



PRIVACY POLICY OF CL INSURANCE BROKER SIA

In effect from 30 June 2021
(with amendments entered into force on the 02.02.2022)

In this policy, on the website <https://www.citadeleleasing.lv/lv/lizings-privatpersonam/dokumenti/>, you will find out what information we collect about you, what we do with it and in which cases we disclose it to others. We always protect your information and update this privacy policy regularly. We will notify you of any amendments to the privacy policy on our website. CL Insurance Broker SIA, registered in the Republic of Latvia under registration number: 40003983430, address: Republikas laukums 2A, Riga, Latvia, LV-1010, is responsible for processing of your data.

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1. How do we collect information about you?

We collect information about you in cases when you apply for insurance.

Information that we receive about you:

- From Citadele Leasing SIA:

- Name, surname, personal identification code;
- Phone number, email address;
- Place of residence;
- Vehicle make and model, VIN (vehicle identification number) and technical specification data;
- Information about another leasing object.

- From our cooperation partners – joint stock insurance companies:

- An insurance offer containing your name, surname, personal identification number, residential address and the terms of the insurance offer.

- From you, if you independently contact us with a request to prepare an insurance offer:

- Name, surname, personal identification code;
- Phone number, email address;
- Place of residence;
- Vehicle make and model, VIN (vehicle identification number) and technical specification data;
- Information about another insurance object.

- From you, if the insurance policy is terminated and you need to return the balance of the premium:

- Bank account number.

2. Why do we process information about you?

We process information about potential and current customers for the following purposes:

Data Type	Processing Purpose	Legal Grounds	Can you receive insurance services if you do not provide us with this information?	How long will we keep this information about you?
Name, surname, personal identification code, contact information and postal address, bank account number of a potential or current customer, name, surname, personal identification code, contact information of a user of a vehicle, data about a vehicle or other leasing/insurance object	Insurance of a vehicle or other leasing/insurance object	Preparation of an insurance offer and conclusion/execution of a contract	No	Until the insurance contract is fulfilled and there are no other data storage obligations arising from regulatory enactments
		Compliance with the distribution requirements established in the law "On the distribution of insurance and reinsurance"	No	Until the insurance contract is fulfilled and there are no other data storage obligations arising from regulatory enactments
		Legitimate interest to prepare an insurance offer	No	Until the insurance contract is fulfilled and there are no other data storage obligations arising from regulatory enactments
Name, surname, e-mail, telephone number and other information	For advertising - receipt of notifications and offers	Consent	Yes	Until withdrawal of consent
All abovementioned types of data	Protection of legal interests/replying to different requests	Fulfilment of duties set out in regulatory enactments	Yes	Until a respective duty is fulfilled
		Exercise of legal (legitimate) interests when obtaining evidence in the framework of administrative/other proceedings or litigation	Yes	Until the end of proceedings/litigation

3. To whom do we disclose your information?

We have introduced various tools and services that facilitate our cooperation and make our communication faster. Therefore, we disclose:

- Your name, surname, personal identification code to vehicle and equipment registration authorities, for example, VAS "Ceļu satiksmes drošības direkcija" /Road Traffic Safety Directorate SJSC/ and VAS "Tehniskās uzraudzības aģentūra" /Technical Supervision Agency SJSC/;
- Your name, surname, personal identification code and other aforementioned information to companies, if you have confirmed that you want to receive an insurance offer for a vehicle or disclosure of the mentioned data to insurance companies listed in Section 5 of this Policy is required to comply with the terms of the Leasing Contract;
- Information about you found in the insurance documentation file to archiving service providers and providers of debt collection services;
- Your contact information to communications providers and IT service providers for administration of insurance services;
- Information about your requests and complaints as well as information about various types of incidents (e.g., incidents related to activities that do not comply with internal and external regulatory enactments, data protection violations), if any, to Citadele banka AS to ensure risk management on the Citadele Group level and improve the quality of service and customer service;
- If you have agreed to receive advertising, to Citadele group companies: Citadele banka AS, CBL Life AS, CBL Atklātais pensiju fonds AS, CBL Asset Management IPAS, Citadele Factoring SIA, Citadele Leasing SIA, address: Republikas laukums 2A, Rīga, LV-1010;
- State supervisory/investigative bodies and other law enforcement bodies, government officials specified in regulatory enactments, external auditors/consultants.

If you do not pay insurance premiums in accordance with the terms of the insurance contract even having received our reminders, we will decide that it is necessary to hire experts to recover your debt. In this case, we will process your personal data to ensure our legitimate interest in recovering the debt. If we decide to transfer your debt to a debt collection company, we will provide them with your name, surname, all contact information, a copy of the insurance contract and any annexes thereto as well as information on all previous payments and other information that may facilitate debt recovery.

4. How do we process your information when sending you notices and offers?

We or any of the Citadele Group companies will prepare the following notifications and offers, incl. personalized offers, personal credit limit offers, and send them to you from time to time, if you have given your consent to the processing of your personal data on our website or unified consent form.

According to your consent, we will send you:

- up-to-date information on financial services provided by Citadele Group companies, for example, account opening, payment card processing; deposit services; lending services; leasing services; insurance services; financial instruments services, etc. services and related offers, incl. personalized offers within customer loyalty programs;
- other notifications related to opportunities to participate in competitions, lotteries, promotions and other customer-related events; congratulations on your birthday, name day and other holidays (for example, National Independence Day, Easter, Christmas, Ligo and other holidays); our comments on current events in the Latvian and world economy; opportunities to express our opinion about the services we provide and the quality of service by participating in customer surveys organized by us; social responsibility and support projects; our financial performance, awards, special events;
- up-to-date information on credit limits available to you personally (for example, payment card credit limits, consumer credit, leasing offer), which will be prepared by financial consultants of Citadele banka AS and/or Citadele Leasing SIA upon evaluating your financial possibilities.

In order to receive notices and offers, including personalized offers and offers of personal credit limits, your personal data will be processed by the following Citadele Group companies as individual or joint controllers: Citadele banka AS, registration number: 40103303559, address:, Insurance Joint Stock Company CBL Life, registration number: 40003786859, Joint Stock Company CBL Atklātais pensiju fonds, registration number: 40003397312, Investment Management Joint Stock Company CBL Asset Management, registration number: 40003577500, Citadele Factoring SIA, registration No. 50003760921,

Citadele Leasing SIA, registration No. 40003423085, CL Insurance Broker SIA, registration number: 40003983430. Address of the mentioned companies: Republikas laukums 2A, Riga, Latvia, LV-1010.

You have the right to withdraw your consent to receive notifications and offers at any time by writing to us at e-mail: privacy@citadeleleasing.lv. Upon withdrawal of consent, we will stop processing your personal data for the preparation and sending of commercial notifications and offers. Withdrawal of consent (s) will not affect the lawfulness of processing of your personal data prior to withdrawal of consent.

You can find detailed information on your rights, incl. the right of withdrawal, and processing of your personal data in the [Privacy Disclaimer for the processing of personal data for receiving notifications and offers](#) published on www.citadele.lv.

5. How do we process your information when offering you insurance services?

For vehicle insurance or other types of insurance, we cooperate with several providers of insurance services - insurance joint stock companies, their branches. If we receive your application for the preparation of an insurance offer, we will transfer your personal data (see Section 2 of this Policy) to insurance joint stock companies, their branches in order to receive an offer for insurance of a vehicle or other insurance object and arrange insurance for a vehicle or other object.

For vehicle insurance, we cooperate with several insurance providers listed in the table below.

Name	Registration No.	Address	Privacy Protection
ERGO Insurance SE Latvijas filiāle	40103599913	Skanstes iela 50, Riga, LV-1013	https://www.ergo.lv/lv/par-ergo/privatuma-politika
Compensa Vienna Insurance Group ADB Latvijas filiāle	40103942087	Vienības gatve 87H, Riga, LV-1004	https://www.compensa.lv/privatuma-politika/
AAS Baltijas Apdrošināšanas nams	40003494976	Antonijas iela 23, Riga, LV-1010	https://www.ban.lv/kompanija/privatuma-politika/
AAS BTA Baltic Insurance Company	40103840140	Sporta iela 11, Riga, LV-1013	https://www.bta.lv/lv/kontakti/privatuma-politika
ADB "Gjensidige" Latvijas filiāle	40103595216	Gustava Zemgala Gatve 74A, Riga, LV-1039	https://www.gjensidige.lv/privatums
If P&C Insurance AS Latvijas filiāle	40103201449	Republikas laukums 2A, Riga, LV-1010	https://www.if.lv/par-lapu/privatuma-politika
AAS Balta	40003049409	Raunas iela 10, Riga, LV -1039	https://www.balta.lv/lv/par-personas-datu-apstradi

For information: Since this Privacy Policy does not provide information on the processing of personal data by each insurance provider, before concluding an insurance contract, read the detailed information on the processing of personal data by insurance providers in their approved privacy policies, privacy notices or other information materials published on websites of insurance providers (see links in the column "Privacy Protection" in the table above).

6. How do we protect your information?

We have implemented a strict policy for the use and access of IT infrastructure, which is based on the principles of "need to know" and less privileged access. We encrypt personal data, use firewalls, attack detection and prevention systems to ensure that all your personal data is confidential and secure. We regularly test our systems and review applicable policies to ensure that our IT security measures are one step ahead of all types of risks.

We delete your personal data in accordance with the provisions of Section 2 of this Privacy Policy.

7. What are your rights?

We process your data, so you can find out what we do with it and how we process it. You may, upon written request, access, correct or delete your personal data, restrict processing, object to processing of such data and transfer them free of charge.

CL Insurance Broker SIA, registered in the Republic of Latvia under registration number: 40003983430, address: Republikas laukums 2A, Riga, Latvia, LV-1010, is responsible for your data processing. A certified personal data protection officer will answer all your questions regarding how CL Insurance Broker SIA uses your information. You can contact him/her by sending an e-mail to privacy@citadeleleasing.lv. Please describe the issue in as much detail as possible. You will receive an answer within 30 days.

Our activities in the field of personal data protection are supervised by the State Data Inspectorate. Before you apply to the Data State Inspectorate for advice or a complaint, we recommend you to contact our personal data protection officer to ensure that your request is processed as soon as possible.