

IPAS “CBL Asset Management” Privacy Protection Rules



Effective as of 31, March 2026

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1. About your privacy, why we care about it and protect it

Your privacy

Nowadays, technology is evolving very quickly, facilitating the rapid exchange of information and data, which can affect your privacy. Your privacy is important to us, so we do everything we can to protect it.

Financial security and secrecy of transaction

Our daily routine is to work with confidential and private information - your data, accounts, transactions, and other information. You entrust this information to us to receive quality services from us and special care for the security of your data and transactions.

Trust

Your trust is important to us, so we make sure your data is always safe.

Compliance with law and best practices

We, IPAS "CBL Asset Management", have developed these Privacy Protection Rules to provide you with general information about what data we process, why we process it, and how we protect it. You can also find information about data processing in applications, agreements, and other documents when you apply for our products and services.

If you want to receive information about the your data processing, we will provide it in accordance with the procedure set out in these rules.

We provide this information in compliance with European Union and Latvian legislation, financial sector and supervisory authority guidelines, and best practices.

2. Let's get acquainted with the terms

bank – AS "Citadele banka".

Citadele Group companies – AS "Citadele banka" and all its foreign branches and subsidiaries.

consent – any freely and knowingly given confirmation by which you agree to your data processing.

data – any information relating to you or that could relate to you, such as your name, surname, personal identification number, address, phone number, email address, and your habits.

Data State Inspectorate – an institution that supervises the application of the Regulation in the Republic of Latvia.

EU/EEA – European Union / European Economic Area.

investment manager or we – IPAS "CBL Asset Management".

processing – any actions we perform with your personal data, such as collecting, recording, storing, viewing, using, disclosing by sending, distributing or otherwise making them available, coordinating, erasing or destroying your data, and more.

profiling – an automated method of processing your data to assess your economic and financial situation, personal preferences, interests, reliability, behaviour, and more.

regulation – Regulation (EU) 2016/679 of the European Parliament and of the Council (27 April 2016) on the protection of natural persons regarding the processing of personal data and on the free. movement of such data.

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rules – these Privacy Protection Rules.

you – the person whose data we process.

3. Who processes your data

Your data is processed by IPAS "CBL Asset Management", registration number 40003577500, address: Republikas laukums 2A, Riga, Latvia, LV-1010.

If you have any questions regarding data processing, you can contact us by calling +371 67010810, or by writing to asset@cbl.lv or to our Data Protection Officer at gdpr@citadele.lv.

4. For what purposes, what data, on what basis we process, to whom we transfer it and how long we retain it

Before we collect your data, we always carefully assess why we need it. We process your data only if there is a justification for doing so.

This may be in the following cases:

- **to enter and perform a contract:** We need data so that we can conclude a contract with you and provide you with a service.
- **to comply with legal requirements (statutory obligation):** We process data if we are obliged to do so to comply with the law, for example, to prevent money laundering or provide information to the relevant public authorities.
- **for public interests arising from the law:** We process data to help maintain security, order and fairness in society, for example, in relation to the prevention of money laundering.
- **with your consent:** We only process your data if you have agreed to this, for example, to receive notifications and offers.
- **to protect important interests:** We process data to protect your and other persons' important interests, such as life or health.
- **for archiving in the public interest:** We process data in accordance with the law to create and maintain archives for public interest.
- **to protect legitimate interests:** We process data when it is necessary to protect the interests of the investment manager, you or others.

What are legitimate interests? This justification allows the investment manager to process data lawfully even if you have not given special permission or the investment manager has not concluded a contract with you.

How does this work? The investment manager assesses whether the data processing is lawful, justified and necessary, and does not excessively interfere with your privacy. For example, the investment manager may process your data for security purposes to prevent fraud.

How does this affect you? If the data is processed based on legitimate interests, you have the right to object to such data processing. The investment manager will carefully assess whether it is necessary to continue data processing.

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4.1. Identity verification in person and in the electronic environment (authentication)

Purpose of data processing	Types/sets of data (categories) we process	Justification for data processing	Data recipients	Data retention period
Client identification in person	Client, including a minor Name, surname, personal identification number, date of birth, identity document number, date of issue, country, issuing authority, expiration date, photo, signature.	Statutory obligation <ul style="list-style-type: none"> Regulation Article 6(1)(c) Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing and other related legal acts, guidelines Law on International and National Sanctions of the Republic of Latvia and other sanctions - related legal acts, guidelines Public interest arising from the law <ul style="list-style-type: none"> Regulation Article 6(1)(e) Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing and other related legal acts, guidelines 	<ul style="list-style-type: none"> Register of invalid documents Cooperation partners ensuring identification when applying for services Information systems maintainers Supervisory and law enforcement authorities 	5 years from the date of termination of the business relationship 10 years if information has been requested by supervisory or law enforcement authorities
Identity verification in the electronic environment (authentication) To use our services, we are obliged to verify your identity. Authentication is most often carried out using tools such as MobileSCAN/Digipass 780, Smart-ID, eID card or eParaksts Mobile, code card/code calculator.	Client/any natural person Name, surname, personal identification number, phone number, user login name, password, device identifier, account number, IP address, transaction history.	Conclusion and performance of the contract: <ul style="list-style-type: none"> Regulation Article 6(1)(b) Statutory obligation: <ul style="list-style-type: none"> Regulation Article 6(1)(c) Regulation (EU) 2022/2554 of the European Parliament and of the Council of 14 December 2022 on the digital 	<ul style="list-style-type: none"> Authentication service providers – SK ID Solutions AS, SJSC Latvian State Radio and Television Centre Information systems maintainers 	5 years from the date of termination of the business relationship 18 months for storing online banking audit records

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<p>We do not process your biometric data (e.g., facial or fingerprint data). These data are processed by companies providing authentication services.</p>		<p>operational resilience of the financial sector and amending Regulations (EC) No 1060/2009, (EU) No 648/2012, (EU) No 600/2014, (EU) No 909/2014 and (EU) 2016/1011</p> <ul style="list-style-type: none"> • Commission Delegated Regulation (EU) 2018/389 of 27 November 2017 supplementing Directive (EU) 2015/2366 of the European Parliament and of the Council regarding regulatory technical standards on secure user authentication and common and secure open communication standards 		
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The investment manager must comply with Articles 26 and 27 of the Personal Data Processing Law, Article 44(3) of the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing, as well as Article 23 of the regulation, which sets limitations on individuals’ rights to access information. These rules apply to the right to request information about data processing, its purposes, recipients, sources, as well as the right to access your data and request its correction, deletion, suspension, or restriction of processing.

4.2. Know your client (Client due diligence within the framework of anti-money laundering) and sanctions management

What is it?

As part of Know your client, the investment manager checks who their client is to make sure they are not involved in illegal activities such as money laundering. “Money laundering” refers to the process of making money obtained through criminal activities – such as drug trafficking, human smuggling, and other unlawful activities, “dirty” money, is converted into “clean” money to make it look as though it was earned legally. Money laundering poses major threat to investment managers and the entire financial system.

Countries have strict rules and laws requiring investment managers to identify, monitor, and report suspicious transactions to state authorities. Anti-money laundering measures implemented by investment managers help to limit such activities.

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As part of sanctions management the investment manager monitors and complies with international and local sanctions. The investment manager carefully reviews client transactions to ensure that sanctioned individuals cannot receive services or access funds. Sanctions are applied to countries, organizations, or individuals that pose security threats, violate laws, or engage in illegal activities such as terrorism, money laundering, or human rights violations.

How does this affect you?

As part of Know your client, the investment manager carefully reviews cash flows, monitors potentially suspicious transactions, and cooperates with state authorities. Please note that when providing services, the investment manager may request documents and explanations required by law regarding transactions.

As part of sanctions management, when providing services, the investment manager may request additional documents and explanations about transactions carried out in accounts.

How does this affect us? If the investment manager fails to comply with these rules, it may face significant financial penalties, suffer reputational damage, lose client trust, or even its license.

Purpose of data processing	Types/sets of data (categories) we process	Justification for data processing	Data recipients	Data retention period
<p>Customer due diligence before and during business relationship</p> <p>We clarify the origin of funds, politically exposed persons (PEPs), beneficial owners, and related persons related to the client to comply with legal requirements and identify unusual or suspicious transactions, as well as ensure compliance with international or national sanctions.</p>	<p>Client, including minors (politically exposed persons ()), beneficial owners (client or their family members or closely related persons)</p> <p>Name, surname, personal identification number, date and place of birth, country, identity document number, issue date, issuing country and authority, expiration date, photo, nationality, address, phone number, email, social status/employer name, position, previous professional activity, occupation, reputation, education, taxpayer number, tax residence, source of income, planned account turnover (incoming/outgoing payments and</p>	<p>Statutory obligation</p> <ul style="list-style-type: none"> Regulation Article 6(1)(c) Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing and related legal acts, guidelines Law on International and National Sanctions of the Republic of Latvia and related legal acts, guidelines <p>Public interest arising from law</p> <ul style="list-style-type: none"> Regulation Article 6(1)(e) Law on the Prevention of Money Laundering and 	<ul style="list-style-type: none"> Public registers: Lursoft, Company Register, Land Register, State Revenue Service registers Information system maintainers Citadele Group companies Supervisory and law enforcement authorities 	<p>5 years after termination of business relationship</p> <p>10 years if requested by supervisory authority or law enforcement authorities</p>

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	<p>origin, cash deposits/withdrawals), used services, family details, relationship, politically exposed person (PEP) status, account number, account balance, transaction history, movable/immovable property, relationship with companies, shares, information related to customer identification and research, criminal record, signature.</p>	<p>Terrorism and Proliferation Financing and related legal acts, guidelines</p>		
<p>Reporting suspicious transactions to the Financial Intelligence Unit (FIU) (Including sanctions violations or attempts) and State Revenue Service</p>	<p>Client, including minors (politically exposed person, beneficial owner (the client or their family member or a closely related person))</p> <p>Name, surname, personal identification number, date of birth, place of birth, country, identity document number, date of issue, country, issuing authority, expiration date, photo, nationality, address, phone number, email, social status/employer name, position, information related to previous professional activity, occupation, reputation, education, taxpayer number, tax residence, source of income, incoming/outgoing payments and their origin, cash deposits/withdrawals, information related to family members, relationship, politically exposed person (PEP) status, account number, account balance, transaction history, movable/immovable property owned, relationship with companies, shares, information related to client</p>	<p>Statutory obligation</p> <ul style="list-style-type: none"> • Regulation Article 6(1)(c) • Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing and related legal acts and guidelines • Law on International and National Sanctions of the Republic of Latvia and other sanctions-related legal acts and guidelines • 17.08.2021 Republic of Latvia Cabinet Regulation No. 550 Regulations regarding the Procedures for the Submission of Reports on Suspicious Transaction and the Threshold Declaration and Content Thereof <p>Public interest arising from the law</p> <ul style="list-style-type: none"> • Regulation Article 6(1)(e) 	<ul style="list-style-type: none"> • Financial Intelligence Unit • State Revenue Service • Information system maintainers 	<p>5 years after termination of business relationship</p> <p>10 years if requested by supervisory authority</p>

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	<p>identification and research, criminal record, signature. Additionally, under sanctions management transaction/payment details (date, amount and currency, payer and payee (name, surname, personal identification number, company name, registration number, registration country), account numbers and the credit institution where the account is held, payment details, short description of the nature of the transaction/payment, information, facts and documents indicating sanctions violations or signs thereof, actions taken regarding the payment – refused and returned to the sender, funds frozen, transaction already executed (i.e., cases where the sanctions violation was detected after payment execution)).</p>	<ul style="list-style-type: none"> • Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing and other related legal acts and guidelines 		
<p>Reporting suspicious transactions with financial instruments to the Bank of Latvia</p> <p>(We closely monitor client transactions involving financial instruments and report any suspicious activity to protect both clients and the investment manager from financial risks).</p>	<p>Client</p> <p>Name, surname, personal identification number, date of birth, address, employer, position, taxpayer number, account number, transaction history.</p>	<p>Statutory obligation</p> <ul style="list-style-type: none"> • Regulation Article 6(1)(c) • Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing and related legal acts and guidelines • Regulation (EU) No. 596/2014 of the European Parliament and of the Council (16 April 2014) on market abuse (Market Abuse Regulation) • Commission Delegated Regulation (EU) 2016/957 (9 	<ul style="list-style-type: none"> • Bank of Latvia • Information system maintainers 	<p>5 years from the termination of the business relationship</p> <p>10 years from the termination of the business relationship if requested by the supervisory authority – Bank of Latvia</p>

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		<p>March 2016) supplementing Regulation (EU) No. 596/2014 regarding regulatory technical standards for the appropriate arrangements, systems and procedures, as well as notification templates to be used for preventing, detecting and reporting abusive practices or suspicious orders or transactions (Document applies to the EEA)</p> <p>Public interest arising from the law:</p> <ul style="list-style-type: none"> • Regulation Article 6(1)(e) • Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing and other related legal acts and guidelines 		
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The investment manager must comply with Articles 26 and 27 of the Personal Data Processing Law, Article 44(3) of the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing, as well as Article 23 of the Regulation, which sets limitations on individuals’ rights to access information. These rules apply to the right to request information about data processing, its purposes, recipients, sources, as well as the right to access your data and request its correction, deletion, suspension, or restriction of processing.

4.3. Investment manager services

Purpose of data processing	Types/sets of data (categories) we process	Justification for data processing	Data recipients	Data retention period
Provision of investment portfolio management and investment advice services	Client, including minors Name, surname, personal identification number, phone number, address, email,	Statutory obligation <ul style="list-style-type: none"> • Regulation Article 6(1)(c) 	<ul style="list-style-type: none"> • Cooperation partners involved in service provision 	10 years from the termination

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	<p>account number, signature, movable/immovable property owned, relationship with companies, shares, credit obligations and other liabilities, history of transactions with financial instruments, information about experience and knowledge in transactions with financial instruments, and ability to assume risk.</p>	<ul style="list-style-type: none"> • Law on Investment Management Companies • Financial Instruments Market Law • Regulation (EU) 2019/2088 of the European Parliament and of the Council (27 November 2019) on sustainability-related disclosures in the financial services sector • Directive 2009/65/EC of the European Parliament and of the Council (13 July 2009) on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities • Directive 2014/65/EU of the European Parliament and of the Council (15 May 2014) on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU 		<p>of the business relationship</p>
<p>Assessment of the compliance of the chosen second-pillar pension plan managed by the investment manager with the participant’s age and investment needs, and providing a recommendation</p>	<p>Client (second-pillar pension plan participant) Name, surname, personal identification number, year of birth, address, chosen second-pillar pension investment plan, email address, phone number, online banking wockID, tax residence.</p>	<p>Statutory obligation</p> <ul style="list-style-type: none"> • Regulation Article 6(1)(c) • Law on Investment Management Companies • Law on State Funded Pensions • Cabinet Regulation No. 272 of 27.05.2023 “Regulations on 	<ul style="list-style-type: none"> • Cooperation partners providing the service 	<p>3 months from the termination of participation in the investment manager’s second-pillar pension plan</p>

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		the Operation of the State Funded Pension Scheme” Bank of Latvia Regulation No. 255 of 27.11.2023 Regulations on Preparation of Basic Information and Determination of Participant Needs for State Funded Pension Scheme Participants		
Provision of automated investment consultations (Finoterapija and Investment Strategy Questionnaire)	Client Name, surname, phone number, email address, age, voice recording, personal identification number or ID number.	Statutory obligation: <ul style="list-style-type: none"> • Regulation Article 6(1)(c) • Law on Investment Management Companies • Financial Instruments Market Law • Regulation (EU) 2019/2088 of the European Parliament and of the Council (27 November 2019) on sustainability-related disclosures in the financial services sector • Directive 2009/65/EC of the European Parliament and of the Council (13 July 2009) on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities • Directive 2014/65/EU of the European Parliament and of the Council (15 May 2014) on markets in financial instruments and amending 	<ul style="list-style-type: none"> • Cooperation partners involved in service provision 	3 months from receipt of the investment recommendation

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		Directive 2002/92/EC and Directive 2011/61/EU		
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4.4. Organization of the investment manager’s activities

Purpose of data processing	Types/sets of data (categories) we process	Justification for data processing	Data recipients	Data retention period
Physical security We ensure safety in the premises, territory, and other locations of the investment manager to protect employees, clients, and property. Our purpose is to prevent and detect crime, control access, and provide evidence to protect the investment manager’s interests.	Client, including minors Video image, name, surname, personal identification number, information indicated in the identity document, information related to violations.	Legitimate interests regarding the protection of the investment manager, your security and property protection, prevention and detection of possible crime, control of access to the investment manager’s premises, and collection of evidence in case of disputes or violations. <ul style="list-style-type: none"> Regulation Article 6(1)(f) 	<ul style="list-style-type: none"> Cooperation partner providing physical security services 	30 days
Attracting clients for the use of investment manager services (promotions, lotteries, raffles, contests)	The amount of data varies depending on the type of event. Client Name, surname, personal identification number, date of birth, phone number, email, data indicated in the identity document, tax residence, information related to the prize won, account number, signature.	Consent to receive notifications and offers <ul style="list-style-type: none"> Regulation Article 6(1)(a) Conclusion and performance of the contract <ul style="list-style-type: none"> Regulation Article 6(1)(b) 	<ul style="list-style-type: none"> Cooperation partners providing the service 	5 years
Maintaining and promoting the investment manager’s image (At in-person and online events, on social media and in the media)	The amount of data varies depending on the type of event. Client or any individual Name, surname, phone number, email address, address, social media account addresses, audio recording,	Conclusion and performance of the contract <ul style="list-style-type: none"> Regulation Article 6(1)(b) Legitimate interests regarding the creation and maintenance of the investment manager’s image,	<ul style="list-style-type: none"> Cooperation partners providing the service 	10 years or, in certain cases, longer to provide information about the investment

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	<p>photograph, video recording, position, profession, type of occupation, length of work experience, employer, education, interests, use of investment manager’s services and suitability to client needs. Any other personal data disclosed during the event in written text/audio/photo/video, IP address.</p>	<p>attracting new clients, and ensuring trust and well-being of existing clients</p> <ul style="list-style-type: none"> Regulation Article 6(1)(f) 		<p>manager’s history</p>
<p>Protection of investor interests in transactions with financial instruments (Based on the information you provide, we assess and assign your client status – retail client, professional client, or eligible counterparty. We check whether investment services match your interests, experience, and knowledge. The level of protection you receive depends on the assigned status.)</p>	<p>Client, including minors Name, surname, personal identification number, date of birth, identity document number, phone number, email, profession, position, education, risk tolerance, experience in transactions with financial instruments, knowledge of financial instruments, financial situation, information on savings by investment type, income, signature.</p>	<p>Statutory obligation</p> <ul style="list-style-type: none"> Regulation Article 6(1)(c) Law on Investment Management Companies Financial Instrument Market Law Directive 2009/65/EC of the European Parliament and of the Council (13 July 2009) on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities Directive 2014/65/EU of the European Parliament and of the Council (15 May 2014) on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU Commission Delegated Regulation (EU) 2017/565 (25 April 2016) supplementing Directive 2014/65/EU with regard to organizational 	<ul style="list-style-type: none"> Citadele banka Cooperation partner (bank) involved in service provision 	<p>10 years from the termination of the business relationship</p>

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		requirements and operating conditions for investment firms and defined terms for the purposes of that Directive		
Receipt and sending of documents (correspondence)	Client / any natural person Name, surname, address, phone number, email address, signature.	Conclusion and performance of the contract <ul style="list-style-type: none"> Regulation Article 6(1)(b) 	<ul style="list-style-type: none"> Postal service providers Delivery and courier service providers Information system maintainer 	10 years
Storage and destruction of paper and electronic documents (archiving)	Client, any natural person, including minors Considering the amount of data and information indicated in different documents, the following data may be processed: Name, surname, personal identification number, date of birth, photograph, type of identity document, number, date of issue, issuing country, issuing authority, signature, phone number, address, email address, password for identification, marital status, relationship, employer, occupation, education level, nationality, validity and expiration date of residence permit, tax residence, taxpayer number, place of birth, country, citizenship, information obtained during communication with the investment manager, authorization device, transaction history, information related to client identification and research, politically exposed person	Statutory obligation: <ul style="list-style-type: none"> Regulation Article 6(1)(c) Archives Law and state - defined document standards Law on Investment Management Companies Alternative Investment Funds Law State Funded Pensions Law Financial Instruments Market Law Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing Law on International and National Sanctions and other sanctions-related legal acts Law on Accounting Civil Law and other regulatory acts Archiving in the public interest <ul style="list-style-type: none"> Regulation Article 9(2)(j) 	<ul style="list-style-type: none"> Cooperation partner providing archiving services, information system maintenance. 	Various document retention periods (6 months, 5 , 10 years)

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	(PEP) status, criminal record, account number, transaction history (outgoing and incoming payments indicating income and its source, liabilities, expenses, account balance), credit obligations and other liabilities, information about financial knowledge, real estate, and movable property.			
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4.5. Receiving information, notifications, and offers

Purpose of data processing	Types/sets of data (categories) we process	Justification for data processing	Data recipients	Data retention period
Communication regarding your products and services, and their changes (via phone, email, the bank’s mobile app, online banking)	Client Name, surname, personal identification number, audio recording, phone number, email address, information about the investment manager’s products and services you use.	Conclusion and performance of the contract <ul style="list-style-type: none"> Regulation Article 6(1)(b) Consent to receive notifications and offers <ul style="list-style-type: none"> Regulation Article 6(1)(a) 	<ul style="list-style-type: none"> Cooperation partners providing communication services 	5 years from the date of communication
Sending notifications and offers	Detailed information is provided in the Privacy disclaimer for the processing of personal data for receipt of notifications and offers.			
Customer satisfaction surveys (We regularly conduct surveys to learn the opinions of clients and the public about the bank’s and investment manager’s services and products. Surveys also gather feedback on the bank’s and investment manager’s image and everyday money usage habits. This information helps us improve services and ensure high-quality client care.)	Client Name, surname, personal identification number, date of birth, audio recording, email address, phone number, number of family members, marital status, age, occupation, position, profession, education, resident or non-resident status, transaction history for survey participant selection, information about client interests, use of investment manager’s and banking services, signature.	Consent to receive notifications and offers <ul style="list-style-type: none"> Regulation Article 6(1)(a) 	<ul style="list-style-type: none"> Cooperation partners providing survey services 	Data is deleted after the survey is completed.

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Personalized offers on Facebook and Google platforms (We use Facebook and Google platforms so that you can receive relevant offers)	Email address, information about the investment manager’s products you use.	Consent to receive notifications and offers <ul style="list-style-type: none"> Regulation Article 6(1)(a) 	<ul style="list-style-type: none"> Meta Google Citadele banka 	6 months from the date the communication is sent.
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4.6. Handling of requests, claims, applications and complaints

Purpose of data processing	Types/sets of data (categories) we process	Justification for data processing	Data recipients	Data retention period
Handling applications, requests, and complaints from individuals	Client Name, surname, personal identification number, date of birth, signature, audio recording, address, email address, phone number, information related to family and children (name, surname, personal identification number, relationship), tax residence, account number, account balance, transaction history (incoming and outgoing payments), credit obligations and other liabilities. Other types of data are determined depending on the scope of information requested in the application, claim, or complaint, as well as the information contained in the documents to be issued.	Statutory obligation: <ul style="list-style-type: none"> Regulation Article 6(1)(c) Law on Investment Management Companies Consumer Rights Protection Law Bank of Latvia Regulation No. 358 on the procedure for handling complaints received by financial market participants 	<ul style="list-style-type: none"> Citadele banka 	10 years from the date the information is provided
For personal data used for identification, please refer to the section Identity verification in person and in the electronic environment (authentication) .				
Management of data subject requests	Client, including a minor	Statutory obligation:	Citadele banka	5 years from the date of

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	<p>Name, surname, personal identification number, date of birth, address, email address, phone number, signature. Other types of data are determined depending on the scope of information requested in the application, claim, or submission, as well as the information contained in the documents to be issued</p>	<ul style="list-style-type: none"> • Regulation Article 6(1)(c) Personal Data Processing Law 		<p>providing the information.</p>
<p>For personal data used for identification, please refer to the section Identity verification in person and in the electronic environment (authentication).</p>				
<p>Examination of requests from competent state authorities and their officials</p>	<p>Client, including a minor Name, surname, personal identification number, date of birth, address, email address, phone number, signature, audio recording, type of identity document, number, date of issue, issuing country, issuing authority, information contained in the documents to be issued, information related to family and children (name, surname, personal identification number, relationship), tax payment country, account number, account balance, transaction history (incoming and outgoing payments), credit obligations and other liabilities, tax residence, place of birth, country, citizenship, information on financial literacy, politically exposed person (PEP) status, occupation, education, authorization device, login device, IP address.</p>	<p>Statutory obligation:</p> <ul style="list-style-type: none"> • Regulation Article 6(1)(c) • Law on Investment Management Companies • Law on Alternative Investment Funds • State Funded Pension Law • State Labour Inspectorate Law 	<ul style="list-style-type: none"> • Bank of Latvia • Financial Intelligence Unit • Courts • Criminal Procedure Authorities • Police, Prosecutor’s Office • Bailiffs • Notaries • Orphan’s Courts • Data State Inspectorate • State Revenue Service • Information Technology • Security Incident Response Institution • Competition Council • Ministry of Finance • Consumer Rights Protection Centre • State Labour Inspectorate • other officials specified by law 	<p>5 or 10 years from the date of providing the information, depending on the type of request.</p>

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	Other types of data are determined depending on the amount of information requested in the request, claim or application, as well as on the information contained in the documents to be issued.			
Reporting (whistleblowing) on potential violations in the activities of the investment manager and protection of whistleblowers (you can report potential or identified violations, including possible fraud or criminal offences. We ensure proper protection of the whistleblower.)	Client / any natural person Name, surname, email address, phone number, social media account addresses and content, video recording, information related to violations.	Statutory obligation <ul style="list-style-type: none"> Regulation Article 6(1)(c) Whistleblowing Law 	<ul style="list-style-type: none"> Citadele banka 	5 years from the date of reporting

4.7. Provision of information and reports to supervisory authorities

Purpose of data processing	Types/sets of data (categories) we process	Justification for data processing	Data recipients	Data retention period
Report on transactions with persons related to the investment manager (This report describes how to prepare and submit information to the Bank of Latvia regarding risk transactions with persons closely connected to the investment manager. The report applies to transactions with the investment manager’s shareholders who own	Name, surname, personal identification number, position, information about spouse, parents and children, relationship, risk transactions (material participation) and their value.	Statutory obligation: <ul style="list-style-type: none"> Regulation Article 6(1)(c) Regulation No. 282 of the Bank of Latvia of 25.03.2024 Regulations regarding the Preparation and Submission of Supervisory Reports Accounting Law 	<ul style="list-style-type: none"> Bank of Latvia 	10 years from the date of providing the information

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<p>a significant stake (significant participation), their spouses, parents, and children; members of the management – board and council members; persons responsible for internal audit, risk management, compliance, and internal control; their spouses, parents, and children; and companies in which the above - mentioned persons have significant influence or participation. The bank determines the level of risk for each such transaction, prepares a report on these transactions, and submits it to the Bank of Latvia. This ensures that the bank operates honestly and transparently, avoiding conflicts of interest or unauthorized favouritism toward related persons.)</p>				
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4.8. Cookies

Purpose of data processing	Data types/sets (categories) we process	Justification for data processing	Data recipients	Data retention period
Use of cookies on Citadele websites	Detailed information in the Cookie Terms and Conditions on Citadele websites.			

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5. How we collect your data

We collect your data:

- when you give them to us:
 - by using our products and services, which you can apply for at our office, bank customer service centres, websites, bank's online banking, by filling out applications and requests. We also collect information about how you use these services, as well as data from your devices (computer or mobile phone) through cookies;
 - when establishing a business relationship with the investment manager as required by law;
 - as a third party in connection with the transfer of an investment portfolio;
 - when contacting us via mail, email, mobile application, by phone, in person at our office or bank customer service centres.
- when third parties give them to us:
 - our cooperation partners who provide you with information about us, conduct market research, or deliver services;
 - companies within the Citadele Group;
 - maintainers of databases, registers established by law, and media;
 - state institutions and law enforcement authorities and their officials.

Your data is available only to our employees and those of our cooperation partners who need it to perform their work duties and provide you with the necessary services. They process your data for certain purposes, in accordance with requirements of the law and the rules of the investment manager.

6. Do we process data in an automated way and perform profiling

We process your data by performing profiling in certain cases. We do not process your data in an automated way.

Profiling

What is it? Profiling is a data processing method where, using various personal data, we create your personal "profile," within which we assess data such as financial situation, transaction history, interests, wishes, and more.

Why do we do it? We perform profiling: :

- to assess whether the relevant product or service is suitable for your wishes and needs;
- to assess risks;
- to provide you with advice related to the investment manager's products and services;
- to offer products and services tailored to your needs.

7. Do we transfer your data outside the EU/EEA

We process your data within the European Union and the European Economic Area. However, to provide certain services, data may be transferred to countries outside these territories, for example, if it is necessary for our cooperation partners to provide certain services. If we carry out such transfers, we will inform you. In such cases, we ensure that data is processed in accordance with the requirements of the regulation and is protected at the same level as required by the regulation.

If we transfer your data outside the EU or EEA, we comply with at least one of the following conditions:

- we carry out the transfer to a country that has been recognized by the European Commission as safe for data protection;
- we transfer the data to a country or an international organization that guarantees security in accordance with specially adopted rules;
- the transfer of data is permitted by the Data State Inspectorate based on agreements between us and third parties (cooperation partners);
- you have given your explicit consent to the transfer of data;
- the transfer of data is necessary for the performance of contract between you and the investment manager or a contract with our cooperation partner in your interest;
- the data is transferred for the purpose of defending or exercising your rights, for example in legal proceedings.

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For more information on data transfers outside the EU and EEA, visit the Data State Inspectorate’s website: <http://www.dvi.gov.lv>. There you can also find the decision on countries that provide a level of data protection equivalent to Latvia’s data protection level.

8. How long we retain your data

The length of time we keep your data depends on the purpose for which it is used. When determining retention periods, we consider the following criteria:

- **Performance of the contract:** We retain data for as long as necessary to ensure that the product or service is available to you.
- **Legal requirements:** We must keep data for a period specified by law, for example, 10 years from the termination of business relations with you, or 5 years to comply with anti-money laundering regulations.
- **Legitimate interests:** If the deletion of data could harm our, your, or third - party interests, we will retain the data for as long as necessary.
- **Preservation of evidence:** We keep data to demonstrate that previous processing was lawful, for example, your consent to receive notifications and offers.

If data is processed based on your consent, we retain it for as long as the consent is valid.

We follow industry guidelines when setting retention periods. If several valid periods apply, such as those required by law and those necessary to protect our and your interests, we will keep the data for the longer period. If none of these criteria apply, we will delete or anonymize your data.

9. What are your rights in relation to the data processing we carry out

When processing data, we ensure that you have the following rights by submitting a written request to us in free form:

9.1. Withdraw consent for data processing	If you have given consent, for example, to receive offers and notifications about our products, you can withdraw it at any time. You can withdraw your consent using: <ul style="list-style-type: none">• online banking, if you are a bank client;• mobile application, if you are a bank client;• email;• our office or bank’s customer service centres by visiting in person. If you withdraw your consent, we will stop processing your data.
9.2. Access your data	You have the right to receive from us: <ul style="list-style-type: none">• confirmation of whether we process your data;• detailed information about your data processing to ensure that the data is accurate and processed in accordance with the law. If you wish to access your data, please specify the exact time and the data you would like to receive. You have the right to know what data we hold about you, why we process it, how we obtained it, to whom we have disclosed it, and how long it will be retained. You may also request a copy of your data. To help us fulfil your request faster, please indicate the shortest possible time and describe precisely what data and information you would like to receive. Please note that we cannot provide information if prohibited by law, for example, when providing data to law enforcement authorities (police, prosecutor’s office, court, etc.).
9.3. Correct data	If you believe that the data we hold is inaccurate or incomplete, please let us know: <ul style="list-style-type: none">• inform us about corrections needed;• we may ask you to provide documents confirming the necessary changes to the data, for example, if you have changed your surname.
9.4. Delete data	You can request the deletion of your data if you believe that: <ul style="list-style-type: none">• it is no longer necessary;• it is not being used for the intended purposes.

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	<p>We will delete your data and inform our cooperation partners about the need to delete it, unless the data is required for the purposes for which we process it or the law requires us to retain it longer.</p> <p>Please note that it may not always be possible to fulfil a deletion request, for example, if the data is needed to provide you with a service, comply with legal requirements, or in legal proceedings.</p>
9.5. Restrict data processing	<p>You may request to restrict processing of your data if:</p> <ul style="list-style-type: none"> • you dispute the accuracy of the data (restriction will apply until accuracy is verified); • you believe the data processing is unlawful, but prefer to restrict rather than delete the data; • we no longer need your data, but you need it to defend your rights; • you object to data processing based on our legitimate interests. We will reassess whether, considering your objections, we need to continue processing data. <p>If data processing is restricted, we will use the data only for specific purposes, such as defending our rights.</p>
9.6. Transfer data	<p>Data you have provided to us based on your consent or under a contract can be transferred. It is also possible to transfer data if we process it in an automated way. You can use this data yourself or, upon your request, we will transfer it to another service provider if there are no obstacles.</p> <p>When transferring data, please note that it may include third-party data, and its transfer must be assessed considering the rights and freedoms of third parties. To help us fulfil your request more quickly, please describe as precisely as possible what data and information you wish to transfer.</p>
9.7. Object to data processing	<p>You may object to the processing of your data if we process it based on legitimate interests. We will review your objections and assess the need to continue processing. We will need to continue data processing if it is necessary to comply with the law or to protect our rights.</p> <p>You will not be able to exercise the right to object to the data processing 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>
9.8. Refuse automated individual decision-making, including profiling	<p>We do not process your data in an automated way, including profiling.</p>

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10. How to submit a data processing request and how will we process your request

How can you submit a request?	What is the response time for processing your request?	What will be the fee for processing the request?	How will we provide a response to the request?
<p>In writing, in free form:</p> <ul style="list-style-type: none"> • in person, by visiting our office or the bank’s customer service centres, presenting an identity document – a passport or ID card, or a power of attorney if acting on behalf of someone else, • by email, signing the request with a secure electronic signature, • via online banking, if you are a bank client, • using the mobile application, if you are a bank client. <p>Upon receiving your request, we will review it. If necessary, we will ask you to clarify the information and the data processing activities you would like to receive information about.</p>	<p>We will review your request:</p> <ul style="list-style-type: none"> • no later than within 1 month from its receipt, • if the request is extensive or complex, we may need an additional 2 months. <p>We will inform you about the period of extension and the reasons for it.</p>	<p>You can receive a response to your request:</p> <ul style="list-style-type: none"> • free of charge, • if you submit a repeated request and we conclude that it is unfounded or excessive, we may apply a fee or refuse to fulfill the request. The fee will cover the costs of processing the information and the work of our employees. If payment is required, we will inform you in advance. 	<p>You can receive a response to your request:</p> <ul style="list-style-type: none"> • in person, by visiting our office or the bank’s customer service centres, presenting an identity document – a passport or ID card, or a power of attorney if acting on behalf of someone else, • by email, receiving a password sent via SMS to access the document, • via online banking, if you are a bank client,, using the mobile application, if you are a bank client. <p>We will take into account the way you provide us with a response.</p>

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11. What to do if you believe that we have infringed your rights while processing your data

We process your data in accordance with the regulation, European Union and Latvian laws, best practices in the financial sector, and guidelines and recommendations issued by supervisory authorities. If you believe we have violated your privacy rights, you can submit a complaint to us using the provided contact information. If the response does not meet your expectations, you can file a complaint with the Data State Inspectorate using the contacts provided:

IPAS “CBL Asset Management”

Address: Republikas laukums 2A,
Riga, Latvia, LV-1010
Phone: +371 67010810
Email: asset@cbl.lv
Data Protection Officer's email: gdpr@citadele.lv

Data State Inspectorate

Address: Elijas iela 17, Riga, LV-1050
Phone: +371 67223131
Email: pasts@dvi.gov.lv
Website: www.dvi.gov.lv

If the response from us or the Data State Inspectorate does not provide the desired solution, you have the right to apply to the court.

12. How do we keep your data safe

We protect your data against unlawful access, use, or disclosure by taking the following measures:

We restrict access to the premises to unauthorised persons by ensuring:

- **Door locks (electronic doors):** We ensure all premises are locked when employees are not present.
- **Access control:** We use access cards (magnetic, chip cards), identity readers, code systems to control who can access the premises.
- **Selection of personnel:** We carefully select reliable employees.

We limit access to technological resources, ensuring protection of:

- **Technological devices:** Computer devices (desktop computers, laptops, tablets, servers), mobile devices (smartphones), communication devices (routers, modems), data storage devices (external hard drives, USB drives, SD cards), and other devices (printers, scanners, monitors);
- **Information systems, software, and applications;**
- **Communication networks and technologies** enabling data transmission and information exchange (Internet, VPN, mobile networks, cloud technologies, etc.).

For the protection of technological resources, we provide:

- **Prevention of environmental threats:** We implement safety measures against fires, floods, large temperature changes and other conditions.
- **Prevention of technical risks:** We take care that there is a good power supply, uninterrupted power supplies in case of power failures and that other similar malfunctions do not occur.
- **Human threats:** We do not allow damage or theft.
- **Secure passwords:** We use secure and complex passwords for devices and accounts.
- **Screen locking:** When the device is not in use, we lock the screen.
- **User roles:** We limit access to data and systems, allowing only what is necessary for the relevant user.
- **Software and security updates:** We always install the latest versions to prevent vulnerabilities.
- **Encryption:** We encrypt data so that it cannot be accessed by third parties/unauthorized persons.
- **Secure connection:** We use HTTPS and VPN to ensure security when working online.
- **Antivirus:** We install and update antivirus programs on all devices.
- **Firewalls:** We use a firewall to protect the network from unwanted access.
- **Attack detection systems:** We install programs that monitor and warn about suspicious activity.

We carry out regular inspections and provide updates

- **Device checks:** We regularly check that all devices are in working order and in place.
- **System updates:** We install the latest software updates to mitigate security risks.

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We educate employees

- **Training:** We regularly inform employees about safety issues and how to act in suspicious situations.
- **Threat prevention:** We warn you about fraudulent emails and other potential security risks.

We monitor and analyse security

- **Log files (audit trails):** We record access and operations in systems so that they can be monitored and reviewed.
- **Regular tests:** We check the safety of systems to identify and eliminate potential risks.

We are ready for emergencies

- **Backups:** We regularly make backups of data and store them in safe places.
- **Emergency plan:** We prepare a plan for responding to threats to premises or technology.

Why is this important to us and to you?

Protecting technological resources helps protect data, prevent data leaks, theft, and guarantees that we can continue to work and avoid loss of money and reputation. Safety depends on each employee, so it is important to be careful and follow the rules.

Your data can only be accessed by the investment manager’s employees and cooperation partners who need it to perform their work duties. Before starting cooperation, we carefully evaluate the cooperation partners and inform them about confidentiality and data protection. We and our cooperation partners ensure the protection and use of your data only for the intended purposes, in accordance with the requirements of the law.

13. How will we ensure up-to-date information about your data processing

To ensure that you are always informed about how your data is processed, we will regularly review and update these rules. Therefore, we encourage you to review the latest version from time to time on our website, in online banking (if you are a bank client), at our office, and in bank’s customer service centres. If there are any significant changes, we will notify you one month before they take effect.