

Privacy Policy

This is the limited liability company JO1N Baltic ("**JO1N Baltic**") **Privacy Policy**.

To take care of your privacy and the protection of personal data, we have developed this Privacy Policy, which provides information about the processing of your personal data, any information directly or indirectly related to you, your right to privacy and its protection, as well as your right to access to information.

The purpose of the privacy policy is to explain to data subjects how JO1N Baltic processes the data of natural persons, to transparently communicate the procedures and measures for the implementation of the rights of data subjects, as well as to describe other issues related to the protection of natural persons' data. It is also designed to ensure that data subjects can exercise their rights granted by law in a simple, accessible and understandable way.

The privacy policy has been developed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (April 27, 2016) "on the protection of natural persons with regard to the processing of personal data and the free circulation of such data and which repeals Directive 95/46/ EC" (General Data Protection Regulation) ("**GDPR**"), as well as the Law on Personal Data Processing and others to the regulatory enactments that regulate the issues of data processing of natural persons.

The terms used in this Privacy Policy and their meaning are the same as in the definitions given in Article 4 of the GDPR.

JO1N Baltic invites all data subjects to familiarize themselves with this Privacy Policy from time to time in order to obtain current information about the personal data processing processes carried out by JO1N Baltic .

Manager

The controller of personal data processing is SIA "JO1N Baltic", registration number 40203244637, legal address: Republikas laukums 2A, Riga, LV-1010. JO1N Baltic's contact information for matters related to personal data processing is: privacy@jo1n.com.

What information about you do we process?

We process your personal information in order to confirm your eligibility for credit, confirm your identity, offer you support or carry out a credit assessment before granting credit. This may include your name, date of birth, address, contact information, employment, financial and identification information. We may request additional information depending on requirements.

We process the following categories of personal data

Data category	Types of personal data included in the data category
Identification data and contact information	Name, surname, social security number, telephone number, e-mail, address (city, address, postal code).
User account information	Information about your user account in our system, including unique account number, unique customer identification, payment method information, marketing preferences, complaint information and any notes attached to your account.
Information about a personal identification document	Type of personal document, number of personal document, persons validity period of the document.
Visual images	For example, videos and photos of you that you provide when you interact with us at social events we host, and your social media profile picture if you choose to enable it through your social media account.
Information about loan	Repayment date, keyword for communication with the lender.
Financial information	Type of income, name of employer, information on monthly income and expenses, as well as data related to the evaluation of creditworthiness

Transaction and account history	For example, what transactions you have made. We will also receive information about you from any third party broker or lender.
Information related to your interests, use of the service and its compliance with your needs, lifestyle and habits	For example, information that is publicly available on your social media profile where you interact with us through your social media account.
Family information	Marital status (married, single), number of dependents.
Information about your communication through our website	For example, chat conversations through the Site, your recorded telephone conversations with our customer support staff and email messages.
Site usage data from your devices	For example, which pages you visit, what content you view, and what links and buttons you click on. This information can be found in more detail in the Terms of Use of Cookies on our Website.
General location information	The device or computer you use to access the Site will provide us with your IP address. An IP address indicates which city, state or country you are accessing the Site or Apps from, but does not provide detailed information about your location.
Advertising and direct marketing data	For example, for offers and competitions addressed to you, including any requests to stop receiving marketing communications. For more details on this information, please see our Cookie Policy on our Website.
Information about political important persons status	Personal data related to this status referred to as Proceeds of Crime of the Legalization and Prevention of Terrorism and Proliferation Financing Act in clause 18 of Article 1.

JO1N Baltic has the above-mentioned data only in aggregated form after you have completed the relevant application "JO1N Baltic financing " in the solution environment. JO1N Baltic passes them on for processing "JO1N Baltic financing " to the lenders involved in the solution, which evaluates them and prepares a loan offer, which, using the technical solution of JO1N Baltic, returns to "JO1N Baltic financing " in the solution environment and is displayed for you to make a choice. Thus, JO1N Baltic provides only automated technical solution that ensures the circulation of your personal data between "JO1N Baltic financing " solution environment and lenders who offer their services in the solution.

At the same time, JO1N Baltic would like to emphasize that the processing of your personal data is a prerequisite for, first of all, "JO1N Baltic financing " solution, taking into account the conditions of Section 8 (4 1) of the Consumer Rights Protection Law, it would be possible to evaluate your ability to repay the loan and thus the possibility of concluding a loan agreement with you, secondly, this loan agreement would also be concluded. You are not obliged to provide this personal data, but please note that in cases of failure to provide personal data, taking into account the nature of the service, as well as the obligations provided for in the regulatory acts - "JO1N Baltic financing " solution, it will not be possible for the lenders to fulfill the obligations stipulated in the regulatory acts and evaluate the feasibility of concluding the contract and, accordingly, also conclude a contract with you.

Purposes of personal data processing

JO1N Baltic "JO1N Baltic financing " processes personal data within the solution mainly for the following purposes:

Purpose (purpose of data processing)	Explanation
1. For the provision of services	<ul style="list-style-type: none"> • For the transfer of identification confirming information to lenders • To fulfill contractual obligations with lenders • To ensure / maintain the operation of services • To improve services, to develop new services • For service • For consideration of submissions • For handling complaints
2. Company security for provision	<ul style="list-style-type: none"> • For information security • Information systems security
3. For providing information	<ul style="list-style-type: none"> • To state administrative institutions, courts, law enforcement institutions in accordance with the

	procedures and to the extent specified in external regulatory acts
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Legal basis

JO1N Baltic processes personal data mainly based on the following legal bases:

Legal basis	Explanation
1. Contract conclusion and execution	<ul style="list-style-type: none"> • Data processing, which is carried out in order to conclude a contract between JO1N Baltic and you, as well as to fulfill this contract, namely to provide you with the opportunity to use "JO1N Baltic financing " solution for receiving a loan from lenders.
2. Provisions of normative acts execution	<ul style="list-style-type: none"> • Data processing, which is carried out in connection with the fulfillment of the obligations applicable to JO1N Baltic established in various regulatory acts .
3. Legitimate interests of JO1N Baltic	<ul style="list-style-type: none"> • Carry out commercial activities and provide services ("JO1N Baltic within the financing " solution) • Identify data subjects (e.g. in cases of data requests) • Eliminate risks for commercial activity (for example, various risks related to the actions of third parties or users) • Eliminate security risks (for example, various risks related to personal data security threats from third parties) • Analyze service provision in order to develop and improve it (for example, make service provision more efficient and convenient) • Prevent fraudulent and other illegal actions and protect JO1N Baltic from the negative consequences of such actions (for example, prevent criminal offenses) • Monitor the provision of services to prevent technical problems (for example, ensure the provision of quality services without technical disruptions) • Provide corporate governance and accounting • Protect your legal interests, including by contacting state, local government and judicial authorities, as well as law enforcement institutions (for example, to prevent, detect and limit illegal third party expressions) • To inform the public about its activities, including through advertising.

Protection of personal data

JO1N Baltic as a personal data manager provides:

- confidentiality of personal data, ensuring that personal data is processed (including accessed) only by persons who need it to perform their duties. JO1N Baltic employees who work with information containing personal data as part of their daily work duties are trained in personal data protection measures;
- appropriate technical and organizational measures for the protection of personal data. Such measures, taking into account the technical level, the costs of implementation and the nature, extent, context and purposes of processing, as well as various possibilities and risks regarding the rights and freedoms of natural persons, include, as far as possible, e.g. pseudonymization of personal data , data minimization, physical and logical data protection measures in the work environment, etc.;
- that technical means use only tested, licensed and updated software. JO1N Baltic regularly checks, renews and improves its technical and organizational measures;
- data security, including using the following technical solutions: data encryption (SSL), firewall, intrusion protection and detection software;

- involvement of certified personal data protection specialists in personal data processing and implementation of personal data protection measures.

Categories of recipients of personal data

JO1N Baltic does not transfer personal data to third parties if there is no legal basis for such processing of personal data and there is no previously defined purpose of personal data processing, as well as if third parties are unable to transparently provide appropriate technical and organizational measures to ensure and be able to demonstrably demonstrate that the processing of personal data processing takes place in accordance with regulatory enactments, and the security of personal data processing and compliance with the rights of data subjects will be ensured.

For the fulfillment of various personal data processing purposes, personal data may be transferred:

- JO1N Baltic employees or specially authorized persons,
- banks and "JO1N Baltic financing " for lenders included in the solution,
- local government institutions, courts, law enforcement institutions, upon the justified request of these persons in accordance with the procedure and to the extent prescribed by law,
- personal data processors by concluding relevant data processing agreements (for example, JO1N Baltic partners who provide various services related to the operation of information systems (cloud computing services, monitoring and operation of systems, security of information systems));
- in certain cases also to cooperation partners (for example, sworn lawyers, auditors, accountants), who are involved in organizing and ensuring the operation of JO1N Baltic .

Transfer of personal data to third countries

JO1N Baltic does not transfer personal data to third parties located outside the European Economic Area.

Duration of storage of personal data

JO1N Baltic takes into account the following principles when determining the personal data storage period:

- the validity of the contract concluded between JO1N Baltic and the data subject;
- necessity of the data for the purpose for which they have been received;
- deadlines set in external regulatory acts regarding the possibility for JO1N Baltic or the data subject to realize their legitimate interests;
- legal obligations to store data defined in external regulatory acts;

After the aforementioned circumstances cease, personal data is permanently deleted from the JO1N Baltic system.

Automated data processing

JO1N Baltic does not carry out such automated processing of personal data, within the framework of which legally binding decisions are made for you.

Rights of data subjects

• Duty to provide information

JO1N Baltic complies with the requirements of Articles 13 and 14 of GDPR and proactively provides the information provided for in these articles to data subjects.

• Right of access (GDPR Article 15)

JO1N Baltic ensures that data subjects receive information about the personal data processing process that concerns them. At the request of the data subject, JO1N Baltic provides access to the personal data of the data subject in the manner specified in the regulatory acts.

• The right to correct personal data (GDPR Article 16)

JO1N Baltic ensures that inaccurate personal data of the data subject is corrected in accordance with the procedures specified in the regulatory acts, without unreasonable delay. Taking into account the purposes of the processing, the data subject has the right to request that incomplete personal data be supplemented when submitting an application.

• The right to data deletion ("the right to be forgotten") (GDPR Article 17), JO1N Baltic ensures that at the request of the data subject, in compliance with the requirements of Article 17 of the GDPR, personal data attributable to the specific data subject is deleted. JO1N Baltic informs the data subject about data deletion, except if such notification would require disproportionate costs or is impossible.

• The right to restriction of processing (Article 18 of the GDPR), JO1N Baltic ensures that the processing of personal data of the data subject is limited if the criteria set out in Article 18, Clause 1 of the GDPR are met. If the processing is limited in accordance with paragraph 1, such personal data, except for storage, is processed only with the consent of the data subject or for the purpose of raising, implementing or defending legal claims or to protect the rights of another natural or legal person, or of companies important to the EU or Latvia for interests.

• The right to receive information about correction, deletion or restriction of processing of personal data (GDPR Article 19), JO1N Baltic shall notify each recipient to whom personal data has been disclosed of any correction or deletion of personal data or restriction of processing carried out in accordance with Article 16. Article, Article 17, Paragraph 1 and Article 18, except if it turns out to be impossible or if it involves a disproportionately large effort. JO1N Baltic informs the data subject about the mentioned recipients, if the data subject requests it.

- **The right to data portability** (GDPR Article 20),

JO1N Baltic ensures the portability of the data subject's personal data in accordance with the criteria of Article 20 GDPR. JO1N Baltic ensures the transfer of personal data to another manager if it is technically possible.

- **The right to object** (Article 21 of the GDPR), the data subject has the right to object to the processing of personal data in accordance with the criteria of Article 21 of the GDPR. JO1N Baltic, upon receiving formal objections to data processing from the data subject in accordance with Article 21 of the GDPR, will no longer process the data, except if it is possible to indicate convincing legitimate reasons for processing that are more important than the interests of the data subject, rights and freedoms, or to establish, exercise or defend legal claims.

- **Automated individual decision making, including profiling** (GDPR Article 22), JO1N Baltic ensures that the data subject has the right not to be the subject of a decision based solely on automated processing, including profiling, which creates legal consequences for the data subject or something similar significantly affects the data subject.

- **The right to submit a complaint to the supervisory authority:** Compliance of physical personal data processing measures with the regulatory framework in Latvia is monitored by the Data State Inspectorate. If the data subject believes that the processing of his personal data is not in accordance with the requirements of regulatory acts, he has the right to file a complaint with the State Data Inspectorate. The address of the Data State Inspectorate is Blaumaņa iela 11/13, Riga, LV-1011. Detailed information is available on the website www.dvi.gov.lv, or by calling 67 22 31 31, or writing to info@dvi.gov.lv.

You can exercise all the above-mentioned rights by sending a request and contacting us via e-mail privacy@jo1n.com.

Disclaimer

JO1N Baltic has the unilateral right to make corrections and/or additions to this Privacy Policy. The valid version of the Privacy Policy is always posted at <https://klix.app/lv/juridiska-informacija/>. JO1N Baltic keeps the previous versions of the Privacy Policy and they are available on the mentioned website.