



Baltic International Bank

MOBILE APPS PRIVACY POLICY

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1. DEFINITIONS AND INTERPRETATION

For the purposes of this Policy:

Bank means Baltic International Bank SE.

Client means a natural person or a legal person's representative to whom Bank provides financial or other services.

Visitor refers to an internet user who visits Bank's website.

Internal Rules and Regulations (IRRs) is an all-encompassing term for Bank's internal regulatory and guidance documents such as policies, procedures, regulations, guidelines, and others.

Website means Bank's website; Bank's official web address is <https://www.bib.eu>.

Personal Data means any information relating to an identified or identifiable natural person ((Visitor); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Privacy Policy means MOBILE APP PRIVACY POLICY OF BALTIC INTERNATIONAL BANK SE, as outlined herein.

Mobile Application (App) is one or more apps listed below:

- BIB Digipass: DigiPass for Mobile (does not support push notifications),
- B Digipass: DigiPass for Mobile (supports push notifications),
- B Online: Mobile Internet Banking,
- BIB Trader: Online trading platform (Forex and ETFs).

2. GENERAL PROVISIONS

- 2.1. Bank is committed itself to protecting and respecting Visitor's privacy while complying with the law that applies to personal data processing, thus ensuring appropriate security and confidentiality of Visitor's Personal Data.

3. SCOPE OF APPLICATION

- 3.1. This Privacy Policy sets forth the basic principles according to which Bank will process Personal Data obtained from Client or submitted by Client while using Bank's App services.
- 3.2. This Privacy Policy focuses on how Client uses:
 - 3.2.1. any App accessible in different Bank-specified App stores (app marketplace) or in web apps (App site), as installed on Bank's servers, after App copy has been downloaded or streamed to Client's mobile phone or portable device (Device);
 - 3.2.2. any of Bank's services accessible through App in Bank's App site, unless Bank announces that a specific service is regulated by a separate privacy policy and/or a specific Bank-provided service is regulated by an internal Client-Bank agreement (in this case, the respective service is regulated by the said separate policy and only the said separate policy applies).
- 3.3. Before using Bank's services accessible through App Client must read this Privacy Policy.
- 3.4. By providing his/her Personal Data, Client gives his/her consent to the transmission, storage and/or processing of the Personal Data. Bank implements all appropriate measures to ensure that Client's data are processed securely and in accordance with this Privacy Policy.
- 3.5. Bank maintains robust security standards and procedures in order to prevent access of any unauthorised persons, including Bank's employees, to Client's data. To ensure data security, Bank uses appropriate technical safeguards such as data encryption, firewall and server authentication (the list is not exhaustive). Bank should maintain its privacy standards and carry out data protection audits for compliance purposes.
- 3.6. If Client does not accept the foregoing provisions, Bank requests Client to refrain from visiting and using the App site and to refrain from using Bank's services or information contained in App.

4. INFORMATION OBTAINED FROM CLIENT

- 4.1. Bank may obtain, aggregate (i.e. present in a summarised format), and process the following Client's data:
 - 4.1.1. Information submitted by Client to Bank (the Submitted Information): information that Client provides when registering himself/herself for the use of App site, downloading or registering App, subscribing to any of Bank's services, searching for App or service, sharing data through App's social-media functions, and/or conducting any other activities normally associated with the use of App. The Submitted Information may include personally identifiable information (PII), such as Client's full name, age, address, email address and telephone number, phone number associated with the Device, username, password and other unique identifiers (authentication credentials), financial information, credit card-specific information, etc.
 - 4.1.2. Client- and Client's device-related information aggregated by Bank: Every time Client visits App site or uses App, Bank can automatically aggregate the following information:
 - 4.1.2.1. technical information, including a type of the device used, IMEI (International Mobile Equipment Identity) which is a unique number for identifying a device on a mobile network, a MAC (Media Access Control) address which is a hardware identification number that uniquely identifies each device on a network, mobile phone number, mobile network info, mobile operating system, type of mobile web browser used, time zone settings, and others (device-specific information);
 - 4.1.2.2. information stored on the respective device, including contact information, subscription-related information, other digital content, registrations, etc. (content-specific information);
 - 4.1.2.3. information about

- how Client uses App, including traffic data, location data, weblogs and other genres of online communication, irrespective of whether this is necessary for Bank's purposes or other purposes, and
 - resources accessed by Client (log information).
- 4.1.3. **Information about location:** Bank may use GPS technology or other available technology to identify Client's present location. Some of Bank's location services may require Client's Personal Data to make the respective function operable (ensure operability). If Client intends to use a certain function, Client will be requested to give his/her consent to use the Personal Data for this specific purpose.
- 4.1.4. **Information obtained by Bank from other sources (third-party information):** Bank closely cooperates with third parties (e.g. cooperation partners, sub-contractors for specific technical services, payment and delivery services, advertising networks, data analytics service providers, information-search service providers, credit bureaus) and can obtain Client-related information from them.
- 4.2. Bank can also request Client to provide relevant information whenever Client reports a problem associated with App or App site.
- 4.3. Where Client communicates with Bank, Bank retains the communication (correspondence) in the manner prescribed by the IRRs. Bank can also request Client to complete survey questionnaires that Bank could use to seek Client's view. As the completion of the questionnaires is voluntary, Client may refuse to participate in the survey.

5. COOKIES

- 5.1. Bank uses cookies (small bits of data stored as text files on a browser) to distinguish Client from other users of App and of App site. Cookies are used essentially to enhance Client's App experience, also referred to as app UX (user experience). As cookies are browser dependent, Client can reset his/her browser to refuse cookies. N.B: if Client refuses cookies, the functionality of the Website may be impacted, i.e. Client will be unable to use all of the possibilities offered by App, App site, and the Website.

6. THE USE OF PERSONAL DATA

- 6.1. Bank uses Client-related aggregated information to:
- offer and provide services to Client and manage the services;
 - register Client;
 - provide Client with information, services or products (if any) that Client applies for or may be interested in;
 - discharge obligations arising from Client-Bank agreements;
 - ensure that the content of Bank's App site is displayed in the most efficient manner to best suit Client's needs and is compatible with Client's device, i.e. is supported by the device;
 - enable Client to use App's interactive functions whenever Client wants;
 - keep Client informed about the changes in App site;
 - keep Client informed about the changes to this Privacy Policy.
- 6.2. Bank can also use Client's data to be able to provide Client with information about Bank's services and products in which Client may be interested. For this purpose, Bank can contact Client by using means of communication that Client has indicated in the Customer Service Agreement.
- 6.3. Bank may combine different categories of information, and Bank will process the combined information in the same manner as Personal Data in accordance with this Privacy Policy for as long as the information is combined.

- 6.4. Bank does not disclose information about identifiable persons to Bank's advertisers. However, Bank may furnish them with anonymised (aggregated) information about App users.

7. OBTAINING AND DISCLOSURE OF PERSONAL DATA

- 7.1. Bank may obtain and disclose Client's Personal Data:
- 7.1.1. if Bank is required to disclose Client's data and if Bank has the right to obtain Client's data from the Bank of Latvia's Credit Registry [*Kreditu reģistrs*] or other bodies with a similar function and/or any register (including a publicly accessible register or database, if any), insofar as the rules and regulations of the respective public body and/or of register and the applicable law (legislative provisions) so permit;
- 7.1.2. if Bank is required to disclose Client's data to third parties whenever Client is unable to perform his/her obligations in a duly manner in accordance with any agreement concluded with Bank. Bank may also disclose Client's data to processors who collect Personal Data, to the extent that that the Personal Data may be necessary to the processors for performing their functions in accordance with the applicable law;
- 7.1.3. if Bank is required to disclose Client's data and Bank has the right to obtain Client's data from third parties with which Bank has concluded agreements for performance of certain functions or provision of services relating to Bank's services and activities (in these cases, Bank discloses or obtains Client's data from third parties to the extent required for Bank to ensure the provision of Bank's particular service);
- 7.1.4. if Bank sells or acquires any enterprise or assets (in this case, Bank may disclose Client's data to a potential seller or buyer of the enterprise or of the assets) and/or if a third party acquires Bank or substantially all of Bank's assets (in this case, Client's Personal Data possessed by Bank will be treated as one of the assets transferred);
- 7.1.5. if Bank is required to disclose or share Client's Personal Data to comply with any legal or statutory duty or inquiry.
- 7.2. In addition to the foregoing and in accordance with the applicable law that provides a legal framework on how to use of data and disclose Client's Personal Data, Bank may disclose some or all data obtained by Bank from Client (whenever Client downloads or uses App and/or uses Bank's services) to any member of Bank's Group, i.e. to Bank's subsidiaries, parent undertaking and subsidiaries of the parent undertaking (Group's members) (if any).

8. STORAGE OF PERSONAL DATA

- 8.1. All information provided by Client to Bank is stored on Bank's secure servers. All payment transactions executed by Bank or by Bank-chosen third-party payment processing service provider are encrypted. The secure servers use the Secure Sockets Layer (SSL) protocol for data encryption to protect data from unauthorized interception, or an alternative encryption technology.
- 8.2. Once Bank has assigned password to Client (or Client has chosen the password) that enables Client to access certain parts of Bank's App site, Client must keep the password secret.
- 8.3. Client uses any Bank-issued unique identifiers (authentication credentials), i.e. specific technical means allowing the unique identification and authentication of Client, in accordance with Client-Bank agreements and Bank's IRRs available on the Website.
- 8.4. Bank cannot guarantee the security of Client's data transmitted to Bank's sites and servers. Any data transmission therefore is at Client's own risk. Once Bank has received Client's information, Bank will use strict procedures and security measures to prevent unauthorised access to the information.

- 8.5. Bank may aggregate and store Personal Data on Client's device by using app cache (cache memory acts as a temporary storage area that the computer's processor can retrieve data from easily) and web storage (with web storage, web application can store data locally within the user's browser), including HTML5 web storage, or alternative storage mechanisms and other technologies.

9. DATA PROTECTION

- 9.1. All jurisdictions have a specific data protection legislation in place. In accordance with:
- the Personal Data Protection Act [*Fizisko personu datu apstrādes likums*] of the Republic of Latvia
 - 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 (General Data Protection Regulation, commonly abbreviated to GDPR), and
 - Bank's IRRs, including the General Terms and Conditions for Transactions,
- Bank must inform Visitor that Bank may legitimately disclose, process the Personal Data and transfer them only to the recipients of Personal Data listed in the "Personal Data Processing Notice to Customers, Third Parties and Other Related Persons".
- 9.2. Bank does not disclose and does not transfer Client's Personal Data to third parties for marketing purposes. However, Personal Data may be disclosed or transmitted to intermediary service providers (agents), or to third parties duly authorised to act on behalf of Bank's or Group's members/participants (if any), or to third parties which provide certain services.
- 9.3. If In certain circumstances (in connection with the said purposes), Bank may transmit Client's (who is based or domiciled in the European Economic Area (EEA)), Personal Data to pre-authorised organisations outside the EEA if a lawful basis applies. Bank's "Personal Data Processing Notice to Customers, Third Parties and Other Related Persons" (available on the Website) describes the manner in which the transfer of Personal Data outside the EU or EEA members is made.
- 9.4. Bank's App site may periodically display links to websites owned and operated by Bank's partners, advertisers and branches (including websites advertising App or Bank's services). If Client uses a certain link to access any of the websites, Client must take account of the fact that the websites and all services that can be accessed through their intermediation are governed by their respective privacy policies. None of the links on Bank's App site should be deemed to imply that Bank endorses or has any affiliation with the links. Bank therefore accepts no liability or obligations in connection with such policies or for any Personal Data (including contact information and location data) that might be obtained via the websites or by using the services.

10. CLIENT'S RIGHTS

- 10.1. Client has the right to request Bank not to process Client's Personal Data for marketing purposes. If Bank intends to use Client's data for marketing purposes, then before the data aggregation Bank must inform Client thereof and must obtain Client's unambiguous consent.
- 10.2. To prevent the processing of Personal Data referred to in cl. 11.1 hereof, Client has the right to refuse to give consent thereto.
- 10.3. The "Personal Data Processing Notice to Customers, Third Parties and Other Related Persons" (available on the Website) sets out in detail Client's rights.

11. CHANGES TO THE PRIVACY POLICY

- 11.1. Bank publishes all updates and amendments made to the Privacy Policy on the Website in the respective area and makes them known to Client.

12. MEANS OF COMMUNICATION WITH BANK

- 12.1. If Client has any questions about this Privacy Policy, Client can:
- call at (+371) 6700 0444,
 - send an email at dataprotection@bib.eu.