

# Privacy disclaimer

for processing of personal data when providing "Click to Pay" service and servicing the Secure Payments

The Citadele logo is a red square with the word "Citadele" in white, bold, sans-serif font.

Effective June 17, 2025

We, AS "Citadele banka", have developed this privacy disclaimer to provide you with information about what data we process, why and how we protect it when you use the secure payments profile within "Click to Pay" service.

We provide this information in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (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, hereinafter - the Regulation, as well as in compliance with the legislation of the European Union and local regulation, recommendations and best practices of the financial sector and supervisory authorities.

The creation, functioning and maintenance of the secure payments profile shall be ensured by the manager of the relevant payment system or card organisation. So, if you use the card organization's VISA payment card, then a secure payment profile will be created for you and operated by Visa Europe Limited. On the other hand, if you use the card organization's MasterCard payment card, then a secure payment profile will be created for you and its operation will be ensured by Mastercard Europe SA.

This privacy disclaimer provides an insight into the personal data protection and processing conditions that Citadele complies with in relation to the processing of personal data. On the other hand, if you want to get acquainted with the conditions for the protection and processing of personal data that card organizations comply with in relation to the processing of personal data carried out by them, we invite you to get acquainted with the following information:

- 1) if you use the card organisation's VISA payment card - Visa Europe Limited's privacy policy can be found here: [<https://usa.visa.com/legal/global-privacy-notice.html>]
- 2) if you use the card organisation's MasterCard payment card - the privacy protection terms of Mastercard Europe SA can be found here: [<https://www.mastercard.com/europe/en/data-privacy.html>]

**IMPORTANT: In the final section of this Privacy Disclaimer, we invite you to familiarize with the main terms of the card organization's VISA joint controller agreement.**

## Who will process your data

Your data is processed by the following controllers:

- 1) AS "Citadele banka" Lithuanian branch, 18B Konstitucijos Ave. LT-09307 Vilnius Lithuania, registration No. of branch: 304940934, , VAT code LT100012055611;
- 2) if you use the card organization's VISA payment card - Visa Europe Limited, 1 Sheldon Square, London, W2 6TT, United Kingdom;
- 3) if you use the card organization's MasterCard payment card - Mastercard Europe SA, Chaussee de Tervuren 198A, 1410 Waterloo, Belgium.

If you have any questions about data processing, you can contact us by calling +370 5 221 9091, writing to the e-mail address [info@citadele.lt](mailto:info@citadele.lt) , or [dap@citadele.lt](mailto:dap@citadele.lt) reaching our appointed data protection officer.

## Privacy disclaimer

for processing of personal data when providing "Click to Pay" service and servicing the Secure Payments

For what purposes, what data, on what basis we process and how long we store it

Purpose of data processing	Data types/categories processed	Legal bases for processing	Data retention period
<b>Steps to create and manage a secure payments profile</b> Within the framework of this purpose, Citadele will carry out activities related to the selection, collection and transfer of personal data to the card organization, as well as updating of personal data.	Customer identification number (Citadele ID) (for internal selection purposes only), payment card number, phone number and email address, current status of secure payments profile (connected, disconnected) and historical statuses.	Processing is necessary for the performance of a contract to which the data subject is a party.	5 years after the termination of the business relationship (Personal data processed within the framework of this purpose are not unique, they are also processed for other purposes – hence, they are subject to general retention periods).
<b>Maintain opt-out and opt-in options for a secure payments profile</b> For this purpose, Citadele carry out activities related to your choice to opt out or opt in for a secure payment profile.	Payment card number	Processing is necessary for the performance of a contract to which the data subject is a party.	Not applicable as this process does not involve retention of personal data
<b>Handling of applications/claims related to the processing of personal data for the above-mentioned purposes.</b>	All personal data processed within the framework of this process, as well as those personal data necessary for the examination of applications/claims.	Legitimate (legitimate) interest in responding to submissions, as well as resolving disputes arising in connection with maintaining a secure payment profile.	5 years from the date of examination of the application/claim or the date of final settlement in the relevant case

## Who we share your data with

Your data will be processed for the above purposes by authorized Citadele employees. Your personal data for the provision of the "Click to Pay" service will be transferred to the card organization, where it will be processed by authorized employees of the respective card organization.

Citadele will not process your personal data outside the European Union or European Economic Area countries.

# Privacy disclaimer

for processing of personal data when providing "Click to Pay"  
service and servicing the Secure Payments

## What are your rights regarding the data processing we perform

When processing your data, we ensure that you have the following rights, which can be exercised by submitting a written request in free form:

<b>Access Your Data</b>	<p>You have the right to receive from us:</p> <ul style="list-style-type: none"><li>• confirmation of whether we process your data,</li><li>• detailed information about your data processing to ensure that the data is accurate and processed in accordance with the law.</li></ul> <p>If you wish to access your data, please specify the time and the data you want to receive. You have the right to know what data we hold about you, why we process it, how we obtained it, to whom it has been disclosed, and how long it will be stored. You may also request a copy of your data.</p> <p>To help us process your request more quickly, please specify the shortest possible time and describe precisely which data and information you wish to obtain.</p> <p>Please note that we may not be able to provide information if prohibited by law, for example, when data is shared with law enforcement authorities (police, prosecutor's office, court, etc.).</p>
<b>Correct data</b>	<p>If you believe that the data we hold is inaccurate or incomplete, please let us know:</p> <ul style="list-style-type: none"><li>• specify the corrections needed,</li><li>• we may request documents to verify the necessary changes.</li></ul>
<b>Delete data</b>	<p>You may request the deletion of your data if you believe that:</p> <ul style="list-style-type: none"><li>• it is no longer necessary,</li><li>• it is not being used for its intended purposes.</li></ul> <p>We will also delete your data from our cooperation partners unless it is necessary for the purposes for which it was processed or if the law requires a longer retention period.</p> <p>Please note that fulfilling a deletion request may not always be possible, for example if the data is needed to comply with legal requirements or for proceedings.</p>
<b>Restrict data processing</b>	<p>You may request to restrict the processing of your data if:</p> <ul style="list-style-type: none"><li>• You contest the accuracy of the data (the restriction will apply until the accuracy is verified).</li><li>• You believe the processing is unlawful but prefer to restrict rather than delete the data.</li><li>• We no longer need your data, but you require it to exercise or defend your legal rights.</li><li>• You object to data processing based on our legitimate interests. We will reassess whether, considering your objection, we need to continue processing your data.</li></ul> <p>If data processing is restricted, we will only use the data for specific purposes, such as defending protecting our legal rights.</p>

## Privacy disclaimer

for processing of personal data when providing "Click to Pay"  
service and servicing the Secure Payments

<b>Transfer data</b>	<p>The data provided by you, either with your consent or under a contract, may be transferred. Data processed automatically can also be transferred. You can use this data personally, or, upon your request, we will transfer it to another service provider, provided there are no obstacles.</p> <p>When transferring data, it is important to consider that it may include third-party information. The transfer of such data must be carefully evaluated with respect to the rights and freedoms of those third parties.</p> <p>To speed up the request, please specify the exact data and information you wish to transfer.</p>
<b>Object to data processing</b>	<p>You may object to the processing of your data if it is conducted based on legitimate interests. We will review your objections and assess the necessity of continuing the data processing.</p> <p>We will need to continue processing your data if it is necessary to comply with the law or to protect our legal rights.</p> <p>You will not be able to exercise the right to object to the processing of your data if you have given your consent to the data processing, if data processing is necessary for the performance of a contract, or if we are required to process the data to comply with the law.</p>

## How to submit a request regarding data processing and how we will ensure the request is handled

<b>How can you submit a request?</b>	<b>What will be the deadline for reviewing the request?</b>	<b>What will be the fee for reviewing the request?</b>	<b>How will we provide a response to the request?</b>
<p>In writing, in free form:</p> <ul style="list-style-type: none"><li>• in person – by visiting the bank and presenting an identity document (passport or ID card), or a power of attorney if acting on behalf of someone else,</li><li>• by email – by sending a request signed with a secure electronic signature,</li><li>• via online banking,</li><li>• through the mobile app.</li></ul>	<p>We will review your request:</p> <ul style="list-style-type: none"><li>• no later than within 1 month from the date of receipt,</li><li>• if the request is extensive or complex, we may need an additional 2 months. We will inform you about the extension and the reasons for it.</li></ul>	<p>You can receive a response to your request:</p> <ul style="list-style-type: none"><li>• free of charge,</li><li>• if you submit a repeated request and we determine that it is unfounded or excessive, we may apply a fee or refuse to fulfil the request. The fee will cover the costs of processing the information and the work of our employees. If a fee is required, we will inform you in advance.</li></ul>	<p>You can receive a response to your request:</p> <ul style="list-style-type: none"><li>• in person, by visiting the bank and presenting an identity document (passport or ID card), or a power of attorney if acting on behalf of someone else,</li><li>• via email, by receiving a password sent via SMS to access the document,</li><li>• through online banking, via the mobile app.</li></ul>

Ką turėtumėte daryti, jei manote, kad tvarkant duomenis buvo pažeistos Jūsų teisės?

## Privacy disclaimer

for processing of personal data when providing "Click to Pay" service and servicing the Secure Payments

We process your data in accordance with regulations, European Union and local laws, financial industry recommendations, and best practice guidelines. If you believe we have violated your privacy rights, you have the right to file a complaint. In case you are not satisfied with our response, you have the right to file a complaint with the State Data Protection Inspectorate:

### **AS "Citadele banka" Lietuvos filialas**

Address: 18B Konstitucijos Ave, LT - 09307, Vilnius, Lithuania  
Phone: +370 5 221 9091  
Email: [info@citadele.lt](mailto:info@citadele.lt)  
Data Protection Officer Email: [dap@citadele.lt](mailto:dap@citadele.lt)

### **Data State Inspectorate Lithuania**

Address: L. Sapiegos str. 17, Vilnius, Lithuania  
Email: [ada@ada.lt](mailto:ada@ada.lt)  
Phone: : +370 5 212 7532  
Website: [www.vdai.lrv.lt](http://www.vdai.lrv.lt)

A complaint to the Inspectorate can also be submitted via the Inspectorate's electronic services portal, by selecting the e-service "[Examination of individual complaints regarding actions \(inaction\) of the data controller](#)".

The complaint to the inspectorate must be signed.

If you disagree with the response of the bank or the State Data Protection Inspectorate, you have the right to go to court.

## How will we ensure up-to-date information about the processing of your data

To ensure you are always informed about how your data is being processed, we regularly review and update this privacy notice. Therefore, we encourage you to periodically check the latest privacy notice on our website. If there are significant changes, we will notify you one month before they come into effect.

## Main terms and conditions of the Citadele and VISA joint controllers agreement

In this final section of the Privacy Disclaimer, we will inform you about the personal data processing terms of our cooperation with the card organization VISA, offering you this most secure solution for making payments in the digital environment and processing of personal data related to it.

Summary of responsibilities for ensuring a secure payment profile when servicing payments with VISA payment cards of the card organization.

Duties of the card organization VISA:

1. Data collection and use
  - collects the personal data of payment card users from Citadele and stores them securely.
  - helps merchants verify payment card users at checkout (e.g. using one-time access codes).
  - may retain delivery addresses if necessary.
2. Legal basis
  - process personal data on the basis of legitimate interests.
3. Confidentiality and transparency
  - provide Citadele with information on how the card organisation VISA processes personal data.
  - provide information on the processing of personal data by the card organisation VISA in the Global Privacy Notice (see link at the beginning of the Privacy Disclaimer).
4. Security
  - establish and update technical and security standards for a secure payment profile.
  - ensure that the card organisation's VISA systems comply with these standards.
5. Data retention
  - determine how long the data is stored in the card organisation's VISA systems, in compliance with the legal acts.
6. Processing requests from payment card users
  - directs payment card users to Citadele in case of general requests from payment card users.
  - independently process wider or specific requests.
7. Constant updates
  - keep data in the card organisation's VISA system up to date, in particular servicing payment card users in Europe.

Duties of Citadele:

# Privacy disclaimer

for processing of personal data when providing “Click to Pay” service and servicing the Secure Payments

1. Data collection and sharing
  - collects the personal data of payment card users and sends them to the card organisation VISA.
  - notify the card organisation VISA of changes in personal data after such information has been received from customers.
2. Legal basis
  - chooses the legal basis for the processing (in the case of processing carried out by Citadele, the legal basis is the contract concluded with the payment card user/customer).
3. Payment card user protection
  - provides payment card users with easy opt-out.
  - where necessary, identify vulnerable groups of payment card users by applying additional protection requirements.
4. Confidentiality and transparency
  - informs payment card users about how Citadele and card organization VISA use their personal data.
  - provides a link to the global privacy statement of the card organization VISA.
5. Information of the joint controller
  - provide payment card users with a summary of the common personal data processing arrangements (i.e. these terms and conditions), including contact details for exercising their rights.
6. Security
  - comply with the minimum security standards of the card organisation VISA and add additional security measures as necessary.
7. Data retention
  - determine the retention periods for payment card users personal data.
8. Processing of requests from payment card users
  - acts as the main point of contact for requests and complaints from payment card users.

Mutual responsibilities:

1. Shared responsibility towards payment card users
  - both VISA and Citadele are jointly responsible for the processing of personal data of payment card users.
  - payment card users may contact any of the parties in order to exercise their rights.
2. Transfer requests from payment card users
  - if one party receives a request which it cannot process on its own, it must forward it immediately to the other party.
  - both parties must inform each other of any changes resulting from such requests.
3. Use of cooperation partners
  - each Party shall be responsible for its cooperation partners, their choice and actions.
4. Data breach management
  - if one of the parties discovers a data breach, it must immediately notify the other party.
  - the parties should cooperate in the investigation of data breaches and in the implementation of corrective actions.
  - Citadele is responsible for informing payment card users about data breaches if required by law. The Parties shall cooperate to agree on the content of such notifications.
  - each Party shall cooperate in good faith with the supervisory authorities.

The summary of duties provided here is for informational purposes only. The application of the mutual conditions set out in the joint controllers agreement is assessed individually on case-by-case basis in order to select the most suitable solution for the payment card user, while respecting the requirements laid down in the legal acts.

Taking care of your payments' security  
Your Citadele bank