

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)

Effective as of 1 May 2026



Contents

1. About your privacy, why it matters to us, and how we protect it	2
2. Let's get acquainted with the terms	2
3. Who processes your data	3
4. For what purposes, what data, on what basis do we process, to whom we transfer it and for how long we store it	4
4.1. Identity verification in person and in the electronic environment (identification and authentication).....	5
4.2. Know your customer (customer due diligence within the framework of anti-money laundering) and sanctions management	8
4.3. Creditworthiness assessment	11
4.4. Our services.....	17
4.5. Other services	19
4.6. Customer acquisition activities	20
4.7. Debt recovery and legal proceedings	21
4.8. Organization of our operations	23
4.9. Receiving information, notifications and offers.....	27
4.10. Review and handling of requests, claims, submissions and complaints	28
4.11. Providing information and reports to supervisory authorities	31
4.12. Cookies.....	32
5. How we obtain your data	33
6. Do we carry out automated data processing and profiling.....	33
7. Do we transfer your data outside the EU/EEA	33
8. What are your rights in relation to the processing of your data	34
9. How to submit a data processing request and how will we process your request.....	36
10. What to do if you believe that we have infringed your rights by processing.....	37
11. How do we keep your data safe	37
12. How will we provide up-to-date information about the processing of your data.....	38

SIA "Citadele Leasing" Privacy Protection Rules (previously titled Privacy policy)

Effective as of 1 May 2026



1. About your privacy, why it matters to us, and how we protect it

Your privacy

Today, technologies are evolving rapidly, enabling swift exchange of information and data that may affect your privacy. Your privacy is important to us, and we do everything we can to protect it.

Financial security and secrecy of transactions

Our daily work involves handling confidential and private information – your data, your transactions, and other information. You entrust us with this information so that you can receive high-quality services from us and so that we can take special care to ensure 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 the law and best practices

We, SIA "Citadele Leasing", have developed these Privacy Protection Rules to provide you with general information on what data we process, why we process it, and how we protect it. You can also obtain information about data processing in applications, agreements, and other documents if you have applied for our products and services.

If you wish to receive information about the processing of your data, we will provide it in accordance with your request and in the manner specified in these rules.

We provide this information in accordance with the laws and regulations of the European Union and the Republic of Latvia, as well as the recommendations of the financial sector and supervisory authorities, and best practices.

These Privacy Protection Rules explain the processing of your data if you are a lessee, renter, borrower, joint lessee, guarantor, pledgor or provider of security, buyer, seller, sub-lessee, holder or user.

2. Let's get acquainted with the terms

processing – any actions we perform with your personal data, such as collecting, recording, storing, viewing, using, disclosing your personal data by sending, disseminating or otherwise making them available, coordination, deletion or destruction of your personal data, and more.

bank – AS "Citadele banka", unified registration No. 40103303559.

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

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

EU/EEA – European Union/European Economic Area.

you or customer – the person whose data we process.

we – SIA "Citadele Leasing", unified registration No. 40003423085.

rules – these Privacy Protection Rules.

data – any information that concerns or could relate to you, such as your name, surname, personal identification number, address, telephone number, e-mail address, your habits.

consent – any freely and informed confirmation by which you consent to the processing of your data.

SIA "Citadele Leasing" Privacy Protection Rules (previously titled Privacy policy)

Effective as of 1 May 2026



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

Regulation - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.04.2016 on the protection of natural persons regarding the processing of personal data and on the free movement of such data.

3. Who processes your data

Your data is processed by SIA "Citadele Leasing", unified registration No. 40003423085, address: Republikas laukums 2A, Riga, Latvia, LV-1010. If you have any questions regarding the processing of your data, you may contact us by calling +371 67010000 or by writing to lizings@citadele.lv, or by contacting our data protection officer at privacy@citadele.lv.

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

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

Before we collect your data, we always carefully evaluate why we need it. We only process your data 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 enter a contract with you and provide you with a service.
- **to comply with legal requirements:** we process data where we are obliged to do so in order to comply with the law, for example, to prevent money laundering, to provide information to the relevant state authorities, and to the registers established by law and other applicable legal acts.
- **public interest 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 process your data, for example for receiving notifications and offers, only if you have given your consent.
- **to protect important interests:** we process data to protect important interests of you and others, 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 where it is necessary to protect our, your or another person’s interests.

What are legitimate interests? This legal basis allows us to process the data lawfully even if you have not given us explicit consent or we have not concluded a contract with you.

How does this work? We assess whether the processing is lawful, justified, and necessary, and whether it does not excessively interfere with your privacy. For example, we may process your data for security purposes in order to prevent fraud.

How does this affect you? If the data are processed on the basis of legitimate interest, you have the right to object to such processing. We will carefully assess whether it is necessary to continue the processing.

How long we keep your data depends on what it is used for. In data storage, we consider the following criteria:

- **performance of the contract:** we retain the data for as long as necessary to ensure the availability of the product or service to you, to receive the fulfilment of your obligations, and to make the required registration entries.
- **legal requirements:** we must retain the data for the period prescribed by law, for example, 3 years when we request information from public registers, or 5 years from the moment your service and/or financing agreements with us are terminated, in order to comply with anti-money laundering requirements.
- **protection of interests:** after our cooperation has ended, we retain the data in order to protect your interests and ours, for example, for 5 years, or for 10 years from the moment the agreement with you has ended.
- **legitimate interests:** if the deletion of the data could harm our, your, or third-party interests, we will retain the data for as long as necessary.

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

- **retention of evidence:** we store data to prove that the processing was lawful in the past, such as your consent to receive notifications and offers. If the data is processed on the basis of your consent and no other lawful basis for the processing applies, we retain the data for as long as the consent remains valid.

In determining storage periods, we also consider the guidelines of the Finance Latvia Association. If there are several reasonable data retention periods, such as those required by law and necessary to protect our interests and yours, we will store the data for a longer period.

If none of these criteria no longer exist, we will delete or anonymize your data.

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

Purpose of data processing	Data types/sets (categories) we process	Legal basis for data processing	Data recipients	Data storage period
In person identification	Customer/any natural person Name, surname, personal identification number or identity number, date of birth, place of birth, country, identity document number, date of issue, country, issuing authority, expiry date, photograph (we compare you with the image in your identity document (for example, passport or ID card) to verify that you are the owner of the document), signature.	Legal Obligation <ul style="list-style-type: none"> • Article 6(1)(c) of the Regulation • Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing and other related legal acts and guidelines • Law on International Sanctions and National Sanctions of the Republic of Latvia and other sanctions-related legal acts and guidelines Public Interest arising from law <ul style="list-style-type: none"> • Article 6(1)(e) of the Regulation • Law on the Prevention of Money Laundering and Terrorism and Proliferation 	<ul style="list-style-type: none"> • Register of invalid documents • Cooperation partners who provide identification services when applying for services and during the term of the contract • Maintenance providers for information system • Supervisory and law enforcement authorities 	5 years from the date of termination of the transactional relationship 10 years if the information has been requested by supervisory or law enforcement authorities

SIA "Citadele Leasing" Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

		Financing and other related legal acts and guidelines		
Remote identification (including becoming a customer)	Customer/any natural person Name, surname, personal identification number or identity number, date of birth, place of birth, country, identity document number, date of issue, country of issue, issuing authority, expiry date, photograph, signature	Legal Obligation <ul style="list-style-type: none"> • Article 6(1)(c) of the Regulation • Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing and other related legal acts and guidelines • Republic of Latvia Cabinet 03.07.2018 regulation No. 392 Procedures by which the Subject of the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing Performs the Remote Identification of a Customer • Law on International Sanctions and National Sanctions of the Republic of Latvia and other sanctions-related legal acts and guidelines Public Interest arising from law <ul style="list-style-type: none"> • Article 6(1)(e) of the Regulation • Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing and other related legal acts and guidelines 	<ul style="list-style-type: none"> • Register of invalid documents • Maintenance providers for information system • Supervisory and law enforcement authorities • Cooperation partners who provide identification services when applying for services and during the term of the contract 	<p>5 years from the date of termination of the transactional relationship</p> <p>10 years if the information has been requested by supervisory or law enforcement authorities</p>

SIA "Citadele Leasing" Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

		<ul style="list-style-type: none"> • 03.07.2018 regulation No. 392 Procedures by which the Subject of the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing Performs the Remote Identification of a Customer 		
<p>Authentication in the electronic environment (Leasing Portal)</p>	<p>Customer/any natural person Name, surname, personal identification number, device identifier, IP address</p>	<p>Conclusion and performance of the agreement</p> <ul style="list-style-type: none"> • Article 6(1)(b) of the Regulation <p>Legal obligation</p> <ul style="list-style-type: none"> • Article 6(1)(c) of the Regulation • Regulation (EU) 2022/2554 of the European Parliament and of the Council of 14 December 2022 on digital operational resilience for 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 • Commission delegated regulation (EU) 2018/389 of 27 November 2017 supplementing Directive (EU) 2015/2366 of the European Parliament and of the Council with regard to 	<ul style="list-style-type: none"> • Authentication service providers – AS "SK ID Solutions", VAS "Latvia State Radio and Television Center", AS "Citadele banka" • Maintenance providers for information system 	<p>3 years from the date of submitting the online application if the contract is not concluded; or 5 years after the end/termination of the contract</p>

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

		regulatory technical standards for strong customer authentication and common and secure open standards of communication		
--	--	---	--	--

We must comply with Sections 26 and 27 of the Personal Data Processing Law, Section 44, Paragraph three of the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing, as well as Article 23 of the Regulation, which imposes restrictions on the right of persons to provide information. These rules apply to the right to request information about the processing of data, its purposes, recipients, sources of acquisition, as well as the right to access your data and to request their rectification, destruction, termination or prohibition of processing.

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

What is it?

As part of know your customer, we verify who our customer is to ensure that they are not involved in illegal activities, such as money laundering.

‘Money laundering’ is the commonly used term for the process of concealing the illicit origin of funds. It means that money obtained through criminal activity – for example, drug trafficking, human smuggling, or other unlawful activities – that is, ‘dirty’ money, is made to appear legitimate or ‘clean’ so that it seems to have been obtained lawfully. Money laundering can pose significant risks to banks and to the entire financial system.

Countries have strict rules and laws that require us to identify, monitor, and report suspicious transactions to state authorities. The anti-money laundering measures we implement help to limit such activities.

As part of sanctions management, we monitor and comply with international and local sanctions. We carefully review customers transactions to ensure that sanctioned persons cannot receive services or obtain funds. We also verify that prohibited goods and services do not reach restricted territories.

Sanctions are imposed on countries, organisations, or individuals that pose security threats, violate laws, or engage in unlawful activities, such as terrorism, money laundering, or human rights violations.

How does this affect you?

As part of know your customer, we carefully review the flow of funds, monitor potentially suspicious transactions, and cooperate with state authorities. When transactions are carried out, we may request documents and explanations necessary for compliance with legal requirements. In certain cases, we are entitled to terminate the business relationship.

As part of sanctions management, when initiating a business relationship or during an existing business relationship, we may request additional documents and explanations regarding the origin of funds.

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

How does this affect us? If we fail to comply with these requirements, we may be subject to a substantial financial penalty, our reputation may be harmed, we may lose customer trust, and we may lose our lending license.

Purpose of data processing	Data types/sets (categories) we process	Legal basis for data processing	Data recipients	Data storage period
<p>Customer due diligence before entering into a transactional relationship and during the relationship (we determine the origin of funds, identify Politically Exposed Persons, beneficial owners, and persons related to the customer in order to comply with legal requirements and to detect unusual or suspicious transactions, as well as to ensure that you are not violating international or national sanctions)</p>	<p>Customer (politically exposed person, beneficial owner (the customer or the customer’s family member, or a person closely associated with the customer)) Name, surname, personal identification number or identity number, date of birth, place of birth, country, identity document number, date of issue, country of issue, issuing authority, expiry date, photograph, citizenship, actual and declared place of residence, telephone number, e-mail address, social status/name of employer, position, information related to previous professional activity, type of occupation, reputation, education, taxpayer number, tax residency, source of income, leasing services used, information related to family members, relationship, politically exposed person (PEP) status, account number, transaction history, movable/immovable property owned, connection with</p>	<p>Legal obligation</p> <ul style="list-style-type: none"> • Article 6(1)(c) of the Regulation • Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing and other related legal acts and guidelines • Law on International Sanctions and National Sanctions of the Republic of Latvia and other sanctions-related legal acts and guidelines <p>Public Interest arising from law</p> <ul style="list-style-type: none"> • Article 6(1)(e) of the Regulation • Article 9(2)(g) of the Regulation • Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing and other related legal acts and guidelines 	<ul style="list-style-type: none"> • Public registers: Population register, Lursoft, Register of Enterprises, Land Register, State Revenue Service registers, Register of Invalid Documents, Vehicle and Driver State Register, State Technical Supervision Agency, Ship Register • Maintenance providers for information systems • Citadele Group companies • Supervisory and law enforcement authorities 	<p>5 years from the date of termination of the transactional relationship</p> <p>10 years if the information has been requested by supervisory or law enforcement authorities</p>

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

	companies, shareholdings, information related to customer identification and due diligence, criminal record, signature			
<p>Reporting of suspicious transactions to the Financial Intelligence Unit of Latvia and the State Revenue Service (including reporting of sanctions violations or attempts to violate sanctions)</p>	<p>Customer Name, surname, personal identification number or identity number, date of birth, place of birth, country, identity document number, date of issue, country of issue, issuing authority, expiry date, photograph, citizenship, address, telephone number, e-mail address, information about contact persons (name, surname, telephone number), information related to professional activity (position, type of occupation, profession, employer), information related to tax residency (resident / non-resident, tax residency country, place/country of birth, taxpayer number), leasing/rental object data (registration number, make, model, etc.), credit liabilities and other obligations, income information, information related to family members, relationship, Politically exposed person (PEP) status</p>	<p>Legal Obligation</p> <ul style="list-style-type: none"> • Article 6(1)(c) of the Regulation • Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing and other related legal acts and guidelines • Law on International Sanctions and National Sanctions of the Republic of Latvia and other sanctions-related legal acts and guidelines • Cabinet 17.08.2021. 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 law</p> <ul style="list-style-type: none"> • Article 6(1)(e) of the Regulation • Article 9(2)(g) of the Regulation • Law on the Prevention of Money Laundering and Terrorism and Proliferation 	<ul style="list-style-type: none"> • Financial Intelligence Unit of Latvia • State Revenue Service • Maintenance providers of information system 	<p>5 years from the date of termination of the transactional relationship 10 years if the information has been requested by supervisory or law enforcement authorities</p>

SIA "Citadele Leasing" Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

		Financing and other related legal acts and guidelines		
--	--	---	--	--

We must comply with Sections 26 and 27 of the Personal Data Processing Law, Section 44, Paragraph three of the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing, as well as Article 23 of the Regulation, which imposes restrictions on the right of persons to provide information. These rules apply to the right to request information about the processing of data, its purposes, recipients, sources of acquisition, as well as the right to access your data and to request their rectification, destruction, termination or prohibition of processing.

4.3. Creditworthiness assessment

What is creditworthiness assessment?

Creditworthiness assessment means that we will verify whether you will be able to make monthly payments, repay the financed amount, and fulfil your obligations to us in a timely manner. As part of this assessment, we evaluate and ensure that:

- you have sufficient income to cover the monthly payments;
- your expenses are not disproportionately high compared to your income;
- you do not have an excessive amount of other debt;
- your previous payment history is good (you have made payments on time).

Basically, we want to ensure that the monthly payments and/or repayment of the financed amount will not cause you financial difficulties.

Creditworthiness assessment involves creating your personal "profile" by evaluating your ability to meet financial obligations, such as your income, debt history, and credit/loan history.

In the creditworthiness assessment process, we make decisions in an automated manner. If the decision is not acceptable to you, you may request that it be reviewed by our employees.

How is the creditworthiness assessment carried out and what affects it?

In order for us to decide on providing services, we evaluate several criteria related to your financial situation and future stability. These criteria help you understand whether the financing or service is suitable for you and whether you will be able to repay it:

- **Age**

If you are under 27 years of age, you may be considered a customer with a higher risk.

If you are over 60-70 years old, your sources of income are evaluated, as the salary may not be there.

SIA "Citadele Leasing" Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

- **Dependent family members**

It is assessed how many people there are in your household – spouse, children, etc. It is calculated whether you have enough funds to live on after the monthly payments.

If the total income is too small to cover both the monthly payments and the livelihood of the whole family, financing or services may not be granted.

- **Joint lessee/guarantor**

If your income is insufficient, we may require the involvement of a joint lessee/guarantor or refuse financing or provision of services.

- **Status of unemployed person**

If you are unemployed or receiving unemployment benefits, financing or services are not provided.

- **Type and stability of income**

It is assessed whether your income is regular and predictable. If your income is seasonal or fluctuating, the amount of financing may be lower.

- **Education**

It can be taken into account when evaluating the transaction.

- **Gambling activities**

If we detect that you regularly spend significant amounts of money on gambling, this may reduce the possibility of receiving financing or a service. Gambling can create financial risks, and therefore we need to ensure that you will be able to fulfil your obligations on time.

- **Citizenship and residence permit**

If you hold only a temporary residence permit, financing or a service will likely not be granted.

If you receive income from abroad or have a temporary residence permit, we may require the involvement of a joint lessee/guarantor.

- **Existing debts and payment delays**

If you already have outstanding debts, financing or a service will not be provided.

If payments for any credit/loan have been delayed for more than 30 days, financing or a service will not be provided.

If, within the last two years, you have had a debt written off (even a small one), this may be grounds for declining the financing or service.

- **Your status as a customer**

Financing or a service is not provided if you are a minor, insolvent, legally incapacitated, or if we have previously terminated cooperation with you.

- **Why is all of this taken into account?**

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

We want to ensure that financing or a service is not provided in a situation where it may cause financial difficulties for the customer or their family. We ensure responsible lending.

Purpose of data processing	Data types/sets (categories) we process	Legal basis for data processing	Data recipients	Data storage period
Creditworthiness assessment (for example, financial lease, lease, loan, full-service lease, transaction restructuring)	Customer Name, surname, personal identification number or identity number, date of birth, place of birth, country, age, employer, business sector, type of occupation (employee in Latvia, employee abroad, pensioner, member of the management board/company owner, self-employed person, seafarer, unemployed, other), level of education (primary, secondary, bachelor’s, master’s, doctoral, other), account transactions (incoming and outgoing payments on bank accounts, as well as account statements from other banks received through PSD2 solutions (with the customer’s authorization) or in PDF format), level of income, bonuses, benefits and other payments indicating the customer’s income and its source, credit liabilities, actual payments (incoming and outgoing), country of citizenship, validity and expiry date of the	Legitimate interests in ensuring responsible lending by assessing the customer’s ability to meet obligations, thereby protecting both us and the customer’s interests and preventing excessive indebtedness. <ul style="list-style-type: none"> Article 6(1)(f) of the Regulation Legal obligation <ul style="list-style-type: none"> Article 6(1)(c) of the Regulation Bank of Latvia 18.12.2023 Regulations No. 265 Credit Risk Management Regulations EBA/GL/2020/06 of 29.05.2020 Guidelines on loan origination and monitoring, applicable as of 30.06.2021 EBA/GL/2017/15 of 23.02.2018 Guidelines on connected customer under Article 4(1)(39) of Regulation (EU) No 575/2013 Consumer Rights Protection Law 	Public/private registers: <ul style="list-style-type: none"> Bank of Latvia Credit Register VSAA (until 31.12.2022) Credit Information Bureau Crediweb Insolvency Register 	5 years 3 years for applications that did not result in the provision of a service 3 years from the date on which information was requested from public/private registers

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

	<p>residence permit, internal group information on the customer’s assets and repaid credits/lease (type of liability, start/end date, status, disbursed amount/outstanding balance/interest rate, number of days/amounts overdue), written-off debts, customer status (deceased, undesirable, legally incapacitated, insolvent, debtor, cooperation terminated, unacceptable, rejected customer), information from sworn bailiffs regarding outstanding debt obligations Information related to the household composition – marital status (married, unmarried, cohabitation), number of dependent children (for subsistence minimum calculation), relationship between the customer and the joint lessee/guarantor (first-degree relatives – spouse, cohabiting partner, parents, children), total household income, actual and declared residential address, phone number, e-mail address Credit Information Bureau (KIB): name, surname, personal identification number KIB.VID: income for the last 3 years, type and amount of</p>	<ul style="list-style-type: none"> • Consumer Rights Protection Centre Guidelines No. 15 of 15.12.2021 Guidelines for assessing consumers’ ability to repay credit for credit providers offering lending services to consumers • Bank of Latvia 25.11.2024 Regulations No. 350 Regulations on obtaining authorization to use internal models, approaches and methods for the calculation of capital requirements 		
--	--	--	--	--

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

	<p>income, employment start date, employer’s name and registration number</p> <p>KIB.VSAA: type and/or amount of benefits and/or pensions for the last 6 months, benefit start and end date (if applicable)</p> <p>KIB.debts: type of debt obligation (telecommunications services, utility payments and other debts), start and end date of the debt obligation, initial amount and outstanding balance, number of inquiries made about the customer, type of credit liability (type of loan), current and termination status, loan start and end date, initial amount and outstanding balance, delay start and end date, number of days and amount overdue, customer’s role at the liability level (borrower, co-borrower, guarantor), insolvency history and current insolvency status</p> <p>KIB.Crefo: type of credit liability, start and end date of the debt obligation, initial amount and outstanding balance, delay start and end date and number of delay days</p> <p>VSAA (used until 31.12.2022): name, surname, personal identification number, income amount for the last 6 months,</p>			
--	---	--	--	--

SIA "Citadele Leasing" Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

	<p>employer's name and registration number, employment start and end date, workplace, type of income (including benefits and pensions)</p> <p>Bank of Latvia Credit Register: name, surname, personal identification number, active and terminated obligations, current and termination status of obligations, initial loan amount, outstanding balance, start and end dates of the obligation, number of overdue days, customer's role at the liability level (borrower, co-borrower, guarantor)</p> <p>Creditweb: information is requested about a natural person who owns a company or regarding a natural person's employer: name, surname, personal identification number, company registration number, liquidation/insolvency, company's annual financial report, number of employees, whether the customer holds shares/stock, start and end date of shareholding/stock ownership (this information may be used to draw conclusions regarding the company's solvency, which may affect the granting of a financing to a customer)</p>			
--	--	--	--	--

SIA "Citadele Leasing" Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

	Insolvency Register: name, surname, personal identification number, date and status of the declaration of insolvency proceedings			
For information regarding the personal data used for identification and authentication, please refer to the section Identity verification in person and in the electronic environment (identification and authentication) .				

4.4. Our services

Purpose of data processing	Data types/sets (categories) we process	Legal basis for data processing	Data recipients	Data storage period
Financial lease and lease (operating lease) (including identification, creditworthiness assessment, receipt of commissions and other payments, and communication within the scope of the service)	Customer, potential customer Name, surname, personal identification number or identity number, date of birth, place of birth, country, telephone number, e-mail address, actual and declared residential address, occupation, information regarding the transaction, desired terms, signature	Conclusion and performance of the agreement <ul style="list-style-type: none"> Article 6(1)(b) of the Regulation 	<ul style="list-style-type: none"> The seller of the leased asset and intermediaries AS "Citadele banka" SIA "CL Insurance Broker" The leased asset manufacturer, representative and authorised dealers 	5 years from the date of termination of the business relationship
Loan (including identification, creditworthiness assessment, receipt of commissions and other payments, and	Customer, potential customer Name, surname, personal identification number or identity number, date of birth, place of birth, country, telephone number, e-mail address, occupation, actual and declared residential	Conclusion and performance of the agreement <ul style="list-style-type: none"> Article 6(1)(b) of the Regulation 	<ul style="list-style-type: none"> AS "Citadele banka" SIA "CL Insurance Broker" 	5 years from the date of termination of the business relationship

SIA "Citadele Leasing" Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

<p>communication within the scope of the service)</p>	<p>address, information regarding the transaction, desired terms, signature</p>			
<p>For information regarding the personal data used for identification and authentication, please refer to the section Identity verification in person and in the electronic environment (identification and authentication). For information regarding the personal data used in the creditworthiness assessment, please refer to the section Creditworthiness Assessment.</p>				
<p>Transaction restructuring (including identification, creditworthiness assessment, receipt of commissions and other payments, and communication within the scope of the service)</p> <p>Restructuring means that the terms of the agreement are modified to make it easier for you to fulfil your obligations; for example, we may consider the possibility of extending the term of the agreement or temporarily postponing principal payments (this is done if you experience difficulties in meeting your obligations)</p>	<p>Customer Name, surname, personal identification number or identity number, date of birth, place of birth, country, telephone number, e-mail address, actual and declared place of residence, information regarding the transaction, movable and immovable property, signature</p>	<p>Conclusion and performance of the agreement</p> <ul style="list-style-type: none"> • Article 6(1)(b) of the Regulation 	<ul style="list-style-type: none"> • Land Register • Register of Enterprises • Lursoft • Bank of Latvia Credit Register • Credit Information Bureau 	<p>5 years from the date of termination of the business relationship</p>
<p>For information regarding the personal data used for identification and authentication, please refer to the section Identity verification in person and in the electronic environment (identification and authentication). For information regarding the personal data used in the creditworthiness assessment, please refer to the section Creditworthiness Assessment.</p>				
<p>Full service lease (including identification, creditworthiness assessment, receipt of commissions and other payments, and</p>	<p>Customer, potential customer Name, surname, personal identification number or identity number, date of birth, place of birth, country, telephone number, e-mail address, actual and</p>	<p>Conclusion and performance of the agreement</p> <ul style="list-style-type: none"> • Article 6(1)(b) of the Regulation 	<ul style="list-style-type: none"> • Leased asset dealers • SIA "Car2Lease" • AS "Citadele Banka" 	<p>5 years from the date of termination of the business relationship</p>

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

communication within the scope of the service)	declared residential address, occupation, information about the transaction, desired conditions, signature			
For information regarding the personal data used for identification and authentication, please refer to the section Identity verification in person and in the electronic environment (identification and authentication) . For information regarding the personal data used in the creditworthiness assessment, please refer to the section Creditworthiness Assessment .				

4.5. Other services

Purpose of data processing	Data types/sets (categories) we process	Legal basis for data processing	Data recipients	Data storage period
Provision of insurance (including administering and verifying the validity of an insurance policy for the leased/pledged asset)	Customer/policyholder Name, surname, personal identification number or identity number, date of birth, telephone number, e-mail address, address, driving experience, insurance period, insurance premium, name of the insurance product, data of the leasing/rental/pledged asset (registration number, make, model, series, chassis number, etc.), type of use	Consent for data transfer • Article 6(1)(a) of the Regulation Conclusion and performance of the agreement • Article 6(1)(b) of the Regulation Legal obligation • Article 6(1)(c) of the Regulation • Insurance Contract Law	• Insurance service providers and intermediaries	5 years
For information regarding the personal data used for identification and authentication, please refer to the section Identity verification in person and in the electronic environment (identification and authentication) .				
Sale of the leased asset	Customer/any natural person Name, surname, personal identification number or identity number, date of birth, place of birth, country, telephone number, e-mail address, address, signature	Conclusion and performance of the agreement • Article 6(1)(b) of the Regulation	• Public registers: Vehicle and Driver State Register, State Technical Supervision Agency, Ship Register	5 years from the date of termination of the business relationship

SIA "Citadele Leasing" Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

	For information regarding the personal data used for identification and authentication, please refer to the section Identity verification in person and in the electronic environment (identification and authentication) . For information regarding the personal data used in the creditworthiness assessment, please refer to the section Creditworthiness Assessment .			
Refinancing and restructuring of credit (which includes the transfer of data to another financial institution or to the creditor upon the customer's request)	Customer Name, surname, personal identification number or identity number, date of birth, place of birth, country, telephone number, e-mail address, actual and declared residential address, transaction information, amount of liabilities, collateral data	Consent expressed through the customers active action by submitting an application to us • Article 6(1)(a) of the Regulation	<ul style="list-style-type: none"> • Other financial and credit institutions Public registers: <ul style="list-style-type: none"> • Vehicle and Driver State Register • State Technical Supervision Agency • Ship Register • Land Register • Commercial Register 	5 years from the date of termination of the business relationship

4.6. Customer acquisition activities

Purpose of data processing	Data types/sets (categories) we process	Legal basis for data processing	Data recipients	Data storage period
Customer acquisition and brand building activities for the provision of our services (including campaigns, lotteries, prize draws, competitions)	The amount of data depends on the type of activity Customer Name, surname, personal identification number or identity number, date of birth, telephone number, e-mail address, data indicated in the identity document, user identifier, device ID, IP address, information related to professional activity, history of transactions performed, information related to the prize won, account number, signature	Consent for data transfer • Article 6(1)(a) of the Regulation Conclusion and performance of the agreement • Article 6(1)(b) of the Regulation	<ul style="list-style-type: none"> • Cooperation partners who ensure the provision of the service 	5 years, but not longer than 10 years

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

<p>Maintaining and promoting our brand image (at in-person and online events, on social media and in the media, conferences and online events)</p>	<p>The amount of data depends on the type of event Customer/any natural person</p> <p>Name, surname, telephone number, e-mail address, address, social media account addresses, audio recording, photograph, video recording, position, profession, type of occupation, length of employment, employer, participation in professional associations, education, interests, use of our services and suitability of such services to the customer’s needs. Any other personal data that you disclose at the event in written text/audio/photo/video, IP address</p>	<p>Conclusion and performance of the agreement</p> <ul style="list-style-type: none"> Article 6(1)(b) of the Regulation <p>Legitimate interests in relation to building and maintaining our brand image, attracting new customers, and ensuring the trust and satisfaction of existing customers.</p> <ul style="list-style-type: none"> Article 6(1)(f) of the Regulation 	<ul style="list-style-type: none"> Cooperation partners who ensure the provision of the service 	<p>10 years or, in certain cases, longer, in order to provide information on our history</p>
---	---	--	--	--

4.7. Debt recovery and legal proceedings

Purpose of data processing	Data types/sets (categories) we process	Legal basis for data processing	Data recipients	Data storage period
<p>Assessment of the suitability of movable and immovable property for securing obligations (including communication, identification)</p>	<p>Customer, pledgor</p> <p>Name, surname, personal identification number or identity number, date of birth, place of birth, country, e-mail address, address, telephone number, information regarding the transaction, movable and immovable property</p>	<p>Legal obligation</p> <ul style="list-style-type: none"> Article 6(1)(c) of the Regulation Consumer Rights Protection Law Bank of Latvia 18.12.2023 Regulations No. 265 Credit Risk Management Regulations 	<ul style="list-style-type: none"> Certified valuers Real estate valuers Land Register Vehicle and Driver State Register State Technical Supervision Agency Commercial Register 	<p>5 years</p>

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

		<p>Legitimate interests in relation to credit risk management and ensuring responsible lending</p> <ul style="list-style-type: none"> • Article 6(1)(f) of the Regulation 	<ul style="list-style-type: none"> • State Land Service Cadastre Information System • Real Estate Market Database • Address Register 	
<p>Debt recovery through debt collection service providers</p>	<p>Customer Name, surname, personal identification number or identity number, date of birth, place of birth, country, e-mail address, address, telephone number, information on debt obligations</p>	<p>Legitimate interests in relation to debt recovery</p> <ul style="list-style-type: none"> • Article 6(1)(f) of the Regulation 	<ul style="list-style-type: none"> • Debt collection service providers • AS “Citadele Banka” 	5 years
<p>Debt recovery through court proceedings</p>	<p>Customer Name, surname, personal identification number or identity number, date of birth, place of birth, country, e-mail address, telephone number, address, financial information (debt obligations, commercial pledges, mortgage information, history of completed transactions)</p>	<p>Legitimate interests in relation to debt recovery</p> <ul style="list-style-type: none"> • Article 6(1)(f) of the Regulation 	<ul style="list-style-type: none"> • Court • Arbitration court • Register of Enterprises • Land Register • Sworn bailiffs 	10 years
<p>Assignment of the debt to another party (cession) If you have an outstanding debt to us, we may assign your debt to another company. This means that the debt does not disappear – you still have an obligation to repay it; only the entity to whom you make the</p>	<p>Customer Name, surname, personal identification number or identity number, date of birth, place of birth, country, e-mail address, address, telephone number, signature, debt obligations, insolvency status, transaction history, information on legal proceedings</p>	<p>Legitimate interests in relation to debt recovery</p> <ul style="list-style-type: none"> • Article 6(1)(f) of the Regulation 	<ul style="list-style-type: none"> • Debt collection service providers (cessionaries) 	10 years

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

payment changes, and you will receive an appropriate notification regarding this	For information regarding the personal data used for identification and authentication, please refer to the section Identity verification in person and in the electronic environment (identification and authentication) .			
Debt recovery in insolvency proceedings Insolvency is a process in which debts are organised and, to the extent possible, repaid when the customer is no longer able to meet their payment obligations	Customer Name, surname, personal identification number or identity number, date of birth, place of birth, country, e-mail address, address, telephone number, debt obligations, commercial pledges, mortgage information, transaction history, financial information, information on legal proceedings	Legal obligation • Article 6(1)(c) of the Regulation • Insolvency Law Conclusion and performance of the agreement • Article 6(1)(b) of the Regulation	• Insolvency process administrators	10 years
Taking possession of leased assets (including the assessment of repossessed leased assets for determining the sale price, and the disposal of repossessed leased assets)	Customer Name, surname, personal identification number or identity number, date of birth, place of birth, country, e-mail address, actual and declared residential address, telephone number, transaction information, debt obligations.	Conclusion and performance of the agreement • Article 6(1)(b) of the Regulation	• Cooperation partners who ensure the provision of the service • Appraisers • Vehicle and Driver State Register • State Technical Supervision Agency, • Ship Register	10 years
For information regarding the personal data used for identification and authentication, please refer to the section Identity verification in person and in the electronic environment (identification and authentication) .				

4.8. Organization of our operations

Purpose of data processing	Data types/sets (categories) we process	Legal basis for data processing	Data recipients	Data storage period
----------------------------	---	---------------------------------	-----------------	---------------------

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

<p>Determination of credit risk for the calculation and creation of provisions</p>	<p>For information regarding the personal data used in the creditworthiness assessment, please refer to the section Creditworthiness Assessment.</p>			
<p>Credit risk monitoring (including early warning systems), monitoring of significant increases in credit risk, monitoring of the quality of financing transactions, measurement, assessment and monitoring of credit risk, evaluation of the effectiveness of financing transaction quality management, as well as decision making regarding the extension of the credit limit</p>	<p>For information regarding the personal data used in the creditworthiness assessment, please refer to the section Creditworthiness Assessment.</p>			
<p>Validation of credit risk models (verification and approval of developed credit risk models for further use)</p>	<p>For information regarding the personal data used in the creditworthiness assessment, please refer to the section Creditworthiness Assessment.</p>			
<p>Assessment and improvement of product and service quality (testing)</p>	<p>Customers and any individuals participating in testing Name, surname, personal identification number, video recording, audio recording, telephone number, e-mail address, information related to the customer’s interests, habits, use of our services and their suitability to the customer’s needs, signature</p>	<p>Consent to the processing of personal data for the assessment/improvement of product/service quality (testing) and for ensuring communication</p> <ul style="list-style-type: none"> • Article 6(1)(a) of the Regulation 	<ul style="list-style-type: none"> • Information system maintenance service providers 	<p>3 months</p>

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

<p>Provision of audits (inspections) We ensure independent internal and external audits in order to verify that we operate in a fair, safe, and lawful manner. This helps protect the interests of both customers and employees</p>	<p>Customer/any natural person Given the volume of data and information indicated in various documents, the following data may be processed: Name, surname, personal identification number, date of birth, place of birth, country, photograph, type of identity document, document number, date of issue, country of issue, issuing authority, signature, telephone number, address, e-mail address, call audio recording, marital status, family relationships, number of family members, employer, type of occupation, level of education, country of citizenship, validity and expiry date of the residence permit, tax residency, taxpayer number, place of birth, country, citizenship, information obtained in communication with us, authentication device, transaction history, information related to customer identification and due diligence, PEP status, information on criminal convictions, health data, account number, transaction history (outgoing and incoming payments indicating income and its source, debts, expenses), credit liabilities and other</p>	<p>Legal obligation</p> <ul style="list-style-type: none"> Article 6(1)(c) of the Regulation <p>Legitimate interests to verify that we operate in a fair, safe, and lawful manner</p> <ul style="list-style-type: none"> Article 6(1)(f) of the Regulation 	<ul style="list-style-type: none"> Audit service providers 	<p>Until the end of the cooperation/audit</p>
--	--	--	---	---

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

	obligations, information on financial literacy, immovable and movable property			
Receipt and sending of documents (correspondence)	Customer/any natural person Name, surname, address, telephone number, e-mail address, signature	Conclusion and performance of the agreement • Article 6(1)(b) of the Regulation	• Postal service providers • Delivery and courier service providers	10 years
Document archiving (storage, destruction)	Customer/any natural person Considering the scope of data and information indicated in various documents, the following data are processed: name, surname, personal identification number, date of birth, place of birth, country, identification document number and other related data (date of issue, country, issuing authority), signature, assigned identification number, address, telephone number, e-mail address, information related to family and relatives (number of family members, marital status), information related to professional activities (position, length of employment, occupation, profession, employer), information related to education, information related to tax residency (taxpayer identification number, place/country of birth, citizenship, tax residence), financial information (history of	Legal obligation • Article 6(1)(c) of the Regulation • Archives Law • Financial Instrument Market Law • Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing • Law on International Sanctions and National Sanctions of the Republic of Latvia • Accounting Law • Civil Law and other regulatory enactments Archiving in the public interest • Article 9(2)(j) of the Regulation	• Cooperation partner providing archiving services and information system maintenance.	The retention periods for documents depend on the type (category) of the document, which may be 1 year, 2 years, 5 years, or 10 years

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

	performed transactions, leasing/rental/pledge object data (registration number, make, model, serial number, chassis number etc.), credit liabilities and other obligations, real estate, movable property), political opinions (including PEP status)			
--	---	--	--	--

4.9. Receiving information, notifications, and offers

Purpose of data processing	Data types/sets (categories) we process	Legal basis for data processing	Data recipients	Data storage period
Communication regarding your products and services and any changes thereto (by telephone, e-mail, mobile application, via video calls)	Customer Name, surname, personal identification number, audio recording, telephone number, e-mail address, information regarding our products and services you use	Conclusion and performance of the agreement • Article 6(1)(b) of the Regulation Consent to receive notifications and offers • Article 6(1)(a) of the Regulation	• Cooperation partners providing communication services	5 years from the date of the communication
Sending notifications and offers, and credit limit offers	Detailed information in the Privacy disclaimer for processing of personal data for receipt of notifications and offers			
Customer satisfaction surveys (We regularly conduct surveys to learn the opinions of customers and residents regarding our services and products. The surveys also gather opinions about the brand and our image. This information helps us	Customer Name, surname, personal identification number, date of birth, audio recording, e-mail address, telephone number, number of family members, marital status, age, occupation, position, profession, education, status as a permanent resident or foreigner, information related to	Consent to receive notifications and offers • Article 6(1)(a) of the Regulation	• Cooperation partners involved in conducting surveys	Data are deleted after the completion of the survey

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

improve our services and ensure a high level of service quality)	the customer’s interests, use of our services, signature			
Standardised notifications on Facebook and Google platforms (We use the Facebook and Google platforms to enable you to receive relevant offers)	IP address, social media account addresses	Consent to receive notifications and offers • Article 6(1)(a) of the Regulation	• Meta • Google	6 months from the date the communication is sent

4.10. Review and handling of requests, claims, submissions and complaints

Purpose of data processing	Data types/sets (categories) we process	Legal basis for data processing	Data recipients	Data storage period
Examination of submissions, requests, and complaints from natural persons/ customers	Customer/any natural person Name, surname, personal identification number or identity number, date of birth, place of birth, country, signature, address, e-mail address, telephone number, transaction history, credit obligations and other liabilities, history of completed transactions, bank account number, data of the leasing/rental/pledged object (registration number, model, chassis number, etc.). Other types of data are determined depending on the scope of information requested in the application, claim or submission, as well as on the	Legal obligation • Article 6(1)(c) of the Regulation • Consumer Rights Protection Law	• Data are not transferred	10 years

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

	information contained in the documents to be issued			
	For information regarding the personal data used for identification and authentication, please refer to the section Identity verification in person and in the electronic environment (identification and authentication) .			
Data subject request management	<p>Customer/any natural person name, surname, personal identification number or identity number, date of birth, place of birth, country, address, e-mail address, telephone number, signature. Other categories of data are determined depending on the scope of information requested in the request, claim, or submission, as well as the information included in the documents to be issued</p>	<p>Legal obligation</p> <ul style="list-style-type: none"> • Article 6(1)(c) of the Regulation • Personal Data Processing Law 	<ul style="list-style-type: none"> • Data are not transferred 	5 years from the date the information is provided
	For information regarding the personal data used for identification and authentication, please refer to the section Identity verification in person and in the electronic environment (identification and authentication) .			
Examination of requests from competent state authorities, officials, and other entities as provided by law	<p>Customer Name, surname, personal identification number or identity number, date of birth, address, e-mail address, telephone number, signature, audio and video recording, photograph, video image, type of identification document, number, date of issue, country of issue, issuing authority, information contained in the</p>	<p>Legal obligation</p> <ul style="list-style-type: none"> • Article 6(1)(c) of the Regulation • State Labour Inspectorate Law • Ombudsman Law • and other legal acts 	<ul style="list-style-type: none"> • Financial Intelligence Unit • Courts • Police, Prosecutor’s • State institutions that have approached us in accordance with the procedure and scope prescribed by law • Sworn bailiffs • Sworn notaries 	1, 5, or 10 years from the date the information is provided, depending on the type of request

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)

Effective as of 1 May 2026



	<p>documents to be issued, information related to family and children (name, surname, personal identification number, relationship), payment card number, employer, tax residency country, account number, account balance, payment card number, transaction history (incoming and outgoing payments), credit liabilities and other obligations, taxpayer identification number, tax residence, place of birth, country, citizenship, account number, payment card number, insolvency status, movable and immovable property owned, credit liabilities and other obligations, account number, account balance, payment card number, information regarding financial literacy, transaction history (incoming and outgoing payments), information on criminal records, PEP status, employer, occupation, education, information related to offences, authorisation device, login device, IP address.</p> <p>Other categories of data are determined depending on the scope of information requested in the request, claim, or submission, as well as the</p>		<ul style="list-style-type: none"> • Insolvency process administrators • Sworn advocates 	
--	--	--	--	--

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

	information included in the documents to be issued.			
Whistleblowing	Customer/any natural person Name, surname, e-mail address, telephone number, social media account addresses and content, information related to infringements	Legal obligation <ul style="list-style-type: none"> • Article 6(1)(c) of the Regulation • Whistleblowing Law 	<ul style="list-style-type: none"> • Data are not transferred 	5 years from the date of reporting

4.11. Providing information and reports to supervisory authorities

Purpose of data processing	Data types/sets (categories) we process	Legal basis for data processing	Data recipients	Data storage period
Providing information to the Bank of Latvia Credit Register and to the Credit Information Bureau (we are required to provide information to the Credit Register and to the Credit Information Bureau regarding obligations, for example, information on the financing granted for the purchase of a vehicle)	Customer Name, surname, personal identification number or identity number, date of birth, identification document number and other related data (date of issue, country, issuing authority), information regarding financial obligations, information related to tax residency (resident/non-resident)	Legal obligation <ul style="list-style-type: none"> • Article 6(1)(c) of the Regulation • Law on the Credit Register • Bank of Latvia 18.01.2018 Regulation No. 160 of Credit Register Regulation • Bank of Latvia 24.10.2022 Regulation No. 226 of Regulation on Electronic Information Exchange with Bank of Latvia • Cabinet 26.05.2020 Regulation No. 327 of Regulations on the Information on Payment Obligations to be Included in the Credit Information Bureau Database 	<ul style="list-style-type: none"> • Bank of Latvia Credit Register • Credit Information Bureau • Cooperation partner ensuring information exchange 	<p>10 years after the end date or transfer date of the obligation</p> <p>3 years after the end of the reporting period</p>

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)

Effective as of 1 May 2026



4.12. Cookies

Purpose of data processing	Data types/sets (categories) we process	Legal basis for data processing	Data recipients	Data storage period
Use of cookies on Citadele Group websites	Detailed information is provided in Cookie Terms and Conditions on Citadele Websites.			

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

5. How we obtain your data

We obtain your data:

- when you provide them to us:
 - when using our products and services, which you may apply for through our partners, on Citadele Group website, in the Leasing Portal, or by completing an application form. We obtain information about how you use these services, as well as data from your devices (computer or mobile phone) through the use of cookies;
 - upon our request, in the manner prescribed by law, when establishing a business relationship with us;
 - as a lessee, renter, borrower, joint lessee, joint renter, guarantor, pledgor or security provider, buyer, seller, sub-lessee, holder or user;
 - when you contact us by post, e-mail, via the Leasing Portal, the mobile application, by telephone, in person, or when visiting our customer service centers.
- when they are provided to us by third parties:
 - our cooperation partners who provide you with information about us, conduct market research, or provide services;
 - other companies within the Citadele Group;
 - databases and registers holders;
 - state institutions and law enforcement authorities and their officials.

Your data are accessible only to our employees and the employees of our cooperation partners and bank who require access for the performance of their work duties and for the provision of the services you need. They process your data for specific purposes, in accordance with legal requirements and our terms of transactions.

6. Do we carry out automated data processing and profiling

We may, in certain cases, carry out automated Processing of your data and perform profiling.

Profiling

- **What is it?** Profiling is a method of data processing in which, using various personal data, we create your personal “profile”, within which we assess data such as your financial situation, purchase or service usage history, liability history, interests, preferences, and similar information.
- **Why do we carry out profiling?** We perform profiling in order to assess whether:
 - the respective product or service is suitable for your specific needs and preferences;
 - to assess risks;
 - to provide you with advice related to our services;
 - to offer products and services that correspond to your needs.
- **How does this affect you?** For example, in order to determine an appropriate financing limit for you, our system automatically receives information from public registers regarding your liability history, analyses account statements and data on your use of our services, and, as a result, makes a decision on granting a financing limit. If you do not agree with the decision, you may request our employees to review it.

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

We process your data in 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. We provide you with information about this in section 4 of these rules. In such cases, we ensure that the data is processed in accordance with the requirements of the Regulation and is protected at the same level as required by the Regulation.

SIA "Citadele Leasing" Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

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

- the transfer is carried out to a country recognized by the European Commission as safe and providing an adequate level of data protection;
- the transfer is carried out on the basis of the Standard Contractual Clauses approved by the European Commission for data transfers outside the EU or EEA.

8. What are your rights in relation to the Processing of your data

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

8.1. Withdraw consent to data processing	<p>If you have given consent, for example, to receive offers and notifications about our products, you may withdraw it at any time. You may withdraw your consent using:</p> <ul style="list-style-type: none">• e-mail,• the Leasing Portal,• our customer service centers by visiting in person,• if you are a customer of AS "Citadele banka" and use internet banking or the mobile application, then via these resources. <p>If you withdraw your consent, we will stop processing your data. The processing of the consent withdrawal may take up to five business days, depending on the channel through which the withdrawal is submitted.</p>
8.2. Access your data	<p>You have the right to receive from us:</p> <ul style="list-style-type: none">• confirmation as to whether we are processing your data;• detailed information regarding the processing of your data in order to ensure that the data are accurate and are being processed in accordance with the law. <p>If you wish to access your data, please specify the exact period of time and the data you would like to receive. You have the right to know which of your data we hold, why we process them, how we obtained them, to whom we have disclosed them, and for how long they will be retained. You may also request a copy of your data.</p> <p>To enable us to fulfil your request more quickly, please indicate as short a time period as possible and clearly describe which data and information you wish to receive.</p> <p>Please note that we will not be able to provide information if its disclosure is prohibited by law, for example, when providing data to law enforcement authorities (the police, the prosecutor's office, courts, etc.).</p>
8.3. Correct the data	<p>If you believe that the data we hold about you are inaccurate or incomplete, please inform us by:</p> <ul style="list-style-type: none">• indicating which data need correction;• we may request that you submit documents confirming the required changes to the data, for example, if you have changed your surname.
8.4. Delete data	<p>You may request the erasure of your data if you believe that:</p> <ul style="list-style-type: none">• they are no longer necessary,• they are not being used for the intended purposes. <p>We will erase your data and will also inform our cooperation partners of the need to erase them, unless the data are required for the purposes for which we have been processing them, or if the law requires us to retain them for a longer period.</p>

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

	<p>Please note that it will not always be possible to comply with a request to erase data, for example, if the data are necessary for providing you with a service, for fulfilling legal requirements, or within the context of legal proceedings.</p>
8.5. Restrict the processing of data	<p>You may request the restriction of data processing if:</p> <ul style="list-style-type: none"> • you contest the accuracy of the data (the restriction will apply until the accuracy has been verified), • you believe that the Processing of the data is unlawful, but you do not wish the data to be erased and instead want the Processing to be restricted temporarily, • we no longer need your data, but you require them for the establishment, exercise, or defense of legal claims, • you object to the processing we carry out based on our legitimate interests. In such a case, we will reassess whether, in light of your objection, we need to continue the processing of the data. <p>If the processing of data is restricted, we will use the data only for specific purposes, for example, for the defense of our legal rights.</p>
8.6. Transfer your data	<p>The data that you have provided to us, either based on your consent or within the framework of a contract, may be transferred. Data that we process in an automated manner may also be transferred. You may use this data yourself or, upon your request, we will transfer them to another service provider, provided that there are no obstacles to doing so.</p> <p>When transferring data, please note that the data may also contain information about third persons, and the transfer of such data must be assessed taking into account the rights and freedoms of those third persons.</p> <p>To enable us to fulfil your request more quickly, please indicate as precisely as possible which data and information you wish to have transferred.</p>
8.7. Object to the processing of data	<p>You may object to the processing of your data if we carry it out on the basis of our legitimate interests. We will review your objection and assess whether it is necessary to continue the processing of the data.</p> <p>We will be obliged to continue the processing of the data if it is necessary for compliance with a legal obligation or for the defense of our legal rights.</p> <p>You will not be able to exercise the right to object to the processing of your data if you have given your consent for the processing, if the processing is necessary for the performance of a contract, or if we are required to process the data in order to comply with the law.</p>
8.8. Refuse automated individual decision making, including profiling	<p>You may refuse automated decisions, including profiling (for example, the automatic rejection of a leasing application).</p> <p>In such a case, you may object to the reasons for the refusal and request that the decision be reviewed by our employee.</p> <p>Please note that you will not be able to exercise this right if the automated decision is necessary for the conclusion or performance of a contract, is required by law, or if you have given your consent.</p>

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)

Effective as of 1 May 2026



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

How can you submit a request?	What will be the time frame for reviewing the request?	What will be the fee for reviewing the request?	How will we provide a response to your request?
<p>In writing, in free form:</p> <ul style="list-style-type: none"> • in person, by visiting us and presenting an identity document (passport or identity card), where you will be provided with all necessary information related to the submission of your request, including answers to any questions you may have; • by post or courier delivery, by sending/delivering your request to our address, bearing in mind that we may request additional information necessary to verify your identity; • by e-mail, by signing the request with a secure electronic signature; • via internet banking or the mobile application, if you are a customer of the bank, provided that the request specifies the Citadele Group company to which the request relates. Upon receiving your request, we will review it. If necessary, we will ask you to clarify the information and the processing activities for which you wish to receive information. 	<p>We will review your request:</p> <ul style="list-style-type: none"> • no later than within 1 month from the date of its receipt; • if the request is extensive or complex, we may require an additional 2 months. <p>We will inform you about any extension of the time limit and the reasons for it.</p>	<p>You may receive a response to your request:</p> <ul style="list-style-type: none"> • free of charge; • if you submit a request repeatedly and we conclude that it is unfounded or excessive, we may apply a fee or refuse to comply with the request. The fee will cover the costs of processing the information and the work performed by our employees. If a fee is required, we will inform you accordingly. 	<p>You may receive a response to your request:</p> <ul style="list-style-type: none"> • in person, by visiting us and presenting an identity document – a passport or an identity card, and, in the case of an authorized person, also the power of attorney; • by e-mail, after receiving a password sent by us via text message in order to access the document; • through online banking; • through the mobile application. <p>We will take into account the method of receiving the response that you have indicated.</p>

SIA “Citadele Leasing” Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

10. What to do if you believe that we have infringed your rights by processing

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

SIA “Citadele Leasing”

Address: Republikas laukums 2A,
Rīga, Latvia, LV-1010
Telephone: +371 67010000
E-mail address: lizings@citadele.lv
E-mail address of the Data Protection Officer:
privacy@citadeleleasing.lv

Data State Inspectorate

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

If our response or the response from the Data State Inspectorate does not provide you with the desired solution, you have the possibility to bring the matter before a court.

11. How do we keep your data safe

We ensure the protection of your data against unlawful access, use, disclosure by taking the following measures:

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

- **Door locks (electronic doors):** We make sure that all premises are locked if there are no employees in them.
- **Access control:** We use access cards (magnetic, chip cards), identity readers, code systems to control who can access the premises.
- **Videosurveillance, alarms, sensors:** We install videosurveillance cameras to monitor important premises and places.
- **Selection of personnel:** We 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, flash drives, SD cards), other devices (printers, scanners, monitors, video cameras, POS terminals);
- protection of information systems, software, applications, mobile applications;
- the protection of communication networks and technologies enabling data transmission and information exchange (internet, VPNs, mobile networks, cloud technologies, etc.).

For the protection of technological resources, we provide:

- **Prevention of environmental hazards:** 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.
- **Man-made hazards:** We do not allow damage or theft.
- **Secure passwords:** We use secure and complex passwords for devices and accounts.
- **Multi-factor authentication:** We add an additional layer of security.
- **Screen lock:** 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.

SIA "Citadele Leasing" Privacy Protection Rules (previously titled Privacy policy)



Effective as of 1 May 2026

- **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

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

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 what to do in case of a threat to premises or technology.

Why is it 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 us, Citadele Group 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 the confidentiality and protection of data. We, Citadele Group companies 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.

12. How will we provide up-to-date information about the processing of your data

To ensure that you are always informed about how your data is processed, we will regularly review and update these rules. Therefore, we invite you to review the latest rules from time to time on our website, customer service centres or by e-mail. If there are any significant changes, we will notify them one month before they come into effect.