



Privacy notice

Processing your personal data carefully and cautiously is of primary importance to us at UAB „OP Finance“. We process your personal data in compliance with data protection legislation and good information management and processing practice.

Please note that our website may include links to the website or services of other companies which have their own specific privacy protection practices. In such cases, we recommend reading the privacy protection practices of the third parties concerned.

We may provide additional information on privacy protection in agreements, application and other service related documents. Such additional information provided in these cases prevails over this privacy statement.

Our privacy practices may change slightly when we develop services or legislation changes. Up-to-date information on our practices can be found on our website.

1 General information

This Privacy Statement contains information required by 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 (hereinafter the General Data Protection Regulation) and data protection legislation in the Republic of Lithuania for a data subject, that is, for customers of UAB „OP Finance“, and for the supervisory authority.

2 Controller and its contact information

UAB „OP Finance“
Registration No. 302247917
Legal address: Konstitucijos ave. 29, 4 floor, Vilnius, Lithuania
Phone: +370 5 2472075
Email: info@opbank.lt

3 Data Protection Officer's contact information

UAB „OP Finance“ Data Protection Officer
Address: Konstitucijos ave. 29, 4 floor, Vilnius, Lithuania
Phone: +370 5 2472075
Email: info@opbank.lt, legal@opbank.lt

4 Name of the personal data file

The data subjects of the UAB “OP Finance” customer data file are the controller's customers and potential customers (sole entrepreneurs), representatives, managing, supervisory bodies' members, owners, beneficial owners of corporate and institutional customers, security providers and potential security providers, etc. The term “customer” used in this Privacy Notice includes all of the mentioned roles.

5 For what purposes and on what legal basis do we process your personal data?

We process your personal data to execute agreements, process orders and perform similar functions. We may use your personal data to offer products and services, answer your requests and questions. We also use your data for OP Financial Group's risk management purposes and to fulfil the obligations based on laws and regulations and instructions issued by the authorities.

Below you can find more detailed information on how personal data is used in the data file.

- Customer service and customer relationship management and development, including customer communications;
- Provision, development and quality assurance of services;
- Business development;
- Monitoring and analysis of service use and customer segmentation, for example, in order for the controller to be able to offer personalised service content to the users;



- Opinion polls and market surveys;
- Fulfilling statutory obligations and any other official rules and regulations;
- Risk management;
- Ensuring the security of services, and preventing and investigating abuses;

KYC information and other data subject's personal data may be used to prevent, uncover and detect money laundering and terrorist financing as well as for other purposes required by the legislation governing prevention of money laundering and terrorist financing.

The data subject's personal data may be used to investigate if the person is subject to international sanctions applied by the controller. Further information on OP Financial Group's sanctions compliance is primarily available in the terms and conditions of the product or service.

The legal basis for processing your personal data is: (i) contractual relationship or actions preceding the conclusion of a contract, (ii) statutory obligation, (iii) consent and (iv) legitimate interests.

6 Categories of personal data

Data subjects are typically subject to processing the categories of personal data and personal data described below. The data content to be processed depends, for example, on whether it is the question of the data of a sole entrepreneur (e.g. farmer) or of a person acting on behalf of the company.

Category of personal data	Example of the OP Financial Group's data content
Basic information	Data subject's name, personal identity code, data subject's postal address, phone number, email address The name and contact details of corporate customers' contact persons, persons in charge and owners, and information on the person's position with regard to the entity
Know Your Customer (KYC) information	Statutory KYC information such as the information required to identify the customer and to determine their financial status and political exposure
Customer relationship information	Information that uniquely identifies and categorises the customer relationship, such as tax code, nationality, language used for communication, profession or position
Consents	The consents given and withheld by the data subject concerning personal data processing
Contract and product information	The controller's and data subject's contract information Information on products and services acquired by the data subject
Customer activity data	Tasks and transactions related to the management of customer relationship
Background information	For instance, information on financial standing, and experience and knowledge
Recordings and content of messages	Recordings and messages in various formats, in which the data subject is a party, for example, call recordings
Technical verification data	Identifier determined by a device or an application, with which the user of the device or application can be identified, using additional information if necessary



7 Where do we obtain your personal data?

We obtain your data directly from you. In addition, we obtain data from registers maintained by the authorities or other third parties, credit information registers, etc.

8 Who can process your personal data?

Those processing your data include only OP Financial Group entities, or service providers and their employees, with the right to process personal data.

The Group's service providers may disclose your data not only within the OP Financial Group but also outside of the OP Financial Group directly for certain purposes based on law. Your data will always be processed exercising due care and complying with law good data processing practices.

9 What personal data do we collect about you?

We collect only data about you relevant to the purpose of use of the product and service concerned.

Such personal data we collect include:

- Details related to identifying and verifying the identity of a person, such as the name and personal ID code / birth date;
- Contact information, such as address, email address and phone number;
- Various information related to customer relationship and its management;
- Information required for the fulfilment of obligations laid down in laws;
- Recordings and technical verification data, such as call recordings, video surveillance (when you visit our premises), etc.

10 To whom do we disclose your personal data?

We disclose your data, within the limits permitted by law.

Personal data could be disclosed to these recipients:

- OP Financial Group entities for the purposes of financial accounting, audit, risk assessment as well as when we use joint IT systems or technical equipment or it is necessary for our services provision;
- authorities and institutions, other entities which exercise functions assigned them by law, i.e. supervisory authorities, law enforcement bodies, tax administrator, courts, bailiffs, notaries;
- external auditors, law and financial or other professional advisers;
- services providers which process joint debtors data files;
- debt collection companies to which debt claims are transferred;
- other services providers or those companies which are related to some services that we are providing (i.e. IT, post, archive etc.).

11 Transfer of personal data

The controller uses suppliers in data processing, and data will be transferred outside of the EU or EEA. When data is transferred outside of the EU or EEA, the transfer is done if at least one of the following instruments is implemented:

- there is an agreement in line with the standard terms and conditions approved by the European Commission;
- the European Commission has recognized the state ensures a sufficient level of personal data protection;
- we get a consent from supervisory authority

Some of the controller's suppliers are other OP Financial Group entities or partner companies. They provide the controller with information system and other support services, among other things.

12 Your rights as a data subject

Data subjects have the right to receive the controller's confirmation of whether their personal data will be processed or not, or whether they have already been processed.



If the controller processes a data subject's personal data, the data subject has the right to receive the information on the personal data being processed.

The data subject also has the right to request the controller to rectify, to supplement incomplete or erase their personal data.

The data subject has, in certain cases, also have the right to request the controller to restrict the processing of their personal data or to otherwise oppose the processing. In addition, the data subject may request that the data he has provided himself be transferred to the other data controller or be submitted directly to data subject in appropriate format.

All of the above requests must be submitted to the abovementioned contacts of the controller. Before accepting the data subject's request the controller will identify the data subject. For the purpose of identification of the data subject, the request/queries can be submitted in person or in form of an e-doc signed with secure electronic signature.

We will reply to your request within a period of not more than 30 (thirty) calendar days since the day of receipt of the request. In exceptional circumstances which require additional time, we have the right to extend the deadline for the submission of the requested data or for the consideration of claims set out in the request up to 60 (sixty) calendar days after the day of your referral.

If you consider that we process your personal data not in compliance with data protection legislation, you may lodge a complaint with the State Data Protection Inspectorate (<https://www.vdai.lrv.lt/>).

13 Right to cancel prior consent

If the controller processes the data subject's personal data on the basis of consent, the data subject has the right to cancel such consent. The cancellation of consent does not affect the lawfulness of processing performed based on the consent prior to its cancellation. Such cancellation may, however, have an effect on the usability and functionalities of the service.

14 Profiling and automated decision-making

UAB „OP Finance“ does not use profiling and automated decision-making. All our decisions are made by a specially designated decision-making body.

15 How and for how long we store your personal data?

We protect your personal data exercising special care by using appropriate data protection and data security methods. These methods include proactive and reactive risk management, use of fire walls, encryption techniques and secure IT areas as well as access control and security systems, security planning, controlled granting and monitoring of access/user rights, ensuring skills through training for personnel involved in processing personal data and through assessments as well as careful selection of suppliers. We are continuously updating our in-house practices and guidelines in an appropriate manner.

We retain your data for at least the time of customer relationship. After the customer relationship ends, the retention period is 10 (ten) years of the end of the customer relationship. We comply with statutory obligations in retaining data.

We seek to keep the personal data in our possession correct and up to date by deleting unnecessary data and updating outdated data.