



PRIVACY NOTICE

1 General information

This Privacy Notice contains information required by 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 (hereinafter the General Data Protection Regulation) and data protection legislation in the Republic of Latvia, that is, for customers, their representatives, security providers of "OP Finance" SIA and for the supervisory authority.

2 Controller and its contact information

"OP Finance" SIA
Registration No. 40103199394
Legal address: Muižas 1, Rīga, LV-1010
The controller's contact person: Data Protection Officer
Phone: 67 777 007
Email: office@opbank.lv

3 Data Protection Officer's contact information

"OP Finance" SIA Data Protection Officer
Address: Muižas 1, Rīga, LV-1010
Phone: 67 777 007
Email: office@opbank.lv

4 Name of the personal data file

"OP Finance" SIA customer data file.

The data subjects of the data file are the controller's customers and potential customers (self-employed persons), representatives, owners, beneficial owners of corporate and institutional customers (hereinafter the company), security providers and potential security providers. The term "customer" used in this Privacy Notice includes all of the mentioned roles.

5 Purposes of personal data processing and legal basis for processing

5.1 Purposes of use of personal data

In this customer data file, personal data is used primarily to produce, offer, deliver and develop the controller's services, i.e. leasing services. Below you can find more detailed information on how personal data is used in the data file.

- Customer service and customer relationship management and development
 - Provision, development and quality assurance of services
 - Business development
 - Fulfilling statutory obligations and any other official rules and regulations
 - Risk management
 - Ensuring the security of services, and preventing and investigating abuses
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- Training purposes

Automated decision-making and profiling

“OP Finance” SIA does not use profiling and automated decision-making. All our decisions are made by a specially designated decision-making body.

Preventing crimes

KYC information and other data subject's personal data may be used to prevent, uncover and detect money laundering and terrorism financing as well as for other purposes required by the Law on the Prevention of Money Laundering and Terrorism Financing.

The data subject's personal data may be used to investigate if the person is subject to international sanctions applied by the controller.

The controller may process personal data concerning crimes or suspected crimes made directly against the operations of the financial institution, if that is necessary in order to prevent and detect such crimes.

5.2 Legal bases of processing

Personal data is processed in the data file on the basis of several legal grounds, the application of which is described with illustrative examples below.

1. Contractual relationship or actions preceding the conclusion of a contract, such as
 - a. Entering into the leasing agreement
 - b. Personal data processing necessary for contract enforcement
2. Statutory obligation, such as
 - a. Law on the Prevention of Money Laundering and Terrorism Financing
 - b. Other statutory personal data processing, such as cooperation with the police or tax authorities, and obligations related to reporting to the authorities
3. Legitimate interests
 - a. Data disclosure within OP Financial Group may be based on a legitimate interest
 - b. protection of the controller's interests at the law enforcement institutions, including establishment, exercise or defence of legal claims may be based on a legitimate interest.

In most cases, the controller's legitimate interests are based on the customer relationship or similar relationship between the controller and the customer. The controller also ensures that such processing is proportionate to the data subject's benefits and meets his/her reasonable expectations.



6 Categories of personal data

Data subjects are typically subject to processing the categories of personal data and personal data described below. The data content to be processed depends, for example, on whether it is the question of the data of a private individual (self-employed person) or of a person acting on behalf of the company.

Category of personal data	Example of the data content
Basic information	Data subject's name, personal identity code / taxpayer's registration No., postal address, phone number, email address, person's position with regard to the company
Know Your Customer (KYC) information	Statutory KYC information such as the information required to identify the customer, the beneficial owner and to determine their financial status and political exposure
Contract and product information	The controller's and data subject's contract information Information on products and services acquired by the data subject
Recordings and content of messages	Recordings and messages in various formats, in which the data subject is a party, for example, video surveillance

7 Recipients and recipient groups of personal data

Any personal data obtained may be used within OP Financial Group as permitted by the law. In addition, personal data may be disclosed, for example, to:

- relevant authorities, such as the State Revenue Service etc.
- credit information controllers, such as The Credit Register of the Bank of Latvia, for the purposes of monitoring payment defaults
- the European Central Bank, other central banks in the European System of Central Banks, European Investment Bank, Nordic Investment Bank, Finnvera plc, European Investment Fund or a similar party in connection with financing and/or collateral arrangements
- Vendors operating as the controller's partners

8 Transfer of personal data

The controller uses suppliers in data processing, and data will be transferred outside of the EU or EEA to a limited extent. When data is transferred outside of the EU or EEA, the transfer is done using the EU Commission's standard contractual clauses or some other transfer mechanism in accordance with legislation.

Some of the controller's suppliers are other OP Financial Group entities or partner companies. They provide the controller with information system and other support services, among other things.

When receiving financing applications, the controller may use vendors as agents.



9 Personal data retention period or criteria for determining the period

Personal data may be processed within the validity of the customer and contractual relationship. It will also be processed after the end of the customer and contractual relationship for a period deemed necessary at any given time and what is stated below.

For example, we retain your KYC information for five years of the end of the customer relationship; in case the establishment of relationship was rejected we retain the data for twelve months since the application date. We comply with statutory obligations in retaining data. The information will be erased in accordance with the controller's erasure processes.

The controller may be under an obligation to process some personal data in the data file for a period longer than stated above in order to comply with legislation or requirements set by the relevant authorities.

10 Personal data sources and updates

Personal data is collected primarily from the data subjects themselves or, on a case-by-case basis, from the entity on behalf of which they act. Personal data may, within the limits permitted by law, also be obtained from other OP Financial Group entities for risk management purposes, for example.

Personal data can also be collected and updated within the limits permitted by law from the personal data files of third parties, examples including:

- registers maintained by other authorities, such as Register of Enterprises of the Republic of Latvia, State Revenue Service, Land Register etc.
- credit information register controllers
- parties that maintain databases with information that is necessary to identify political exposure and parties subject to international sanctions followed by the controller

11 Data subject's rights

Data subjects have the right to receive the controller's confirmation of whether their personal data will be processed or not, or whether they have already been processed.

If the controller processes a data subject's personal data, the data subject has the right to receive the information on the personal data being processed or already processed.

The data subject also has the right to request the controller to rectify or erase their personal data.

After the application of the General Data Protection Regulation has begun, the data subject will, in certain cases, also have the right to request the controller to restrict the processing of their personal data or to otherwise oppose the processing. In addition, under the General Data Protection Regulation, the data subject may request that the data they have provided themselves be transferred in machine-readable format.

All of the above requests must be submitted to the abovementioned contact person of the controller. Before accepting the data subject's request the controller will identify the data subject. For the purpose of identification of the data subject, the request/queries can be submitted in person or in form of an e-doc signed with secure electronic signature.



If a data subject considers that his/her personal data is not processed legally, he/she has the right to file a complaint with the Data State Inspectorate (www.dvi.gov.lv).

12 Protection methods regarding the data file

The controller processes personal data securely and in a manner fulfilling the requirements of applicable laws. It has carefully assessed the risks that may be associated with the processing and taken the necessary measures to manage these risks.

The controller has protected the data appropriately in technical and organisational terms. The data file is protected using, for example, the following tools:

- Protection of equipment and files
- Access control and access rights
- Registration of usage events
- Processing guidelines and supervision

The controller also requires of its suppliers the appropriate protection of personal data to be processed.