

SIA "LANDE PLATFORM"
PRIVACY POLICY Effective

from 01.11.2025.

The purpose of the Privacy Policy (hereinafter referred to as the Policy) is to provide information on how SIA "LANDE Platform" (hereinafter referred to as "the Company" or "we") and its group companies that perform the functions of a Collateral Agent(hereinafter referred to as the "Collateral Agent" or "us") collect, process, store, share, delete and protect personal data, thus ensuring that personal data is processed lawfully, fairly and in a manner transparent to the data subject. The Policy applies to any information about personal data that we hold and is related to an identified or identifiable natural person, any processing of personal data, and the service we provide. The processing and storage of personal data we provide is subject to 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)(hereinafter referred to as the GDPR), as well as the relevant legislation of the Member States of the European Union.

I. Personal Data Controller:

We process your personal data as joint controllers:

1. The Company:
 - SIA "LANDE Platform", registration No. 40203386735, legal address: Riga, Roberta Hirsa Street 1, LV-1045, Latvia;
2. Collateral Agent:
 - SIA "SF MGMT collateral", registration No. 40203386735, address: Roberta Hirsa Street 1, Riga, LV-1045, Latvia;
 - "LANDE PLATFORM RUM" SRL, registration No. 47369331, registered office address: Bucharest, Sector 5, B-dul TUDOR VLADIMIRESCU, No. 22, Green Gate Offices, Office 526 Register12, 5th Floor; Correspondence address: Bucharest, Sector 3, Str. NERVA TRAIAN, No. 3, OFFICE/SPACE 11, 8th Floor;
 - UAB "LANDE LT", registration No. 306185224, address: Vilnius, Livo g. 25-702, LT-09320, Lithuania.
 - LANDE PL SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ, registration number 0001170297, address: Ludna 2 / 209, 00-406, Warsaw, Poland.

Our contact information for matters related to the processing and storage of personal data: e-mail: dpo@lande.finance, address: Roberta Hirša Street 1, Riga, LV-1014, Latvia.

II. Legal Basis for Processing Personal Data

We process your personal data based on the following legal grounds:

- For the establishment and performance of contractual relationships (Article 6(1)(b) GDPR);
- For compliance with a legal obligation (Article 6(1)(c) GDPR);
- To protect the legitimate interests of the public or a third party (Article 6(1)(f) GDPR);
- Consent of the data subject (Article 6(1)(a) GDPR).

III. Purpose and Categories of Personal Data Processing

3.1. For Customer Account Registration

Personal data is collected, processed, and stored for the purpose of ensuring the registration and management of customer accounts on our crowdfunding service provision platform (hereinafter referred to as the Platform) so that the customer can receive the services we provide. Registration of customer accounts is carried out in an online environment based on the Customer's initiative.

For customer account registration	
Data categories	<p>During the account registration process on the Platform, you provide and we collect the following personal data (the required information may vary depending on the type of client – investor or project owner):</p> <ul style="list-style-type: none">• first name, last name;• personal identification number;• date of birth• contact information (phone number, email address).
Legal basis for data processing	<ul style="list-style-type: none">• Performing actions prior to receiving a service and concluding a contract (Article 6(1)(b) of the GDPR);
DURATION OF DATA PROCESSING	<ul style="list-style-type: none">• If a potential customer becomes an existing customer – as long as the account is active and for 5 years after the account is closed;• If a potential customer does not become an existing customer – 12 months.

3.2. For customer identification and verification

Personal data is collected and processed to ensure customer identification and compliance verification on the Platform. In accordance with regulatory requirements, we are required to perform customer identification and compliance verification. We perform the "*Know Your Customer*" (KYC) procedures set out in regulatory requirements, as well as verification requirements regarding the prevention of money laundering and terrorist financing.

For customer identification and verification
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Data categories	<p>During the process of verifying the identification and eligibility of the customer on the Platform, you provide and we collect the following personal data (the required information may vary depending on the type of customer – investor or project owner):</p> <ul style="list-style-type: none"> • first name, last name; • Email address; • Personal code; • Phone number, • Address, • Date of birth; • Place of birth (country, city), • Citizenship, country of residence, • Identification document (passport or identity card, driver's license, residence permit, etc.) data; • Politically Exposed Person (PEP) status.
Legal basis for data processing	<ul style="list-style-type: none"> • Compliance with legal obligations and statutory requirements (Article 6(1)(c) GDPR). • Performing actions prior to receiving a service and concluding a contract (Article 6(1)(b) of the GDPR).
DURATION OF DATA PROCESSING	<ul style="list-style-type: none"> • If a potential customer becomes an existing investor – as long as the account is active and for 5 years after the account is closed; • If a potential customer does not become an existing customer – 12 months;

3.3. For Testing Customer's Knowledge and Simulation of Their Ability to Bear Risks

Personal data is collected and processed to ensure the testing of customer knowledge and to conduct a voluntary simulation of the customer's ability to bear losses. In accordance with regulatory requirements, we are required to conduct a customer knowledge test and provide the customer with the opportunity to take a simulation test.

For testing clients' knowledge and simulation test of their ability to take risks

Data categories	<p>For the purpose of testing the customer's knowledge and during the simulation test on the Platform, you provide and we collect the following personal data:</p> <ul style="list-style-type: none"> • Information about previous investment experience; • Income; • Commitments undertaken; • Education; • Professional experience; • Source of income.
Legal basis for data processing	<ul style="list-style-type: none"> • Compliance with legal obligations and statutory requirements (Article 6(1)(c) GDPR).

DURATION OF DATA PROCESSING	<ul style="list-style-type: none">• If a potential customer becomes an existing customer – as long as the account is active and for 5 years after the account is closed;• If a potential customer does not become an existing customer – 12 months;• Personal data entered into the simulation test tool is not stored and is deleted immediately; the Company processes and stores only the simulation test result data.
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3.4. For the Evaluation of Customers - Project Owners

Personal data is collected and processed to provide secure crowdfunding services and issue loans to creditworthy customers – project owners. In accordance with regulatory requirements, we are required to conduct an assessment of the project owner's credit risk and creditworthiness during the project owner assessment process.

For the evaluation of clients - project owners	
Data categories	<p>For the purpose of assessing the customer-project owner and determining credit risk on the Platform, you provide and we collect the following personal data:</p> <ul style="list-style-type: none">• First name, last name;• Email address;• Personal code;• Phone number;• Address;• Date of birth;• Place of birth (country, city);• Citizenship, country of residence;• Data on identification documents (passport or identity card, driver's license, residence permit);• Financial data (income, liabilities, assets);• Information about real estate and movable property used in economic activities;• Criminal record data.
Legal basis for data processing	<ul style="list-style-type: none">• Compliance with legal obligations and statutory requirements (Article 6(1)(c) GDPR);• For the establishment and performance of contractual relationships (Article 6(1)(b) GDPR).
DURATION OF DATA PROCESSING	<ul style="list-style-type: none">• Personal data is stored for 5 years after the completion of the relevant project evaluation process.

3.5. For the Provision of Crowdfunding Services

Personal data is collected and processed to ensure the provision of crowdfunding services and the receipt of other services offered by the Platform, including to prepare and conclude loan agreements with the customers, parallel commitment agreements and collateral agreements with the customer, serve customers, publish projects, ensure the fulfillment of contractual obligations, administer loan settlements,

and ensure communication with customers in connection with the fulfillment of contractual obligations. Data processing also includes settlement administration, including payment processing, invoicing and accounting. In addition, personal data is also processed for the purposes of maintaining the Platform, ensuring security on the Platform, improving the functionality of the Platform, in order to improve the user experience and tailor the provision of services to the needs of customer.

For the provision of crowdfunding services

Data categories	During the agreement's conclusion process, we collect the following information: <ul style="list-style-type: none">• first name, last name;• personal identification number;• Date of birth;• contact information (phone number, email address);• position held;• Bank account information;• investment information;• information about the loan;• information about real estate and movable property used in economic activities;• information about economic activity;• information about relatives, spouse (name, surname, contact information);• information about the person to contact in an emergency (name, surname, telephone number).
Legal basis for data processing	<ul style="list-style-type: none">• Carrying out your requested pre-contractual actions (Article 6(1)(b) GDPR).
DURATION OF DATA PROCESSING	<ul style="list-style-type: none">• Personal data is stored for 5 years after the completion of the relevant project evaluation process.

3.6. To Protect the Legal Rights of the Company, including Debt Collection and Financing Restructuring, Refinancing, and Conclusion of Agreements.

Personal data is collected and processed to ensure the respect and protection of our and our customers' legitimate interests, including: execution of concluded contracts, repayment of loans, debt recovery, including communication with the customer, payment monitoring and collection measures, preparation and submission of debt cases to appropriate judicial and arbitration authorities, forced execution of court judgments.

To protect the legal rights of the company, including debt collection and financing restructuring, refinancing, and conclusion of agreements.

Data categories	To ensure the protection of the Company's legitimate interests, we process the following categories of personal data: <ul style="list-style-type: none"> • first name, last name; • personal identification number; • date of birth; • contact information (phone number, email address); • Bank account information; • information about the investment; • information about the loan;
	<ul style="list-style-type: none"> • information about real estate and movable property used in economic activities; • information about economic activity.
Legal basis for data processing	• For the establishment and performance of contractual relationships (Article 6(1)(b) GDPR).
DURATION OF DATA PROCESSING	• Personal data is stored for 5 years after the contract; fulfilment of the relevant

3.7. For the Transfer of Customer Debts to Third Parties

Personal data is collected and processed to ensure the recovery of our and our customers' investments and the collection of loan debts. As one of the means for recovering customers' overdue and defaulted loans, the Company uses the sale and assignment of debts to third parties.

For the transfer of customer debts to third parties

Data categories	To ensure the transfer of debts to third parties, we process the following categories of personal data: <ul style="list-style-type: none"> • first name, last name; • personal identification number; • date of birth; • contact information (phone number, email address); • Bank account information; • information about the loan; • information about concluded collateral agreements • Information about economic activity.
Legal basis for data processing	• To protect the legitimate interests of the public or a third party (Article 6(1)(f) GDPR);

DURATION OF DATA PROCESSING	<ul style="list-style-type: none">Personal data is stored for 5 years after the fulfilment of the relevant contract
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3.8. For Handling Customer Complaints

Personal data is collected and processed to ensure the review of complaints submitted by the Company's customers. In certain cases, customers submit complaints about the services we provide, and we review them in accordance with the procedure established by law.

For handling customer complaints

Data categories	To ensure the handling of complaints from the Company's customers, we process the following categories of personal data: <ul style="list-style-type: none">first name, last name;personal identification number;Date of birth;contact information (phone number, email address);address;other data provided by the client in the complaint.
Legal basis for data processing	Compliance with legal obligations and statutory requirements (Article 6(1)(c) GDPR);
DURATION OF DATA PROCESSING	<ul style="list-style-type: none">Personal data is stored for 5 years after the relevant complaint is submitted.

3.9. Intermediary Services, Finding the Most Suitable Services for Customer and Concluding a Contract between Customer and the Partner

Personal data is collected and processed to provide the most suitable services to our customers. In some cases, we find that the services we provide are not suitable for customers or that the customer profile does not meet our service provision criteria. Some partners offer services related to loan comparison, credit intermediary and insurance broker services. We collect, process and share customer's data with them, helping the customer to conclude contracts with our partners and obtain the most suitable product for you.

Intermediary services, finding the most suitable services for customer and concluding a contract between customer and the partner

Data categories	To provide customers with the most suitable service, we process the following categories of personal data: <ul style="list-style-type: none">• first name, last name;• personal identification number;• Date of birth;• contact information (phone number, email address);• Bank account information;• information about the loan;• information about real estate and movable property used in economic activities;• Information about economic activity.
Legal basis for data processing	The consent of the data subject (Article 6(1)(a) GDPR).
DURATION OF DATA PROCESSING	<ul style="list-style-type: none">• Personal data is stored for 5 years after the completion of the relevant project evaluation process.

3.10. For the Implementation and Management of the Company's Loyalty Program "LANDE KLUBS"

Personal data is collected and processed to provide our customers with additional benefits, personally selected services and products, customer registration in the loyalty program. We collect and process customers data for registration in the loyalty program, sending personalized offers, program analytics and improvement (for example, statistics on the effectiveness of the loyalty program), consideration of customer requests or complaints related to the loyalty program, possible data exchange with cooperation partners. Some of our partners offer services and products related to agriculture, such as the sale of mineral fertilizers, agricultural machinery and spare parts, etc. To provide benefits, we share personal data with our partners. We collect, process and share customer's data with them, helping customer's conclude contracts with our partners and obtain benefits, and the most suitable services and products for customers.

For the Implementation and Management of the Company's Loyalty Program "LANDE KLUBS"

Data categories	To provide customers with the additional benefits, we process the following categories of personal data: <ul style="list-style-type: none"> • first name, last name; • personal identification number; • Date of birth; • contact information (phone number, email address); • information about real estate and movable property used in economic activities; • Information about economic activity. • Information about the location of real estate used in business activities. • data on interaction with program offers (clicks, responses).
Legal basis for data processing	The consent of the data subject (Article 6(1)(a) GDPR).
DURATION OF DATA PROCESSING	<ul style="list-style-type: none"> • Data is stored for the entire duration of the loyalty program and for 2 years after the last activity.

3.11. Granting and Administration of Loans Related to the Carbon Programme

Personal data is collected and processed for the purpose of granting and administering loans in connection with the implementation of the Carbon Programme. This includes customer's identification and eligibility assessment, review of loan applications and risk evaluation, conclusion and performance monitoring of contracts, validation of results achieved within the framework of the Carbon Programme, and communication with the customer regarding the transaction and the implementation of the programme. Some of our partners provide services related to the issuance of carbon credits and the validation and verification of carbon sequestration. We collect, process, and share your data with them to assist customers in evaluating the compliance of your economic activity with the requirements of the Carbon Programme, to carry out assessments in accordance with carbon accounting standards (e.g. Gold Standard, Verra, etc.), to validate and verify carbon sequestration results, and, where necessary, to acquire carbon credits and carry out other activities essential to the implementation of the Carbon Programme.

Granting and Administration of Loans Related to the Carbon Programme

Data categories	We process the following categories of personal data: <ul style="list-style-type: none"> • first name, last name; • personal identification number; • Date of birth; • contact information (phone number, email address); • information about real estate and movable property used in economic activities; • Information about economic activity.
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Legal basis for data processing	<ul style="list-style-type: none">For the establishment and performance of contractual relationships (Article 6(1)(b) GDPR).
DURATION OF DATA PROCESSING	<ul style="list-style-type: none">Personal data is stored for 5 years following the completion of the relevant project evaluation process or the conclusion of the contract.

3.12. Processing of Personal Data of Employees and Potential Employees

3.12.1. For employee recruitment

Personal data is collected and processed to ensure employee selection, evaluation of potential employees, and job interviews to ensure the candidate's suitability for the position we offer.

For employee recruitment	
Data categories	<p>To ensure the management of employee user rights, we process the following categories of personal data:</p> <ul style="list-style-type: none">first name, last name;email address;phone number,CV, motivation letter;reviews.
Legal basis for data processing	<ul style="list-style-type: none">The consent of the data subject (Article 6(1)(a) GDPR).
DURATION OF DATA PROCESSING	<ul style="list-style-type: none">Personal data is stored for up to 6 months after the completion of the recruitment project.

3.12.2. For the Conclusion and Execution of Employment Contracts (applicable only to the Employees)

Personal data is collected and processed to ensure the processing of personal data for the purpose of hiring an employee, concluding employment contracts, initiating employment relationships, performing an employment contract and paying for work, terminating employment relationships, ensuring occupational safety and protection. We process your data also for the purpose of calculating monthly wages, calculating taxes, deductions, applying bonuses, vacation and other payments. Data is also collected and processed to verify the identification of employees.

For concluding employment contracts

Data categories	<p>To ensure the recruitment of employees and the maintenance of legal employment relationships, we process the following categories of personal data:</p> <ul style="list-style-type: none"> • first name, last name; • personal identification number, • date of birth; • bank account information; • address; • email address; • phone number, • work title; • compensation amounts; • information on dependents; • information on working hours.
Legal basis for data processing	<ul style="list-style-type: none"> • Compliance with legal obligations and statutory requirements (Article 6(1)(c) GDPR); • For the establishment and performance of contractual relationships (Article 6(1)(b) GDPR).
DURATION OF DATA PROCESSING	<ul style="list-style-type: none"> • Personal data is stored for five years after the termination of the employment relationship , unless external legal acts provide for a longer retention period.

3.12.3. Managing employee user Access Rights (applicable only to Employees)

Personal data is collected and processed to ensure the granting, revocation and management of employee user rights for users of internal ICT systems, tools and applications.

Managing employee user access rights

Data categories	<p>To ensure management of employees' user access rights, we process the following categories of personal data:</p> <ul style="list-style-type: none"> • first name, last name; • contact information (phone number, email address); • personal identification number.
Legal basis for data processing	<ul style="list-style-type: none"> • For the establishment and performance of contractual relationships (Article 6(1)(b) GDPR).
DURATION OF DATA PROCESSING	<ul style="list-style-type: none"> • Personal data is stored for three years after the termination of the employment relationship.

3.12.4. To Ensure Mandatory Health Checks for Employees (applicable only to employees) Personal data is collected and processed to ensure mandatory health checks of employees.

To ensure mandatory health checks for employees

Data categories	To ensure the mandatory health of employees, we process the following categories of personal data: <ul style="list-style-type: none">• first name, last name;• personal identification number;• date of birth;• contact information (phone number, email address);• position;• mandatory health examination results.
Legal basis for data processing	Compliance with legal obligations and statutory requirements (Article 6(1)(c) GDPR).
DURATION OF DATA PROCESSING	<ul style="list-style-type: none">• Personal data is stored for five years after the termination of the employment relationship.

3.13. Monitoring of ICT systems and log files

Personal data is collected and processed to ensure the processing of personal data contained in log files and to monitor the operation of the ICT system and ensure the effective management and security of the company's information systems.

Monitoring of ICT systems and log files

Data categories	To ensure the monitoring of ICT system and log files, we process the following categories of personal data: <ul style="list-style-type: none">• contact information (phone number, email address);• personal identification number.
Legal basis for data processing	For the protection of the legitimate interests of the public or of a third party (Article 6(1)(f) GDPR).
DURATION OF DATA PROCESSING	<ul style="list-style-type: none">• Personal data is stored up to one year after termination of legal employment relationship .

3.14. Web cookies and analytics

Personal data is collected and processed using the Company's website and cookies to monitor website statistics and provide targeted advertising.

Web cookies and analytics

Data categories	To monitor website statistics and provide targeted advertising, we process the following categories of personal data: <ul style="list-style-type: none">• contact information (phone number, email address);• personal identification number.
Legal basis for data processing	• The consent of the data subject (Article 6(1)(a) GDPR).
DURATION OF DATA PROCESSING	We will process your personal data for the duration of your consent.

Our website uses cookies. You can find more information about the cookies used on our website [in our Cookie Policy](#).

3.15. For direct marketing purposes

Personal data is collected and processed to provide general and personalized offers and other information from our partners. We may send you notifications, offers, and information by email or SMS, WhatsApp, or by calling. In order to select the notifications and offers to be sent to you, to get to know you and your needs better, to improve your experience when using our services, to use automated marketing tools for more effective customer engagement, to expand the range of services offered and to constantly improve them, to provide you with relevant, interesting and useful offers and other information about our services, we analyze data related to your behavior, usage habits of our services and/or other characteristics, and we will use this data to group customers.

For direct marketing purposes	
Data categories	In order to provide you with relevant notifications, offers, and information, we process the following data: <ul style="list-style-type: none">• first name, last name;• contact information (phone number, email address);• telephone conversation recording (information we receive from you during a telephone conversation);• other relevant information that you provide to us during the conversation.
Legal basis for data processing	The consent of the data subject (Article 6(1)(a) GDPR).

Duration of data processing	We will process your personal data for the duration of your consent. Conversation records are not stored for longer than three months.
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3.16. Customer support services - questions, requests, surveys

If you contact our customer support department by phone and you agree, we will process your data, and your phone call will be recorded. We will record the information you provide, including personal data, in order to properly handle your request and/or answer your question.

If you contact us in writing (by email or otherwise), we will process your data and store the fact of your contact and the information provided, including personal data, in order to properly consider your request and/or respond to your question, request, or complaint.

We may contact you by phone to conduct quality control surveys and obtain your opinion on the services we provide, as well as in connection with various company operational issues, provide information on platform use, loans, etc.

Customer support services - questions, requests, surveys

Data categories	The phone number you are calling from or email address, other information relevant to your question, including, but not limited to, name, surname, call record, technical details of the call (date, duration, etc.), call history; complaint, request, question text, description
	of the circumstances of the complaint or other question, objections, supporting documents for the request, question or other information provided to us.
Legal basis for data processing	<ul style="list-style-type: none">For the protection of the legitimate interests of the public or of a third party (Article 6(1)(f) GDPR).
Duration of data processing	<ul style="list-style-type: none">Call recordings are stored for a maximum of three months from the time of the call.

3.17. For Receiving Services from Suppliers, Concluding Contracts, and Cooperating

Personal data is collected and processed so that we can receive the services necessary for our operations, which are provided to us by our third-party partners, as well as to enter into various agreements and commitments with cooperation partners in both the private and public sectors, in order to develop and expand our operations, as well as for other purposes related to our operations.

For receiving services from suppliers, concluding contracts, and cooperating

Data categories	We process and collect the following data: <ul style="list-style-type: none"> • First name, last name; • Personal code; • Address; • Email address; • Bank account information. • Job title/roles.
Legal basis for data processing	<ul style="list-style-type: none"> • For the establishment and performance of contractual relationships (Article 6(1)(b) GDPR).
Duration of data processing	<ul style="list-style-type: none"> • Personal data is stored for five years after the completion of the relevant project evaluation process.

3.18. For Accounting and Audit purposes

Personal data is collected and processed so that we can ensure that our accounting is carried out in accordance with legal requirements, ensure payments to various parties, and comply with legal obligations regarding accounting. Also, as part of the internal control system, personal data is collected and processed so that our internal/external auditors can carry out regular audits.

For accounting and audit purposes	
Data categories	We process and collect the following data: <ul style="list-style-type: none"> • First name, last name; • Personal code; • Address; • Bank account information;
	<ul style="list-style-type: none"> • Job title/roles; • Information about wages.
Legal basis for data processing	Compliance with legal obligations and statutory requirements (Article 6(1)(c) GDPR).
Duration of data processing	<ul style="list-style-type: none"> • Personal data is stored up to seven years after the transaction is completed •

IV. Persons who can access your data

We take appropriate measures to process and store your personal data in accordance with applicable laws and regulations and to ensure that your personal data is not accessed by third parties who do not have an appropriate legal basis for processing your personal data. Your personal data will be accessible, as necessary:

- our employees or directly authorized persons who need it to perform their work duties;

- personal data processors in accordance with their concluded contracts and only to the extent necessary;
- our external service providers and other cooperation partners in accordance with the services provided and only to the extent necessary for the performance of functions, for example, auditors, ICT service providers, sworn attorneys, sworn notaries;
- state and local government institutions in cases specified in legal acts, for example, law enforcement agencies, local governments, tax authorities, sworn bailiffs, supervisory authorities (for example, the Bank of Latvia);
- third parties, carefully assessing whether there is an appropriate legal basis for such data transfer, for example, the State Revenue Service, courts, out-of-court dispute resolution and debt recovery institutions, insolvency administrators, external valuers, third parties maintaining registers (for example, the debtor register, and other registers).

For the purposes mentioned in the policy, we share your data with other partners, independent controllers:

No.	Cooperation partner	Personal data storage and processing regulations
1	LEMONWAY, simple joint stock company (FR), registration No. 500486915	https://www.lemonway.com/en
2	SIA Altero, registration No. 40103981737	https://www.altero.lv/
3	eAgronom OÜ, registration No. 14092394	https://www.eagronom.com/
4	UAB ILTE , registration No. 110084026	https://ilte.lt/en/

In order to provide you crowdfunding services, opening Lemonway payment accounts, and arranging payments on our Platform, we work closely with Lemonway , in transferring and processing your personal data. Lemonway processes your personal data in accordance with its [Privacy Policy](#) .

In order to provide you with the most suitable financing services, we work closely with our partner SIA Altero, which provides loan and insurance product comparison services, as well as credit intermediary and insurance brokerage services. We work with our partner when transferring and processing your personal data. SIA Altero processes your personal data in accordance with its [Privacy Policy](#) .

For your participation in the Carbon program, we work closely with our partner eAgronom OÜ, which implements Carbon programs, administers, and verifies Carbon credits. We work with our partner when in transferring and processing your personal data. The eAgronom OÜ processes your personal data in accordance with its [Privacy Policy](#) .

For your participation in Avietė Loans program, we work closely with our partner UAB ILTE, which administers Avietė program in Lithuania, and verifies, monitors, and audits the granting and execution of

Avietē Loans and implementation of Avietē Loans in Lithuania. We work with our partner when in transferring, and processing your personal data. The UAB ILTE processes your personal data in accordance with its [Privacy Policy](#).

In addition, we or our partners, depending on customer's request, may also share your personal data with the following organizations or obtain your personal data from the following organizations: the Credit Register of the Bank of Latvia, the Land Register of the Republic of Latvia, the State Social Insurance Agency, the Office of Citizenship and Migration Affairs, the Population Register, the State Revenue Service, the Road Traffic Safety Directorate, the Land Register departments of various district courts, and others in accordance with our processing purpose.

We take appropriate measures and carefully check our cooperation partners to ensure the processing, protection and transfer of your personal data to cooperation partners in accordance with applicable laws and regulations. We carefully select personal data processors and, when transferring data, assess its necessity and the amount of data to be transferred. Data transfer to processors is carried out in compliance with the requirements of confidentiality, integrity and secure processing of personal data, as well as the requirements set out in legal acts.

V. Data transfer outside the European Union (EU) or European Economic Area (EEA) countries.
Your personal data is not transferred to data processors in countries outside the EU/EEA. However, in some events, it is unavoidable.

Our ICT service providers, whose services involve data processing and storage, are generally located in the Member States of the European Union or store the data entrusted to us in the European Union. Only a few carefully selected data processors (e.g., SaaS service providers) process data outside the European Union. We closely follow the practices and guidelines of data protection supervisory authorities on data transfers outside the European Union, and carefully consider the conditions under which data transfers take place and under which data may be processed and stored there after transfer outside the European Union. In order to ensure an appropriate level of data security and to guarantee lawful data transfers, we conclude standard contractual clauses for data transfers outside the European Economic Area (EEA) approved by the European Commission or comply with other bases and conditions set out in the GDPR.

VI. Use of Personal Data in Automated Decision-Making. We do not use your data for automated decision-making.

VII. Personal Data Retention Periods

The personal data specified in this Policy are stored and otherwise processed for no longer than the period specified in Section III of this Privacy Policy for each relevant data category and no longer than is necessary to achieve the purposes for which the data were collected. In cases where the Policy does not specify a data retention period, your data will be stored for no longer than is necessary to achieve the purposes for which the data were collected or taking into account the deadlines set out in the law. After the end of the processing and storage period for your data specified in the Policy, we will destroy or irreversibly and reliably anonymize your data as soon as possible, but within a period reasonably necessary to perform such an action.

If, according to the Policy, different processing or storage periods may apply to the same data category for different purposes, the longest of the applicable periods shall apply.

Your personal data may be stored for longer than specified in the Policy if:

- your data is necessary for the proper administration of damages (for example, you have caused damage to us or other persons), for the consideration and resolution of a dispute, complaint, or for the protection of our or third parties' legitimate interests;
- it is necessary for us to defend against existing or potential claims, demands or legal actions and to exercise our rights;
- there are reasonable suspicions of violations or illegal activities that are or may be the basis for an investigation;
- this is necessary to ensure the functioning, stability, integrity of backup copies, information systems, traceability of activities, statistics and other similar purposes;
- there are other justifications included in the legislation.

In any case, according to regulatory enactments, the general limitation period is 10 years. Additionally, certain personal data of employees may be stored for 75 years in accordance with regulatory requirements.

VIII. The Data Subject regarding the Processing of Personal Data

8.1. Personal data update

If there have been any changes to the personal data you have provided to us, such as changes to your personal identification number, contact address, telephone number or email address, please contact us and provide us with the updated data by contacting and writing to us via e-mail dpo@lande.finance so that we can achieve the relevant personal data processing purposes.

8.2. Your right to access and correct your personal data

Under the GDPR, you have the right to request access to your personal data held by us, to request rectification, erasure, restriction of processing, objection to the processing of your data, as well as the right to data portability in the cases and manner specified in the GDPR. 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 no later than one month, unless there is a special request that requires a longer time to prepare a response), and, if possible, we will correct or delete your personal data accordingly.

You can obtain information about your personal data held by us or exercise your other rights as a data subject by contacting and writing us via email dpo@lande.finance.

Upon receiving your application, we will evaluate its content and your ability to be identified, and depending on the relevant situation, we reserve the right to ask you to additionally identify yourself to ensure the security and disclosure of your data to the relevant person.

8.3. Withdrawal of consent

If the processing of your personal data is based on your consent, you have the right to withdraw it at any time, by using the withdrawal options available on the Platform or by contacting us via email at: dpo@lande.finance, and we will no longer process your personal data that we processed on the basis of

consent for the relevant purpose. However, we inform you that the withdrawal of consent cannot affect the processing of personal data that is necessary to comply with regulatory requirements or that is based on a contract, our legitimate interests, or other grounds for lawful data processing set out in regulatory enactments.

You can also object to the processing of your personal data if the processing of your personal data is based on legitimate interests or is used for marketing purposes (for example, sending commercial communications) by contacting and writing us via email dpo@lande.finance.

IX. Personal data protection

We process personal data in accordance with the requirements of regulatory enactments, using the capabilities of modern technology, taking into account existing privacy risks and the organizational, financial, and technical resources reasonably available to us. We process the personal data of the data subject only for the achievement of a legitimate and predetermined purpose related to the services we provide. The principle of proportionality is observed in the processing of personal data, which provides that we have the right to process only those data and to the extent necessary to achieve a specific purpose.

We are entitled to transfer for processing on our behalf the necessary personal data to our cooperation partners on the basis of an agreement concluded between the parties. If cooperation partners process personal data at our disposal, the relevant cooperation partner is considered a data processing operator (processor). In accordance with the agreement concluded between the parties, the Company's cooperation partners (in the status of a personal data processor) ensure the fulfillment of personal data processing and protection requirements in accordance with the Company's requirements and legal acts, and do not use personal data for purposes other than to fulfill the requirements of the concluded agreement and regulatory enactments.

X. Complaints regarding issues related to the processing of personal data

If you have any questions or objections regarding our processing of your personal data, we encourage you to contact us first using the contact details provided in Section I. If you believe that we have not been able to resolve the issue amicably and you believe that we are violating your rights to personal data protection, you have the right to file a complaint with the Data State Inspectorate. The contact details of the Data State Inspectorate are available on the website: <https://www.dvi.gov.lv/en>.

XI. Privacy Policy Changes

The Company has the right to change this Policy by publishing an updated version on the website. The data subject is advised to check this page from time to time to ensure that the current Policy meets the data subject's wishes.