
PRIVACY POLICY

Version applicable as of 7 April 2022

Why should I read this policy?

This Privacy Policy ('policy') describes how Demivolt, UAB ('we', 'our', 'us' or 'Demivolt) collects, uses, and stores your personal data and what statutory rights do you have.

We protect your personal data under the EU General Data Protection Regulation (2016/679) ('GDPR') and other applicable laws.

We may amend this policy unilaterally from time to time. Any such amendments will be effective immediately upon publication, therefore please visit our [website](#) regularly for the latest version of this policy.

Who is responsible for protecting my information?

We are: **Demivolt, UAB**, a licensed electronic money institution ([License](#) No 77 issued on 26 November 2020). We provide payment services and we are supervised by the Bank of Lithuania.

Our company number is: 305562462

Our address is: Jogailos str. 4, LT-01116 Vilnius, the Republic of Lithuania

Our e-mail address: info@demivolt.com

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1. Why and how do you collect and use my data?

In general, we collect and use your personal data for the purposes of provision of payment services. There are also other purposes related to the provision of payment services, internal administration, and legal processes for which we collect and process your personal data. You can find more detailed information on personal data categories, legal basis for the processing of personal data, personal data retention periods, etc. in the tables below:

1.1. To identify you

| When is this relevant for me? | What information do you collect about me? | What is your legal basis to collect my data? | Where do you collect the information from? | Am I obliged to provide this information? | How long do you store information about me? |
|---|---|---|--|---|--|
| When establishing a business relationship with us | Name and surname, ID number, personal code, sex, ID type, date of birth, ID issue/expiry date, nationality, country which issued ID, IP address, start and finish time of identification process, client ID, picture of document front side and back side, telephone number | Legal obligation (Art. 6 (1) (c) of GDPR) Art. 9 (1) (1) of the Law on the Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania (Law on AML) | From yourself | It is a statutory requirement and a requirement necessary to enter into a contract. If you or a company represented by you do not provide this information, we will not be able to provide our services | For the duration of and 8 years after the termination of business relationship |
| | Biometrical data (facial image and short video) | Reasons of substantial public interest (Art. 9 (2) (g) of GDPR) Art. 11 (1) (4) (b) of the Law on AML | | | |

1.2. To provide payment services to you or a company represented by you

| When is this relevant for me? | What information do you collect about me? | What is your legal basis to collect my data? | Where do you collect the information from? | Am I obliged to provide this information? | How long do you store information about me? |
|---|---|---|--|--|--|
| When you or the company represented by you access and use our systems (i.e., account in the systems, internet bank or mobile application) or use the payment services we offer to you, e.g., payment account services, electronic | Name and surname, e-mail address, telephone number, account number, number of payment account, amount of electronic money, payment denomination currency, applicable fee, payment order, receipt of a payment order, payment transaction, amount of payment transaction, commission fees and other payable fees, date and time of payment transaction, payee of payment transaction, payer of payment transaction, information about credit, account login credentials (PIN, password, one-time passwords), account creation date, other registration information, sort | Contract (Art. 6 (1) (b) of GDPR) Legal obligation (Art. 6 (1) (c) of GDPR) Art. 15 (6), 62 (1) of the Law on Payments of the Republic of Lithuania | From yourself | It is a contractual and a statutory requirement. If you or the company represented by you do not provide this information, we will not be able to provide our services | For the duration of and 10 years after the termination of a contract |

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|--|---|--|--|--|--|
| money issuance and redemption, payment initiation, account information, money transferring, or/and currency exchange services, acquiring, and other payment services that we are entitled to provide under our license . | code and IBAN, and other unique identifiers of the payment accounts | | | | |
|--|---|--|--|--|--|

1.3. To implement measures of anti-money laundering (AML) and counter terrorist financing (CTF)

| When is this relevant for me? | What information do you collect about me? | What is your legal basis to collect my data? | Where do you collect the information from? | Am I obliged to provide this information? | How long do you store information about me? |
|--|---|--|---|--|--|
| When establishing a business relationship with us (when you are a customer (natural person), company's representative or a beneficial owner) | Name and surname, ID information (such as number, date of issuance, period of validity) the number and period of validity of the residence permit in the Republic of Lithuania and the place and date of its issuance (when you are a foreigner and you possess such permit), citizenship or citizenships, a country which has issued identity document to the individual in case of stateless person, country of residence for tax purposes, tax identification number, information about your place of residence and contact data (country, postal code, residential address, telephone number, e-mail address), information about your occupation and source of funds, purposes for opening an account, your other bank accounts, countries from which the funds will be obtained and transferred, monthly amount of electronic money that is planned to obtain and redeem, products to be used, information on the beneficial owner and the company's director (name, surname, personal ID number, date of birth, percentage of shares, voting rights, the country that has issued an identity document, ID information citizenship), representation basis, whether you are a true owner of the account and funds held on such account and act on your own behalf, business correspondence, date of completion of the questionnaire, information on a company's business activities, information on your individual | Legal obligation (Art. 6 (1) (c) of GDPR) Art. 9, ,11, 12, 16 of the Law on AML | From yourself, AML/CTF service providers or state institutions and public registers | It is a statutory requirement. If you or the company represented by you do not provide this information, we will not be able to provide our services | For the duration of and 8 years after the termination of business relationship |

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| | activities (according to a certificate, business certificate etc.), information about suspicious transactions | | | | |
| | Information on participation in politics - whether you, your immediate family member or a close associate is a politically exposed person (PEP), whether the director or the beneficial owner of the company, their immediate family member or a close associate is a PEP | Reasons of substantial public interest (Art. 9 (2) (g) of GDPR) Art. 14 of the Law on AML | | | |

1.4. To ensure security of our website/internet bank/mobile application and continuously improve it

| When is this relevant for me? | What information do you collect about me? | What is your legal basis to collect my data? | Where do you collect the information from? | Am I obliged to provide this information? | How long do you store information about me? |
|--|---|--|--|--|--|
| When you use our website and/or our systems (such as internet bank / mobile application) | IP address used to connect your computer to the internet, your log-in information, the browser type and version, the time-zone setting, the operating system and platform, the type of device you use, a unique device identifier (your device's IMEI number, the MAC address of the device's wireless network interface, or the mobile phone number used by the device), mobile network information, your mobile operating system and the type of mobile browser you use | Legitimate interest (security and improvement of our website/app) (Art. 6 (1) (f) of GDPR) | From yourself | You are not statutorily or contractually obliged to provide this personal data, but we will collect this personal data if you use our website/internet bank/mobile application | 1 year after your last use of our website/internet bank/mobile application |

1.5. To provide you with customer support

| When is this relevant for me? | What information do you collect about me? | What is your legal basis to collect my data? | Where do you collect the information from? | Am I obliged to provide this information? | How long do you store information about me? |
|--|--|--|--|---|---|
| When you submit an inquiry or file a complaint to our customer support, as well as you file any complaints with state authorities (such as the Bank of Lithuania and etc.) regarding | E-mail address, subject of your inquiry, date of your inquiry, content of your inquiry, attachments to your inquiry, your name and (or) surname provided in your inquiry, reply to your inquiry, information provided by you | Consent (Art. 6 (1) (a) of GDPR) | From yourself | You are not statutorily or contractually obliged to provide this personal data, but we will collect this data if you submit an inquiry to or file a complaint with our customer | 10 years from the receipt of the last inquiry |

| | | | | | |
|------------------------------|--|--|--|------------------------------|--|
| our services provided to you | | | | support or state authorities | |
|------------------------------|--|--|--|------------------------------|--|

1.6. To conduct marketing activities

| When is this relevant for me? | What information do you collect about me? | What is your legal basis to collect my data? | Where do you collect the information from? | Am I obliged to provide this information? | How long do you store information about me? |
|---|---|--|---|---|--|
| When we want to inform you or ask your opinion about our services | Full name, e-mail, telephone number, company that you represent, communication history | Consent (Art. 6 (1) (a) of GDPR) (Art. 81 (1) of Lithuanian Law on Electronic Communications) Customer relationship (Art. 81 (2) of Lithuanian Law on Electronic Communications) Legitimate interest (to send direct marketing communications) (Art. 6 (1) (f) of GDPR) | From yourself and social media platforms | No | 5 years after the termination of a contract or after you give your consent, unless you withdraw your consent earlier |
| When we contact you because you are a registered user of websites and platforms that are designed for business networking | Full name, e-mail, telephone number, company that you represent, information about the company, communication history | Consent (Art. 6 (1) (a) of GDPR) (Art. 81 (1) of Lithuanian Law on Electronic Communications) Legitimate interest (to send direct marketing communications) (Art. 6 (1) (f) of GDPR) | From Versli Lietuva, VŠĮ (Enterprise Lithuania) | No | 5 years unless you opt-out earlier |

1.7. To manage our social media profiles

| When is this relevant for me? | What information do you collect about me? | What is your legal basis to collect my data? | Where do you collect the information from? | Am I obliged to provide this information? | How long do you store information about me? |
|-------------------------------|---|--|--|---|---|
|-------------------------------|---|--|--|---|---|

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|---|--|----------------------------------|--|--|--|
| If you interact with our social media profiles (e.g., send a message, follow our profiles, share a post, react to a post) | Name and surname indicated in your profile, e-mail address, gender, country, picture, message, time, and date the message was received, content of the message, message attachments, response to the message, time of response to the message, information about our rating, comments on a post, post shares, information about post reactions | Consent (Art. 6 (1) (a) of GDPR) | From yourself and social media platforms | You are not statutorily or contractually obliged to provide this personal data, but we will collect this data if you interact with our social media profiles | 10 years from the moment you interact with our social media profiles |
|---|--|----------------------------------|--|--|--|

1.8. To carry out the selection of potential employees

| When is this relevant for me? | What information do you collect about me? | What is your legal basis to collect my data? | Where do you collect the information from? | Am I obliged to provide this information? | How long do you store information about me? |
|---|---|---|---|--|--|
| When we receive your application for a job position, when you give us your consent or we contact you based on the information you publicly disclose on professional social media platform | Full name, e-mail, phone number, CV, work experience, other information you provide us with | Consent (Art. 6 (1) (f) of GDPR) Contract (Art. 6 (1) (b) of GFPR) Legitimate interest (to contact you when you publicly disclose your information on professional social media platforms) (Art. 6 (1) (f) of GDPR) | From yourself and professional social media platforms | It is a requirement necessary to enter into a contract only where we intend to enter into an employment contract with you. | 6 months after the end of the relevant recruitment process, or 5 years after you give us your consent or publicly disclose your information on professional social media platforms |

1.9. To fulfill statutory accounting requirements

| When is this relevant for me? | What information do you collect about me? | What is your legal basis to collect my data? | Where do you collect the information from? | Am I obliged to provide this information? | How long do you store information about me? |
|---|--|---|--|---|---|
| When you or the company that you represent order our services | Name, surname, e-mail address, telephone number, bank account number, address, signature, invoices, reports, accounting documents, payments, paid amounts, company you represent, other information we are statutorily required to collect | Legal obligation (Art. 6 (1) (c) of GDPR) Law on Accounting of the Republic of Lithuania | From yourself | It is a statutory requirement. If you or the company represented by you do not provide this information, we will not be able to | 10 years from a transaction |

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|--|--|--|--|----------------------|--|
| | | | | provide our services | |
|--|--|--|--|----------------------|--|

1.10. To defend our rights and interests and fulfil other statutory requirements

| When is this relevant for me? | What information do you collect about me? | What is your legal basis to collect my data? | Where do you collect the information from? | Am I obliged to provide this information? | How long do you store information about me? |
|--|---|--|---|--|--|
| In case we become a party or concerned party in legal process which you are subject to or we are statutorily required to collect and/or provide data about you in order to comply with the law | All of the afore-mentioned information, accounting and legal case files, legal documents, other information you or the company represented by you provide us with, other information that we are statutorily required to collect and/or provide | Legal obligation (Art. 6 (1) (c) of GDPR) Legitimate interest (to protect our rights and interests) (Art. 6 (1) (f) of GDPR). | From aforementioned sources, law enforcement authorities, parties that are subject to legal process, courts | You are statutorily obliged to provide personal data. In other cases, we will collect your personal data when we have a legitimate interest to defend our rights and interests | 10 years following the end of contractual relationship with us or, whichever is longer, for the duration of legal process and 3 years following the date of entry into force or full enforcement of a judgment of a court or authority |

2. Who do you share my data with?

We share your data with data recipients, both within and outside European Economic Area (EEA), in cases where necessary for the above-described purposes and allowed in accordance with applicable laws.

| Data recipient or category of data recipient | Purpose of data transfer | Country of the recipient | European Commission decision on whether a non-EEA country has an adequate level of data protection | Suitable safeguards that protect my data, when it is transferred to non-EEA countries |
|--|---|--------------------------|--|---|
| Identification service providers | To identify potential customers | Lithuania/EU | N/A | N/A |
| Core banking service providers | To provide our services | Lithuania/EU | N/A | N/A |
| Payments & operations service providers | To provide our services | Lithuania/EU | N/A | N/A |
| Data protection officers, attorneys, notaries, bailiffs, auditors, internal auditors | To monitor our compliance and defend our rights and interests | Lithuania/EU | N/A | N/A |
| Accounting service providers | To fulfil statutory accounting requirements | Lithuania/EU | N/A | N/A |

| | | | | |
|---|---|--------------|-----|--|
| Bank of Lithuania, State Tax Inspectorate, Financial Crime Investigation Service, Centre of Registers, State Security Department of Lithuania, other state institutions, law enforcement authorities and courts of the EU and the Republic of Lithuania | To comply with the law and applicable regulations, to implement reporting duties, to defend our rights and interests (if so required) | Lithuania/EU | N/A | N/A |
| AML and identification service providers | To implement measures of AML and combat the financing of terrorism | EU/US | N/A | EU Standard Contractual Clauses for the transfer of data as approved by the European Commission (link) |
| Cloud hosting service providers | To provide our services | EU/US | N/A | EU Standard Contractual Clauses for the transfer of data as approved by the European Commission (link) |
| Social media service providers | To manage our social media profiles | EU/US | N/A | EU Standard Contractual Clauses for the transfer of data as approved by the European Commission (link) |

3. What statutory rights do I have regarding my data

Subject to conditions, limitations, and exceptions established by statutory data protection provisions, you have the rights listed below:

| My right | When this right is applicable to me? |
|--|--|
| Right of access | when you seek to obtain confirmation as to whether we collect or otherwise process personal data concerning you, and, where that is the case, access to the personal data and the information about the data processing. |
| Right to rectification | when you seek to obtain from us the rectification of inaccurate personal data concerning you. |
| Right to erasure ('right to be forgotten') | <ul style="list-style-type: none"> - when personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; - when you withdraw consent on which the processing is based and there is no other legal ground for the processing; - when you object to the processing and there are no overriding legitimate grounds for the processing, or you object to the processing for direct marketing purposes; - where the personal data have been unlawfully processed; - where the personal data have to be erased for compliance with a legal obligation; - where the personal data have been collected in relation to the offer of information society services directly to a child and subject to a consent. |
| Right to restriction of processing | <ul style="list-style-type: none"> - where the accuracy of the personal data is contested by you; - where the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead; - where we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims; - where you have objected to processing. |
| Right to data portability | where you seek to receive the data you have provided in a structured, commonly used and machine-readable form or to transmit those data to another controller, the processing is based on consent or on a contract and is carried out by automated means. |

| | |
|----------------------------|--|
| Right to object | where the collection and use is based on a task carried out in the public interest or in the exercise of official authority vested or legitimate interest, including profiling, as explained in Section 3 of this Privacy Policy, or where you object to the collection of your personal data for direct marketing purposes. |
| Right to withdraw consent | where the processing is based on consent, as explained in Section 3 of this Privacy Policy, and you seek to withdraw it at any time. |
| Right to lodge a complaint | where you want to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the GDPR. |

4. Do you engage in automated individual decision-making, including profiling?

No, we do not make decisions based solely on automated processing, including profiling, which would produce legal effects concerning you.

5. Do you use cookies or similar tracking technologies?

Yes, we use cookies on our website as described in the table below:

| Website | Cookie Category | Provenance | Cookie name | Cookie expiry |
|---|-----------------|---|------------------------|---------------|
| https://www.demivolt.com/ | Necessary | Demivolt | OptanonConsent | 1 year |
| | | Demivolt | OptanonAlertBoxClosed | 1 year |
| | | Third party (CookiePro) | OptanonConsent | 1 year |
| | | Third party (CookiePro) | OptanonAlertBoxClosed | 1 year |
| | | Third party (Google Analytics; gtag.js) | _ga | 2 years |
| | | Third party (Google Analytics; gtag.js) | _gid | 24 hours |
| | | Third party (Google Analytics; gtag.js) | _ga_<container-id> | 2 years |
| | | Third party (Google Analytics; gtag.js) | _gac_gb_<container-id> | 90 days |

6. How can I manage cookies?

You can configure your browser to decline some or all cookies or to ask for your permission before accepting them. Please note that by deleting cookies or disabling future cookies you may be unable to access certain areas or features of our website. You can control the use of functionality cookies, targeting cookies or advertising cookies by adjusting your browser settings. To find out how to manage cookies in your browser, please visit one of the links below:

- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Google Chrome: <https://support.google.com/chrome/answer/95647>
- Opera: <https://www.opera.com/help/tutorials/security/privacy>
- Microsoft Edge: <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>
- Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

7. How can I contact your DPOs?

If you have any questions, comments, or complaints regarding how we collect, use, and store your personal data, we have our data protection officers to help you. If you need their help, you may contact him any time:

E-mail address: dpo@demivolt.com