

**SIA “WINGODEPOSIT”
DATA PROCESSING NOTICE
TO CUSTOMERS, COOPERATION PARTNERS AND OTHER ASSOCIATED PERSONS**

1. Information about the manager

Our name is SIA "WingoDeposit", registration number: 44103138926, legal address: Dzirnavu iela 83-46, LV-1011.

You can contact us by phone: 29199891 or by writing to the following email address: info@wingo-deposit.com

2. Contact information for communication on personal data protection issues

If you have any questions regarding this notice or the processing of your personal data, you can contact us using the communication channels indicated in the previous point (point 1) or by contacting our personal data protection specialist by writing to the following email address info@wingo-deposit.com

3. General description of our personal data processing

This statement describes how we process the personal data of our customers, customer representatives/contact persons, raffles and lotteries participants, cooperation partners, website visitors and other persons whose data may be at our disposal as part of our commercial activities.

We assume that before using our website or becoming our customer, you have read this statement from us and have accepted its terms. This is the current version of the announcement. We reserve the right to amend and update this notice as necessary.

The purpose of this notice is to give you a general insight into our personal data processing activities and purposes, however, please note that other documents (e.g. service agreements, cooperation agreements, lottery rules, website or mobile application terms of use) may also contain additional information on the processing of your personal data is provided.

We inform you that the personal data processing rules contained in this notice apply only to the processing of personal data of natural persons.

In addition to these regulations, you can also familiarize yourself with the following additional personal data processing notices:

- Terms of use of the website (available at www.wingo.lv/#/privacy-policy);
- Terms of use of cookies (available at www.wingo.lv/#/privacy-policy)

We are aware that personal data is your value and we will process it in compliance with confidentiality requirements and taking care of the security of your personal data in our possession.

4. For what purposes do we process your personal data and what is the legal basis for processing personal data?

We will process your personal data only according to previously defined legitimate purposes, including:

- a) For the initiation and provision of services, as well as for the fulfillment and provision of obligations specified in the contract (including the cooperation agreement) -**

As part of this purpose, we would also need to identify you, provide an appropriate payment calculation and ensure the payment process, contact you in matters related to the provision of the service and/or the performance of the contract.

For this purpose and for the aforementioned sub-purposes, we may need at least the following personal data: customer name, surname, telephone number, e-mail address.

The main legal bases to be used to achieve these purposes are:

- conclusion and execution of the contract with the data subject (point b of the first part of Article 6 of the General Data Protection Regulation);
- Fulfillment of legal obligations (clause c of the first part of Article 6 of the General Data Protection Regulation);
- The controller's legitimate interests (Article 6, Part One, Clause f of the General Data Protection Regulation), for example, identifying you as a customer, client and/or contact person of a cooperation partner, ensuring communication with you.

b) Fulfillment of the requirements set forth in regulatory acts regarding the provision of services or fulfillment of the requirements set forth in other normative acts

Within the scope of this purpose, we would need to fulfill both the requirements of the regulatory acts regulating consumer rights, as well as the requirements of the accounting law, the requirements of the archive law and the requirements specified in other regulatory acts.

For this purpose, we may need to process the following personal data: Customer's name, e-mail;

The main legal bases to be used to achieve these purposes are:

- Fulfillment of legal obligations (Article 6, Part One, Clause c of the General Data Protection Regulation).

c) Provision of marketing activities

For this purpose, we may send you commercial communications, ensure your participation in lotteries and/or raffles organized by us, as well as publish materials from public events organized by us.

For this purpose, we may need at least the following personal data: Client's name, surname, telephone number, e-mail address;

The main legal bases to be used to achieve these purposes are:

- consent of the data subject (point a of the first part of Article 6 of the General Data Protection Regulation);
- conclusion and execution of the contract with the data subject (point b of the first part of Article 6 of the General Data Protection Regulation);
- The controller's legitimate interests (Article 6, Part One, Clause f of the General Data Protection Regulation), for example, to ensure communication.

d) To ensure the proper provision of services

As part of this purpose, we would need to maintain and improve technical systems and IT infrastructure, use technical and organizational solutions that can also use your personal data (for example, monitoring cookies), with the aim of ensuring proper service provision.

The main legal bases to be used to achieve these purposes are:

- The controller's legitimate interests (Article 6, first part, point f of the General Data Protection Regulation).

5. Who could access your personal data?

We take appropriate measures to process your personal data in accordance with applicable laws 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.

If necessary, your personal data could be accessed by:

- 1) our employees or directly authorized persons who need it for the performance of work duties;
- 2) personal data processors in accordance with the services they provide and only to the extent necessary, for example, auditors, financial management and legal consultants, database developer/technical maintainer, other persons who are related to the provision of administrator services;
- 3) in cases specified in the legal acts of state and municipal authorities, for example, law enforcement agencies, municipalities, tax administrations, sworn bailiffs;
- 4) third parties, after carefully evaluating whether there is an appropriate legal basis for such data transfer, such as debt collectors, courts, out-of-court dispute resolution institutions, bankruptcy or insolvency administrators, third parties who maintain registers (for example, register of citizens, registers of debtors, etc.) .

6. Which cooperation partners in personal data processing or personal data processors do we choose?

We take appropriate measures to ensure the processing, protection and transfer of your personal data to data processors in accordance with applicable laws. We carefully select personal data processors and, when transferring data, we evaluate its necessity and the amount of data to be transferred. The transfer of data to processors is carried out in compliance with the requirements of confidentiality and secure processing of personal data.

We can currently cooperate with the following categories of personal data processors:

- 1) outsourcing accountants, auditors, financial management and legal consultants;
- 2) IT infrastructure, database owner/developer/technical maintainer;
- 3) other persons who are related to the provision of our services;

Personal data processors may change from time to time, which we will also update in this document.

7. Are your personal data sent to countries outside the European Union (EU) or the European Economic Area (EEA)?

We do not transfer data to countries outside the European Union or the European Economic Area.

8. How long will we store your personal data?

Your personal data is stored for as long as its storage is necessary according to the relevant purposes of personal data processing, as well as in accordance with the requirements of applicable legislation.

When evaluating the duration of storage of personal data, we take into account the applicable requirements of regulatory acts, aspects of the performance of contractual obligations, your instructions (e.g. in the case of consent), as well as our legitimate interests. If your personal data is no longer needed for the specified purposes, we will delete or destroy them.

Below we indicate the most common retention periods for personal data:

- personal data necessary for the fulfillment of contractual obligations - we will store until the contract is fulfilled and until other storage terms are fulfilled (see below);
- personal data that must be stored in order to fulfill the requirements of legal acts, we will store the terms specified in the relevant regulatory acts, for example, the Law "On Accounting" stipulates that supporting documents must be kept until the day they are needed to establish the beginning of each economic transaction and track for its implementation, but not less than 5 years;
- In order to prove the fulfillment of our obligations, we will store the data for the general claim limitation period, in accordance with the claim limitation periods defined in the laws and regulations - 10 years in the Civil Law, 3 years in the Commercial Law and other terms, taking into account also the time limits for bringing claims in the Civil Procedure Law.

9. What are your rights as a data subject regarding the processing of your personal data?

Restoration of personal data

If there have been changes in the personal data that you have provided to us, such as a change in the personal code, contact address, telephone number or e-mail, please contact us and provide us with the current data so that we can achieve the relevant purposes of personal data processing. .

Your right to access and correct your personal data

In accordance with the provisions of the General Data Protection Regulation, you have the right to request from us access to your personal data that we have at our disposal, to request their correction, deletion, restriction of processing, to object to the processing of your data, as well as the right to data portability in the cases specified in the General Data Protection Regulation and in order.

The company respects this right of yours to access and control your personal data, therefore, in case of receiving your request, we will respond to it within the time limits set by the regulatory acts (usually no later than one month, unless there is a special request that requires a longer time to prepare answer), 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 in

one of the following ways:

1) when submitting a relevant application by sending it to our e-mail: info@wingo-deposit.com, it is recommended to sign it with a secure electronic signature.

Upon receiving your submission, we will evaluate its content and the possibility of your identification, and depending on the relevant situation, we reserve the opportunity to ask you to additionally identify yourself in order to ensure the security and disclosure of your data to the relevant person.

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 and we will no longer process your personal data, which 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 such personal data, which is necessary to fulfill the requirements of regulatory enactments or which is based on a contract, our legitimate interests or other grounds for legal data processing established by regulatory enactments.

You can also object to the processing of your personal data if the processing of personal data is based on legitimate interests or is used for marketing purposes (for example, sending commercial communications or participating in sweepstakes).

10. Where can you submit a complaint related to issues related to personal data processing?

If you have any questions or objections regarding our processing of your personal data, we invite you to contact us first.

If you still believe that we have not been able to mutually resolve the problem and you believe that we still violate your right to personal data protection, you have the right to file a complaint with the Data State Inspectorate. You can find samples of submissions to the Data State Inspectorate and other related information on the website of the Data State Inspectorate (<http://www.dvi.gov.lv/lv/datu-aizsardziba/privatpersonam/iesniegumu-paraugi/>).

11. Why do you need to provide us with your personal data?

Primarily, we collect your information to fulfill our contractual obligations, fulfill our legal obligations and to pursue our legitimate interests. In these cases, obtaining certain information is necessary for us to achieve the relevant purposes, therefore, failure to provide such information may jeopardize the initiation of business relations or the performance of the contract. If the data will not be required necessarily, but their submission could help to improve the service, or offer you favorable contract conditions and/or offers, we will indicate at the time of data collection that the provision of data is voluntary.

12. How do we obtain your personal data?

We can obtain your personal data in one of the following ways:

- 1) in the process of concluding a mutual agreement, obtaining data from you;
- 2) if the contract is concluded with a third party and it has indicated you as a contact person;
- 3) from you, if you submit any submissions, e-mails, call us;
- 4) from you if you sign up for our services online;
- 5) from you, by performing authorization on the website www.wingo.lv or in the mobile app
- 6) on the website www.wingo.lv, using cookies;
- 7) in some cases, we can obtain data from third parties from third party databases, for example when evaluating your creditworthiness, to achieve this purpose;
- 8) in relevant cases, from video surveillance recordings;

13. Is your personal data used in automated decision-making?

We do not use your data for automated decision-making.