

## PRIVACY NOTICE OF IPF DIGITAL AS

Protecting your personal data is of paramount importance to IPF Digital AS (we or IPF).

Please read this privacy notice carefully as it regulates the way your personal data is processed (e.g. collected, used, disclosed, protected and retained) when using any of our services, such as our credit services or e-money and payment services. It also provides you with information on your rights as a data subject.

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### 1. Who is the controller of my personal data?

A data controller is an entity responsible for processing your personal data in accordance with the General Data Protection Regulation (GDPR) as well as any other applicable national laws and internal rules.

IPF Digital AS, established in the Republic of Estonia, will be the controller for you:

- e-money and payment services and/or
- consumer credit services for Estonian customers.

We are a licensed [consumer creditor](#) and [e-money institution](#) by the Estonian Financial Supervisory Authority.

Depending on the services you are using, you may also have relationships with other [IPF Digital Group companies](#). For example, when you use consumer credit via the Creditea App outside Estonia, your data controller for consumer credit services will be the IPF Digital Group company issuing the credit in your country of residence. The information about your data controller(s) will be provided in the relevant service terms and conditions and additional privacy information will be available to you in the Creditea App.

### 2. How can I contact you?

If you have any questions or requests regarding your privacy, please contact IPF's customer care by using the following contacts, depending on your country of residence:

Country	Name	Address	E-mail	Telephone
Estonia	IPF Digital AS	Lõdtsa 5 (VIII korrus), 11415 Tallinn, Eesti	<a href="mailto:klienditeenindus@credit24.ee">klienditeenindus@credit24.ee</a>	614 3400
Latvia	SIA IPF Digital Latvia	Rīga, 13. janvāra iela 3, LV-1050	<a href="mailto:info@credit24.lv">info@credit24.lv</a>	20140014

We have also appointed a data protection officer (DPO) responsible for monitoring your data is processed securely. You can contact the DPO at [privacy@ipfdigital.com](mailto:privacy@ipfdigital.com)

### 3. What kind of personal data do you process about me?

Personal data is any information that can be used to identify you. To enable you to use our services, we need to process the following categories of your personal data:

<p><b>Information you give us</b> - you submit data to us in the product application(s), other forms in our applications, when communicating with us by phone, e-mail or another communication channel.</p> <p>Additionally, we query our internal databases based on your earlier agreements, if they exist and we still legitimately store those data;</p>	<b>Personal details</b> – name, surname, personal identification number, etc.
	<b>Contact data</b> – e-mail, telephone number, address, etc.
	<b>Document data</b> – document number, date of issue, date of expiry, facial biometric data, etc.
	<b>Due diligence data</b> – legally required information under anti-money laundering laws, tax residency data etc.
	<b>Data about professional life</b> – employer, experience, position, salary, education, etc.
	<b>Data about personal life</b> – marital status, children, property status (rent, house, flat, etc.) etc.
<p><b>Information collected from you and your device</b> - when you interact with our applications, we automatically collect certain data.</p>	<b>Financial data</b> – bank account number, income, assessable expenses, other financial obligations etc.
	<b>Device data</b> – device information such as IP-address, unique device identifier, operation system, browser and other technical information related to your device
	<b>Preference &amp; usage data</b> – language, transaction limits, pages visited, searches and other events within our applications
	<b>Debit card data</b> - name, number and expiry date of your debit card(s)
	<b>Top-up card data</b> - name, number and expiry date of your top-up card(s)
	<b>Product usage data</b> – withdrawals and repayments of credit, payment transactions etc.
<p><b>Information collected from others</b> - Your data may also be collected from third-party sources such as public and private external registries.</p> <p>In case you have submitted a credit application via our partner credit intermediary, they will disclose your credit application data to us.</p>	<b>Transaction data</b> – transaction date, amount and/or payment recipient/sender, transaction details etc.
	<b>Financial data</b> - income, assessable expenses, other financial obligations etc collected from external registries
	<b>Payment default data</b> – information from credit bureaus, for example Creditinfo Eesti AS and Krediidiregister OÜ
<p><b>Information collected from others</b> - Your data may also be collected from third-party sources such as public and private external registries.</p> <p>In case you have submitted a credit application via our partner credit intermediary, they will disclose your credit application data to us.</p>	<b>Due diligence data</b> collected from external databases such as politically exposed person and financial sanction status, device data etc.
	<b>Information about your location</b>
<b>Information from publicly available sources</b>	Public information and databases available on the Internet in situations required by our internal rules (e.g. Avalikud Teadaanded)

#### 4. How long do you keep my data?

Based on the storage limitation principle, we are storing your data only for as long it is needed to perform contractual obligations under our agreements or as required by applicable legislation or other lawful basis.

That means when your data is not required anymore, it will be made anonymous or deleted after the end of our business relationship. Please note the storage periods may differ based on your products, but include the following general rules:

- If you register an account with us, your data is stored up to 1 year.
- If you submit a credit application, but it is rejected, all of your data is stored up to 5 years from submitting the application;
- If you enter into an agreement with us, for example open an e-money account, order a card or receive consumer credit, all of your data is stored for up to 8 years after the expiry of our agreements as required under accounting, taxation and anti-money laundering laws;
- If you have breached your obligations under our agreement(s), all of your data is stored for up to 10 years for the purpose of enforcing legal claims.

Where IPF processes your data with your consent, the retention period or criteria how the period is determined is specified in the consent.

#### 5. How do you share my data?

Depending on the reason we process your data, we may disclose your personal data to other parties in the following categories:

##### **IPF Group**

We transmit your personal data within the IPF Group organisation, for internal administrative purposes and provision of services in accordance with legal data transfer requirements. Your personal data might be processed by other subsidiaries of the International Personal Finance plc. Group than IPF Digital AS (the list of companies belonging to IPF group is available at: <http://www.ipfin.co.uk/en/about-us/our-businesses.html>).

##### **Partners**

We may disclose your data to our partners who help us provide services to you. We have signed agreements protecting your rights and freedoms with regards to your personal data with all partners and disclose data only to the necessary extent. You can request more information on disclosure by contacting our customer care or DPO.

The partners we use typically include the following categories:

- Hosting providers to securely store your data;
- IT partners to deliver and maintain our applications;
- Our banking, processing and payment network partners like Mastercard to enable you to use our payment services or Stripe to top-up your e-money account;
- Card manufacture, personalizing and delivery partners in case you have ordered a debit card;
- Postal, communication service providers and call centres to send communications and provide customer care;
- Credit bureaus to meet IPF's responsible lending obligations;
- Advertising partners and analytics providers to understand how you interact with our applications and for sending marketing offers;
- Debt collection agencies to manage and collect debts related to our products;
- In case you have opted-in to any additional services available via the Creditea App, your data will be shared with the respective third parties to deliver the requested services to you.

## Public authorities

We are in some cases legally obligated to disclose your data to public authorities such as investigative authorities, tax administrators, bailiffs, trustees in bankruptcy, consumer protection and financial supervision authorities and financial intelligence units. This is done only to comply with defined legal obligations.

### 6. Where do you process my data?

IPF processes your personal data mainly in servers located in the European Economic Area.

In cases where we or our partners process your personal data outside the European Economic Area, we will carefully assess all the circumstances and make sure appropriate safeguards are put in place so that your rights are not in any way undermined. We make sure that conditions to enforce your rights and effective legal remedies are available.

### 7. How do you use my data?

- **We use your personal data for entering into agreements and providing services requested by you, such as consumer credit and/or payment services. Failure to provide the required data will not enable us to sign an agreement with you.**
  - If you choose to open an e-money account with us, you must fill in an application form. We will process the personal data you provided to conclude a services agreement with you and open an e-money account.
  - From thereon, we also process your data on an ongoing basis to provide the payment services such as execute payment orders and send communications related to the provision of payment services.
  - If you choose to apply for and use a debit card, then we will process your debit card data, including details of your transactions.
  - If you use a (debit or credit) card to add funds to your payment account, we will also process your top-up card data.
  - Before concluding a credit agreement with us, you must fill in the credit application form. Using the data provided in the application and data collected from other sources, our system will make a credit decision and generate a credit proposal for you. The proposal will determine the terms of the credit agreement and is necessary for our credit risk analysis and management. Therefore, if you do not provide the required data in the application, we cannot present you with a credit proposal.
  - In order to manage and amend existing credit agreements, e.g. changing the credit limit, we will collect and use your data on your repayment behaviour.
  - Where we have concluded the credit agreement, we will use your data to perform and collect payments.
  - We will also send you communications and documents about your credit agreement using your contact data either directly or via our communication services providers;
  - If you have unfulfilled financial obligations towards us arising from our agreements, we have a right to enforce its violated contractual rights. After a payment is due, we or our partners will send you reminders; if you are unresponsive to the reminders, we may disclose data on your unfulfilled financial obligations to credit registries pursuant to rules on publishing payment defaults.
  - We may also raise or assign a claim with the data of your unfulfilled obligations or provide such data to our authorized debt collection service provider(s).
- **We process your personal data to comply with our legal obligations defined in personal data protection, payment services, consumer credit, consumer protection, anti-money laundering and**

**other applicable legislation. Failure to provide legally required data will not enable us to conclude the credit or the payment services agreement(s).**

- Before concluding an agreement, we process your contact data to provide you with information on our services to enable you to make an informed decision.
  - We adhere to the principle of responsible lending - for this purpose we collect and verify your creditworthiness data. We collect your creditworthiness data from both yourself and others (including both publicly available databases and private databases). For example, (i) we may ask you to provide your bank account data for verifying your income and expenses and (ii) make queries into external databases on income, other obligations and prior payment defaults. We use all the collected information to analyse and verify your creditworthiness. For this purpose, we also disclose some of your creditworthiness data to our service providers. You have a right to receive immediate information about data used in the valuation of your creditworthiness and state your objections against the credit decision.
  - To prevent money laundering and terrorist financing, we collect your personal details, contact data, document data and due diligence data. We screen some of that data against certain databases (both public and private) and use the collected data to verify your identity and apply other required due diligence measures.
  - We have audit, tax reporting and accounting obligations. To comply, we disclose some of your data to financial consultants, auditors and other service providers, provided always that they ensure the confidentiality of your personal data.
  - We may also disclose some of your personal details, tax residency data and transaction data to tax authorities so as to perform its obligations under the tax information exchange act and other relevant applicable law.
  - We may need to perform other obligations deriving from legislation and may process any data necessary to perform these obligations. Such personal data shall always be strictly processed for the purpose of the legal obligation.
- **We process your personal data based on our legitimate interests**
- Legitimate interests mean the thoroughly considered interests of IPF in conducting our businesses, including creating personalised marketing offers, fraud detection and prevention, information and system security and product development. To make sure our interests are balanced against your privacy rights, we conduct balancing test for each processing activity based on our legitimate interest. We process your personal data based on a legitimate interest for the following purposes:
- to prevent financial fraud and optimize our anti-fraud processes.
  - to guarantee the security of our applications and services.
  - to disclose your data to other IPF group entities to provide you with the credit services and for our internal administrative purposes.
  - to process your usage, preference and device data for developing new products and services and optimising existing products by trying to understand how you interact with our applications and use our services. Please note we make use of certain tools by Google (e.g. Google Places to suggest addresses or Google analytical tools). For more information on how Google processes your personal data, please refer to Google Privacy Policy: <https://policies.google.com/privacy>

Wherever we rely on a legitimate interest to use your personal data, your interests and rights under data protection law have been taken into account. Your privacy rights are always protected by sufficient safeguards and balanced with your rights and freedoms. You have the right to object to your personal data processing based on our legitimate interest and if you wish to submit an objection, please contact our customer care or DPO. Please note that we can continue processing if the legitimate interest is balanced with your rights and freedoms.

If your objection is sustained, it may stop us from processing your personal data for a given purpose.

- **We may from time to time collect and process your data based on your consent.**

Your consent is voluntary and limited to specific purposes as defined in the consent. You can withdraw your consent at any time free of charge by changing your profile preferences in our applications or by contacting our customer care. Please note the withdrawal of your consent does not affect the legality of processing your personal data prior to the withdrawal of your consent. For example, if you opt-in, we may process your data for creating and sending marketing offers as detailed in the following section.

#### 8. How do you use my data for marketing?

We wish to be transparent about how marketing activities are conducted and how you can opt-out of receiving some or all of our offers. We can market to you in the following ways:

- if you are using or have previously used our products and services and you haven't opted out of receiving such information, we assume you allow us to send you information about same or similar services.
- **If you have previously opted-in**, we will send you offers via e-mail, SMS, phone calls and other channels about:
  - general marketing information and campaigns;
  - offers from our carefully selected partners
- We create personalized offers so they would be interesting and relevant to you. If you expressly allow it, we further personalize marketing offers by processing your transaction data, card, device, preference & usage data;
- To respect your choices around marketing, our applications enable you to control your preferences, such as select allowed communication channels and profiling activities, any time;
- Additionally, you can opt-out of receiving marketing information any time by:
  - following the links or information how to unsubscribe included in each marketing message; or
  - contacting our customer care or DPO via the contacts above.

#### 9. Do you make automated decisions about me?

Yes, we make partially or fully automated decisions about you in the following cases:

- our credit application process includes profiling. Based on the information collected, our system will make a partially or fully automated decision to approve or reject your credit application and determine your credit agreement terms. In certain cases, your credit application can also be automatically rejected or approved by IPF.
- Providing financial services includes an assessment of risk of money laundering and terrorist financing (as obliged by law) and financial fraud associated with you and your transactions before and during providing our services. This assessment is partly conducted by automated means and involves profiling.

You are entitled to request human intervention in the application process, but kindly note that in such case the processing will take longer. You can also express your point of view and contest the automated decision.

#### 10. How can I exercise my rights?

To exercise any of your rights below, please use the functionalities within the Creditea App, contact our customer care or the DPO.

- Before exercising your rights, you must be identified to protect your personal data from fraudulent attempts.
- Your requests will be generally handled within one month. In some cases, we may take up to 2 additional months, but you will always be notified of these cases.
- You have a **right to receive information** at any time regarding the purposes of using, categories and source, recipients and storage periods of your personal data and your rights.

- You have the right to **access** your personal data via our applications, including the right to obtain a copy of your personal data processed.
- You have a **right to portability** of your data which you have provided to us for concluding our agreement(s) or data processed based on your consent and which are processed by automated means. We will provide you that data in a machine-readable format, so you can store it or disclose it to other service providers. You may also request that your personal data is provided to another controller – however, we can only do that when the transmission is technically possible. As the file contains your personal data, please store the personal data securely on your device.
- We keep your personal data up to date, by asking you to review it from time-to-time and when required by law. However, if you find any data about you is incorrect, you can request **rectification of inaccurate data** and you can have incomplete data completed. You can rectify or complete your personal data via our applications, by contacting customer care and providing us with the correct or additional data.
- You have a **right to restrict processing**. That means your data will be stored, but not used for anything else. You also have a **right to request erasure** of your personal data, but only in one of the following cases provided by law:
  - your data is no longer necessary or has exceeded the defined storage periods;
  - you have withdrawn your consent in case your data are processed based on your consent;
  - you object to processing based on a legitimate interest. Processing will be restricted until verification of your interests; If your rights prevail, your data will be erased upon your request.
  - the personal data have to be erased for compliance with a legal obligation;
  - the processing is unlawful.

If a basis does not exist, your data will not be erased nor processing restricted.

- You have a **right to object to a decision** based solely on automated processing of your personal data, including profiling.
- You have a **right to contact IPF** any time, if you find your rights under data protection law have been violated.
- You have a **right to turn to the competent Data Protection Authority** or a competent court if you believe your rights with regards to the personal data processing have been violated. We would appreciate if you could approach us first with your request or concern in order to resolve it. You can contact the Data Protection Authority using the following contacts:

Country	Name and website	Postal address	E-mail	Telephone
Estonia	Andmekaitse inspektsioon, <a href="https://www.aki.ee/et">https://www.aki.ee/et</a>	Tatari 39, Tallinn, 10134	info[at]aki.ee	(+372)627 4135

#### 11. Do you use cookies or otherwise track my activities?

With your consent, we use tracking technologies, for example cookies on our websites and software development kits (SDKs) within the Creditea App, to collect preference and usage data for analytical and marketing purposes. You can change your preferences any time within our applications.

#### 12. How will I know if anything changes?

We keep this privacy notice under review and may change it from time to time (mostly to comply with the law and data protection practices). Updated versions can be accessed via the Creditea App and our websites at any time. If appropriate, you will be notified of updates when you log into the Creditea App or via other channels, like e-mail.

This notice was last updated August 2021.