the income and creditors, employer, position, duration of employment, marital status and number of dependents of the potential customer and co-borrower or guarantor	Creditworthiness assessment	Consumer Lending Law; Civil Code; Legitimate interest in assessing the guarantor's ability to fulfill the debtor's obligations	No	10 years after fulfilment of the agreement or 5 years have passed from the date of refusal to grant leasing	No	Yes
Bank account statement of the potential customer and co-borrower	Creditworthiness assessment	Consumer Lending Law; Civil Code	Yes	10 years after fulfilment of	No	Yes

				the agreement		
Amount of state social insurance contributions of the potential customer and co-borrower or guarantor	Creditworthiness assessment	Consumer Lending Law; Civil Code; Legitimate interest in assessing the guarantor's ability to discharge the debtor's obligations	Yes	10 years after fulfilment of the agreement	No	Yes
Information on the potential customer and co-borrower or guarantor in credit registers and debtor databases	Creditworthiness assessment	Consumer Lending Law; Civil Code; Legitimate interest in assessing the guarantor's ability to fulfill the debtor's obligations; Implementation of measures before the conclusion of the agreement	No	10 years after fulfilment of the agreement	No	No
Name, surname, personal identity number, copy of ID or passport of the potential customer and co-borrower or guarantor	Prevention of money laundering and terrorism financing	Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing, Art. 19	No	8 years with possibility to extend 2 years after the last contact or fulfilment of the agreement	No	Yes
Bank account statement of the potential customer and co-borrower	Prevention of money laundering and terrorism financing	Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing	No	8 years with possibility to extend 2 years after the last contact or fulfilment of the agreement	No	Yes
Amount of state social insurance contributions of the potential customer and co-borrower or guarantor	Prevention of money laundering and terrorism financing	Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing	No	8 years with possibility to extend 2 years after the last contact or fulfilment of the agreement	No	Yes
Information from credit registers and debtor databases on the potential customer and co-borrower or guarantor	Prevention of money laundering and terrorism financing	Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing	No	8 years with possibility to extend 2 years after the last contact or fulfilment of the agreement	No	Yes
Customer's and co-borrower's or guarantor's credit file (information stored in various data sources) containing all personal data	Prevention of money laundering and terrorism financing	Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing	No	8 years with possibility to extend 2 years after the last contact or fulfilment of	No	No

processed for the issuance of leasing and during its validity or any communication with you if the agreement is not signed				the agreement		
Remark on a politically exposed person, information on the beneficial owner	Prevention of money laundering and terrorism financing	Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing	No	8 years with possibility to extend 2 years after the last contact or fulfilment of the agreement	No	Yes
Information from registers of the State Revenue Service	Prevention of money laundering and terrorism financing	Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing	No	8 years with possibility to extend 2 years after the last contact or fulfilment of the agreement	No	No
Name, surname, personal identity number, bank account No. of the potential customer and co-borrower or guarantor	Granting and execution of leasing	Signing of the agreement	No	10 years after fulfilment of the agreement or 5 years have passed from the date of refusal to grant leasing	No	Yes
Contact details and postal address of the potential customer and co-borrower or guarantor	Granting and execution of leasing	Signing of the agreement	No	10 years after fulfilment of the agreement or 5 years have passed from the date of refusal to grant leasing	No	Yes
Name, surname, personal identity number of the potential customer and co-borrower or guarantor	Insurance of the leasing object	Consent	Yes	Until the insurance contract is signed	Yes	Yes
		Purchase of insurance for fulfilment of the agreement	Yes	Until the insurance contract is signed	Yes	Yes
Name, surname, contact information, leasing agreement, payments made, number of dependents of the potential customer and co-borrower or guarantor	Debt recovery	Legitimate interest in debt recovery	Not applicable	Until the debt is repaid or ceded to another person	No	Yes
Customer's and co-borrower's or guarantor's credit file (information stored in various data sources)	Provision of services; Enforcement of contractual obligations	Fulfilment of the agreement	No	10 years after fulfilment of the agreement or 5 years	No	Yes

containing all personal data processed for the issuance of leasing and during its validity				have passed from the date of refusal to grant leasing		
Customer's and co-borrower's or guarantor's credit file (information stored in various data sources) containing all personal data processed for the issuance of leasing and during its validity	Protection of interests of Citadele Leasing in cases of complaints	Civil Code; Legitimate interest in making a profit from a leasing transaction	Not applicable	10 years after leasing is repaid	No	Yes
Recording telephone conversations	Customer service quality evaluation	Legitimate interest in providing and improving the quality of service, providing evidence of transactions and communication with you	Yes	12 months	Yes	No
Name, surname, e-mail, telephone number, information on creditworthiness and liabilities from the credit file, other information	For advertising - receipt of notices and offers	Consent	Yes	Until withdrawal of consent	Yes	Yes
Name, surname, e-mail, telephone number, information on creditworthiness and liabilities from the credit file, information from credit bureaus and debtor databases, other information	For advertising - receipt of personal credit limit offers	Consent	Yes	Until withdrawal of consent	Yes	Yes
Name, surname, personal identity number and credit file (information stored on different data sources) containing all the personal data processed for entering into the agreement and during its validity	Risk management and fulfilment of prudential regulations	Legal obligation and Legitimate interest of parent company to fulfil legal requirements stipulated in regulations of European Banking Authority and European Central Bank	Not applicable	10 years after leasing is repaid	No	Yes

INFORMATION: Please be advised that the retention periods of information (incl. but not limited to personal data) stipulated in the table hereinabove are indicated according to each processing purpose. If the same set of information (incl. but not limited to personal data) has been processed for multiple purposes, the longest retention period shall prevail.

We process information about persons buying out cars for the following purposes:

Data Type	Processing Purpose	Legal Grounds	Are you able to buy out a car if you do not provide us with this information?	How long will we keep this information about you?	Can you ask us to delete or stop using this information at any time?	Can you ask us to correct this information?
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Name, surname, personal identity number and address	Processing of car buy-out	Conclusion and fulfilment of the agreement	No	10 years after fulfilment of the agreement	No	Yes
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We process information about sellers of leasing objects (private individuals) for the following purposes:

Data Type	Processing Purpose	Legal Grounds	Are you able to sell/lease a leasing object if you do not provide us with this information?	How long will we keep this information about you?	Can you ask us to delete or stop using this information at any time?	Can you ask us to correct this information?
Name, surname, personal identity number, address, e-mail, telephone number, bank account number, vehicle registration number	Conclusion of the agreement with seller of leasing object, incl. communication thereon	Conclusion and fulfilment of the agreement	No	10 years after fulfilment of the agreement	No	Yes
Name, surname, personal identity number	Due diligence process/ Prevention of money laundering and terrorism financing	Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing	No	8 years with possibility to extend 2 years after the last contact or fulfilment of the agreement	No	Yes

3. How do we analyze your data?

We make sure that you act in good faith and evaluate your solvency by automated means in order to grant you leasing as soon as possible. This allows us to decide whether, to what extent and on what conditions we will provide financing to you. This is beneficial for you, as we can take into account individual information about you and adjust the leasing conditions to your needs. The process described below will take approximately 2 business days. Unfortunately, if you do not agree with the automated individual decision-making procedure described below, we will not be able to assess your creditworthiness, prepare the terms of your leasing and provide you with financing.

In the process of granting leasing and determining leasing conditions, we use an algorithm, according to which we analyze your information in accordance with the consumer financing procedure of SIA Citadele Leasing Lithuania branch. If we are to refuse granting leasing to you, you can request an explanation for the refusal as set out in Section 8.

To assess your creditworthiness, we receive information from the following credit registers or credit information registers and Citadele group companies:

- VĮ „Registrų centras“
- UAB „Creditinfo Lietuva“
- Valstybinio socialinio draudimo fondo valdyba prie Socialinės apsaugos ir darbo ministerijos
- Informatikos ir Ryšių Departamentas Prie Lietuvos Respublikos Vidaus Reikalų Ministerijos
- AB „Regitra“
- UAB „Scorify“
- UAB „Citadele Factoring“
- AS „Citadele banka“ Lietuvos filialas

4. To whom do we disclose your information?

We have introduced various tools and services that facilitate our cooperation and make our communication faster. Therefore, we disclose:

- Information about your agreement and contact information to car dealers who have submitted your leasing application to us;
- Your name, surname, personal identity number to vehicle and equipment registration authorities, for example, AB "Regitra" and municipality administrations;
- Your personal identity number to UAB "Okredo" during your registration process in our customer portal to receive information on legal entities you represent;
- Your name, surname, personal identification code to our cooperation partner insurance broker company "Aon Baltic", if you have confirmed that you want to receive an insurance offer for the leasing object or disclosure of the mentioned data to insurance broker company "Aon Baltic", if you agreed to receive leased car insurance offer;
- Your name, surname, personal identification code, contact information, current payment information and agreement information to AS Citadele banka Lithuania branch in order to provide us with remote customer service (for example, servicing your calls or electronic correspondence);
- Your name, surname, personal identification code and current payment information to UAB "Creditinfo Lietuva", UAB "Scorify" and Bank of Lithuania;
- Information about you found in the leasing documentation file to entities ensuring debtor monitoring, litigation support and debt recovery services as well as archiving service providers;
- Your contact information to communications providers and IT service providers for leasing administration;
- Your name, surname, personal identification code, payment information and agreement information as well as information on your debts (if any) to our parent company AS Citadele banka to ensure risk management on the Citadele Group level and reporting in conformity with prudential regulations;
- Information on the examination of your data in accordance with the Consumer Lending Law and the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing to AS Citadele banka Lithuania branch and other Citadele Group companies for the purposes of carrying out due diligence or mitigation or prevention of the identified risks;
- Information on Your payment obligations, information characterizing solvency, agreement information as well as information related to fulfillment of agreement Citadele banka AS for the numerical calculation and evaluation of various types of risk factors, as well as for the fulfillment of various types of reporting obligations, which are determined by the regulatory requirements of supervisory authorities or financial investment institutions;
- Information about your requests and complaints as well as information about various types of incidents (e.g., incidents related to activities that do not comply with internal and external regulatory enactments, data breaches), if any, to AS Citadele banka to ensure risk management on the Citadele Group level and improve the quality of services and servicing of customers;
- If you have agreed to receive advertising, we may transfer your personal data to Citadele Group companies: AS Citadele banka Lithuania branch, UAB Citadele Factoring, address: Konstitucijos Ave. 18B, LT-09307 Vilnius, Lithuania; AS Citadele banka, AAS CBL Life, IPAS CBL Asset Management address: Republikas laukums 2A, Riga, Latvia, LV-1010.

If you do not repay the leasing in accordance with the terms of the leasing agreement even having received our reminders, we will decide on necessity to hire experts to recover your debt. In this case, we will process your personal data to ensure our legitimate interest in recovering the debt. If we decide to transfer your debt to a debt recovery service company, we will provide them with your name, surname, all contact information, a copy of the leasing agreement and any annexes thereto as well as information on all previous payments and other information that may facilitate debt recovery.

5. How do we process your information when sending you individual notifications and offers?

We or any of the Citadele Group companies will prepare the following notifications and offers, incl. personalized offers, individual offers of credit limits, and send them to you from time to time, if you have given your consent to the processing of your personal data on our website, in the leasing application or unified consent form.

According to your consent, we will send you:

- up-to-date information on financial services provided by Citadele Group companies, for example, account opening, payment card processing; deposit services; lending services; leasing services; insurance services; financial instruments services, etc. services and related offers, incl. personalized offers within customer loyalty programs;
- other notices related to opportunities to participate in contests, draws, lotteries, promotions and other customer-related events; congratulations on your birthday, name day and other festivities (for example, Easter, Christmas, New Year and other celebrations); our comments on current events in the Latvian and world economy; opportunities to express our opinion about the services we provide and the quality of service by participating in customer surveys organized by us; social responsibility and support projects; our financial performance, awards, special events;
- up-to-date information on credit limits available to you personally (for example, payment card credit limits, consumer loans, leasing offers), which will be prepared by financial consultants of AS Citadele banka/AS Citadele banka Lithuania branch and/or SIA Citadele Leasing Lithuania branch upon the assessment of your financial situation.

In order to receive notifications and offers, including personalized offers and offers of individual credit limits, your personal data will be processed by the following Citadele Group companies as individual or joint controllers: SIA Citadele Leasing Lithuania branch, registration number: 302629475, UAB Citadele Factoring, registration number: 126233315, address: Konstitucijos Ave. 18B, LT-09307 Vilnius, Lithuania; AS Citadele banka, registration number: 40103303559, AAS CBL Life (insurance company), registration number: 40003786859, IPAS CBL Asset Management (investment management company), registration number: 40003577500, address: Republikas laukums 2A, Riga, LV-1010, Latvia. In order to receive a personal credit limit offer, we and AS Citadele banka Lithuanian Branch will process your personal data.

You have the right to withdraw your consent to receipt of notifications and offers at any time by writing to us at e-mail: privacy@citadele.lt. Upon withdrawal of consent, we will stop processing your personal data for the preparation and sending of commercial messages and offers. Withdrawal of consent (s) will not affect the lawfulness of processing of your personal data prior to withdrawal of consent.

You can find detailed information on your rights, incl. the right of withdrawal, and processing of your personal data in the Privacy Disclaimer for Processing of Personal Data for Receipt of Notifications and Offers published on www.citadele.lt.

6. How do we process your information when offering you insurance services?

Insurance of the leasing object is provided by our cooperation partner insurance broker company "Aon Baltic", which cooperates with several insurance service providers to offer you the best insurance deal on the market. If we have received your consent or if it is necessary for the fulfilment of the terms of the agreement, we will transfer your personal data (name, surname, personal identity code) to insurance broker company "Aon Baltic" for receiving the leasing object insurance offer and processing of the leasing object insurance.

You can withdraw your consent at any time by writing to us at e-mail: privacy@citadele.lt. Withdrawal of consent will not affect the lawfulness of processing of your personal data prior to withdrawal of consent.

7. How do we protect your information?

We have implemented a strict policy for the use and access of IT infrastructure, which is based on the principles of "need to know" and less privileged access. We encrypt personal data, use firewalls, attack detection and prevention systems to ensure that all your personal data is confidential and secure. We regularly test our systems and review applicable policies to ensure that our IT security measures are one step ahead of all types of risks.

We delete your personal data in accordance with the provisions of Section 2 of this Privacy Policy. If you have not reached the age of 13, but have completed the leasing application, our system will reject all information about you and will not store it.

8. What are your rights?

We process your data, so you can find out what we do with it and how we process it. You may, upon written request, access, correct or delete your personal data, restrict processing, object to processing of such data and transfer them free of charge.

However, if we find that your requests are recurring on a regular basis, are manifestly unreasonable or excessive, we will take into account the administrative costs associated with providing the information or communication or performing the requested action (including staff resources), we will charge you a reasonable fee for processing your request in accordance with the approved pricelist or we will refuse to fulfil your request by informing you in advance.

In case of automated individual decisions, you have the right to request a reconsideration of such decisions by involving employees of AS Citadele banka Lithuanian Branch and/or SIA Citadele Leasing Lithuanian Branch in the decision-making. Such a request shall be made in writing to the Citadele Group company where you are a customer.

SIA Citadele Leasing Lithuanian Branch, registered in the Republic of Lithuania under registration number: 302629475, address: Konstitucijos Ave. 18B, LT-09307 Vilnius Lithuania, is responsible for your data processing. A certified personal data protection officer will answer all your questions regarding how SIA Citadele Leasing Lithuanian Branch or other Citadele Group companies use your information. You can contact him/her by sending an e-mail to privacy@citadele.lt. Please describe the issue in as much detail as possible. You will receive an answer within 30 days.

Our activities in the field of personal data protection are supervised by the State Data Protection Inspectorate. Before you apply to the State Data Protection Inspectorate for advice or a complaint, we recommend you to contact our personal data protection officer to ensure that your request is processed as soon as possible.