

PERSONAL DATA PROCESSING POLICY

CHAPTER I GENERAL TERMS

1.1. The Policy on processing of personal data (hereinafter – the **Policy**) establishes principles on processing of personal data, purpose for processing of personal data, sources of processing of personal data, recipients of data, territorial processing of personal data, periods for storage of data, rights of the client and their enforcement, automated decision making, including profiling.

1.2. The Policy is applicable to relations between Macte Invest FM AB (hereinafter – the **Company**) and natural persons, who have expressed their intention to use, do use or were using or who are otherwise related with the services provided by the Company, including relations that arose before the adoption of this Policy. This Policy is applicable also in cases when natural person is not a client, but nevertheless is indirectly connected to services provided by the Company (e.g. representative of legal person, direct main or ultimate beneficiary, shareholder, member of family).

1.3. The Policy is drafted in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, Law on Legal Protection of Personal Data of the Republic of Lithuania as well as other legislation.

1.4. The terms employed in this Policy have the following meaning:

1.4.1. **Personal data** – means any information relating to an identified or identifiable natural person. Such information includes, but is not limited to a name and surname, personal ID number, contact information, information relating to agreements concluded with the Company and their performance history, information on usage of services provided by the Company, bank account information, audio and video recordings of conversations, information related to the tax payer's status, financial reliability.

1.4.2. **Processing of personal data** – means any operation or set of operations which is performed on personal data or on sets of personal data (including collection, recording, storage, adaptation or alteration, disclosure by transmission, dissemination, alignment, restriction, erasure etc.).

1.4.3. **Data controller** – Macte Invest FM AB, code: 122601232, address: Gedimino ave. 20, LT-01103 Vilnius; email: broker@macteinvest.com.

1.4.4. **Client** – a natural person, who uses the Services, was using them or has expressed intent to use the Services.

1.4.5. **Services** – any of the services provided by the Company.

CHAPTER II

PRINCIPLES OF PERSONAL DATA PROCESSING

2.1. The Company processes the Personal data under the following principles:

2.1.1. personal data are processed in a legitimate, fair and transparent manner (the principle of legality, fairness and transparency);

2.1.2. personal data are collected or specified and legitimate purposes that are prescribed in this Policy and they are not further processed in a manner incompatible with those purposes (principle of purpose limitation);

2.1.3. processed personal data are accurate and, when necessary, updated (principle of accuracy);

2.1.4. personal data are sufficient, relevant and processed inasmuch is necessary for the purpose for which they are processed (principle of data minimization);

2.1.5. personal data are kept in a form which permits identification of the data subject for no longer than it is necessary in view of the purposes for which data were collected and processed (principle of retention limitation).

2.1.6. personal data are processed in such a way that application of relevant technical or organizational measures would ensure adequate personal data security, including protection from unauthorized data processing or unlawful data processing and from accidental loss, destruction or damage (integrity and confidentiality principle).

CHAPTER III

PURPOSES OF PROCESSING OF PERSONAL DATA

3.1. The Company collects and processes the Personal data that were provided by the Client or obtained from other sources.

3.2. The processing of the Personal data is based on the following purposes:

3.2.1. **Proper identification and support of business relations.** For this purpose, the following data shall be processed: name, surname, date of birth, personal ID code, address, personal ID document copy, email address, telephone number and other contact data.

3.2.2. **Implementation of anti-money laundering and terrorist financing prevention.** For this purpose the following data shall be processed: name, surname, citizenship, gender, address, IP address, date of birth, personal ID code, address, residence for the purposes of taxation, information on participation in political activities, sources of income, pictures, facial image and other information to duly implement requirements of anti-money laundering and terrorist financing prevention.

3.2.3. **Providing suitable services.** Subject to respective Services provided by the Company the following additional data shall be collected and processed: data on trading experience and suitability of the Services to the Client (for example, value of the managed portfolio, finance related work experience, etc.), data on financial literacy, knowledge and experience in the field of finance, financial situation (for example annual income, total value of assets, total value of liabilities, etc.) and other information required for proper provision of the Services.

3.2.4. **Providing additional services, getting feedback regarding the Services, inviting to participate in market research, collecting statistical data.** For this purpose, the following data

shall be processed: name, surname, age, contact information, data on services, information on the Services provided by the Company.

3.2.5. Protection of infringed rights and against violation of legal acts. For the purpose of protection of interests of the Company in pretrial or trial proceedings or to assist in identifying or reveal violation of legal acts the following data shall be processed: name, surname, contact information, data on the Services provided by the Company, data about the Client's liabilities against the Company, documents obtained from and submitted to the Client, other documents that contains personal data, information on crimes committed by the Client or his convictions.

3.2.6. Improving service quality and compliance with requirements prescribed in legal acts, recording telephone conversations and storing electronic notices. For this purpose, the following data shall be processed: phone conversation recordings, electronic notices and personal data contained herein.

3.2.7. Ensuring continuity of the Services. In order to ensure continuous and uninterrupted provision of the Services, the Company shall be entitled to transfer the Personal data to third parties. For this purpose the following data shall be processed: name, surname, contact information, data on the Services that were provided or are intended to be provided, financial information, data on financial literacy, financial situation and other data required to ensure continuity of the Services.

CHAPTER IV SOURCES OF THE PERSONAL DATA

4.1. The Company processes personal data which it receives from the Client, his activities, when the Client was using, uses or expressed intention to use services provided by the Company.

4.2. The Company to the extent permitted by the applicable legislation and in accordance with the requirements prescribed in legal acts, as well as for the purposes provided in this Policy, collects and receives information from the following other sources:

4.2.1. other financial institutions;

4.2.2. the State Social Insurance Fund Board under Ministry of Social Security and Labour;

4.2.3. the State Enterprise Centre of Registers;

4.2.4. Creditinfo Lietuva, UAB;

4.2.5. the Ministry of Finance;

4.2.6. the Bank of Lithuania;

4.2.7. natural persons when they provide data of their spouses, children, other relatives by blood or marriage;

4.2.8. legal entities, when the Client is a representative employee, counterparty, shareholder, participant owner etc. or respective legal entity;

4.2.9. partners or other legal entities, who approach the Company to provide Services to the Client or provide their services with help of the Company;

4.2.10. other

4.3. The Company can combine information about the Client obtain from various sources.

CHAPTER V RECIPIENTS OF DATA

5.1. The Company shall provide the Personal data of the Clients in compliance with relevant legal requirements. The Company shall be entitled to transmit personal data to:

5.1.1. Banks as well as other financial and payment institutions, insurance companies (including insurance intermediaries, insurance brokerage firms), financial services intermediaries, third parties involved in the execution and settlement of financial instruments, which undertake or intends to undertake risk, related to execution of financial obligations;

5.1.2. the Bank of Lithuania, Financial Crime Investigation Service under the Ministry of Interior of the Republic of Lithuania, and other authorities that supervise the Company, law enforcement institutions, other registers and state institutions;

5.1.3. stock exchanges, central depositories and other entities involved when the Company directly or indirectly provides Services to the Client;

5.1.4. State Tax Inspectorate with the aim to implement the Agreement between the Government of the Republic of Lithuania and Government of the United States America on the improvement of cross-border compliance and on the implementation of the Foreign Account Tax Compliance Act as well as other international commitments of the Republic of Lithuania in this area;

5.1.5. Financial Crime Investigation Service, courts and other law enforcement agencies pursuant to their request or at initiative of the Company if any suspicion regarding criminal offence arises;

5.1.6. third parties which install, administer or otherwise manage software and database systems employed by the Company;

5.1.7. courts, tribunals, arbitral tribunals or other dispute settlement institutions or bodies;

5.1.8. third parties whose activities involve archiving and storage of contracts and other documents;

5.1.9. third parties whose activities involve messaging, printing services insofar it is related to messaging and printing of the Company's notices;

5.1.10. notaries, bailiffs, lawyers, consultants, auditors, service providers that the Company employs to provide the services required by the Company or when such parties contact the Company while performing the functions assigned to them;

5.1.11. other third parties to the extent it relates to the Company's business divestment, mergers, acquisitions or reorganization of business in whole or in part, potential or current business acquirers or their authorized persons or consultants.

5.2. The legal relationship between the Company as a controller and other processors shall be established in separate written agreement, unless such relationship is regulated by legal acts.

CHAPTER VI TERRITORIAL PROCESSING OF THE PERSONAL DATA

6.1. The Company usually processes and stores the Personal data in the territory of the European Union of the European Economic Area, however where it is necessary or the Client has explicitly consented, the Personal data can be transferred and processed outside the territory of the European Union or European Economic Area. In such a case the Personal data can be transferred and processed if at least one of the following conditions exist:

6.1.1. recipient is in a third state, which European Commission has included in a list of countries that ensure sufficient level of personal data protection;

6.1.2. recipient in the United States of America is certified in accordance with the requirements of the US-EU agreement 'Privacy shield';

- 6.1.3. the Company has concluded an agreement with the recipient in accordance to standard terms and conditions approved by the European Commission;
- 6.1.4. in accordance with code of conduct or certification mechanism, approved in a manner prescribed in GDPR;
- 6.1.5. the personal data is transferred in accordance with provisions of DGPR concerning derogations for specific situations.

CHAPTER VII DATA STORAGE PERIODS

- 7.1. The Company shall store personal data no longer than it is required for the purposes for which they have been collected. The period of storage of personal data shall be established considering the character of Services provided to the Client, legal interest of the Company or requirements prescribed by law.
- 7.2. Upon expiration of the data storage period the Company shall destroy such data.

CHAPTER VIII RIGHTS OF THE CLIENT AND METHODS OF THEIR IMPLEMENTATION

- 8.1. The Client as a personal data subject has the following rights:
 - 8.1.1. To obtain information on whether the Company processes the Client's personal data and should the Company process such data, to request an access to such personal data of the Client;
 - 8.1.2. to submit a request to the Company requiring to rectify incorrect, inaccurate or incomplete Personal data of the Client;
 - 8.1.3. to submit a request to the Company to erase personal data of the Client;
 - 8.1.4. to submit a request to the Company to limit the processing of the Personal data until, at the Client's request, the lawfulness of such processing is checked;
 - 8.1.5. to express objection with personal data processing for direct marketing purposes, including profiling, and when such personal data are processed in the legitimate interests of the Company;
 - 8.1.6. to request a transfer of the Personal data to another controller or provide them directly to the Client. Such provision is applicable to the Personal data, which the Client has provided himself and which are processed by automated means on the basis of consent or on the basis of conclusion and performance of the agreement;
 - 8.1.7. to withdraw submitted consent concerning processing of the Personal data without any impact on the use of the Client's personal data that was performed before the withdrawal of the consent;
 - 8.1.8. to submit a complaint to the State Data Protection Inspectorate.
- 8.2. The Client may submit any request prescribed in this chapter using contacts of the Company prescribed in Article 1.5.3 of this Policy.
- 8.3. The Company undertakes to reply to any request within a period of not more than 30 (thirty) calendar days from the day of receipt of such request. In exceptional circumstances, for example due to volume of data the Company requires additional time to provide a reply to the request, the Company shall be entitled to extend the deadline for the submission of the response by additional period of 30 calendar days. In case the Company decides to extend the deadline for the submission of the response, it shall give to the Client a relevant notice indicating the number of

additional days for the response and reason to extend the deadline. In any case the period for the response to the request shall not exceed 60 (sixty) calendar days from the day of receipt of the request.

8.4. The Company shall be entitled to refuse to examine the request if such request is anonymous, manifestly ill-founded or excessive, as well as in other instances prescribed in applicable legal acts.

CHAPTER IX AUTOMATED DECISION MAKING, INCLUDING PROFILING

9.1. The Company shall be entitled to make a decision based solely on automated processing:

9.1.1. to improve quality of the Services;

9.1.2. to advise the Client, render him the Services and duly perform Company's contractual obligations and exercise responsibilities under applicable legal acts;

9.1.3. to implement the anti-money laundering and terror financing requirements, the Company shall be entitled to categorize the Client according to the Client's risk, product, service risk and / or transaction risk, country and / or geographic region risk. Depending on the category of identified risk, the intensity of the Services provided by the Company to the Client and the frequency of review of the data for a particular Client may vary. If the Client disagrees with a decision taken by automatic means, the decision at the Client's request shall be revised and assessment by non-automatic means shall be undertaken by the employee of the Company.

CHAPTER X FINAL PROVISIONS

10.1. This Policy shall take effect from 25 September 2020.

10.2. This policy might be amended within the limits of changes of activities of the Company or changes in the legislation pertaining to the activities of the Company.

10.3. The Company shall inform about any amendments of this Policy at its webpage <https://macteinvest.com/en> as well as by other means.