

Principles of Processing Client Data

Effective as of 01.12.2019

We care about your right to privacy and want to guarantee that your personal data is well kept at Inbank. In order to ensure you of the transparency of the processing of your personal data, we have prepared principles that describes how your data is processed at Inbank.

We will apply these principles when a client relationship is established between us, or you use, have used or intend to use the services of Inbank or visit our website or branch. The data obtained during the process preceding the establishment of a client relationship also belong among client data.

1. DEFINITIONS

Client Data	Any information about You that is in Our possession (incl. information subject to banking secrecy, Your and Your representative's personal data, contact details, transaction data, etc.), as well as information collected from public databases and public channels and information lawfully obtained from Third Parties.
(Client Data) Processing	Any operation executed with the Client Data, incl. collection, recording, organisation, retention, alteration, disclosure, grant of access to, making inquiries and statements, use, transmission, cross-usage, deletion, etc., of the Client Data.
We or the Bank	AS Inbank and the Group that act as the controller of the Client Data.
Principles	Principles of Processing Client Data.
You or the Client	Every natural person and legal entity who uses, has used or intends to use Our services or visits Our Website or Branch.
Processor	The person who processes the Client Data on Our behalf. The list and contact details of Processors are given on the Website or in any other manner determined by Us, of which We have informed You.

We use the other terms with capital initials in the meaning defined in the General Terms and Conditions of Inbank AS.

2. GENERAL PRINCIPLES OF PROCESSING CLIENT DATA

2.1. We Process the Client Data pursuant to effective law, including the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council), the Personal Data Protection Act, the Credit Institutions Act, the Money Laundering and Terrorist Financing Prevention Act, these Principles and the terms and conditions of the contracts entered into with You.

2.2. We and Our employees will keep the Client Data confidential and We will only collect and Process Client Data to the extent necessary for the achievement of the objectives of the Principles.

2.3. We will implement appropriate organisational, physical and information technology measures to guarantee protection of Client Data from unintentional or unauthorised Processing, disclosure or destruction. We also require compliance with reasonable confidentiality and security measures from the Processors.

2.4. We may amend the Principles unilaterally at any time proceeding from effective law. We will inform You about the amendment of the Principles via the Website and/or the Digital Channels at least 30 (thirty) days before the amendment enters into force, unless the amendment arises from an amendment made to effective law.

3. PROCESSED CLIENT DATA

3.1. We will collect Client Data from You as well as Third Parties if You use, have used or intend to use Our services or visit Our Website or Branch. Third Parties may be public and private registers (e.g. the Credit Register) and business partners (if You have given Your consent thereto).

3.2. The primary categories of the processed Client Data include (but are not limited to) the following:

3.2.1. personal data, incl. name, personal ID code, date of birth, place of birth, citizenship, details of the identity document, residency, language of communication, area of activity, place of work, position, work experience, education, marital status, dependents, successors;

3.2.2. contact details, incl. address, telephone number, e-mail address;

3.2.3. financial details, incl. income, obligations, earlier payment discipline, assets, debts, incl. data obtained from the Credit Register, data of the current account and transactions in the current account, data from the Pension Register;

3.2.4. data of tax residency, incl. country of residence, taxpayer's identification number;

3.2.5. data of origin of assets, incl. the data of beneficial owners, Your transaction partners and business activities;

3.2.6. data related to transactions and contracts, incl. data of contracts that have been entered into, amended or terminated, data concerning the performance or breaches of the contracts entered into with You, transactions in the Client Account, sub-

mitted Notices, Applications and Orders, interest and service charges received and paid, queries and complaints;

3.2.7. data related to conduct and satisfaction, incl. data about Your habits and preferences, submitted queries and complaints, activity of use of services, used services, personal settings, responses to surveys;

3.2.8. data related to participation in consumer games and campaigns, incl. the data of the prizes won in consumer games and participation in campaigns;

3.2.9. data related to trustworthiness, incl. data of payment discipline, data of damage caused to Us or a company belonging to the same Group with Us or to a Third Party, data about involvement in money laundering, terrorist financing or organised crime;

3.2.10. data related to client communication, incl. data related to visits to Our Website and communication via any other of Our channels, the visual and/or audio recordings collected when You visit Our Branches and other places where We provide services and when You communicate with us by telephone, as well as any other data collected via e-mail, messages, social media and other manners of communication;

3.2.11. data obtained upon the performance of an obligation arising from law, incl. data arising from the inquiries of investigative bodies, notaries public, tax authorities, bailiffs and the court and the claims of bailiffs;

3.2.12. location data, incl. the place of conclusion of a transaction, IP address, place of login, logs of Internet use.

4. PURPOSES AND LEGAL GROUNDS OF CLIENT DATA PROCESSING

4.1. The main purposes for which We Process Client Data are the establishment of Client Relationships, performance and termination of Service Contracts, performance of the due diligence obligation stipulated by law, providing better customer service to You, making offers to You, analysing the usability of services and development of new services.

4.2. We process Client Data for the following purposes and on the following grounds:

Purposes of Processing	Legal grounds for Processing
We decide whether and on what conditions to establish a Client Relationship or enter into a Service Contract and on which conditions to provide a service.	Performance of a contract or implementation of pre-contractual measures or performance of a legal obligation.

Purposes of Processing	Legal grounds for Processing
We assess Your creditworthiness and trustworthiness (for the implementation of the responsible lending principle) and carry Our risk assessments in relation to Our capital requirements.	Performance of a contract or implementation of pre-contractual measures, performance of a legal obligation or Our legitimate interest in risk management.
We will identify You and/or Your representative upon the establishment of the Client Relationship and/or during the Client Relationship in order to comply with the Know Your Client principles, incl. identify Your beneficial owner(s), whether You or Your beneficial owner(s) are politically exposed person(s), whether You or Your beneficial owner(s) are subjects of financial sanctions.	Performance of a contract or implementation of pre-contractual measures, performance of a legal obligation or Our legitimate interest in risk management.
We are performing a contract entered into with Your or guarantee the performance of the respective contract and realise, waive and protect Our rights.	Performance of a contract or implementation of pre-contractual measures, performance of a legal obligation or Our legitimate interest in the exercise of legal claims.
We prevent money laundering and terrorist financing and perform the obligations arising from effective international and national law and from the international agreements entered into and ratified by the Republic of Estonia.	Performance of legal obligations.
We reduce or prevent risks and damage to You as well as us and protect Your and Our interests, study the quality of Our services, and prove business transactions or other business communication.	Performance of a contract or implementation of pre-contractual measures, performance of a legal obligation or Our legitimate interest to prevent, restrict and investigate the misuse or unlawful use of our services and products or disruptions in the functioning in order to guarantee the quality of the services.
We allow access to and the use of Our Website.	Performance of a contract or implementation of pre-contractual measures or Our legitimate interest to prevent unauthorised access to Our Website.
We develop Our systems.	Our legitimate interest in the functioning and improvement of systems.
We carry out statistical research and analyses of the market shares of client groups, products and services, etc., reporting and risk management.	Our legitimate interest to perfect Our services, improve the user experience offered to You, develop new services, manage risks or perform legal obligations.
We develop Our existing services and new services.	Our legitimate interest to perfect Our services, improve the user experience and develop new services.
We check and, if necessary, improve or update Client Data, manage Client Relationships, keep data up-to-date and correct by checking and updating data via external and internal sources, and also request updating of data from You.	Performance of a contract, implementation of pre-contractual measures or performance of a legal obligation.
We send You advertisements and offers, incl. personal offers, of the products and services of our Third Party partners.	Your consent or Our legitimate interest to provide additional services.
We organise consumer games and campaigns.	Your consent or Our legitimate interest to provide additional services.

Purposes of Processing	Legal grounds for Processing
We want to understand Your expectations better (e.g. analysis of Website visits, client surveys, etc.).	Your consent or Our legitimate interest to perfect Our Services, improve the user experience offered to You, develop new products and services.

5. TRANSMISSION OF CLIENT DATA TO THIRD PARTIES

5.1. We will disclose and/or transmit Client Data:

5.1.1. to companies belonging to the same Group with Us in order to: (1) comply with the requirements for risk management and control; (2) organise strategic research and analyses of the market shares of client groups, products and services and other financial indicators; (3) comply with effective prudential norms, incl. capital and liquidity requirements; (4) enter into and perform contracts and give You information about the effective contracts You have entered into with persons belonging to the same Group with Us; (5) comply with the responsible lending principle; (6) develop and implement information systems of the entire Group; and (7) implement the due diligence measures stipulated in the Money Laundering and Terrorist Financing Prevention Act.

5.1.2. to persons and organisations related to the provision of Services and performance of the contract entered into with You (e.g. sureties, guarantors, collateral owners; payment intermediaries, credit institutions, international card organisations, translation, communication, IT and postal service providers, call centre service providers);

5.1.3. to the registrar of the Credit Register to whom We sent and from whom We request information on the basis of effective law or an effective contract in order to implement the responsible lending principle, also to allow Third Parties to assess Your payment discipline and creditworthiness. Information about Your possible payment defaults is disclosed in the Credit Register and the Client Data transmitted to the registrar can be Processed by all persons who are members of such a register or who can access such a register on any other grounds;

5.1.4. to the registrars of various registers (e.g. population registers, commercial registers, credit registers, traffic registers) to whom We transmit and from whom We request Client Data in order to check and guarantee the correctness and integrity of the Client Data or for the implementation of pre-contractual measures or for the performance of a contract entered into with You;

5.1.5. to other credit and financial institutions, creditors, insurers and intermediaries of financial services on the basis of the queries submitted by them. We will also request Client Data from such institutions in order to provide to You the services requested by You or assess the trustworthiness and risk of You or a person related to You;

5.1.6. to the Third Parties that receive the data as a part of the Service requested by You;

5.1.7. to the service providers to whom We have outsourced activities in part or in full on the terms and conditions stipulated by effective law, provided that such persons comply with the organisational, physical and information technology requirements set by Us in respect of the confidentiality and protection of the Client Data;

5.1.8. to credit institutions, creditors, debt collection service providers and other Third Parties with whom We hold negotiations for the transfer of a contract entered into with You or waiver of the claims arising from such a contact;

5.1.9. to the new creditor upon the waiver of a claim;

5.1.10. to other Third Parties if You have breached the contract (e.g. provider of debt collection services, courts, trustees in bankruptcy or insolvency trustees);

5.1.11. to Processors.

5.2. We are obliged to disclose and transmit Client Data for the performance of the obligations arising from effective law (e.g. transmit data to law enforcement authorities, notaries, trustees in bankruptcy, the Tax and Customs Board, or the Financial Supervision Authority).

5.3. We may use Third Parties (e.g. payment service providers) upon the performance of a contract entered into with You and make the Client Data accessible to them. These persons process Client Data according to their rules and at their responsibility. We may also use Third Parties from outside Estonia upon the performance of a contract entered into with You, who process the Client Data according to the law of their country of location.

6. TRANSMISSION OF CLIENT DATA TO THIRD COUNTRIES

6.1. We Process Client Data in the European Economic Area (EEA), but there may be cases where We transmit Client Data and they are Processed in countries outside the EEA. We only transmit Client Data to the kind of third countries or territories (outside the EEA) in respect of which the European Commission has decided that protection is adequate. If there is no such decision, We will only send Client Data outside the EEA if the protection of Your rights in court is guaranteed to You and effective legal remedies are accessible in the respective country or territory. Also, the transmission described above is not done without a legal basis (e.g. performance of a legal obligation or Your consent). The measures that protect You are, among others: (1) an effective contract that complies with the General Data Protection Regulation; (2) if Client Data are transmitted to the United States of America, the recipient is certified on the basis of the Privacy Shield data protection framework.

7. PROFILING AND AUTOMATED DECISIONS

7.1. Profiling means assessment and automated Processing of Your personal aspects and Client Data, which We carry out with Your consent or for the performance of a contract or for the implementation of pre-contractual measures or compliance with a legal obligation or in the case of Our legitimate interest.

7.2. We use profiling and automated Processing in order to send You direct marketing materials, make automated decisions upon the assessment of Your creditworthiness, manage risks and monitor transactions for the prevention of fraud.

7.3. We make automated decisions for the assessment of Your creditworthiness in order to make responsible lending decisions. When We make decisions, We use the information You have given to Us Yourself, the information We have about Your prior payment discipline and the information We have obtained from public and private registers.

7.4. Upon the assessment of Client Data and automated Processing, We only used the data We have collected according to these Principles.

8. PRE-FILLING OF FIELDS

8.1. We use pre-filling of the fields of Your contact details (see clause 3.2.2) in Our Digital Channels and other systems in order to make the service more convenient. The fields are pre-filled, provided that Your personal data have been entered in the applica-

tion fields of Our digital channels and other systems, and You are Our Client. We will pre-fill the contact details fields with the data You submitted to Us when You entered into the last Service Contract. You must always check whether the information in the pre-filled fields is correct.

8.2. If You do not want the contacts details fields to be pre-filled in Our Digital Channels and other systems, You can waive this option. Contact Us via our Contact Details in order to do this.

9. CLIENT DATA PROCESSING IN MARKETING

9.1. We Process Client Data for marketing purposes. If such Processing is based on Your consent, You have the right to withdraw the consent at any time. In order to withdraw Your consent, send the respective message to Our Contact Details or manage Your consents via Our Digital Channels. The guidelines for withdrawal of consent are also included with all marketing communication.

9.2. The general information about Our services and introductory or supplementary information or notices about changes in the terms and conditions or the price list, or information related to the performance of a contract entered into with You (e.g. notifications about due dates of payments, debts, termination of contracts, etc.) are not deemed marketing. In general, You cannot refuse to receive such information.

10. RECORDING OF CLIENT DATA

10.1. We will record all of the Orders given by You to Us via a means of communication or Digital Channel as well as Your other operations. We have the right to use the recordings as evidence and/or reproduction of Orders or other operations and for the other purposes set forth in the Principles.

10.2. We survey the premises of Our Branches and their close surroundings (incl. persons) with surveillance equipment for the purpose of protecting the property of Us, You and other Clients and to guarantee the physical security of Our employees, You and other clients, and We may record the surveillance results. We can use the recordings of surveillance equipment for the protection of Our rights and performance of Our obligations and as evidence of the operations and/or unlawful acts performed by You and/or of the damage caused to Us. We are obliged to disclose the recordings pursuant to the procedure and to the extent set forth by law primarily in criminal cases to pre-trial investigation authorities, courts and other competent authorities. The recordings can

be viewed at Our Branch at the time agreed with Us in advance.

11. DATA RETENTION

11.1. We process the Client Data for as long as necessary for the achievement of the purposes of Client Data Processing or performance of obligations arising from effective law. The period of Client Data retention is based on the contract entered into with You, Our legitimate interest or applicable law.

12. AMENDMENT OF CLIENT DATA AND TERMINATION OF CLIENT DATA PROCESSING

12.1. Inform Us immediately of any changes and inaccuracies in the Client Data submitted to Us. At Our request, submit to Us a document that proves the changes in Client Data (e.g. name change certificate).

12.2. We regularly check (e.g. via Digital Channels, at client meetings) that the Client Data are complete and correct.

13. RIGHTS OF PRIVATE INDIVIDUAL CLIENT

13.1. As a private individual Client, You have the right to:

13.1.1. request correction of incorrect or incomplete Client Data;

13.1.2. receive information on whether We Process Your Client Data. If We Process them, You have the right to view the Client Data and obtain a copy thereof;

13.1.3. submit objections to the Client Data Processing if the use of the Client Data is based on a legitimate interest, including profiling for the purposes of direct marketing (e.g. receipt of marketing offers or participation in surveys);

13.1.4. request deletion of Client Data, e.g. if Client Data are Processed with Your consent and You have withdrawn Your consent. The above right does not apply if the Client Data the deletion of which has been requested are also Processed on other legal grounds;

13.1.5. withdraw Your consent to Client Data Processing if Processing is done on the basis of consent. In this case, the withdrawal of consent does not affect the lawfulness of the Processing done before the withdrawal of consent;

13.1.6. restrict the Processing of Client Data, e.g. during the time when We assess whether You have the right to the deletion of Your data;

13.1.7. receive the Client Data You have submitted to Us Yourself and that are automatically Processed on the basis of Your consent or for the performance of a contract, in a widely used electronic format and, if this is technically possible, transmit these data to another service provider;

13.1.8. request that no decisions are made in respect of You that are only based on automated decision-making, incl. profiling, if this brings about legal consequences that concern You or has a significant impact. If You submit such a request, Our employees will only review the automated decision, not make a fully manual decision. Said right does not apply if decisions must be made for entering into or performance of a contract with You if making the decision is permitted on the basis of applicable law or You have given Your express consent;

13.1.9. file complaints about the use of Client Data to the Estonian Data Protection Authority if You find that the Processing of Your Client Data constitutes an infringement of Your rights and interest on the basis of applicable law.

13.2. Contact Us on Our Contact Details if You would like to exercise said rights. We will reply to You within one (1) month.

13.3. You can also contact Our data protection specialist on Our Contact Details.