

Approved
by the Board of Directors
on 27th of April, 2018

Effective from 24th of May, 2018

PERSONAL DATA PROTECTION POLICY

1. PURPOSE

1.1. "Personal Data Processing and Protection Policy" has been developed to create such a Personal Data Processing System at the Platform that would ensure the following objectives:

1.1.1. to maintain the high quality of Personal Data Processing and to ensure Data Protection in accordance with the requirements of the law;

1.1.2. to maintain and increase confidence of existing and potential Investors in the Platform;

1.1.3. to ensure transparent and understandable Procedure of Personal Data Processing;

1.1.4. to prevent the risk of unauthorized Processing of Personal Data, to regulate the Platform's actions in cases where Data Protection breaches are detected.

2. TERMS AND ABBREVIATIONS

- **Platform** – GRUPEER SIA, Reg.Nr. 40203023192, having its legal address: Rupniecibas str.5-1B, Riga, LV-1010, Latvia, the owner of the platform placed on www.grupeer.com;
- **Investor** – a natural person who receives the services on the Platform;
- **DSI** – Data State Inspectorate;
- **Person (Data Subject)** – a private person (Investors of the Platform, Investor's representatives and current and potential employees of the Platform);
- **Data** – any information that can be used for identification of a Person (Data Subject), directly or indirectly;
- **Processing** – any operation carried out with Person's Data (such as, but not limited with, recording, storing, transfer, use for contacting and enquires and other purposes, registration, structuring, deletion etc.);
- **Policy** – this Personal Data Protection Policy;
- **Regulation** – REGULATION (EU) 2016/679 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);

- The use of other terms and abbreviations is consistent with the terms used in the Regulation.

3. GENERAL PROVISIONS

3.1. This Policy governs the Data Processing and protection that is carried out with or without automated means, where processing is any kind of operation with Data.

3.2. The Policy is developed in accordance with the requirements of the Regulation. The Platform processes Data, respecting the interests of Persons to protect their privacy.

3.3. The Policy defines the basic principles of Data protection at the Platform.

3.4. Principles of Data Processing and protection shall be observed in all processes of Processing, incl. when servicing the Investors, recruiting new employees and managing information about the existing employees, improving data processing technologies, transferring documents for archiving our outsourcing, destroying documents and deleting electronic documents (files) after expiration of storage period.

3.5. The Policy is approved by the Board of the Platform and is binding to all employees of the Platform.

4. CATEGORIES OF DATA

4.1. Data may be collected from the Investor, from the Investor's use of the services and from external sources such as public and private registers or other third parties. Personal data categories which Platform primarily, but not only, collects and processes are:

- Identification data such as name, surname, personal identification code, date of birth, data regarding the identification document (such as copy of the passport, ID card).
- Contact data such as address, telephone number, email address, language of communication.
- Beneficiaries.
- Data about the relationships (representation rights) with legal entities such as data submitted by the Investor or obtained from public registers or through third party for the execution of transactions on behalf of the legal entity in question.
- Financial data such as bank accounts, accounts with other financial institutions (payment entities, etc.)
- Data about trustworthiness and due diligence that enables Platform to perform its due diligence measures regarding money laundering and terrorist financing prevention and to ensure the compliance with international sanctions, including the purpose of the business relationship and whether the Investor is a politically exposed person.
- Data obtained and/or created while performing an obligation arising from law such as data resulting from enquiries made by notaries, tax administrators, official registries, etc.
- Data about the Investor's tax residency such as data about the country of residence, tax identification number, citizenship.
- Information about users of the Platform's website (cookies, IP address);
- Education and work experience Data (of employees);
- Person's photo from the ID documents.

5. WHEN THE PLATFORM REQUESTS DATA

5.1. The Platform processes various types of Data mentioned above only if there is a certain purpose and legal basis for the processing.

5.2. Data can be obtained by the Platform in various ways, for example:

- conducting identification and due diligence of Investors;
- entering into contractual relations with a Investor and performing contractual obligations;
- providing one-time service to a Person who is not Investor of the Platform (information requests made by the visitors of the Platform);
- recruiting a new employee;
- consulting a Person over the phone (if identification of the Person is required for consultation);
- receiving a letter or e-mail from a Person and replying to it;
- information about a Person from different registers;
- using information about a Person from Internet resources and other publicly available sources.

6. BASIS FOR PROCESSING OF DATA BY PURPOSE

6.1. The Platform may initiate Processing of Data only if the Processing has a specific purpose strictly in accordance with the Law, for example, but not limited in the following cases:

- registration on the Platform,
- conclusion of a contract,
- acceptance of the funds,
- due diligence and other legal requirements in respect of Investor's analysis for AML and KYC purposes,
- notifying the Investor of regulation updates using its contact information,
- disclosing of Data on request of the regulatory authorities or banking institutions processing Investor's payments, etc.

7. DATA PROCESSING AND PROTECTION PRINCIPLES

7.1. The Platform does not request from a Person and does not process more information than is necessary to achieve the certain purpose and observes the main principles established by the Regulation.

7.2. The Platform processes Data lawfully, fairly and in a transparent manner in relation to the Person – the Investors and employees are kept notified of all the Data processed by the Platform and the legal basis for concrete processing.

7.3. The Platform undertakes all the necessary actions and requires updates from Persons to ensure that Data is accurate and, where necessary, kept up to date, and erases all inaccurate Data without delay.

7.4. The Platform stores Data only for concrete purpose, which means that Data that not required anymore is being deleted, unless the legal requirements regarding the term of

Data storage exist and are binding to the Platform or the Person.

7.5. The Platform provides appropriate security of Data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. For that purpose the Platform continuously develops information technologies in order to ensure the protection of Personal Data.

7.6. The Platform ensures that access to Data is prohibited to those employees who don't need it for the performance of their duties. The Platform has approved a respective internal procedure for Processing of Data and included confidentiality and Data protection obligations in the employment and co-operation contracts entered into with the employees or outsourcing services providers who the Platform grants the access to the Data.

7.7. The Platform allows a Person to control and monitor their Data Processing. The respective information is being provided to the Persons on request.

8. DATA TRANSFER TO THIRD PARTIES

8.1. Data may be transferred by the Platform to third parties in the following cases:

- in the cases stipulated by the applicable Law of Latvian Republic and European Union,
- in order to ensure the provision of high-quality and efficient services by the Platform,
- when it is necessary for the performance of the contractual obligations with the Investor.

8.2. Data may be transferred to:

- state institutions, control services, registries, notaries, and other authorities - in accordance with applicable legal regulation;
- external auditor of the Platform if it is appointed;
- subsidiary of the Platform;
- beneficiary of the services provided by the Platform if it is not an Investor by itself;
- loan originators / project owners that Investors conclude agreements with;
- Platform`s partners, incl. those who provide the following services to the Platform: courier service, accounting, telecommunication service, information technology, electronic mail services, electronic documents storage services (cloud services), legal services, payment company services, custody services, debt collection services, data analysis, archive services, etc.;
- credit institutions, financial institutions, payment entities, financial services intermediaries, etc., if they are included in process of provision of services to Investors (fund transfer etc.).

8.3. Before transferring data to a third person, the Platform concludes the agreement with the respective third person obliging it to process and protect the Data. During the cooperation, only the Data required for the certain purpose will be transferred to the third person. If there is such possibility, the Platform transfers such information, so that the third person is not able to identify the particular Person. The Platform may not enter into a contract with a third party only in cases where the transfer of the relevant Data is regulated

by the applicable legal regulation and Data protection regulation is in the same manner binding to the respective third person.

9. PERSON'S RIGHTS

9.1. A person has the following rights regarding the processing of his or her information:

- a. to receive information on the type, purpose and legal basis of their Data Processing;
- b. to access their Data and obtain approval for their Data Processing. The Investor is able to get acquainted with the information on the concluded Assignment Agreements and other agreements via the Platform, balance on the Posting account, amount of the investments made, projects which the Investor is invested in, personal data submitted to the Platform, etc.;
- c. to correct and update their Data if it is incorrect or inaccurate;
- d. to erase their Data or "right to be forgotten", for example, if the Data is no longer necessary in relation to the purposes for which it was collected or if the Person has withdrawn his/her consent on which the Processing is based;
- e. restrict Data Processing, for example, the accuracy of the Data is contested by a Person, the Platform no longer needs the Data for the purposes of the Processing, but it is required by the Person for the establishment, exercise or defence of legal claims, etc.;
- f. to object to Processing of Data (on grounds relating to the Person's particular situation) if processing is based on the Platform's legitimate interests or public interest. The right to object can't be realized if the legal basis for Processing is the consent of the Person, the establishment and performance of contractual relations, fulfilment of a legal obligation, protection of vital interests of the Person or third parties;
- g. right to Data portability or transfer in order to store or to enable the reuse of Data, for example, by transferring to another service provider. The right can't be realized for absolutely all information. Rights may be realized in respect of Data submitted by a Person, for example, by filling in forms and applications, applying for the use of the Platform's services, as well as Data processed by automated means (other than paper documents) and the legal basis for Processing is either consent of the Person or establishment of contractual relationships.

9.2. The Platform shall examine Persons' requests without undue delay and, in any case, inform the Person about the actions performed within a month. The Platform may extend the period of examination of the claims for another two months on a reasonable basis (for example, large number of requests or complexity of requests).

9.3. The Platform shall respond to the Persons' applications, as well as any other activities related to the implementation of Person requests, free of charge (except in cases where the request is manifestly unfounded, excessive, or depending on what resources are required for handling the request). When providing a response to a request or executing a request, the Platform may charge a reasonable fee for additional costs incurred.

10. COMPLAINTS TO DATA PROTECTION, CONTACT INFORMATION

10.1. The Platform appoints the employees responsible for Data protection related matters. Their tasks are to inform and advise the Platform's employees on issues related to the

processing of Data, to monitor compliance with the provisions of the Regulation at the Platform, to cooperate with the DSI, and to advise the Persons who are contacting the Platform in matters related to Data Processing.

10.2. A Person has the right to ask questions related to the Processing of its Data, to withdraw any consents given, to submit a complaint related to the Data processing by contacting the Platform by e-mail dp@grupeer.com or by sending a letter to 5-1B, Rupniecibas Street, Riga, LV-1010, Latvia, marked "Data Protection".

10.3. If the Person is dissatisfied with the answer provided by the Platform, it has the right to contact the DSI (www.dvi.gov.lv).