

Privacy Notice for Third Parties and Commercial Partners 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. 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 your personal data. 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](#). The information about your data controller(s) will be provided in the relevant service terms and conditions.

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:

Country	Name	Address	E-mail	Telephone
Estonia	IPF Digital AS	Lõdtsa 5 (VIII floor), 11415 Tallinn, Estonia	klienditeenindus@credit24.ee info@creditea.ee	614 3400 611 9090

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

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:

Information you give us - you submit data to us on our website, when communicating with us by phone, e-mail or another communication channel.	Personal details – name, surname, etc.
	Contact data – e-mail, telephone number, address, etc.

As well as other information that the law or applicable provisions could request from you, in order that IPF would be able to provide you our services.

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.

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, provision of services in accordance with legal data transfer requirements, issued by IPF Group company in your residency. 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 services;
- Our banking, processing and payment network partners;
- Postal, communication service providers and call centres to send communications and provide customer care;

- Advertising partners and analytics providers to understand how you interact with our services and for sending marketing offers;
- Debt collection agencies to manage and collect debts related to our products;

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?

- **Processing of personal data is intended mainly for:**
 - Analysis of the viability of the collaboration that exist between IPF and you.
 - Market studies.
 - Marketing communication.
 - Notification about change in conditions.
 - Meeting legal requirements of competent authorities and/or contained in the laws that are applicable.
 - Request commercial references from third parties.
- **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 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;
- 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?

No, we are not making automated decisions about you.

10. How can I exercise my rights?

To exercise any of your rights below, please 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, 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 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, https://www.aki.ee/et	Tatari 39, Tallinn, 10134	info@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, to collect preference and usage data for analytical and marketing purposes. You can change your preferences any time within our webpage.

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 our websites at any time. If appropriate, you will be notified of updates via other channels, like e-mail.

This notice was last updated August 2023.