

# Privacy Disclaimer

for processing of personal data in insurance portal

**Citadele**

Effective September 9, 2025

We, AS "Citadele banka", have developed this privacy disclaimer to provide you with information about what data we process, why and how we protect it when you use the insurance portal.

We provide this information in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (27.04.2016) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, hereinafter - the Regulation, as well as in compliance with the legislation of the European Union and Latvia, recommendations and best practices of the financial sector and supervisory authorities.

The maintenance of the insurance portal and the processing of information on the portal are carried out by us in cooperation with our Swedish cooperation partner Insurely AB. The insurance offer itself for you will be prepared by our insurance cooperation partner AAS "BTA Baltic Insurance Company".

This privacy disclaimer provides an insight into the personal data protection and processing conditions that Citadele complies with in relation to the processing of personal data carried out, including processing carried out in cooperation with Insurely AB.

If you would like to get acquainted with the personal data protection and processing conditions recognized by our insurance cooperation partner in relation to the processing of personal data carried out by it, we invite you to devote additional time and familiarize with the privacy protection conditions of AAS "BTA Baltic Insurance Company", which can be found here: <https://www.bta.lv/media/doc/BTA-Privatuma-politika-09-2025-EN-v1.pdf>

## Brief description of process (simply about the supposedly complicated) \_\_\_\_\_

Our insurance portal offers you to check the conditions of your current insurance policy and buy a new insurance policy from our insurance partner. You can buy a new insurance policy from our insurance cooperation partner even without checking the conditions of the current insurance policy.

The process of checking the conditions of your current insurance policy is simple. Namely, you connect to our portal and, with the help of a secure connection, request the data of your current insurance policy from your current insurer. This data is sent to us and we pass it to our insurance cooperation partner so that it can prepare a new insurance offer for you. Consecutively, you can see on our portal the conditions of your current insurance policy and the conditions of a new insurance offer presented you by our insurance partner. If you choose the offer of our insurance partner, you can immediately conclude a contract and receive the new insurance policy. This whole process is automated and safe, and takes only a few moments.

The process of buying a new insurance policy is even simpler if you do not check the conditions of the current insurance policy – you provide us with the necessary data, we send it to our insurance cooperation partner so that it can prepare a new insurance offer for you, and after a moment you can already conclude a contract and receive a policy.

## Who will process your data \_\_\_\_\_

Your data is processed by AS "Citadele banka", registration No. 40103303559, address: Republikas laukums 2A, Riga, Latvia, LV-1010.

If you have any questions about data processing, you can contact us by calling +371 67010000, writing to the e-mail address [info@citadele.lv](mailto:info@citadele.lv), or [gdpr@citadele.lv](mailto:gdpr@citadele.lv) reaching our appointed data protection officer.

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For what purposes, what data, on what basis we process and how long we store it

| Purpose of data processing                                                                                                                                                                                             | Data types/categories processed                                                                                                                       | Legal bases for processing                                                                                                                                       | Data retention period                                                                                                                                |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Obtaining data from you as a user of the insurance portal and transferring the collected data to our insurance cooperation partner for concluding a new insurance contract and issuing a new insurance policy</b>   | Name, surname<br>Personal ID code<br>Date of birth<br>Place of residence<br>E-mail address<br>Phone number                                            | The processing is necessary for the performance of a contract (i.e. Terms for the verification and purchase of insurance) to which the data subject is a party.  | 18 months after the conclusion of the insurance contract. The data storage period will be extended every time you conclude a new insurance contract. |
| <b>Obtaining up-to-date insurance information from your existing insurer for the preparation of a comparative insurance offer</b>                                                                                      | Name, surname<br>Personal ID code<br>Date of birth<br>Place of residence<br>E-mail address<br>Phone number<br>Data from the existing insurance policy | The processing is necessary for the performance of a contract (i.e. Terms for the verification and purchase of insurance) to which the data subject is a party.  | 18 months after retrieval of data from the existing insurer.                                                                                         |
| <b>Transfer of data obtained from your existing insurer to the insurance cooperation partner for the calculation of a new insurance offer</b>                                                                          | Name, surname<br>Personal ID code<br>Date of birth<br>Place of residence<br>E-mail address<br>Phone number<br>Data from the existing insurance policy | The processing is necessary for the performance of a contract (i.e. Terms for the verification and purchase of insurance) to which the data subject is a party.  | Not applicable to this purpose, as the data is transferred to the insurance cooperation partner.                                                     |
| <b>Maintenance of the insurance portal, the development of its functionality and data exchange process</b>                                                                                                             | All personal data to be processed within the framework of the service, if they are necessary for the achievement of the relevant purpose.             | Citadele's legitimate interest in providing customers with quality services                                                                                      | No more than 18 months from the moment of obtaining the data.                                                                                        |
| <b>Registering you as a user of the insurance portal in our information system to perform further actions related to assistance in purchasing or renewing insurance before the expiration of the insurance policy.</b> | Name, surname<br>Personal ID code<br>Date of birth<br>Place of residence<br>E-mail address<br>Phone number<br>Data from the existing insurance policy | Citadele's legitimate interest in managing and improving the customer experience by: (a) identifying users who have not completed an insurance purchase, as well | 18 months after the moment of entering an insurance contract or obtaining data.                                                                      |

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|                                                                                                                                                                      |                                                                                                                                                                                                    | as<br>(b)proactively communicating with customers, for example by sending reminders about the approaching expiry of a policy or offers to renew a policy.                                                                                                                 |                                                                                                                                                      |
| <b>Communicating with you as a user of the insurance portal and/or a customer regarding assistance in purchasing or renewing insurance after its expiration date</b> | Name, surname<br>Personal ID code<br>Place of residence<br>E-mail address<br>Phone number<br>Data of the object of insurance and/or the terms of the existing and new policy<br>Communication data | Communication and related processing of your personal data in cases of pending purchases is based on the performance of contracts (i.e. i.e. Terms for the verification and purchase of insurance) to which the data subject is a party.                                  | 18 months from the moment of receipt of the data.                                                                                                    |
|                                                                                                                                                                      |                                                                                                                                                                                                    | Communication in cases of insurance policy renewal and related processing of personal data is based on Citadele's legitimate interests (i) to improve the customer experience and reliability of our services, as well as (ii) to promote the sale of insurance policies. | 18 months after the conclusion of the insurance contract. The data storage period will be extended every time you conclude a new insurance contract. |
| <b>Handling of applications/claims related to the processing of personal data for the above-mentioned purposes.</b>                                                  | All personal data processed within the framework of this process, as well as those personal data necessary for the examination of applications/claims.                                             | Legitimate interest in responding to submissions, as well as resolving disputes arising in connection with maintaining a secure payment profile.                                                                                                                          | 5 years from the date of examination of the application/claim or the date of final settlement in the relevant case.                                  |

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## Who we share your data with \_\_\_\_\_

Your data will be processed for the above purposes by authorized Citadele employees and employees of our cooperation partner Insurely AB. Please note that the insurance checking and purchase process is automated and does not require employee participation, so employees of our cooperation partner Insurely AB would be able to access your personal data only in the event of a failure in the operation of the portal, the elimination of which would require their participation.

Your personal data for the preparation of the insurance offer and/or the insurance contract and the issuing of the insurance policy will be transferred to our insurance partner AAS "BTA Baltic Insurance Company".

Citadele will not process your personal data outside the European Union or the European Economic Area.

## What are your rights regarding the data processing we perform \_\_\_\_\_

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

|                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Access Your Data</b>         | <p>You have the right to receive from us:</p> <ul style="list-style-type: none"><li>• confirmation of whether we process your data,</li><li>• detailed information about your data processing to ensure that the data is accurate and processed in accordance with the law.</li></ul> <p>If you wish to access your data, please specify the time and the data you want to receive. You have the right to know what data we hold about you, why we process it, how we obtained it, to whom it has been disclosed, and how long it will be stored. You may also request a copy of your data.</p> <p>To help us process your request more quickly, please specify the shortest possible time and describe precisely which data and information you wish to obtain.</p> <p>Please note that we may not be able to provide information if prohibited by law, for example, when data is shared with law enforcement authorities (police, prosecutor's office, court, etc.).</p> |
| <b>Correct data</b>             | <p>If you believe that the data we hold is inaccurate or incomplete, please let us know:</p> <ul style="list-style-type: none"><li>• specify the corrections needed,</li><li>• we may request documents to verify the necessary changes.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Delete data</b>              | <p>You may request the deletion of your data if you believe that:</p> <ul style="list-style-type: none"><li>• it is no longer necessary,</li><li>• it is not being used for its intended purposes.</li></ul> <p>We will also delete your data from our cooperation partners unless it is necessary for the purposes for which it was processed or if the law requires a longer retention period.</p> <p>Please note that fulfilling a deletion request may not always be possible, for example if the data is needed to comply with legal requirements or for proceedings.</p>                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Restrict data processing</b> | <p>You may request to restrict the processing of your data if:</p> <ul style="list-style-type: none"><li>• You contest the accuracy of the data (the restriction will apply until the accuracy is verified).</li><li>• You believe the processing is unlawful but prefer to restrict rather than delete the data.</li><li>• We no longer need your data, but you require it to exercise or defend your legal rights.</li><li>• You object to data processing based on our legitimate interests. We will reassess whether, considering your objection, we need to continue processing your data.</li></ul> <p>If data processing is restricted, we will only use the data for specific purposes, such as defending protecting our legal rights.</p>                                                                                                                                                                                                                         |

|                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Transfer data</b>             | <p>The data provided by you, either with your consent or under a contract, may be transferred. Data processed automatically can also be transferred. You can use this data personally, or, upon your request, we will transfer it to another service provider, provided there are no obstacles.</p> <p>When transferring data, it is important to consider that it may include third-party information. The transfer of such data must be carefully evaluated with respect to the rights and freedoms of those third parties.</p> <p>To speed up the request, please specify the exact data and information you wish to transfer.</p> |
| <b>Object to data processing</b> | <p>You may object to the processing of your data if it is conducted based on legitimate interests. We will review your objections and assess the necessity of continuing the data processing.</p> <p>We will need to continue processing your data if it is necessary to comply with the law or to protect 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 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>               |

## How to submit a request regarding data processing and how we will ensure the request is handled

| <b>How can you submit a request?</b>                                                                                                                                                                                                                                                                                                                                                         | <b>What will be the deadline for reviewing the request?</b>                                                                                                                                                                                                                                      | <b>What will be the fee for reviewing the request?</b>                                                                                                                                                                                                                                                                                                                                                                | <b>How will we provide a response to the request?</b>                                                                                                                                                                                                                                                                                                                                                      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>In writing, in free form:</p> <ul style="list-style-type: none"> <li>in person – by visiting the bank and presenting an identity document (passport or ID card), or a power of attorney if acting on behalf of someone else,</li> <li>by email – by sending a request signed with a secure electronic signature,</li> <li>via online banking.</li> <li>through the mobile app.</li> </ul> | <p>We will review your request:</p> <ul style="list-style-type: none"> <li>no later than within 1 month from the date of receipt,</li> <li>if the request is extensive or complex, we may need an additional 2 months. We will inform you about the extension and the reasons for it.</li> </ul> | <p>You can receive a response to your request:</p> <ul style="list-style-type: none"> <li>free of charge,</li> <li>if you submit a repeated request and we determine that it is unfounded or excessive, we may apply a fee or refuse to fulfil the request. The fee will cover the costs of processing the information and the work of our employees. If a fee is required, we will inform you in advance.</li> </ul> | <p>You can receive a response to your request:</p> <ul style="list-style-type: none"> <li>in person, by visiting the bank and presenting an identity document (passport or ID card), or a power of attorney if acting on behalf of someone else,</li> <li>via email, by receiving a password sent via SMS to access the document,</li> <li>through online banking,</li> <li>via the mobile app.</li> </ul> |

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What should you do if you think your data rights have been violated \_\_\_\_\_

We process your data in accordance with regulations, European Union and Latvian laws, financial industry recommendations, and best practice guidelines. If you believe we have violated your privacy rights, you have the right to file a complaint:

|                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>AS "Citadele banka"</b><br>Address: Republikas laukums 2A,<br>Riga, Latvia, LV-1010<br>Phone: +371 67010000<br>Email: <a href="mailto:info@citadele.lv">info@citadele.lv</a><br>Data Protection Officer's email: <a href="mailto:gdpr@citadele.lv">gdpr@citadele.lv</a> | <b>Data State Inspectorate</b><br>Address: Elijas iela 17, Riga, LV-1050<br>Email: <a href="mailto:pasts@dvi.gov.lv">pasts@dvi.gov.lv</a><br>Phone: +371 67223131<br>Website: <a href="http://www.dvi.gov.lv">www.dvi.gov.lv</a> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

How will we ensure up-to-date information about the processing of your data \_\_\_\_\_

To ensure you are always informed about how your data is being processed, we regularly review and update this privacy notice. Therefore, we encourage you to periodically check the latest privacy notice on our website. If there are significant changes, we will notify you one month before they come into effect.