

## **CREDIT SOLUTIONS UAB PERSONAL DATA PROCESSING POLICY**

Valid from 2023 August 24

Credit Solutions UAB personal data processing policy (hereinafter - the Policy) contains information on how Credit Solutions UAB (hereinafter – Credos) processes personal data.

This Policy applies to the relationship between and Clients who applied to Credos for the opportunity to use the services provided by Credos, use, have used or are in any other way related to the services provided by Credos, including relationships with Clients that occurred before this Policy came into force.

### **1. CONCEPTS**

1.1. Personal data is any information directly or indirectly related to the Client from which the Client's identity can be determined.

1.2. A Client is a natural person who applied to Credos for the opportunity to use the services provided by Credos, uses, has used or is in some other way related to the services provided by Credos.

1.3. Processing is any operation performed on Personal Data (including collection, recording, storage, modification, request submission, transfer, etc.).

1.4. Credos is a legal entity registered in the Republic of Lithuania, legal entity code 305952640, actual business address Labdarių g. 7, LT-01120 Vilnius telephone no. +370 638 27830, e-mail address [info@credos.lt](mailto:info@credos.lt).

### **2. GENERAL PROVISIONS**

2.1. The Policy contains general provisions on how Credos processes Client's Personal Data.

2.2. Personal data of Clients is processed in accordance with the General Data Protection Regulation (EU) 2016/679 (hereinafter - GDPR), the Law on Legal Protection of Personal Data and other legal acts.

2.3. Personal data is processed in the territory of the European Union / European Economic Area (EU/EEA).

2.4. Credos may use data processors for processing personal data. Credos cooperates only with such data processors who can ensure the same protection of personal data as applied by Credos. The personal data processors process personal data of the client only in accordance with instructions of Credos and for fulfillment of the stated goals.

2.5. By ordering and/or using the services offered by Credos and by providing Credos with their personal data, the Client agrees with the provisions of this Policy.

### **3. PERSONAL DATA COLLECTED BY CREDIT SOLUTIONS UAB**

Personal data can be obtained directly from the Client and from external sources, such as registers managed by the state and private individuals and other third parties.

3.1. Personal identity data - name, surname, personal identification number, date of birth, personal identity document (passport, identity card) data.

3.2. Data on financial literacy - education, professional activity, workplace, seniority.

3.3. Data about the Clients's online behavior - data about what the Client did on the Credos website.

3.4. Data on the Client's relationship with legal entities or other Clients - data on the relationships the Client has with legal entities and/or other Clients, what duties and/or services he/she provides.

3.5. Data about the family - marital status, number of dependents.

3.6. Financial data - current account numbers in banks and other financial institutions, available financial obligations, fulfillment of financial and other obligations, credit history, creditworthiness, assets, their types, value, received income and their types, stability, sources, expenses and their types, information obtained from registers and other entities when assessing the Client's creditworthiness.

3.7. Information collected during communication with the Client - letters, messages, correspondence, recordings of telephone conversations.

3.8. Communication data - phone number, residential and correspondence address, e-mail address.

#### **4. PURPOSES OF PROCESSING PERSONAL DATA**

Credos collects and uses the personal data of the Clients, which are provided by the Client himself or obtained from other sources. Credos processes the personal data of Clients for the following main purposes:

4.1. Client's identification - Credos collects the Client's name, surname, personal identification number, date of birth, copy of the personal identification document, current account numbers in banks and other financial institutions to identify the Client.

4.2. Communication support - Credos collects the Client's phone number, residential and correspondence address, e-mail address to communicate with the Client, inform him of the latest information about the services provided, execution of contracts and other important information.

4.3. Prevention of money laundering and terrorist financing - in compliance with the requirements of legal acts, Credos collects information about the Client's place of work, held positions, citizenship, whether the Client, his relatives or colleagues are persons participating in politics or holding other high public positions.

4.4. Creditworthiness and Client risk assessment - In order to properly assess the Client's opportunities to obtain credit and to assess and control the risk posed by the Client, Credos collects information about the Client's income, education, workplace, current position, work experience, available assets, financial obligations, credit and payment history, family and dependants.

4.5. Protection of the interests of the Client and/or Credos - to protect the interests of the Client and/or Credos, Credos collects information about the communication between the Client and Credos.

4.6. Asking for the Client's opinion - in order to improve the quality of the services provided, Credos may ask the Client to submit an opinion about the services provided, the wishes and expectations of the Clients. Client responses are evaluated and stored.

4.7. Direct marketing - Credos processes the Client's name, surname, residential and correspondence address, telephone number, e-mail address during direct marketing.

4.8. Providing services remotely - to implement the possibility for the Client to apply for credit remotely, Credos collects information about the Client's in accordance with Credos's Cookies Policy.

## **5. BASIS FOR PROCESSING PERSONAL DATA**

5.1. Credos has the right to receive and process the Client's personal data, under at least one of the following conditions:

- The client applied to Credos regarding the provision of services and seeks to conclude a contract;
- The client makes an appointment to process personal data;
- Processing of personal data is possible on the basis of legal acts;
- in order to pursue the legitimate interests of Credos, such as, for example, filing lawsuits in court, performing other legal actions in order to reduce or avoid losses

5.2. If the Client refuses to provide personal data that is necessary for the purpose of concluding and/or fulfilling the contract, or the provision of which is stipulated by legal acts or the contract, Credos will not be able to provide services to the Client.

## **6. PERSONAL DATA PROVIDERS**

Credos receives data from the following persons:

6.1. Directly from the Client;

6.2. Register of wanted persons;

6.3. Register of invalid documents;

6.4. of the Bank of Lithuania, other state institutions, registries, credit/financial institutions, credit bureaus, including but not limited to Creditinfo Lietuva UAB and other persons;

6.5. Boards of the State Social Insurance Fund;

6.6. Real estate register;

6.7. Population register;

6.8. From other natural persons, when they provide the data of spouses, children, other persons;

6.9. From legal entities, when the Client is a representative, employee, contractor, founder, shareholder, participant, owner, etc. of these legal entities.

## **7. RECIPIENTS OF PERSONAL DATA**

Personal data may be transferred to the following recipients of personal data in accordance with the requirements of legal acts:

7.1. State institutions and institutions, other persons performing the functions assigned to them by law (for example, law enforcement institutions, courts, bailiffs, notaries, tax administrators, Credos activity supervision, institutions performing financial crime investigation activities).

7.2. Credit and financial institutions;

7.3. Credos related companies, insofar as it is necessary to accept decisions to grant credit to the Client, to conduct audits, and to implement other legal measures;

7.4. UAB "Creditinfo Lietuva";

7.5. Individuals who provide Credos postal services, IT services, website administration and related services, information technology infrastructure services, document archiving services, advertising, direct marketing, marketing services, communication services, who create, provide, support and develop software;

7.6. For lawyers, auditors, consultants and advisors;

7.7. Third parties managing registers (including loan registers, Resident Register, Real Estate Register, Register of Legal Entities, in which personal data is processed) or who mediate the provision of Personal Data from such registers.

## **8. PROFILING, AUTOMATED DECISION MAKING, PROVIDING INFORMATION ABOUT BORROWERS**

8.1. Credos can carry out personal data profiling to automatically evaluate the characteristics of the Clients, perform forecasts, analyses, assign the Clients to separate groups. Profiling is used for the purpose of direct marketing, for sending informational messages to individual groups of Clients, for automated decision-making related to credit provision, risk assessment and management.

8.2. Profiling is based on the legitimate interest of Credos, the performance of legal obligations or the Client's consent.

8.3. Credos can process Personal Data to improve and simplify the quality of the provided electoral services, that is, based on the processed Personal Data, adapt services to the devices used by the Client or provide the Client with customized offers.

8.4. If the Client is late in fulfilling his obligations to Credos for more than 30 (thirty) calendar days, Credos provides information about the Client's identity and credit history, i.e. i.e. financial obligations and their execution, debts and their payment, to Credit Bureau UAB "Creditinfo Lietuva" (company code: 111689163, address: A. Goštauto st. 40A, LT-03163 Vilnius, <https://lt.creditinfo.com/>).

## **9. PERIOD OF STORAGE OF PERSONAL DATA**

9.1. Personal data is processed no longer than is necessary.

9.2. Personal data collected when concluding a contract with the Client are processed as long as the Client uses the services of Credos and for another 10 years after the full fulfillment of the obligations of Credos.

9.3. If Credos decides not to grant credit to the Client and/or does not conclude a credit agreement with him, the data and information collected at the time of decision-making will be destroyed and will not be stored, but the "Information about processed personal data" form filled out by the Client and the application submitted by the Client (or part of it) will be stored no longer than 12 (twelve) months after the date of such decision.

## **10. CLIENT'S RIGHTS**

The client has the right to:

10.1. Ask to get acquainted with processed Personal data;

10.2. Demand correction of Personal Data if they are incorrect, incomplete or inaccurate;

10.3. Demand to limit the processing of the Client's Personal Data until the legality of their processing is verified at the Client's request;

10.4. Do not consent to the processing of Personal Data for the purpose of direct marketing and when the basis of their processing is legitimate interest;

10.5. Demand the deletion of Personal data that is processed only with the Client's consent and the Client withdraws consent. The Client does not have the right to demand the deletion of his Personal data, which are processed on another legal basis, for example: when the processing is necessary for the performance of the contract or is the fulfillment of an obligation according to the applicable legislation;

10.6. Require the transfer of Personal Data to another data controller, if this is possible, or provide it directly to the Client in a convenient form (applies to those Personal Data provided by the Client himself and which are processed by automated means on the basis of consent or on the basis of conclusion and execution of a contract);

10.7. Withdraw consent to process Personal data;

10.8. Submit a complaint directly to Credos or the State Data Protection Inspectorate, Art. L. Sapiegos. 17, LT-10312 Vilnius, <https://vdai.lrv.lt> or call +370 5 212 7532 for consultations.

## **11. CONTACT INFORMATION**

11.1 The Client has the right to apply to Credos to submit inquiries, revoke given consents, submit requests for the implementation of the data subject's rights and complaints regarding the processing of personal data.

11.2 Credos contact details are published on Credo's website [www.credos.lt](http://www.credos.lt).

## **12. EFFECTIVENESS AND CHANGES TO THE POLICY**

12.1 Clients can familiarize themselves with this Policy in the branches of Credos and on the website [www.credos.lt](http://www.credos.lt).

12.2 Credos has the right to unilaterally change this Policy at any time, informing the Clients about the changes by publishing them on the Credos website [www.credos.lt](http://www.credos.lt), or informing the Clients by e-mail, by mail or in another way (for example, by publication in the press) no later than 30 (thirty) calendar days before the entry into force of such changes.