

Privacy Policy of SIA Citadele Leasing Estonian branch



Valid from 20th of July 2023

In this policy (formerly named – Principles of Personal Data Processing*), on the website www.citadele.ee, you will find out what information we collect about you, what we do with it and in which cases we disclose it to others. We always protect your information and update this privacy policy regularly. We will notify you of any amendments to the Privacy Policy on our website, and if the amendments are substantial, we will notify you via email (if such is provided to us), giving 3 business days to familiarize with amendments before entry into force. SIA Citadele Leasing Estonian branch, registered in the Republic of Estonia under registration number: 11453650, address: Narva mnt 63/1, Tallinn 10120, Estonia, is responsible for processing of your data.

*If your agreement, document or other information contains any references to the Principles of Personal Data Processing, then it must be deemed to be a reference to this Privacy Policy.

Table of contents

1. How do we collect information about you?	1
2. Why do we process information about you?	2
3. How do we analyse your data?	8
4. To whom do we disclose your information?	8
5. How do we process your information when sending you individual notifications and offers?	9
6. How do we process your information when offering you insurance services?	9
7. How do we protect your information?	10
8. What are your rights?	10

1. How do we collect information about you?

We collect information about you in cases where:

- You use our website or provide personal data in the forms on it;
- You apply for or repay leasing, loan or insurance (hereinafter collectively referred to as leasing);
- You guarantee the leaseholder's obligations;
- You are unable to repay your obligations.

1.1. What is the personal data you provide:

- Name, surname, personal identification code;
- Postal address of residence;
- Telephone number;
- Employer, position, duration of employment;
- E-mail address;
- Monthly net income;
- Additional regular income and its sources;
- Information on other existing obligations;
- Bank account number;
- Bank account statement for up to the last 12 months;
- Tax data up to the last 12 months for the calculation of the size of the regular income;
- Amount of funded pension contributions for the last 6 months;
- Copy of ID or passport;
- Relationship with politically exposed persons;
- Marital status

1.2. Information we receive about you:

1.2.1. Credit history and number of minor dependents

According to the Creditors and Credit Intermediaries Act and Law of Obligations Act, we are obliged to assess your creditworthiness at the time we receive a leasing application. In order to assess your creditworthiness we receive information about your credit history from credit information registers and information on your minor dependents from the Population Register /Rahvastikuregister/.

1.2.2. Information provided by Citadele Group companies

As a Citadele Group company, we may receive leasing applications from other Citadele Group companies and consider them in accordance with the terms of this Privacy Policy for the processing of your personal data. Also, by ensuring the progress of consideration of the leasing application, we can receive information from other companies of the Citadele Group that is necessary for considering and approving the leasing application.

We may receive information from other Citadele Group companies to mitigate or prevent money laundering, terrorism and proliferation financing, violations of international and national sanctions, fraud and other risks of the Citadele Group. Also in this case, we will process your personal data in compliance with the requirements of regulatory enactments and the conditions provided for in this Privacy Policy for the processing of your personal data.

1.2.3. Actions on our website

In order to improve the quality of our services and speed-up the performance of our website as well as the loan granting process, we, together with our partners, collect anonymous cookies and store them for a maximum of 12 months. This information is anonymous.

1.2.4. Information from public registers

Information we obtain from publicly available registers in the context of the provision of leasing, for instance Population Register /Rahvastikuregister/.

If you do not enter into an agreement in accordance with your application, then we will delete the information collected under the application within one year unless otherwise provided by law. We may extend the one-year retention period due to our legitimate interest.

2. Why do we process information about you?

We process information about potential and existing customers, as well as guarantors for the following purposes:

Data Type	Processing Purpose	Legal Grounds	Can you receive leasing if you do not provide us with this information?	How long will we keep this information about you?	Can you ask us to delete or stop using this information at any time?	Can you ask us to correct this information?
Name, surname, personal identity number	Ensure operation of the customer portal	Fulfilment of the Terms of Use and Servicing of Leasing Portal of SIA Citadele Leasing Estonian branch	No	1 year from submitting an online leasing application if leasing agreement has not been concluded; or 1 year after the leasing agreement has expired/been terminated	No	Yes
Name, surname, personal identity number, telephone number, e-mail	Preparation of a leasing offer	Legitimate interest in preparing a leasing offer;	No	10 years after fulfilment of the agreement	No	Yes

Data Type	Processing Purpose	Legal Grounds	Can you receive leasing if you do not provide us with this information?	How long will we keep this information about you?	Can you ask us to delete or stop using this information at any time?	Can you ask us to correct this information?
and marital status of the potential customer and guarantor		Implementation of measures before the conclusion of the agreement; Money Laundering and Terrorist Financing Prevention Act		or 5 years have passed from the date of refusal to grant leasing		
Name, surname, personal identity number of the potential customer or guarantor	Creditworthiness assessment	Law of Obligations Act and Creditors and Credit Intermediaries Act; Legitimate interest in assessing the guarantor's ability to fulfill the debtor's obligations	No	10 years after fulfilment of the agreement	No	Yes
Information on the income and creditors, employer, position, duration of employment, number of dependents and marital status of the potential customer and guarantor	Creditworthiness assessment	Law of Obligations Act and Creditors, Credit Intermediaries Act and Money Laundering and Terrorist Financing Prevention Act; Legitimate interest in assessing the guarantor's ability to fulfill the debtor's obligations	No	10 years after fulfilment of the agreement or 5 years have passed from the date of refusal to grant leasing	No	Yes
Bank account statement of the potential customer and guarantor	Creditworthiness assessment	Law of Obligations Act and Creditors and Credit Intermediaries Act; Legitimate interest in assessing the guarantor's ability to fulfill the debtor's obligations	Yes (if the required information is obtained in any other manner)	10 years after fulfilment of the agreement	No	Yes
Tax data or amount of funded pension contributions of the potential customer and guarantor	Creditworthiness assessment	Law of Obligations Act and Creditors and Credit Intermediaries Act; Legitimate interest in	Yes (if the required information is obtained in any other manner)	10 years after fulfilment of the agreement	No	Yes

Data Type	Processing Purpose	Legal Grounds	Can you receive leasing if you do not provide us with this information?	How long will we keep this information about you?	Can you ask us to delete or stop using this information at any time?	Can you ask us to correct this information?
		assessing the guarantor's ability to discharge the debtor's obligations				
Information on the potential customer and guarantor in credit registers and debtor databases	Creditworthiness assessment	Law of Obligations Act and Creditors and Credit Intermediaries Act; Legitimate interest in assessing the guarantor's ability to fulfill the debtor's obligations; Implementation of measures before the conclusion of the agreement	No	10 years after fulfilment of the agreement	No	No
Name, surname, personal identity number, copy of ID or passport of the potential customer and guarantor	Prevention of money laundering and terrorism financing	Money Laundering and Terrorist Financing Prevention Act	No	5 years after the last contact or fulfilment of the agreement	No	Yes
Bank account statement of the potential customer	Prevention of money laundering and terrorism financing	Money Laundering and Terrorist Financing Prevention Act	No	5 years after the last contact or fulfilment of the agreement	No	Yes
Tax data or amount of funded pension contributions of the potential customer and guarantor	Prevention of money laundering and terrorism financing	Money Laundering and Terrorist Financing Prevention Act	No	5 years after the last contact or fulfilment of the agreement	No	Yes
Information from credit registers and debtor databases on the potential customer and guarantor	Prevention of money laundering and terrorism financing	Money Laundering and Terrorist Financing Prevention Act	No	5 years after the last contact or fulfilment of the agreement	No	Yes
Customer's and guarantor's credit file (information stored in various data sources) containing all personal data processed for the issuance of	Prevention of money laundering and terrorism financing	Money Laundering and Terrorist Financing Prevention Act	No	5 years after the last contact or fulfilment of the agreement	No	No

Data Type	Processing Purpose	Legal Grounds	Can you receive leasing if you do not provide us with this information?	How long will we keep this information about you?	Can you ask us to delete or stop using this information at any time?	Can you ask us to correct this information?
leasing and during its validity or any communication with you if the agreement is not entered into						
Information on a politically exposed person and the beneficial owner	Prevention of money laundering and terrorism financing	Money Laundering and Terrorist Financing Prevention Act	No	5 years after the last contact or fulfilment of the agreement	No	Yes
Information from public registers	Prevention of money laundering and terrorism financing	Money Laundering and Terrorist Financing Prevention Act	No	5 years after the last contact or fulfilment of the agreement	No	No
Name, surname, personal identity number, bank account No. of the potential customer and guarantor	Granting and execution of leasing	Entry into the agreement; Money Laundering and Terrorist Financing Prevention Act	No	10 years after fulfilment of the agreement or 5 years have passed from the date of refusal to grant leasing	No	Yes
Contact details and postal address of the potential customer and guarantor	Granting and execution of leasing	Entry into the agreement; Money Laundering and Terrorist Financing Prevention Act	No	10 years after fulfilment of the agreement or 5 years have passed from the date of refusal to grant leasing	No	Yes
Name, surname, personal identity number, contact information of the potential customer	Insurance of the leasing object	Consent	Yes	Until the insurance contract is entered into	Yes	Yes
		Purchase of insurance for fulfilment of the agreement	Yes	Until the insurance contract is entered into	Yes	Yes
Name, surname, contact information, leasing agreement, payments made, number of dependents of the potential customer and guarantor	Debt recovery	Legitimate interest in debt recovery	Not applicable	Until the debt is paid in full or the claim has been assigned to another person	No	Yes

Data Type	Processing Purpose	Legal Grounds	Can you receive leasing if you do not provide us with this information?	How long will we keep this information about you?	Can you ask us to delete or stop using this information at any time?	Can you ask us to correct this information?
Customer's and guarantor's credit file (information stored in various data sources) containing all personal data processed for the issuance of leasing and during its validity	Provision of services; Enforcement of contractual obligations	Fulfilment of the agreement; Money Laundering and Terrorist Financing Prevention Act	No	10 years after fulfilment of the agreement or 5 years have passed from the date of refusal to grant leasing	No	Yes
Customer's and guarantor's credit file (information stored in various data sources) containing all personal data processed for the issuance of leasing and during its validity	Protection of interests of Citadele Leasing in cases of complaints/claims	Legitimate interest in making a profit from a leasing transaction; Legitimate interest in defending company's interests (incl. provision of evidence) with authorities or court	Not applicable	3 years after leasing is repaid; 7 years from the end of financial year after the claim has been finally awarded	No	Yes
Recording telephone conversations	Customer service quality evaluation	Legitimate interest in providing and improving the quality of service, providing evidence of transactions and communication with you	Yes	12 months	Yes	No
Name, surname, e-mail, telephone number, information on creditworthiness and liabilities from the credit file, other information	For advertising - receipt of notices and offers	Consent	Yes	Until withdrawal of consent	Yes	Yes
Name, surname, e-mail, telephone number, information on creditworthiness and liabilities from the credit file, information from credit registers and debtor	For advertising - receipt of personal credit limit offers	Consent	Yes	Until withdrawal of consent	Yes	Yes

Data Type	Processing Purpose	Legal Grounds	Can you receive leasing if you do not provide us with this information?	How long will we keep this information about you?	Can you ask us to delete or stop using this information at any time?	Can you ask us to correct this information?
databases, other information						
Credit file (information stored on different data sources) containing all the personal data processed for entering into the agreement and during its validity	Obligation to preserve accounting documents	Accounting Act	Not applicable	7 years from the end of financial year when the agreement has expired	No	Yes
Name, surname, personal identity number and credit file (information stored on different data sources) containing all the personal data processed for entering into the agreement and during its validity	Risk management and fulfilment of prudential regulations	Legal obligation and Legitimate interest of parent company to fulfil legal requirements stipulated in regulations of European Banking Authority and European Central Bank	Not applicable	5 years after fulfilment of the agreement	No	Yes

INFORMATION: Please be advised that the retention periods of information (incl. but not limited to personal data) stipulated in the tables hereinabove and below are indicated according to each processing purpose. If the same set of information (incl. but not limited to personal data) has been processed for multiple purposes, the longest retention period shall prevail.

We process information about persons buying out leased property for the following purposes:

Data Type	Processing Purpose	Legal Grounds	Are you able to buy out a leased property if you do not provide us with this information?	How long will we keep this information about you?	Can you ask us to delete or stop using this information at any time?	Can you ask us to correct this information?
Name, surname, personal identity number, contact information, bank account number	Processing of leased property buy-out	Conclusion and fulfilment of the agreement	No	10 years after fulfilment of the agreement*	No	Yes
Name, surname, personal identity number, information on the origin of the funds used in the transaction	Due diligence process/ Prevention of money laundering and terrorism financing	Money Laundering and Terrorist Financing Prevention Act	No	5 years after the last contact or fulfilment of the agreement	No	Yes

*until the expiration of the limitation period for claims and/or including the term arising from the Accounting Act.

We process information about persons selling property to be leased for the following purposes:

Data Type	Processing Purpose	Legal Grounds	Are you able to sell/lease a property if you do	How long will we keep this	Can you ask us to delete or stop using this	Can you ask us to correct

			not provide us with this information?	information about you?	information at any time?	this information?
Name, surname, personal identity number, address, e-mail, telephone number, bank account number, data of property (e.g. registration plate number, identification number, etc.)	Conclusion of the agreement with seller of property to be leased, incl. communication thereon	Conclusion and fulfilment of the agreement	No	10 years after fulfilment of the agreement*	No	Yes
Name, surname, personal identity number	Due diligence process/ Prevention of money laundering and terrorism financing	Money Laundering and Terrorist Financing Prevention Act	No	5 years after the last contact or fulfilment of the agreement	No	Yes

*until the expiration of the limitation period for claims and/or including the term arising from the Accounting Act.

3. How do we analyse your data?

We make sure that you act in good faith and evaluate your solvency by automated means in order to grant you leasing as soon as possible. This allows us to decide whether, to what extent and on what conditions we will provide financing to you. This is beneficial for you, as we can take into account individual information about you and adjust the leasing conditions to your needs. The process described below will take approximately 2 business days. Unfortunately, if you do not agree with the automated individual decision-making procedure described below, we will not be able to assess your creditworthiness, prepare the terms of your leasing and provide you with financing.

In the process of granting leasing and determining leasing conditions, we use an algorithm, according to which we analyse your information in accordance with the consumer financing procedure of SIA Citadele Leasing Estonian branch. If we are to refuse granting leasing to you, you can request an explanation for the refusal as set out in Section 8.

To assess your creditworthiness, we receive information from the following credit registers or credit information registers:
AS Creditinfo Eesti
Narva mnt 5, Tallinn 10117, Estonia

4. To whom do we disclose your information?

We have introduced various tools and services that facilitate our cooperation and make our communication faster. Therefore, we disclose:

- Information about your agreement and contact information to car dealers who have submitted your leasing application to us;
- Your name, surname, personal identity number to vehicle registration authorities, for example, Transpordiamet /Transport Administration/ and MTÜ Eesti Liikluskindlustuse Fond /Estonian Motor Insurance Bureau/;
- Your personal identity number to the Registrate ja Infosüsteemide Keskus /Centre of Registers and Information Systems/ during your registration process and identification in our customer portal to receive information on legal persons you represent;
- Your name, surname, personal identification code, contact information to the insurance broker Smart Kindlustusmaakler AS, if you have confirmed that you want to receive an insurance offer for the leasing object or disclosure of the mentioned data for insurance purposes is required to comply with the terms of the leasing agreement. The list of insurance companies with whom Smart Kindlustusmaakler AS shares information on you for the purpose of receiving insurance offers can be found on the website of Smart Kindlustusmaakler AS;
- Your name, surname, personal identification code, contact information, current payment information and agreement information to AS Citadele banka Estonian branch in order to provide us with remote customer service (for example, servicing your calls or electronic correspondence);
- Your name, surname, personal identification code, date on which the debt was incurred and expired, the debt amount and information on the origin of the debt to AS Creditinfo Eesti in accordance with the Personal Data Protection Act;

- Information about you found in the leasing documentation file to entities ensuring debtor monitoring, litigation support and debt recovery services as well as archiving service providers;
- Your contact information to communications providers and IT service providers for leasing administration;
- Your name, surname, personal identification code, payment information and agreement information as well as information on your debts (if any) to our parent company AS Citadele banka to ensure risk management on the Citadele Group level and reporting in conformity with prudential regulations;
- Information on the examination of your data in accordance with the Money Laundering and Terrorist Financing Prevention Act to AS Citadele banka Estonian branch and other Citadele Group companies for the purposes of carrying out due diligence or mitigation or prevention of the identified risks;
- Information about your requests and complaints as well as information about various types of incidents (e.g., incidents related to activities that do not comply with internal and external regulatory enactments, data breaches), if any, to AS Citadele banka to ensure risk management on the Citadele Group level and improve the quality of services and servicing of customers;
- If you have agreed to receive advertising, we may transfer your personal data to Citadele Group companies: AS Citadele banka Estonian branch, OÜ Citadele Factoring, address: Narva mnt 63/1, Tallinn 10120, Estonia; AS Citadele banka, address: Republikas laukums 2A, Riga, Latvia, LV-1010.

If you do not repay the leasing in accordance with the terms of the leasing agreement even having received our reminders, we will decide on necessity to hire experts to recover your debt. In this case, we will process your personal data to ensure our legitimate interest in recovering the debt. If we decide to transfer your debt to a debt recovery service company, we will provide them with your name, surname, all contact information, a copy of the leasing agreement and any annexes thereto as well as information on all previous payments and other information that may facilitate debt recovery.

5. How do we process your information when sending you individual notifications and offers?

We or any of the Citadele Group companies will prepare the following notifications and offers, incl. personalized offers, individual offers of credit limits, and send them to you from time to time, if you have given your consent to the processing of your personal data on our website, in the leasing application or unified consent form.

According to your consent, we will send you:

- up-to-date information on financial services provided by Citadele Group companies, for example, account opening, payment card processing; deposit services; lending services; leasing services; insurance services; financial instruments services, etc. services and related offers, incl. personalized offers within customer loyalty programs;
- other notices related to opportunities to participate in contests, draws, lotteries, promotions and other customer-related events; congratulations on your birthday, name day and other festivities (for example, Easter, Christmas, New Year and other celebrations); our comments on current events in the Estonian and world economy; opportunities to express our opinion about the services we provide and the quality of service by participating in customer surveys organized by us; social responsibility and support projects; our financial performance, awards, special events;
- up-to-date information on credit limits available to you personally (for example, payment card credit limits, consumer loans, leasing offers), which will be prepared by financial consultants of AS Citadele banka/AS Citadele banka Estonian branch and/or SIA Citadele Leasing Estonian branch upon the assessment of your financial situation.

In order to receive notifications and offers, including personalized offers and offers of individual credit limits, your personal data will be processed by the following Citadele Group companies as individual or joint controllers: SIA Citadele Leasing Estonian branch, registration number: 11453650, OÜ Citadele Factoring, registration number: 10925733, AS Citadele banka Estonian branch, registration number: 11971924, address: Narva mnt 63/1, Tallinn 10120, Estonia; AS Citadele banka, registration number: 40103303559, address: Republikas laukums 2A, Riga, LV-1010, Latvia. In order to receive a personal credit limit offer, we and AS Citadele banka Estonian branch will process your personal data.

You have the right to withdraw your consent to receipt of notifications and offers at any time by writing to us at e-mail: privacy@citadele.ee. Upon withdrawal of consent, we will stop processing your personal data for the preparation and sending of commercial messages and offers. Withdrawal of consent (s) will not affect the lawfulness of processing of your personal data prior to withdrawal of consent.

You can find detailed information on your rights, incl. the right of withdrawal, and processing of your personal data in the [Privacy Disclaimer for Processing of Personal Data for Receipt of Notifications and Offers](#) published on www.citadele.ee.

6. How do we process your information when offering you insurance services?

Insurance of the leasing object can be provided by several insurance service providers which cooperate with our partner – the insurance broker Smart Kindlustusmaakler AS. If we have received your consent or if it is necessary for the fulfilment of the terms of the agreement, we will transfer your personal data (name, surname, personal identity number, contact information) to the

insurance broker Smart Kindlustusmaakler AS for receiving the leasing object insurance offer and processing of the leasing object insurance. The list of insurance companies with whom Smart Kindlustusmaakler AS shares information on you for the purpose of receiving insurance offers can be found on the website of Smart Kindlustusmaakler AS.

You can withdraw your consent at any time by writing to us at e-mail: privacy@citadele.ee. Withdrawal of consent will not affect the lawfulness of processing of your personal data prior to withdrawal of consent.

7. How do we protect your information?

We have implemented a strict policy for the use and access of IT infrastructure, which is based on the principles of "need to know" and less privileged access. We encrypt personal data, use firewalls, attack detection and prevention systems to ensure that all your personal data is confidential and secure. We regularly test our systems and review applicable policies to ensure that our IT security measures are one step ahead of all types of risks.

We delete your personal data in accordance with the provisions of Section 2 of this Privacy Policy. If you have not reached the age of 18, but have completed the leasing application, our system will reject all information about you and will not store it.

8. What are your rights?

We process your data, so you can find out what we do with it and how we process it. You may, upon written request, access, correct or delete your personal data, restrict processing, object to processing of such data and transfer them free of charge.

However, if we find that your requests are recurring on a regular basis, are manifestly unreasonable or excessive, we will take into account the administrative costs associated with providing the information or communication or performing the requested action (including staff resources), we will charge you a reasonable fee for processing your request in accordance with the approved pricelist or we will refuse to fulfil your request by informing you in advance.

In case of automated individual decisions, you have the right to request a reconsideration of such decisions by involving employees of AS Citadele banka Estonian branch and/or SIA Citadele Leasing Estonian branch in the decision-making. Such a request shall be made in writing to the Citadele Group company where you are a customer.

SIA Citadele Leasing Estonian branch, registered in the Republic of Estonia under registration number: 11453650, address: Narva mnt 63/1, Tallinn 10120, Estonia, is responsible for your data processing. A certified personal data protection officer will answer all your questions regarding how SIA Citadele Leasing Estonian branch or other Citadele Group companies use your information. You can contact him/her by sending an e-mail to privacy@citadele.ee. Please describe the issue in as much detail as possible. You will receive an answer within 30 days.

Our activities in the field of personal data protection are supervised by the Data Protection Inspectorate. Before you apply to the Data Protection Inspectorate for advice or a complaint, we recommend you to contact our personal data protection officer to ensure that your request is processed as soon as possible.