



APPROVED
 at the meeting held by JSC Baltic International Bank
 Management Board on 10 May 2018
 Minutes No. 01-05/31/18

JSC Baltic International Bank

PERSONAL DATA PROCESSING NOTICE

TO CUSTOMERS, THIRD PARTIES AND OTHER CONNECTED PERSONS

1. Information about the data controller responsible

Our company name is **Joint Stock Company Baltic International Bank**,

Registration number: 40003127883,

Registered office: 43 Kalēju Street, Riga, LV-1050.

You may contact us in the manner as follows:

over the telephone by calling [\(+371\) 6700 0444](tel:+37167000444)

by fax, number [\(+371\) 6700 0555](tel:+37167000555) or

by emailing to: info@bib.eu.

2. Contact information for communication on the personal data protection matters

Should you have any questions in relation to this Notice or the processing of your personal data, please do not hesitate to contact us:

(1) using the communication channels referred to in Clause 1 herein;

(2) by emailing to: dataprotection@bib.eu

3. General description of the personal data processing carried out by us

This Notice describes how we carry out the processing of personal data of our customers, customers representatives and contact persons, website visitors and other persons whose data may become available to us within the framework of business.

We assume that before using our website or becoming our customer you have read this Notice and have accepted its terms and provisions. This is the most recent version of the Notice; we reserve the right to make amendments and / or update this Notice from time to time.

The purpose of this Notice is to give you a general overview of our personal data processing activities and purposes; however, please note that other controller's documents (for instance, service contracts, co-operation contracts, general terms of business, website usage rules) may provide additional information about the processing of your personal data.

Please be advised that the personal data processing provisions set out in this Notice apply to the processing of personal data of natural persons only.

In addition to these provisions, you may also read the additional personal data processing notices as follows:

- Website Usage Rules (available at www.bib.eu) <https://www.bib.eu/lv/dokumentu#A5>
- Privacy Policy While Using Mobile Applications (available at www.bib.eu). <https://www.bib.eu/lv/dokumentu#A5>

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We are aware that personal data is a value for you and we will process it in accordance with the confidentiality requirements and taking care of the security of your personal data at our disposal.

4. For what purposes will we process your personal data and what is the lawful basis for the processing of personal data?

We will process your personal data only for the defined legitimate purposes that could have resulted from the regulatory requirements as well as from our legitimate interests (including the provision of services).

a) For customer accounting, commencement and provision of services, rendering, offering and maintenance thereof

Within the framework of this purpose, we may need to identify you, perform due diligence on you and assess you as a customer, keep copies of your identification and due diligence documents, ensure the respective service provision process, making of transactions and documentation of the transactions made as well as contact you on the matters relating to the provision of services and / or contract performance and, in individual cases, to ensure recovery of outstanding obligations.

For this very purpose and the above sub-purposes, we may need to process your personal data as follows:

- **identification data**, for instance, first name, surname, identity number, date of birth, citizenship/allegiance, nationality, identity document data (including a copy of the identity document), visa/residence permit details of the customer, customer's representative and/or counterparty and/or contact person, third party, customer's (non-resident) photo;
- **contact details**, for instance, address, telephone number, email address, communication language;
- **information relating to professional, economic or personal activities**, for instance, education, occupation, experience and CV, information relating to transactions and counterparties;
- **information relating to tax residency and special status of a person**, for instance, country of tax residence and tax payer registration number, whether you have a politically exposed person status;
- **information relating to your family**, for instance, information about your family (family status, composition) and personal data of the family members;
- **information relating to your transactions**, for instance, information about the beneficial owner and beneficial owner's personal data, information about the customer's affiliated parties and their personal data, information about the client's business and counterparties;
- **information relating to your property/financial status and source of funds**, for instance, information about the sources of funds and their amount, property owned, shares in companies, financial funds and other assets, information about accounts with other banks, loan obligations and other related information;
- **data relating to the use of our services**, for instance, account transactions, types of services used by the customer (for instance, lending, investment services, financial instruments, trading operations, etc.), transaction experience and habits, types, description and strategy of the customer's investments; information about signed contracts, description of fulfilment /non-fulfilment of contractual obligations, paid transaction commissions, information relating to cooperation and communication with the Bank;
- **data relating to your creditworthiness investigation, risk and reliability assessment**, for instance, data from credit and debtor registers, data on debt balance, notes and historical notes in databases; data on whether the customer is a politically exposed person or not; data on the nature and habits of the customer's transactions, data on the customer's counterparties;
- **other data obtained and/or created when fulfilling the statutory obligations**, for instance,

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data obtained and generated as a result of due diligence performed on the customer and his or her transactions; data resulting from requests from tax authorities, bankruptcy and insolvency administrators, bailiffs and other law enforcement authorities and their enforcement;

- **data relating to insurance services**, for instance, insured persons, insurance beneficiaries upon occurrence of an insured event;
- **audio and video recordings**, for instance, voice recordings that certify your orders given to the controller in connection with the provision of services, data obtained from video surveillance (person's image, location and time);
- **special categories of data**, for instance, information about the person's ethnic origin, political opinions, religious or philosophical beliefs, health data, fingerprints, information about the person's convictions; data whether the customer is a politically exposed person or not.

The main lawful bases for the meeting of said purposes are:

- consent of the data subject (Article 6(1)(a) of the General Data Protection Regulation¹);
- entry into and performance of a contract with the data subject (Article 6(1)(b) of the General Data Protection Regulation);
- compliance with legal obligations (Article 6(1)(c) of the General Data Protection Regulation), for instance, identification of you as a customer, customer's and/or counterparty's representative and/or contact person, a third party; discovery and identification of the beneficial owner, due diligence on your transactions, provision of information relating to you to the credit register;
- legitimate interests pursued by the data controller responsible (Article 6(1)(f) of the General Data Protection Regulation), for instance, investigation of your creditworthiness and customer risk assessment, communication with you.

b) Implementation of the requirements set out in the AML/CTF regulatory enactments

Within the framework of this purpose, we need to comply with the statutory requirements in the field of AML/CTF by identifying customers, discovering their beneficial owners, checking the legality of the source of customer funds, performing due diligence on the customer's transactions and counterparties, reporting suspicious transactions.

For this purpose, we may need to process your personal data (in accordance with the scope and instances mentioned above in Sub-clause a) of this Notice) as follows:

- identification data;
- information relating to professional, business or personal activity;
- information relating to tax residency and person's special status;
- information relating to your transactions;
- information relating to your property/financial status and source of funds;
- data relating to the use of our services;
- data relating to the assessment of your risk;
- data obtained and/or generated when performing the statutory duties.

The main lawful bases for the meeting of said purposes are:

- compliance with legal obligations (Article 6(1)(c) of the General Data Protection Regulation);
- legitimate interests pursued by the data controller responsible (Article 6(1)(f) of the General Data Protection Regulation).

c) Assessment of your, as a customer, creditworthiness and risk

For this purpose, we may need to assess your creditworthiness and risk to determine the products and services to offer to you and under what conditions as well as fulfil the statutory

¹ REGULATION (EU) 2016/679 (27 APRIL 2016) OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL 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 (General Data Protection Regulation)

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requirements regarding customer creditworthiness and risk assessment and manage your obligations to the Bank.

For this purpose, we may need to obtain additional information about you from the public registers, State Revenue Service registers, Credit Register and other statutory registers as well as process your personal data (in accordance with the scope and instances mentioned above in Sub-clause a) of this Notice) as follows:

- identification data;
- information relating to professional, business or personal activity;
- information relating to tax residency and person's special status;
- information relating to your property/financial status and source of funds;
- information relating to your transactions;
- data relating to the determination of the customer's creditworthiness, assessment of the customer's risk and reliability.

The main lawful bases for the meeting of said purposes are:

- compliance with legal obligations (Article 6(1)(c) of the General Data Protection Regulation);
- legitimate interests pursued by the data controller responsible (Article 6(1)(f) of the General Data Protection Regulation).

d) Fulfilment of other statutory requirements related to the provision of financial services

Within the framework of this purpose, we may need to comply both with the requirements of the Law on Credit Institutions, for instance, by responding to the requests of supervisory authorities, tax administration or law enforcement authorities, and the requirements of the Accounting Law, Archives Law and other regulatory enactments.

For this purpose, we may need to process any of your personal data referred to in Sub-clause a) of this Notice with the exception of information relating to your family.

The main lawful bases for the meeting of said purposes are:

- compliance with legal obligations (Article 6(1)(c) of the General Data Protection Regulation);

e) Execution of transactions in the payment system

Within the framework of this purpose, we may need to execute international transactions through foreign credit institutions and/or local payments through domestic, European Union and international payment systems, including fulfilling the requirements and obligations set out by the EU and international standards and certification systems related to payment cards and security thereof.

For this purpose, we may need to process your personal data (in accordance with the scope and instances mentioned above in Sub-clause a) of this Notice) as follows:

- identification data;
- information relating to your transactions;
- if need be, information relating to your property/financial status and source of funds;
- data relating to the use of our services.

The main lawful bases for the meeting of said purposes are:

- performance of a contract with the data subject (Article 6(1)(b) of the General Data Protection Regulation);
- compliance with legal obligations (Article 6(1)(c) of the General Data Protection Regulation);

f) Respect for and protection of the customer's and the data controller responsible interests

Within the framework of this purpose, we may need to take measures to protect the customer's and the data controller responsible interests, including to know the quality of our

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services, prove making of transactions and communication with you (for instance, storage of your orders, account transaction registration, negotiation records); to prevent, limit and investigate the dishonest or illegal use or disturbance of our services, products and IT systems in order to prevent unauthorised access to our IT systems, ensure data security and control authorisation of services, access to them and operation of IT systems; for internal staff trainings in order to ensure the quality of services.

The main lawful bases for the meeting of said purposes are:

- entry into and performance of a contract with the data subject (Article 6(1)(b) of the General Data Protection Regulation);
- compliance with legal obligations (Article 6(1)(c) of the General Data Protection Regulation);
- legitimate interests pursued by the data controller responsible (Article 6(1)(f) of the General Data Protection Regulation).

g) Creation, protection and exercising of the right of claim

Within the framework of this purpose, we may use your personal data to ensure that you fulfil your obligations to us and exercise our right of claim as well as transfer the Bank's right of claim to third parties by assigning them to third parties.

For this purpose, we may need to process at least your personal data (in accordance with the scope and instances mentioned above in Clause a) of this Notice) as follows:

- identification data;
- contact information;
- data relating to the use of our services, including data relating to your obligations to us, substantiation of their commencement, amount of the obligations, delay start date and duration, etc;
- data relating to our actions for the purposes of exercising and protection of the right of claim;
- other data as required.

The main lawful bases for the meeting of said purposes are:

- legitimate interests pursued by the data controller responsible (Article 6(1)(f) of the General Data Protection Regulation), for instance, exercising of the right of claim, facilitation of debt recovery.

h) Prevention of threat to security, property interests, and our other legitimate interests or legitimate interests of third parties

Within the framework of this purpose, we would need to perform video surveillance of our area, buildings and other properties, record telephone conversations, use personal data processors to ensure different functions and, if need be, disclose information to courts and other law enforcement authorities, exchange information within the Bank and its functional units, exercise the right to pursue own statutory legitimate interests.

For this purpose, we may need to process at least your personal data (in accordance with the scope and instances mentioned above in Sub-clause a) of this Notice) as follows:

- identification data;
- contact information;
- our facility's address;
- person's outer appearance (image), location and time;
- other data as required.

The main lawful bases for the meeting of said purposes are:

- legitimate interests pursued by the data controller responsible (Article 6(1)(f) of the General Data Protection Regulation), for instance, for the purpose of detection of criminal

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offences.

i) Marketing activities

Within the framework of this purpose, we could send you commercial messages, ensure your participation in our marketing activities by sending you information about the services and products that we think may be of interest to you as well as publish materials from our public events.

For this purpose, we may need your contact information.

The main lawful bases for the meeting of said purposes are:

- consent of the data subject (Article 6(1)(a) of the General Data Protection Regulation);
- entry into and performance of a contract with the data subject (Article 6(1)(b) of the General Data Protection Regulation);
- legitimate interests pursued by the data controller responsible (Article 6(1)(f) of the General Data Protection Regulation), for instance, to ensure communication, sending of information about the most recent services and products.

j) Proper provision of services

Within the framework of this purpose, we would need to maintain and improve the technical system and IT infrastructure ensuring proper provision of services.

For this purpose, we may need to process any of your personal data referred to in Sub-clause a) of this Notice in accordance with the need for the processing thereof.

The main lawful bases for the meeting of said purposes are:

- legitimate interests pursued by the data controller responsible (Article 6(1)(f) of the General Data Protection Regulation).

5. Profiling and automated decision-making

In some cases, we may process your personal data taking into account the personal aspects related to you in order to assess risks, determine your creditworthiness or adjust our different services to your needs, for instance, to improve your experience in the use of services, including customise the display of services on the device you are using, prepare offers suitable for you.

Unless you have restricted direct marketing, we may process your personal data to prepare general and personalised offers of our services and products. Such measures may be based on the services and products you use and how you use them as well as how you operate in the controller's digital channels/IT systems.

For the profiling based on personalised offers and marketing, we ensure that you can make choices simply and easily using our Internet Banking solutions.

We may also collect statistics relating to you, including typical behaviour and lifestyle habits based on the demographic household data. To create segments/profiles, statistical data may be obtained from external sources and may be combined with our internal data.

The main lawful bases for the meeting of said purposes are:

- consent of the data subject (Article 6(1)(a) of the General Data Protection Regulation);
- entry into and performance of a contract with the data subject (Article 6(1)(b) of the General Data Protection Regulation);
- compliance with legal obligations (Article 6(1)(c) of the General Data Protection Regulation);
- legitimate interests pursued by the data controller responsible (Article 6(1)(f) of the General Data Protection Regulation).

6. Who can access your personal data?

We implement the respective measures to process your personal data in accordance with the applicable legal enactments and ensure that your personal data is not accessed by third parties who do not have the appropriate legal basis for the processing of your personal data.

If need be, your personal data may be accessed by:

- 1) our employees or directly authorised persons who need it to perform their job duties;
- 2) personal data processors in accordance with their services, and only in the scope required;
- 3) third parties who guarantee for the customer's obligations, for instance, surety providers, guarantors, pledgors;
- 4) supervisory authorities in the cases specified in the legal enactments;
- 5) third parties upon thorough assessment of whether such data transfer has an appropriate legal basis: law enforcement authorities, tax authorities, sworn bailiffs, investigation bodies in the cases specified in the legal enactments; sworn notary offices; courts, out-of-court dispute resolution bodies, bankruptcy or insolvency administrators;
- 6) third parties maintaining registers (for instance, population registers, credit registers, commercial registers, securities registers and other registers that contain or transfer personal data);
- 7) rating agencies;
- 8) credit institutions and financial institutions, insurance service providers and financial intermediaries, third parties involved in the execution of trading transactions, payments and reporting cycle (for instance, venues, including regulated markets, MTFs, organised trading systems; trade repositories, approved publishing bodies, approved reporting systems; local and foreign brokers).

7. What counterparties in the personal data processing or personal data processors do we choose?

We implement the respective measures to ensure the processing, protection and transfer of your personal data to data processors in accordance with the applicable legal enactments. We carefully select personal data processors and, when making data transfer, we evaluate its necessity and the amount of data to be transferred. Data transfer to processors is carried out subject to the requirements of confidentiality and secure processing of personal data.

At present, we cooperate with the personal data processor categories as follows:

- 1) legal entities and functional units within the Controller's group (for instance, the controller's representative offices abroad);
- 2) outsourced accountants, auditors, financial management and legal advisers, translators;
- 3) participants of the European and international payment systems, including SWIFT, and their connected persons;
- 4) debt collectors in accordance with the transferred right of claim;
- 5) owners/developers/maintainers of the IT infrastructure, database;
- 6) other persons who are connected with the provision of our services, including archiving, courier and postal service providers, providers of other services to the Customer at the Bank for whose e-invoices for the services the Customer has applied, health care institution in case of life insurance, sellers of lease assets and authorised persons connected with their service.

From time to time, there may be changes in the list of personal data processors.

8. Are your personal data transferred outside the European Union (EU) or the European Economic Area (EEA)?

Your data processing usually takes place within the European Union (EU) and the European Economic

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Area (EEA); however, in some cases personal data may be transferred and processed in a country outside the EU and the EEA

Personal data may be transferred and processed outside the EU/EEA if there is an appropriate legal basis for that:

- based on the customer's consent, or
- to comply with a legal obligation, or
- to enter into or perform a contract,

in compliance with the adequate security measures.

Adequate security measures are, for instance, as follows:

- in the recipient country outside the EU and the EEA, an adequate level of data protection is ensured in accordance with the decision of the Data State Inspectorate or the European Commission;
- a cooperation contract or the respective agreement has been concluded with the data recipient outside the EU and the EEA applying the standard data protection clauses developed by the European Commission or the Data State Inspectorate (and approved by the European Commission);
- application of binding corporate data processing rules in relation to data processing in a third country or in relation to the data recipient;
- the certification requirement under the Privacy Shield has been complied with in relation to the personal data recipients located in the United States of America.

If you would like to get additional information on the personal data transfer and processing outside the EU or the EEA, you may submit a separate request to us in accordance with the provisions of Clause 2 of this Notice.

9. How long will we store your personal data?

Your personal data is stored for as long as its storage is required for the respective personal data processing purposes as well as under the requirements of the applicable legal enactments.

When assessing the personal data storage duration, we take into account the requirements of the applicable legal enactments, contractual obligation fulfilment aspects, your instructions (for instance, in the case of consent) as well as our legitimate interests. If your personal data is no longer required for the purposes specified, we will erase or destroy it.

Below are the most widespread personal data storage periods:

- we will store personal data required to perform a contract until the contract is performed and other storage periods are fulfilled (please see below);
- we will store personal data obtained as a result of customer identification and investigation, including identification data relating to the customer/customer's beneficial owner, information relating to the transactions made and correspondence with you throughout the whole duration of business relationships and *for 5 years following the termination of business relationships or execution of a random transaction*;
- we will store personal data subject to storage in order to comply with the legal requirements for transaction registration and accounting within the timeframes set in the respective regulatory enactments; for instance, *the law "On Accounting" stipulates that the supporting documents must be kept until the date when they are required to establish the start of each business transaction and track its course but not less than 5 years*;
- the Bank will store data to prove the fulfilment of its obligations observing the general limitation period for claims, in accordance with the limitation periods for claims set by the regulatory enactments, i.e. *10 years in the Civil Law, 3 years – in the Commercial Law*, and other periods taking into account also the timeframes for bringing actions set in the Civil Procedure Law.

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10. What are your, as the data subject, rights in relation to the processing of your personal data?

Personal data updating

If there are changes in the personal data you have provided to us, for instance, changes in your identity number, identification document data, contact details, telephone number or e-mail, please contact us and provide us with the up-to-date data so that we can meet the respective personal data processing purposes.

Your right to access and rectify your personal data

In accordance with the provisions of the General Data Protection Regulation you are entitled to request that we ensure access to your personal data at our disposal, request its rectification, erasure, processing restriction, object to the processing of your data, and the right to data portability in the cases and under the procedure specified in the General Data Protection Regulation.

We respect your right to access and control your personal data; therefore, upon receipt of your request we will respond to it within the time limits specified in the regulatory enactments (usually not later than within one month if there is no specific request that takes more time to prepare a reply) and, if possible, will either rectify or erase your personal data.

You can obtain information about your personal data available to the Bank or exercise your other rights as the data subject in one of the following ways:

- 1) by submitting the respective application to the Bank in person and identifying yourself in our office at 6 Grēcinieku Street, Riga, every working day from 10.00 till 16.00;
- 2) by mailing the respective application to us to the address: 43 Kalēju Street, Riga, LV-1050;
- 3) by emailing the respective application to info@bib.eu or dataprotection@bib.eu; it is recommended to sign it with a secure electronic signature.

Upon receipt of your application, we will evaluate its content and your identifiability and, depending on the situation, reserve the possibility to ask you to additionally identify yourself to ensure the security of your data and disclosure to the respective person.

Consent withdrawal

If your personal data processing of is based on your consent, you are entitled to withdraw it at any time, and we will not further process your personal data which we were processing based on your consent for that purpose. However, please be advised that the withdrawal of consent cannot affect the processing of personal data that is required to fulfil the statutory requirements or is based on a contract, our legitimate interests or other bases specified in the regulatory enactments for the lawful processing of data.

You may also object to the processing of your personal data if personal data processing is based on legitimate interests or is used for marketing purposes (for instance, to send commercial messages).

11. Where can you file a complaint with regard to the issues connected with person data processing?

If you have any questions or objections with regard to the processing of your personal data by us, we encourage you to, first of all, contact us as indicated in Clause 2 of this Notice.

However, if you still believe that we were not able to resolve the issue and you believe that we are still violating your right to the protection of personal data, you are entitled to file a complaint with the Data State Inspectorate. Sample applications for the Data State Inspectorate and other related information may be found on the Data State Inspectorate's website (<http://www.dvi.gov.lv/lv/datu- aizsardziba/privatpersonam/iesniegumu-paraugi/>).

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12. Why do you have to submit your personal data to us?

Mostly, we collect your information in order to offer and provide services to you, fulfil the contractual obligations undertaken, comply with our legal obligations and pursue our legitimate interests. In these cases, we need to obtain the specific information to meet the respective purposes; thus, a failure to provide such information may endanger the commencement of a business relationship or performance of a contract. If data is not mandatory but its submission could help improve the service or offer favourable contract terms and conditions and/or offers to you, when collecting data we will specify that data submission is voluntary.

In addition, we would like to inform you about the main requirements of the regulatory enactments regarding the processing of personal data:

- 1) the provision of personal data listed and defined in Sub-clause a) of this Notice to the Bank and its subsequent processing is primarily based on and is requested in accordance with the requirements of the Law on Credit Institutions and the AML/CTF Law and the requirements of the legal enactments governable by them;
- 2) in addition, the Law "On Accounting" stipulates that the personal data to be specified in a business transaction document (contract) the party to which is a natural person is as follows: first name, surname, identity number (if any), address specified by the person or, if not specified, declared residential address.

13. How do we obtain your personal data?

We can obtain your personal data in any of the manners as follows:

- 1) in the process of entering into a contract when you yourself provide data to us;
- 2) if a contract is entered into with a third party and it has specified you as the customer's legal/authorised representative, contact person or beneficial owner;
- 3) from you when you submit any application to us, send emails, or call us;
- 4) from you when you apply for our services online;
- 5) from you when you perform authorisation at www.bib.eu or via the controller's Internet Banking;
- 6) at www.bib.eu using cookies;
- 7) in some cases, from third-party databases, for instance, when assessing your creditworthiness or performing due diligence on you as the customer and/or determination of your risk, we may obtain data from third parties for this purpose;
- 8) in the respective cases, from video surveillance recordings.

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