Effective from 01/10/2024

PRIVACY NOTICE

HOW ARTEA PROCESSES YOUR PERSONAL DATA FOR DIRECT MARKETING PURPOSES

1. THE PURPOSE OF THIS NOTICE?

This Privacy Notice (hereinafter, the **Privacy Notice**) is intended to provide you with detailed information about the direct marketing activities carried out by Artea Companies*, the personal data processed for the purpose of direct marketing, your related rights, etc.

The Privacy Notice supplements the information contained in direct marketing consents and individual information notices.

In this Privacy Notice, we endeavour to provide you with as clear and comprehensive information as possible about the processing of your personal data in connection with direct marketing.

Direct marketing activities include: sending newsletters, providing with service offers (including personalised offers) of Artea Companies and information about new Artea Companies' services, ongoing promotions, opportunities to participate in competitions or marketing campaigns, joint offers with Artea Companies' partners, asking your opinion on the quality of services and customer care, participating in surveys or market research. Sending e-mails and making calls with content related to the performance of contracts are not considered direct marketing activities. However, if you find the information provided in this Privacy Notice inadequate or unclear, we welcome your questions. You can submit them to any of the Artea Companies using the contact details listed in Section 2 of the Privacy Notice.

Please note that this Privacy Notice only covers the processing of personal data in relation to the performance of direct marketing. Your questions may be answered in the general privacy policy of Artea Bank Group companies in Lithuania, so before submitting your questions, we suggest that you consult it.

*** Artea Companies:** AB Artea bankas, UAB Artea Life Insurance, UAB Artea Asset Management, UAB Artea lizingas.

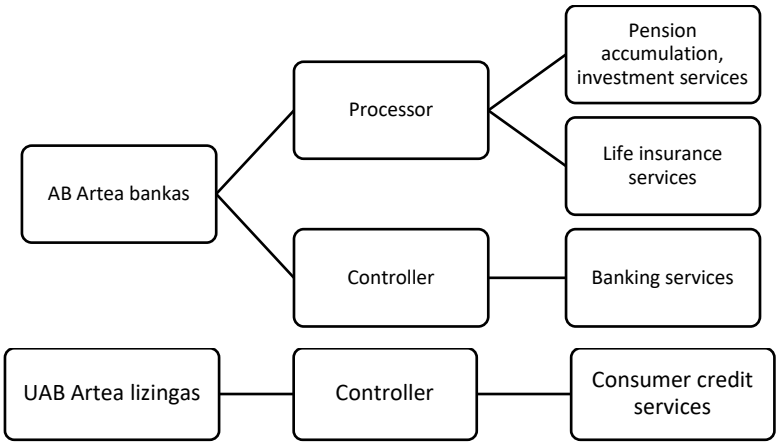
2. INFORMATION ON THE DATA CONTROLLER

The controllers of personal data processed for direct marketing purposes are the Artea Companies, which act as **separate controllers**:

Services for which direct marketing is carried out		Controller
Banking services	->	AB Artea bankas
Consumer credit services	->	UAB Artea lizingas
Pension accumulation, investment services	->	UAB Artea Asset Management
Life insurance services	->	UAB Artea Life Insurance

Contact details. You can find the relevant contact details of the controller by clicking on the link www.artea.lt/en/write.

UAB Artea Life Insurance and UAB Artea Asset Management use a data processor: AB Artea bankas for direct marketing, which carries out direct marketing on behalf of these companies (collecting consents, sending direct marketing messages, etc.). UAB Artea lizingas carries out direct marketing on its own behalf (collecting consents, sending direct marketing messages, etc.).



3. DATA SHARING BETWEEN ARTEA COMPANIES

Artea Companies collect joint consents for direct marketing, i.e. by consenting to direct marketing by Artea Companies to you, you consent to several data controllers at the same time. This means that in order to administer such consents, Artea Companies will have to share personal data in certain cases. For example:

- The Artea company to which you have applied and to which you have given your consent shall pass on the personal data necessary for direct marketing to other Artea Companies;
- If you update your contact details at one Artea Company, they will automatically be updated at the other Artea Companies (direct marketing is carried out with the last contact details provided to any of the Artea Companies);
- If you inform one of the Artea Companies about the withdrawal of consent, the withdrawal will be communicated and will be valid for all Artea Companies.

Personal data is also shared by Artea Companies if they have obtained your consent to send you personalised direct marketing communications and to share your personal data for that purpose. This sharing of personal data is discussed in more detail in Section 5 of the Privacy Notice PERSONALLY SUBMITTED PROPOSALS (PROFILING).

4. WHAT CONSENTS DO WE COLLECT FOR DIRECT MARKETING?

You can give your consent to:

- **The provision of direct marketing offers by Artea Companies (of a general nature, not personally tailored)**, in which case each of the Artea Companies will process the following personal data for the purpose of carrying out the direct marketing: name, surname, date of birth, email address, telephone number, mailing address;
- **Tailoring direct marketing offers to you personally and sharing personal data between Artea Companies for this purpose**; for more information about providing personalised offers, please refer to section 5 of the Privacy Notice PERSONALIZED OFFERS (PROFILING);
- **The provision of joint direct marketing offers with partners**, in which case Artea Companies remain the controllers and your personal data is not transferred to the partners, but you will receive offers from Artea Companies not only for Artea Companies, but also for the partners' goods or services; for example, you will be provided with special offers of consumer credit from UAB Artea lizingas for the purchase of goods or services from UAB Artea lizingas partners. Find out more about the partners: www.artea.lt/r/en/partners.

5. PERSONALISED OFFERS (PROFILING)

Clients who are natural persons

For clients who are natural persons, we will only provide personalised offers (selected by analysing their personal characteristics) after obtaining their separate consent to provide such offers.

For the purpose of providing personalised offers, we use automated decision-making, including profiling, taking into account both the personal data provided by you (e.g. age, place of residence) and collected by us (e.g. balance of funds in the bank account of AB Artea bankas, purchasing habits).

We may select personalised offers after taking into account all or some of your personal data in the table below.

Personal data groups	Personal data (categories of personal data)
Identification data:	Date of birth
Demographic data:	Address of residence and/or correspondence address, location of the correspondence address you provided
Contact details:	Telephone number, email address
Financial data:	Account balance
Economic data:	For example, your current/former employment, your economic/commercial activities (type of work), stability of income and other sources of income
Credit/insurance history:	Details of your credit and insurance history
Behavioural habits:	Your shopping habits (e.g. type, channel, time, geography, cashing habits)
Demographic data:	Age, gender, marital status, children. (age, gender)
Sociodemographic data:	Belonging to certain social groups (this may include data such as age, employment, income, marital status, etc.)
Funding experience and investment objectives:	For example, designation as an informed or uninformed investor, holding an investment certificate
Data on transactions in Artea Companies and other contracts concluded:	Products available and owned, customer presence, etc.

Clients who are legal persons

For clients who are legal persons, personalised offers are also sent without separate consent (if a general consent for direct marketing has been given). If you are a legal person, no personal data is processed for the purpose of selecting personalised offers for you – only information about the legal person, not natural persons (e.g. number of employees, field of activity, etc.) is considered.

6. CONSENT MANAGEMENT

Withdrawal of consents. You can withdraw any of your direct marketing consents:

- By contacting any Artea Company www.artea.lt/en/write using the contact details provided;
- By clicking on the unsubscribe link in the direct marketing message.
- By managing direct marketing preferences in the Customer (natural persons) self-service area.

If consent is withdrawn in one Artea Company, consent will be withdrawn in all Artea Companies.

You will be removed from the database of recipients of direct marketing within 2 working days after the withdrawal of your consent. This means that you may still receive direct marketing offers within the next 2 working days, even if you withdraw your consent. However, such cases are very rare and exceptional – we try to avoid them altogether.

Update contact details. For direct marketing, we use your most recent contact details held by any of the Artea Companies. When contact details are updated in any of the Artea Companies, the new contact details are passed on to the other Artea Companies.

7. HOW LONG ARE PERSONAL DATA PROCESSED?

Artea Companies shall process your personal data for the purpose of direct marketing, as specified in the consent and in this Privacy Notice, for as long as any contract between you and any Artea Company is in force, or for a period of 5 years from the date on which you gave your consent to direct marketing, whichever is longer (only applies if you do not exercise your right to withdraw your consent).

Retention of consents. We retain the direct marketing consents and the personal data contained therein for a further 2 years from the end of the current year in which the processing of the personal data for the purpose of direct marketing ended. We retain consents and the personal data contained therein for the purpose of defending legal claims (in the course of disputes/complaints) relying on the legal basis set out in Article 6(1)(f) of the General Data Protection Regulation, i.e., our legitimate interest.

Exception. If the direct marketing consents are an integral part of the contract or application, we will keep them as part of the contract or application for 10 years from the expiry of the contract (even if the above 2 years expires earlier).

At the end of the period of validity of the consent for direct marketing, Artea Companies may contact you to renew the consent.

8. WHAT RIGHTS DO YOU HAVE AND HOW TO EXERCISE THEM?

In addition to the above-mentioned right to withdraw at any time all or any of the consents you have given to direct marketing, you also have the right to have access to, erasure, rectification or restriction of the processing of your personal data. You also have the right to request that your personal data be transferred in accordance with the procedure prescribed by the applicable legislation. Where we process your personal data on the basis of legitimate interest, you have the right to object to the processing of your personal data.

If you withdraw your consent in one Artea Company, it shall be withdrawn in the other Artea Companies (the consent shall be indivisible in relation to the Artea Companies), and if you request the rectification of personal data processed by one of the Artea Companies, it shall be rectified in the other Artea Companies as well (provided that the Artea Companies process the personal data which you request to be corrected). All other rights are only enforceable against the Artea Companies to which you apply or which are named as the addressee of your request.

You can submit a request for exercising your rights or a complaint to any of the Artea Companies using the contacts provided at www.artea.lt/en/write. For more information on the exercise of rights, please refer to the Privacy Policy of Artea Bank Group companies in Lithuania: www.artea.lt/r/en/privacy-policy.

If you have any complaints, you can contact Artea Companies directly via the general contacts tel. +370 610 44447, by email to info@artea.lt, by registered mail to Konstitucijos ave. 14A, LT-09308 Vilnius, Lithuania, or lodge a complaint with the State Data Protection Inspectorate (L. Sapiegos g. 17, Vilnius, www.vdai.lrv.lt, tel. +370 5 271 2804, 279 1445; however, we recommend that you contact us first and we will try to work with you to resolve all your requests.