

Principles of Processing Client Data

Effective as of 31.01.2022

We care about Your right to privacy and want to guarantee that Your Personal Data is well protected at Inbank. We have established Principles to describe how Your Data is processed at Inbank in order to assure You of the transparency of the processing of Your Data.

We will apply these Principles when a Client relationship is established between us, or when You use, have used or intend to use Our Services, use Our Digital Channels or visit Our Office. The data obtained during the process preceding the establishment of a client relationship also belong among Personal Data of the Client.

1. DEFINITIONS

Personal Data (Data)	Any information about You that is in Our possession and which can be connected directly to You as an individual. This information includes data subject to banking secrecy, Your and Your representative's personal data, contact details, transaction data, etc., as well as information collected from public sources and information lawfully obtained from third parties.
Data Processing	Any operation executed with Your Personal Data, including collection, recording, organisation, retention, alteration, disclosure, grant of access to, making inquiries and statements, use, transmission, cross-usage, deletion, etc.
We or Inbank	AS Inbank and the AS Inbank group companies 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 Services and Digital Channels or visits Our Office.
Client Relationship	The legal relationship between Us and You, which emerges in relation to You being a Client of Inbank.
Services	Any services or products provided by Us or by Our partners on Our behalf.
Service Contract	The contract entered into between Inbank and the Client on the basis of which and according to the terms and conditions of which We provide the Service to You.
Processor	The person who processes the Client's Personal Data on Our behalf.
Our Website	www.inbank.it , www.mokilizingas.it , the websites on its subdomains, subsites and Our websites on other domains to which Inbank's Terms and Conditions of Website Use apply.
Our Office	The physical location where We service Clients and the persons who have contacted Us.
Digital Channels	The digital environments (e.g. Website, Self-service system) and applications (e.g. Mobile Bank) of Inbank via which You can see the information of the Services related to You or perform the operations related to the Services.

Other terms are understood as they are defined in the legislation provided in point 2.1. below.



2. GENERAL PRINCIPLES OF PROCESSING CLIENT DATA

- 2.1 We Process Your Data pursuant to applicable law, including the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council), Law on Legal Protection of Personal Data, Law on the Credit Institutions, Law on the Prevention of Money Laundering and Terrorist Financing, Law on Electronic Communications and other applicable legal acts, these Principles and the terms and conditions of the contracts entered into with You.
- 2.2 We and Our employees will Process Your Personal Data in accordance with these Principles.
- 2.3 We implement appropriate organisational, physical and information technology measures to guarantee protection of Your Data from unintentional or unauthorised Data Processing, disclosure or destruction. We also require compliance with reasonable confidentiality and security measures from the Processors.
- 2.4 We follow a risk-based approach so Our security measures shall be determined in consideration of the risks that could potentially arise to Your rights and freedoms. Therefore, adequate measures are always selected that best meet Your interests.
- 2.5 We may amend Principles unilaterally at any time. Therefore, We recommend that You periodically visit our Website where you will always find the latest version.

3. PROCESSED CLIENT DATA

- 3.1 The way We collect Your Data depends on the Services You have chosen, as well as on the extent of data provided or the channel through which the data was provided. We will collect Your Personal Data from You as well as third parties (e. g. public and private registers, Our service providers and business partners). Your Personal Data may also be collected by generating it when You use the Services (for example, when You visit the Website, during a creditworthiness assessment, etc.).
- 3.2 In order to use Our Services, You must provide the information about yourself that is necessary for Us to offer Services to You or that We are required to collect by law. If You do not provide information required by Us, We will not be able to provide Services to You.
- 3.3 The primary categories of the Processed Client Data include (but are not limited to) the following:
 - 3.3.1 name, surname, personal ID code, date of birth, place of birth, citizenship, details of the identity document, a copy of the identity document, personal image, residency, area of activity, place of work, position, work experience, education, marital status;
 - 3.3.2 contact details, incl. address, telephone number, e-mail address;

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.

- 3.3.3 data on family members and guarantors, incl. information about the spouse, heir, guardian, close associate, dependents, successors and other related persons.
- 3.3.4 financial details, incl. income, obligations, earlier payment discipline, assets, debts, loans, data of Your credit rating, data of the current account and transactions in the current account.
- 3.3.5 data of origin of assets, incl. the data of beneficial owners, Your transaction partners and business activities;
- 3.3.6 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 and operations performed by You, interest and service charges received and paid, queries and complaints;
- 3.3.7 data of special categories, incl. data on Your capacity;
- 3.3.8 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;
- 3.3.9 data related to participation in consumer games and campaigns, incl. the data of Your consents given to Us, the data of the prizes won in consumer games and participation in campaigns;
- 3.3.10 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;
- 3.3.11 data related to Client communication, incl. data related to visits to Our Website and communication via any other of Our channels, audio recordings collected 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;
- 3.3.12 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, data which are required to apply the necessary measures in the field of prevention of money laundering and terrorist financing and to ensure the enforcement of international sanctions, incl. the establishment of purpose and monitoring of business relations with the Client, implementation of the *Know Your Customer* principle, determining whether a Client is a politically exposed person etc.;
- 3.3.13 data obtained while using the Internet, incl. the place of conclusion of a transaction, IP address, place of login, logs of Internet use.



Purposes of Processing	Legal grounds for Processing
We are contacting you regarding additional information in order to establish a Client Relationship or we are providing You with the information or Our assistance when You are facing difficulties using Our Services delivery channels.	Performance of a contract or implementation of pre-contractual measures or performance of a legal obligation.
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.
We check Your legal capacity to prevent illegal transactions and to protect Your essential interests.	Performance of legal obligations, exercise of legal claims.
We 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 <i>Know Your Customer</i> 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.
We are performing a contract entered into with You or guarantee the performance of the respective contract and realise, waive and protect Our rights, incl. debt management, fraud prevention purposes.	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 Lithuania.	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 improve 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 Digital Channels	Performance of a contract or implementation of pre-contractual measures or Our legitimate interest to ensure that You will have the access to Digital Channels, to create convenient conditions for You to contact Us or to conveniently find information relevant to You also 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 partners.	Your consent or in cases where You have not given Your consent but use Our Services and have provided Us with Your contact details and have not objected to the processing of Your data for direct marketing purpose, we may send You offers for similar services by e-mail or SMS based on Our legitimate interest in providing information about Our services.
We organise consumer games and campaigns.	Your consent.
We want to understand Your expectations better (e.g., analysis of Website visits, client surveys, etc.).	Your consent.



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 Inbank group 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, archiving service providers, translation, communication, IT and postal service providers, call centre service providers);
- 5.1.3 to legal and natural persons who offer and provide Our Services, e. g. consumer credit intermediaries, courier companies, call centres and other partners who help Us offer Services to You.
- 5.1.4 third parties that maintain registers (including companies that manage joint data files, credit registers), the Population Register, the Register of Legal Entities or other registers that process personal data or mediate in the provision of Personal Data from such registers 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, check and guarantee the correctness and integrity of the Client Data, for the implementation of pre-contractual measures, for the performance of a contract entered into with You or to comply with the requirements of the Law on the Prevention of Money Laundering and Terrorist Financing and other applicable laws. Also, for allowing third parties to assess Your payment discipline and creditworthiness. Information about Your possible payment defaults. Client Data transmitted to the register can be Processed by all persons who are members of such a register or who can access such a register on any other grounds;
- 5.1.5 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 relation to the confidentiality and protection of the Client Data;
- 5.1.8 legal entities providing Us with data systematization, transmission, storage and processing services, e. g. Telia Lietuva, AB.

- 5.1.9 to credit institutions, creditors, debt collection service providers and other third parties with whom We negotiate for assignment of the claims arising from Service contract;
- 5.1.10 to the new creditor upon the assignment of a claim. In this case, We do not have to request Your consent, both the old and the new creditor can inform You about the transfer of the debt;
- 5.1.11 to other third parties if You have breached the contract (e.g., provider of debt collection services to which debt claims are assigned, courts, out-of-court redress bodies, notaries and bankruptcy administrators);
- 5.1.12 auditors, legal and financial consultants, data processors authorized by Us;
- 5.1.13 Other third parties with Your consent, which may be obtained in a specific case.
- 5.1.14 If You delay in fulfilling your obligations with Us for more than 30 days, We will transfer the information about Your identity, contact details and credit history to UAB Creditinfo Lietuva (company code: 111689163, address: A. Goštauto St. 40A, Vilnius, Lithuania, www.manocreditinfo.lt, tel.: (8 5) 2394131), UAB Scorify (company code: 302423183, address: Olimpiečių St. 1A-24 Vilnius, Lithuania, www.scorify.ai, ph.: +370 676 48676), other joint data file managers. These legal entities process and provide Your information to third parties (financial institutions, telecommunications companies, insurance, electricity and utilities, merchants, etc.) for the legitimate interests and purposes of assessing creditworthiness and managing indebtedness. In assessing creditworthiness, the assessment of a person's characteristics is performed automatically (profiling), which may affect your ability to conclude transactions in the future.
- 5.2 We are obliged to disclose and transmit Client Data for the performance of the obligations arising from applicable law (e. g. transmit data to law enforcement authorities, notaries, bailiffs, bankruptcy administrators, institutions performing tax administration, supervision of the financial institutions, investigation of financial crimes).
- 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 Your Data accessible to them. These third parties process Client Data according to their rules and at their responsibility. We may also use third parties from outside Lithuania 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 Your Data and they are Processed in countries outside the EEA. We only transmit Your Data to 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 Data Processing of Your personal aspects and 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 about Yourself, the information We have about Your prior payment discipline and the information We have obtained from public and private registers.

7.4 We may collect statistics about You, such as typical behaviour, choices or lifestyle. Statistical data for segment / profile creation are collected from external sources and can be used together with other data available to Us.

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

7.6 PRE-FILLING OF FIELDS

7.7 We use pre-filling of the fields of Your contact details (see clause 3.3.2) 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 application fields of Our digital channels and other systems, and You are Our Client. You must always check whether the information in the pre-filled fields is correct.

8. CLIENT DATA PROCESSING FOR MARKETING

8.1 We Process Your Data for marketing purposes. Such Processing is based on Your consent or Our legitimate interest in providing information about Our services. You have the right to withdraw Your consent to process Your Personal Data for direct marketing purposes at any time. In order to withdraw Your consent, call Us or send the respective message to Our contact details.

8.2 Greetings for birthdays or holidays, 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.

9. RECORDING OF CLIENT DATA

9.1 We will record all submission of orders, notifications, requests to Us via a means of communication or Digital Channel. We have the right to use the recordings as evidence and/or reproduction of such operations and for the other purposes set forth in the Principles.

10. DATA RETENTION

10.1 We process Your Data for as long as necessary for the achievement of the purposes of Your 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.

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

11.1 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).

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

12. YOUR RIGHTS

12.1 You have the right to:

12.1.1 request correction of incorrect or incomplete Your Data;

12.1.2 receive information on whether We Process Your Personal Data. If We Process it, You have the right to view the Data and obtain a copy thereof;

12.1.3 submit objections to Your Data Processing if the use of the Data is based on a legitimate interest, including profiling for the purposes of direct marketing;

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

12.1.5 withdraw Your consent to Your 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;

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

12.1.7 receive Your Personal 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;

12.1.8 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;

12.1.9 file complaints about the use of Your Data to the State Data Protection Inspectorate (www.ada.it) if You find that the Processing of Your Data constitutes an infringement of Your rights and interest on the basis of applicable law. You can complain about Our actions (or omissions) within 3 months from Our response to Your complaint or within 3 months from the end of the



term for reply. You can appeal to the court against the actions of the State Data Protection Inspectorate.

12.2 Contact Us by e-mail if You would like to exercise said rights. You should submit a written request together with an identity document or, in accordance with the law, by using electronic means that allow proper identification of the person. We will reply to You within one (1) month.

12.3 If You have any questions or complaints related to the processing of Personal Data, please contact Us in the most convenient way for You, the contacts can be found below.

AS Inbank branch, legal entity code: 305340173

Visit Us - Kareivių st. 11B, 09109 in Vilnius (business center "Eleven")

Call Us - +370 700 700 80

Write to Us - asmens.duomenys@inbank.lt