

Privacy policy of Eleving Group Partners

This Privacy policy (hereinafter – “**Privacy policy**”) states how AS Eleving Vehicle Finance (hereinafter – “us”, “we”) as data controller will process the personal data provided in the Eleving Group Partner’s *Know Your Customer* (hereinafter – “KYC”) Questionnaire or contact us.

For the purposes of this Privacy policy and the KYC Questionnaire, Eleving Group refers to Eleving Group S.A, incorporated and existing under the laws of the Grand Duchy of Luxembourg, registration number B.174457 and any of its subsidiaries.

Our contact information:

AS Eleving Vehicle Finance (reg.no. 42103088260),
Legal address: Skanstes street 52, Riga, LV-1013, Latvia
E-mail: dpo@eleving.com

1. Personal data processed, purpose of processing and legal basis

If you are our Partner (legal or natural person, which collaborates with Eleving Group), we may request you to fill out our KYC Questionnaire. This is necessary so we can identify you and ensure compliance with applicable regulations on prevention of money laundering and terrorism and proliferation financing.

When filling out the form, we will ask you to provide the following information:

- a) For legal persons (for the authorized representative and the ultimate beneficial owner):
 - Full name,
 - Date of birth,
 - Politically exposed person status.
- b) For natural persons:
 - Full name,
 - Date and place of birth,
 - Nationality,
 - Address,
 - Contact details (e-mail address and phone number),
 - Politically exposed person status.

We will process this personal data on the basis of compliance with a legal obligation, which we are subject of.

If the information provided by you is unclear or needs to be clarified, we may request you to provide additional information or documents.

If you have provided in this Questionnaire the personal data of a third party, please note that you are obliged to inform the said third party about the disclosure of their personal information to us.

Based on our legitimate interests to ensure our network security, monitor our webpage, and improve its functionality, we also collect technical usage data, such as information on your device and browser, IP address and other information required for this purpose.

2. Data retention

We will process your personal data as long as any of the above-mentioned data processing purposes or legal basis are still valid. In most cases, the personal data will be retained for 5 years as of the end of cooperation or final transactions with the Partner.

3. Data transfer

If reasonably required, we may share your personal data with third-party service providers, who provide us with various services, which are necessary for the purposes in this Privacy policy, for example, e-mail and content delivery services, legal, IT, data hosting services and other services.

When we share your personal data with third-party service providers, we comply with the applicable data protection legal norms, specifically:

- We transfer only the minimum amount of data necessary for a particular third-party service provider;
- We only cooperate with service providers who can provide and ensure adequate level of personal data protection;
- If the service provider acts as our data processor, it may only process personal data in accordance with our instructions, on the basis of a written agreement, and may not use it for other purposes.

If any of the service providers are located outside the EU / EEA, we will share your data in accordance with the requirements set in the applicable personal data protection legal norms, including:

- by entering into EU standard contractual clauses or by using other appropriate grounds for data transfer provided by applicable legal norms such as codes of conduct and certifications,
- cooperating with service providers located in country, which offers an adequate level of data protection in accordance with the EC Decision.

4. Your rights

As a data subject you have the rights, which are provided by the GDPR and other legal acts. These rights provide that you can:

- ascertain what information we process about you, access that information and ask for clarification on data processing;
- correct false or inaccurate data;
- ask to delete your data. Please note that there may be circumstances where we may be legally entitled to retain your personal data;
- object to the processing of data, which is processed based on our legitimate interests. In the event of such an objection, we will no longer process your personal data, unless we will demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

To exercise these rights, please contact us using the e-mail address indicated in this Privacy policy. We will process this request within 30 days and provide an answer. Please note that in accordance with the applicable regulations on prevention of money laundering and terrorism and proliferation financing, in certain circumstances we may be restricted to comply with certain data subject requests.

Additionally, you have the right to file a complaint to the supervisory authority (State Data Inspectorate) if you believe that we have violated your data subject's rights.

The version of this Privacy policy is effective as of 1st May, 2024.