

### **FINOMARK UAB PRIVACY POLICY**

#### 1. GENERAL PROVISIONS

- 1.1. This privacy policy (hereinafter the Privacy Policy) is intended to provide you with key information on how FinoMark UAB (hereinafter we, or FinoMark) processes your personal data when you access the FinoMark website (<a href="www.finomark.lt">www.finomark.lt</a>) and use the crowdfunding platform that FinoMark operates (hereinafter the Platform), or when we provide you with other services, handle inquiries, or collaborate on other matters.
- 1.2. The terms and conditions of this Privacy Policy shall apply each time you seek to access the content and/or services we provide, regardless of what device you use (a computer, mobile phone, or other).
- 1.3. If you transfer the data of third parties to us, you must duly inform the subjects of the data (managers, beneficiaries, representatives, collateral providers, guarantors, etc.) about the transfer of their data to FinoMark and provide them with this Privacy Policy for their review.
- 1.4. FinoMark reserves the right to alter the provisions of this Privacy Policy. The latest version of the Privacy Policy shall be published on the FinoMark website (<a href="https://www.finomark.lt">www.finomark.lt</a>).

### 2. PERSONAL DATA CONTROLLER

- 2.1. The controller of your personal data is FinoMark UAB, a company registered and operating in the Republic of Lithuania, with legal entity code 305538582 and registered office at Ulony St. 5 in Vilnius, Lithuania.
- 2.2. As the controller of your personal data, we independently determine the purposes and means for processing personal data. We ensure data protection by implementing the provisions of the General Data Protection Regulation (EU) 2016/679 and other personal data protection legislation. Additionally, because we are a crowdfunding platform, in our activities we also abide by the legal acts that regulate the activities of crowdfunding platforms.
- 2.3. If you have any questions related to the processing of your personal data, you can contact us by e-mail at <a href="mailto:info@finomark.lt">info@finomark.lt</a> or a personal data protection officer at <a href="mailto:duomenuapsauga@finomark.lt">duomenuapsauga@finomark.lt</a>.

### 3. PROCESSING OF YOUR PERSONAL DATA

# Provision of crowdfunding services and contracting with customers

- 3.1. FinoMark is a crowdfunding platform included on the Public List of Crowdfunding Platform Operators maintained by the Bank of Lithuania. In providing services, FinoMark abides by the provisions of the Republic of Lithuania Law on Crowdfunding as well as other applicable legal acts.
- 3.2. In order to use the services provided by the Platform, you must register on the Platform and enter into a Crowdfunding Platform Use Agreement (for investors and project owners). With that in mind, we will process the personal data of Customers or their representatives for the purpose of providing financing services, on the grounds of the agreement concluded with you when the agreement is made with a natural person, or on the grounds of legitimate interest when the agreement is made with a legal person.
- 3.3. For the purpose of providing the services, we also process the personal data of guarantors, collateral providers and their representatives. Such data are processed on the grounds of agreements made with the guarantors or collateral providers when an agreement is made with a natural person, or on the grounds of legitimate interest, when an agreement is made with a legal person.
- 3.4. In order to provide you with crowdfunding services, we may process the following data of customers, guarantors, collateral providers and their representatives:
- 3.4.1. Data about your identity: name, surname, personal identification number or other unique sequence of characters for personal identification, date of birth, personal document number, personal document copy, citizenship or the state that issued the identity document, country of residence, face photograph, and other identity data;
  - 3.4.2. Contact details: address, telephone number, e-mail address, and other contact information;
- 3.4.3. Know-your-customer information: results of checks in public and private registers, workplace, position, activities, marital and social status, income and types, education, services used, operations and transactions, information on participation in politics, data on knowledge and investment experience, and other know-your-customer information;
- 3.4.4. Payment information: account number, payment service provider, account balance, amount paid, amount invested, interest received, other payments, and other payment details;
- 3.4.5. Information on creditworthiness: credit rating, payments, debts, information about bankruptcy cases, and other creditworthiness data;
- 3.4.6. For the purpose of paying taxes to the state budget on the basis of a legal obligation, we process the following investor (lender) data: name, surname, personal identification number, date of birth, place of residence (address), status of permanent/non-permanent resident of the Republic of Lithuania, interest amount, tax amount. We forward the data to the State Tax Inspectorate.



Data shall be processed while the agreement is in effect and for 10 years after termination of the contract and the fulfilment of obligations under the contract.

- 3.4.7. Other data related to the services we typically provide as a crowdfunding platform.
- 3.5. This data is necessary for entering into and carrying out agreements with a customer and providing services.

When data requested by FinoMark is not provided, FinoMark may refuse to enter into a business relationship with the customer and to provide services.

- 3.6. We may obtain data both from you and from third parties, including financial institutions, providers of identification services, credit rating systems, registers, databases, social networks with accounts that you link to our system, and other sources. We may also check publicly available information about you to verify your identity or information you provide and transactions and operations you perform.
- 3.7. Your data will be processed for 10 years from the date of a financing transaction or 8 years from the end of the business relationship with the customer, whichever is later.

### Access to an individual customer's account

- 3.8. Each customer of the Platform has the ability to connect to their individual account. Customers log in to their account via the Platform's website (<a href="www.finomark.lt">www.finomark.lt</a>) using the unique login credentials provided to them.
- 3.9. To properly administer this system, FinoMark also processes its customers' personal data, including customer IDs, login passwords, data provided in customer applications or agreements, data on transactions customers perform, holdings of investment units, and other data. FinoMark processes this personal data in the performance of agreements with the customers.
- 3.10. The grounds for processing the data is the performance of an agreement, when the agreement is made with a natural person, or legitimate interest, when the agreement Is made with a legal person.
- 3.11. In administering the system of individual customer accounts, customers' personal data is stored for the same period indicated above, i.e. 10 years from the date an investment decision is made, a transaction is conducted, a corresponding application is submitted, or an operation is performed, except where legal acts stipulate longer retention periods for such data. At the request of a customer, an account can be deleted, but data which has been provided will be processed further for the above specified length of time.

### Prevention of money laundering and terrorist financing

3.12. FinoMark processes the personal data of its customers, their representatives and beneficiaries in fulfilling requirements set out in the provisions of the Republic of Lithuania Law on the Prevention of Money Laundering and Terrorist Financing (hereinafter – the Law). Personal data is processed for the following purposes: to establish a person's identity, prevent money laundering and terrorist financing, implement the principle of Know Your Customer, monitor business relations and information updates, and detect suspicious financial operations.

Before entering into a business relationship, FinoMark must determine the identity of its customers, their representatives and beneficiaries. Thus, the processing of your personal data for this purpose is essential for fulfilling the legal obligation imposed on FinoMark by the law.

- 3.13. We process the following personal data: Know Your Customer information: results of checks in public and private registers, workplace, position, activities, family and social status, income and its types, education, services used, operations and transactions conducted, information about participation in politics, data about investment knowledge and experience, and other Know Your Customer information; participation in politics, applicable sanctions; monitoring or business relationships: information provided in customer and beneficiary profiles, personal names, alternative names, shares of other rights in a legal entity, behaviour, monetary operations or transactions, and the validity of customer's personal identity document.
- 3.14. While you normally directly provide us with the personal data required by law, FinoMark also has the right to verify the identity of customers, their representatives or beneficiaries without their direct participation, obtaining the information needed from other financial institutions and obligated entities in the manner established by law.
- 3.15. FinoMark stores your personal data in accordance with the requirements of the law, i.e. for 8 years from the date of transactions or the end of business relationship with the customer. In certain cases established by the law, some personal data is stored for a shorter period of time (for example, business correspondence with a customer is stored for 5 years).

#### Administration of inquiries

3.16. We process your personal data when you contact us by e-mail, submit inquiries (queries, complaints or requests) on our website, social media accounts, by telephone or in any other way.



- 3.17. We process personal data received together with your inquiries in order to properly manage the inquiries, ensure the quality of services provided, and fulfil legal requirements. We usually process personal data received with your inquiries on grounds of legitimate interest, i.e. to duly respond to inquiries or when the data submitted in an inquiry is necessary for us to be able to defend infringed rights and legitimate interests of ourselves or other persons.
- 3.18. We process the following personal data: name, surname, e-mail address, telephone number, and other data which you yourself include in an inquiry.
- 3.19. The retention period for personal data in inquiries received is up to 5 years, depending on the nature of the data and other circumstances. In certain cases, your personal data may be retained for a longer period of time as long as is necessary to defend our own or other persons' rights and legitimate interests, properly manage inquiries, address complaints and resolve disputes, and in other cases specified by law.

## **Direct marketing**

- 3.20. If you subscribe to newsletters which FinoMark sends by e-mail or otherwise, FinoMark will process your personal data for direct marketing purposes, i.e. to send the newsletters in question. FinoMark newsletters provide information on new projects on the Platform and review economic and financial market trends.
- 3.21. In sending such newsletters, FinoMark processes the data on the grounds of your consent, i.e. based on you having subscribed to the newsletters on the FinoMark website. For the purpose specified, FinoMark processes the following personal data of yours: name, surname, and e-mail address.
- 3.22. The retention period for your personal data processed for direct marketing purposes is 3 years from the receipt of your consent unless you withdraw that consent earlier. FinoMark shall stop processing the data at the end of the specified period or if you withdraw your consent.
- 3.23. You have the right to opt out of receiving newsletters at any time. You can do so by clicking on the corresponding link at the bottom of the newsletters that are sent or by notifying FinoMark about that in writing (for example, by e-mail).
- 3.24. On grounds of legitimate interest to inform about its services, FinoMark may send direct marketing messages or invitations to participate in surveys to current FinoMark customers without separate consent for such service marketing and surveys if the customers are given a clear, free-of-charge and easily exercisable opportunity to object to or opt out of such use of their contact details, and if they have not initially objected to such use of the data in sending each message.
  - 3.25. The following personal data are processed: name, surname, e-mail address, telephone number.
  - 3.26. The time period for processing the data is until the end of the business relationship.
- 3.27. You can send an objection to the processing of personal data on grounds of legitimate interest for direct marketing purposes by e-mail to info@finomark.lt. Or you can change the settings on your account.

# Cookie policy

3.28. When you visit our website, we want to provide content and features tailored to your specific needs, and we also want to better understand your behaviour in order to improve our products and services. That requires "cookies" – small pieces of information which are automatically created as you browse a website and are stored on your computer or other terminal device. They help us recognize you as a previous visitor to a particular website, save the history of your visits to the website, and tailor content accordingly. Cookies also help ensure the smooth functioning of websites, allow us to monitor the duration and frequency of website visits, and collect statistical information about the number of website visitors.

3.29. The following cookies are used on the FinoMark website (www.finomark.lt):

3.29. The following cookies are used on the fillowark website (www.iiriomark.it).					
Name	Domain	Expiration	Description		
Strictly necessary – Strictly necessary cookies allow core website functionality such as user login and account management. The website cannot be used properly without strictly necessary cookies.					
_hjFirstSeen	<u>Hotjar Ltd</u> .finomark.lt	30 minutes	The cookie is set so Hotjar can track the beginning of the user's journey for a total session count. It does not contain any identifiable information.		



PHPSESSID	PHP.netwww.finomark.lt	3 days	Cookie generated by applications based on the PHP language. This is a general purpose identifier used to maintain user session variables. It is normally a random generated number, how it is used can be specific to the site, but a good example is maintaining a logged-in status for a user between pages.	
_hjAbsoluteSessionInProgress	<u>Hotjar Ltd</u> .finomark.lt	30 minutes	The cookie is set so Hotjar can track the beginning of the user's journey for a total session count. It does not contain any identifiable information.	
_hjIncludedInPageviewSampl e	<u>Hotjar</u> <u>Ltd</u> www.finomark.lt	2 minutes	This cookie is set to let Hotjar know whether that visitor is included in the data sampling defined by site's pageview limit.	
CookieScriptConsent	<u>CookieScript</u> www.finoma rk.lt	2 years	This cookie is used by Cookie-Script.com service to remember visitor cookie consent preferences. It is necessary for Cookie-Script.com cookie banner to work properly.	
Performance - Performance cookies are used to see how visitors use the website, eg. analytics cookies. Those cookies cannot be used to directly identify a certain visitor.				
_ga	Google LLC.finomark.lt	2 years	This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service.	



			This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports.	
_gat_UA-163228282-1	.finomark.lt	1 minute	This is a template-type cookie set by Google Analytics that contains a unique identifier for the account or website to which it belongs in the name of the template element. This is a variation of the gat cookie used to limit the amount of data Google stores on high-traffic websites.	
_gid	<u>Google LLC</u> .finomark.lt	1 day	This cookie is set by Google Analytics. It stores and update a unique value for each page visited and is used to count and track pageviews.	
Targeting - Targeting cookies are used to identify visitors between different websites, eg. content partners, banner networks. Those cookies may be used by companies to build a profile of visitor interests or show relevant ads on other websites.				
_gat_gtag_UA_163228282_1	.finomark.lt	1 minute	This cookie is part of Google Analytics and is used to restrict queries (throttle query indicator).	
IDE	Google LLC.doubleclick.net	1 year	This cookie is set by Doubleclick and carries out information about how the end user	



			uses the website and any advertising that the end user may have seen before visiting the said website.	
test_cookie	Google LLC.doubleclick.net	15 minutes	This cookie is set by DoubleClick (which is owned by Google) to determine if the website visitor's browser supports cookies.	
_fbp	Meta Platform incfinomark.lt	3 months	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	
_gcl_au	Google LLC.finomark.lt	3 months	Used by Google AdSense for experimenting with advertisement efficiency across websites using their services.	
Unclassified - Unclassified cookies are cookies that do not belong to any other category or are in the process of categorization.				
_hjSessionUser_1785954	.finomark.lt	1 year		
cflb	psd2.neopay.lt	30 minutes		
_hjSession_1785954	.finomark.lt	30 minutes		

<sup>3.30.</sup> If you consent to the use of non-essential cookies, activate their storage and click "Save and close". If you do not consent, cookies will not be stored.

# **Statistics**

- 3.33. All data provided by you or collected by us may be processed for statistical purposes. We will process your data in such a way that it is no longer possible to identify you when the data is included in a statistical assessment.
- 3.34. Depersonalised data about your device, location, behaviour, and other information may also be processed for statistical purposes.
  - 3.35. Data may be obtained both from you and from the other data sources indicated in this Privacy Policy.
- 3.36. You have the right at any time to refuse the processing of your data for statistical purposes, though FinoMark reserves the right to continue such processing if it can prove that the processing is for legitimate reasons that are more important than your rights and legitimate interests

<sup>3.31.</sup> To learn more about how to manage cookies, visit: <a href="http://www.allaboutcookies.org/manage-cookies/">http://www.allaboutcookies.org/manage-cookies/</a>.

<sup>3.32.</sup> Note that in some cases deleting cookies may slow internet browsing, limit the functioning of certain website features, or block access to the website.



- 3.37. This data is processed to meet legal obligations of FinoMark (the provision of statistics on the website and to the supervisory authority, as set out in the Law on Crowdfunding) and is also necessary for FinoMark's legitimate interests to monitor the services it provides in terms of their volume, sources, popularity, website traffic and other statistics.
  - 3.38. The data shall be processed throughout FinoMark's time in operation.

# Administration of events and/or competitions

- 3.39. FinoMark may organise events and/or competitions in which you can participate and thus FinoMark may process your identity data (name, surname), contact details (e-mail address, telephone number), social media profile data, and payment data for the purpose of administering the events and/or competitions.
- 3.40. Data may be obtained both from you and from partners in the organisation of events/competitions. We may also transfer data to partners.
- 3.41. Data is processed on grounds of legitimate interest when you participate in an event/competition organised by FinoMark.
- 3.42. Data will be processed for one year after the end of an event. For a competition, we will keep the related data for a maximum of 2 years from the end of the competition or, when prizes are won, for a maximum of 10 years from the presentation of the prize.
- 3.43. For the purpose of declaring prizes, your data (name, surname, and personal identification number or date of birth) will be forwarded to the State Tax Inspectorate on the grounds that to do so is a legal obligation.

### 4. PROFILING AND AUTOMATED DECISION-MAKING

- 4.1. Your data is processed both automatically and by physical means, including also automated decision-making and profiling for different processing purposes.
- 4.2. Automated decision-making and profiling may be used to verify your identity, verify your data in international databases, monitor your operations, transactions and activities, assign you to certain categories, assess your risk and your investment knowledge, and anticipate other aspects. Such actions are mandatory under the current anti-money laundering and anti-terrorist financing regulations and are necessary for starting a business relationship with a user. You have the right to request human intervention, to state your position, to receive a more detailed explanation of a decision made after such an assessment, and the right to challenge that decision, the legal basis for processing personal data is a legal obligation.
  - 4.3. We process the following personal data of investors:
- 4.3.1. In performing profiling for the purpose of assessing the suitability of crowdfunding transactions and modelling capacity to absorb losses, we process the following personal data of yours: name, surname, age, education, total personal income, financial securities portfolio, profession, work experience, experience in investment and capital markets, and other data provided in the questionnaire on the suitability of financial transactions for an investor, the legal basis for processing personal data is a legal obligation.
- 4.3.2. In performing profiling and automated decision-making for the purpose of assessing your creditworthiness, we process the following personal data of yours: name, surname, place of residence, citizenship, age, sex, your credit history, number of minor children and dependants, marital status, spouse details, current financial obligations and arrears, information about your workplace, data regarding your assets, your income, and other data, the legal basis for processing personal data is legitimate interests in assessing creditworthiness.
- 4.3.3. In performing profiling to implement the provisions of the Republic of Lithuania Law on the Prevention of Money Laundering and Terrorist Financing, we process the following personal data of yours: name, surname, date of birth, place of residence (address), citizenship, income, source of income, position held, activities pursued, information about political vulnerability, company shareholdings, and other data provided in a Know Your Customer form or obtained from external sources such as international sanctions lists.
  - 4.4. Data is obtained from you and from public registers.
  - 4.5. The time frame for processing the data is 10 years after the end of the crowdfunding relationship.

### 5. CALL RECORDING

- 5.1. FinoMark undertakes call recording with the aim of confirming the content of conversations, assuring the quality of the services that FinoMark provides, developing uniform practices, and ensuring the objective handling of requests and complaints. Call recording is a standard practice used by most companies.
- 5.2. Audio recordings of telephone calls may also be used to uncover suspected criminal activities and violations of administrative law and as evidence of damages done to the Company or third persons. They may only be disclosed in the manner established by law, to persons with the right to obtain such data.
- 5.3. The following personal data is processed for a call: telephone number, audio recording of the call, attending employee's name and surname, call date, and start and end time.



- 5.4. The grounds for data processing is consent. If you do not consent to call recording, you can contact FinoMark at the e-mail address info@finomark.lt.
- 5.5. The data retention period is no longer than 6 months after data is received. Where there is reason to believe that call recordings document the commission of a crime or other unlawful acts, the necessary call recording data is transferred to secure media and retained for as long as there is an objective need, even after the end of the indicated retention period for call recordings.

#### 6. DEBT RECOVERY

- 6.1. For the purpose of debt recovery, on the grounds of a legitimate interest to collect debts, FinoMark processes the following data of debtors and/or their representatives, and of guarantors and/or their representatives: name, surname, personal identification number, date of birth, place of residence (address), telephone number, debt amount, solvency data for debt recovery assessment, available collateral, agreements, available means of verification, and surety agreements. The data retention period is 10 years after obligations are met.
- 6.2. When you are more than 30 days late meeting your obligations, FinoMark provides information on the identity, contact details and credit history of debtors or their representatives financial and property obligations and their fulfilment, i.e. debts and their payment to Creditinfo Lietuva UAB (company code: 111689163, address: A. Goštauto St. 40A, LT 01112 Vilnius, Lithuania, <a href="www.manocreditinfo.lt">www.manocreditinfo.lt</a>, tel.: +370 (5) 2394131, hereinafter Creditinfo) and to Scorify UAB (company code: 302423183, address: Olimpiečių St. 1A-24 Vilnius, Lithuania, <a href="www.scorify.ai">www.scorify.ai</a>, tel.: +370 676 48676, hereinafter Scorify). We will transfer the personal data on the grounds of a legitimate interest (debt collection).
- Creditinfo and Scorify process your information and provide it to third parties (financial institutions, telecommunications companies, insurers, electricity and other utilities, trading companies, etc.) for legitimate interests and purposes – to assess creditworthiness and manage indebtedness. In assessing creditworthiness, the characteristics of a person are evaluated automatically (profiling is performed), which may affect your ability to make transactions in the future. Automated evaluation helps for lending responsibly, assessing the information provided by an individual, their credit history, public information, and so on, Automated assessment methods are reviewed regularly to ensure they are fair, effective, and impartial. Credit history data is processed for 10 years after the fulfilment of obligations. You can view your credit history by contacting Creditinfo or Scorify directly or by using the Finpass mobile app. You also have the right to request that data be corrected or deleted, or that its processing be restricted, and the right to object to the processing of data, to request human intervention in automated decision-making, and to express your position and challenge decisions, as well as the right to data portability. You can find out more about implementation of and restrictions on these rights and automated evaluation of characteristics (profiling) at www.manocreditinfo.lt and www.scorify.ai. If violated, you may rights contact а data protection officer at duomenu.apsauga@creditinfo.lt (for Creditinfo), duomenu.apsauga@scorify.ai (for Scorify) or at the telephone numbers specified above, or submit a complaint to the State Data Protection Inspectorate or to a court.

### 7. PROCESSING OF PERSONAL DATA FOR THE PURPOSE OF EMPLOYMENT OR INTERNSHIP

- 7.1. Potential employees and interns (applicants, persons seeking employment) provide us with personal data such as their CV, name, surname, contact details, etc. Potential employees are informed about the processing of their personal data and data retention periods during the first contact, orally or by e-mail (if a potential employee contacts us via e-mail).
- 7.2. Personal data that you provide in applying for a specific job opening is processed for the purpose of entering into an employment agreement with you.
- 7.3. Once the selection process for a specific job opening ends, your personal data are kept for 1 year from the submission of your application documents.
  - 7.4. The grounds for processing the data is your consent.

### 8. ACCOUNTS ON SOCIAL MEDIA NETWORKS

8.1. FinoMark has accounts on the Facebook, Instagram Linkedin, and YouTube social media networks. Social network operators monitor the information that a person provides on social media networks (including posts, use of the "Like" and "Follow" options, and other communication) or receives when visiting FinoMark accounts on social media networks. Social network operators may collect information about what type of content a person views, what they do on a social network, who they interact with, and other information, so we recommend that you read the social network operators' privacy notices.

You can learn more about Facebook's privacy policy here: <a href="https://www.facebook.com/policy.php">https://www.facebook.com/policy.php</a>

You can learn more about Instagram's privacy policy here: <a href="https://help.instagram.com/519522125107875">https://help.instagram.com/519522125107875</a>.

You can learn more about Linkedin's privacy policy here: <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>.

You can learn more about YouTube's privacy policy here: <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>



- 8.2. FinoMark as an administrator of social media accounts selects appropriate settings in light of its target audience and performance and promotion goals. The social network operators that allow us to create and administer social network accounts may restrict the ability to change certain essential settings and, as a result, FinoMark cannot influence what information social network operators will collect about you once we create accounts on social networks.
- 8.3. All such settings may affect the processing of personal data when you visit our accounts or read our posts on social media networks. Social network operators generally process your personal data (even that collected by us through additional account settings) for purposes set out by the social network operators in keeping with their privacy policies. But when you use social media, interact with FinoMark through social media, visit FinoMark accounts on social media, and view posts, FinoMark receives information about you.

## 9. PERSONAL DATA PROCESSORS

9.1. We may use certain service providers to process your personal data, i.e. data processors. They may be providers of data storage and communication services, companies that develop and support software, or providers of newsletter services, analytics services, or other services. Your personal data may be transferred to these data processors used by us only if and to the extent necessary for provision of the relevant services by the data processors. We sign data processing agreements with the data processors.

### **10.PERSONAL DATA RECIPIENTS**

- 10.1. To carry out requirements of the law and lawful instructions of competent authorities or on other legitimate grounds, we may transfer certain personal data of our customers to third parties such as the Bank of Lithuania, the Financial Crime Investigation Service under the Ministry of the Interior, courts and persons providing legal or audit services, and other persons.
- 10.2. As a general rule, we do not transfer customers' personal data outside the European Economic Area (EEA). Nonetheless, in specific cases and to some extent, a customer's personal data may have to be transferred to a recipient outside the EEA (for instance, if a service provider of ours is based in a non-EEA member state). In that case, we strive to ensure that the necessary security measures are in place for such data transfers (the data recipient is in a country recognised by the European Commission as having an adequate level of protection of personal data; an agreement is in place with the data recipient in keeping with the standard contract terms approved by the European Commission; etc.).

# 11. YOUR RIGHTS AND EXERCISE OF THEM

- 11.1. You have the rights provided by the law with regards to your personal data, namely:
- 11.1.1. The right to access your personal data and know how it is processed. You have the right to receive our confirmation that we process your personal data, as well as the right to access the personal data of yours which is processed and other related information;
- 11.1.2. The right to request the rectification of data which is incorrect, inaccurate or incomplete. If you believe that information about you processed by FinoMark is inaccurate or incorrect, you have the right to ask that that information be changed, clarified or corrected;
- 11.1.3. The right to request erasure of your personal data. In certain circumstances specified in the law (as when personal data are processed unlawfully, when the grounds for processing the data no longer exist, and so on), you have the right to ask that we delete your personal data;
- 11.1.4. The right to ask for restrictions on the processing of your personal data. In certain circumstances specified in the law (as when personal data is being processed unlawfully, you dispute the accuracy of the data, and so on), you have the right to request that we restrict the processing of your personal data;
- 11.1.5. The right to request the transfer of your personal data to another data controller or to give it directly to you in a convenient form. You have the right to obtain data we process on the grounds of your consent and that is processed by automated means in a commonly used computer-readable format, and you have the right to request the transfer of that data to another data controller;
- 11.1.6. The right to object to the processing of your personal data if such personal data is being processed on the grounds of a legitimate interest, as set out in this Privacy Policy. You can present your objection by sending it by e-mail to info@finomark.lt.
- 11.1.7. The right to revoke your consent to the processing of your personal data at any time (when your personal data is being processed on the grounds of separate consent). Upon the revocation of your consent to the processing of your personal data, processing of the data will be halted.
- 11.2. These rights of data subjects may be exercised when all the requirements stipulated by law are met. To exercise your rights, contact us by e-mail at <a href="mailto:info@finomark.lt">info@finomark.lt</a>.

On receipt of your written request, we may additionally ask you to confirm your identity and/or clarify the scope of your exercise of the data subject right in question. You can find the detailed procedure for exercising your rights as a personal data subject <u>here</u>.



11.3. Finally, if you think that your rights related to the protection of your personal data have been violated, you always have the right to contact the State Data Protection Inspectorate (<a href="www.vdai.lrv.lt">www.vdai.lrv.lt</a>) and file a complaint. But before formally turning to the supervisory authority, we recommend that you contact FinoMark to seek a suitable and effective solution to the problem.

FinoMark has a designated data protection officer, whom you can contact by e-mail at duomenuapsauga@finomark.lt.