

## PRIVACY NOTICE

In this privacy notice, we, UAB Finansų bitė verslui (legal entity code 304175555, business address Šv. Ignoto str. 5, Vilnius, Republic of Lithuania) provide information on how we process your personal data when you visit this website ([www.desico.io](http://www.desico.io) and/or <https://desico.finbeeverslui.lt/>) and use our services related to the sale of the financial instruments which are publicly offered at the crowdfunding platform operated by us ('**Financial Instruments**').

In our activities we, UAB Finansų bite verslui, also own and use the trademark DESICO.

We are the controller of your personal data.

If you have any questions or wish to exercise any of your rights provided in this notice, please contact our data protection officer by e-mail: [asmensduomenys@finbee.com](mailto:asmensduomenys@finbee.com).

### 1. HOW DO WE USE YOUR DATA?

1.1. This section provides the following information:

- (a) categories of data processed by us;
- (b) in case the data is received from sources other than you, information on the sources of such data;
- (c) purposes we seek when processing your data; and
- (d) the legal basis for the processing of data.

1.2. We process your access and purchase data ('**Access and Purchase Data**'). Access and Purchase Data includes your name, surname, nationality, e-mail, date of birth, amounts (intended amounts to invest) and other data supplied by you at the time of registration. We process Access and Purchase Data to provide you with our services; without this information, you will not be able to register and access our services. Such data processing is necessary for the performance of a contract concluded between us.

1.3. We process information required to identify our users ('**Identification Data**'). Identification Data may include your personal ID number, sex, contact details, address, details of personal ID document, other information and/or documents which are necessary for the proper application of user identification and other anti-money laundering and counter-terrorism financing procedures ('**KYC/AML/CTF**'). We process Identification Data for the purpose of preventing money laundering and terrorist financing. We have an obligation by law to identify our users before providing them with our services. In the event these legal requirements are not fulfilled properly, the person may not become our user. Please note that we can establish the identity of our users without their direct participation (for example, by receiving necessary information from other financial institutions and authorised subjects). We can also obtain additional personal data on users from other third parties (for example, Identification Data can be verified in the databases on wanted persons, politically exposed persons etc.).

Please notice that you have to complete KYC/AML/CTF procedures for the purchase of the Financial Instruments, which must be in form and substance satisfactory to us. KYC/AML/CTF procedures can be carried by providing necessary information with regard to identification of the user, beneficial owner and origin of the funds, the scope and type of information depending on the type of user and the purchase amount.

In certain cases (e.g., when additional verification is needed according to governmental rules, decisions or opinions of competent authorities, applicable KYC/AML/CTF policies) we may, at any time before, during and/or after the Financial Instruments sale, demand from you to submit additional information and documents (such as a colour photo of your passport or other identity card, a selfie, utility bill or other documents required by authorities to show proof of your identity, documentation that evidences the origins of your funds, country of residence as well as any other additional documents and/or information) that we find necessary for the full compliance with KYC/AML/CTF policies.

1.4. We process you data related to the assessment of the user's investment experience ('**Assessment Data**'). Assessment Data includes your knowledge and experience related to the investment activities as well as other data supplied by you in the appropriateness assessment test. Assessment Data is important for the performance of some of our services (e.g., reception

and transmission of your orders to acquire Financial Instruments) and is processed on the basis of applicable law.

- 1.5. We process *information that you provide to us for the purpose of subscribing to our e-mail and newsletters* (**'Messaging Data'**). We may process such data for sending of relevant messages and newsletters. Also, if we have already provided services for you on our website and you do not object, we may process Messaging Data on the basis of our legitimate interest, namely, seeking to maintain and improve customer relations.
- 1.6. We process *information related to any communication that you send to us* (**'Communication Data'**). Communication Data may include both the content of the correspondence, call and metadata associated with such communication. Communication Data is processed to get in touch with you as well as for record-keeping. We process such data on the basis of a contract concluded between us (when such communication is necessary for the performance of a contract) or on the basis of legitimate interest (namely in order to ensure due administration of website and related activities, to ensure uniform and good quality of consultation practice, examination of conflict situations between you and our employees, etc.).
- 1.7. We process *information on the way you use our website and services* (**'Usage Data'**). The Usage Data may include your IP address, geographical location, browser type and version, operating system, referral source, duration of visit, viewed pages, website browsing paths, as well as information on the periods and frequency of the use of services, other connection information. Such data is obtained through the use of cookies or similar technologies. We process such data in order to get a better understanding of how you use our website and services. Such data is processed on the basis of legitimate interest – namely, for monitoring and improving our website and services.
- 1.8. Please notice, that any and all information provided by you to us shall be valid, current, complete and accurate.
- 1.9. We may process any of your personal data identified in this notice where it is necessary for the establishment, enforcement or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. For this purpose, we process your personal data on the basis of legitimate interest and, namely, in order to protect and ensure our and/or your rights and/or the rights of other persons.
- 1.10. In addition to the specific purposes set out in this section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subjected, or in order to protect your vital interests or the vital interests of other natural persons.
- 1.11. In case you refuse to provide any of the information that we has identified as being required to participate in Financial Instruments sale, you will be unable to participate in such sale.

## **2. TO WHOM AND WHEN DO WE PROVIDE YOUR DATA?**

- 2.1. We may disclose your personal data to *our service providers* insofar as it is reasonably necessary to provide specific services to our users or to us (including, website hosting service providers, providers of platform and servers and maintenance thereof and e-mail service providers etc.). We make reasonable efforts to be sure that our data processors implement proper organisational and technical measures that ensure security and maintain the confidentiality of personal data.
- 2.2. During the user identification procedure, you could be redirected to our service provider's – *Finpass (UAB Ondato)* – webpage. In this webpage, remote identification of you is performed by taking video/picture of you and your identity documents. Your facial photograph and photograph in the document are usually compared by using automatic means and it is established that it is the same person. Depending on the results, you will be redirected to our website.
- 2.3. After you perform KYC/AML/CTF procedures, we provide your Identification Data *to our partner UAB FMĮ "DV Invest" (financial brokerage firm)*. Such personal data is transferred in accordance to law in order to ensure the proper application of KYC/AML/CTF procedures as well as to ensure the ability for you to become UAB FMĮ "DV INVEST" client and acquire Financial Instruments. In case you would like to become a client of other financial institution, we could also provide your Identification Data to such financial institutions to ensure the proper application of KYC/AML/CTF procedures.

- 2.4. For the purpose of preventing money laundering and terrorist financing, Identification Data may be transferred on the grounds established by law to the Financial Crime Investigation Service under the Ministry of the Interior of the Republic of Lithuania, other law enforcement organisations and financial institutions operating within the EEA and beyond. In all cases, we make reasonable efforts to ensure that, in compliance with applicable legal requirements, the personal data of our users are not lost or used illegally.
- 2.5. In our website you will be able to conclude contracts with our partners (e.g., with UAB FMĮ “DV Invest”) regarding their services. The provision of our partners’ services could be necessary in order for you to be able to acquire Financial Instruments. Therefore, we provide some of your Access and Purchase Data (e.g., your name, surname, address, personal code and/or other) to our partners insofar it is needed for the conclusion of such contracts.
- 2.6. We may also disclose your personal data to a certain extent to any member of our group of companies (including our subsidiaries, our ultimate holding company and all its subsidiaries) or other legal entities (e.g. the issuer of the Financial Instruments) insofar as it is reasonably / legally necessary for the purposes set out in this notice.
- 2.7. In addition to the specific disclosures of personal data set out in this section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, as well as to protect your vital interests or the vital interests of other natural persons.
- 2.8. Persons indicated in this section may be established outside the Republic of Lithuania and the European Economic Area. In case we transfer your personal data to such persons, we will take all the necessary measures provided for by the laws to ensure that your privacy remains properly secured.

### **3. HOW LONG DO WE STORE YOUR DATA?**

- 3.1. Your personal data that we process for any purpose or purposes shall not be kept for longer than it is necessary for that purpose or those purposes. In any case, it shall be kept for no longer than as follows:
  - (a) Access and Purchase Data and Assessment Data shall be stored up to 10 years after the expiration of the contract (unless other legal acts provide for a longer time limit for the storage of data).
  - (b) Identification Data shall be stored for time limits stated in applicable legal acts – for 8 years after the termination of the transactions or official relationship with the user (unless other legal acts provide for a longer time limit for the storage of data). In certain cases established by law, some personal data are stored for a shorter time limit (for example, the correspondence of the official relationship with the user is stored for 5 years after the termination of the transactions or official relationship with the user).
  - (c) Messaging Data shall be stored for no longer than 2 years following the end of provision of our services;
  - (d) Communication Data shall be stored for a period of no more than 2 months from the end of such communication.
- 3.2. In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. For example, the Usage Data will be retained for as much as it is necessary for the relevant processing purposes.
- 3.3. Notwithstanding the aforementioned time-limits of this section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect our interests or interests of other natural persons.

### **4. DIRECT MARKETING**

- 4.1. If we already have provided services to you and you do not object, we will inform you about our other products that might interest you including other information related to such.
- 4.2. You may opt-out of receiving marketing messages at any time. You may do so by:
  - (a) pressing a respective link in any of the received marketing messages;
  - (b) contacting us via email: [asmensduomenys@finbee.com](mailto:asmensduomenys@finbee.com).

- 4.3. The opt-out of the marketing messages will not stop you from receiving messages directly related to the provision of services.

## 5. YOUR RIGHTS

- 5.1. In this section, we have summarised the rights that you have under the data protection laws. Some of the rights are complex, thus, we only provide the main aspects of such rights in this notice.
- 5.2. Right to access. You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data together with certain additional information. This additional information includes details of the purposes of the processing, the categories of personal data and the recipients of the personal data. Except for the cases of violation of the rights and freedoms of others, we will provide you with a copy of your personal data at your request. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee in order to cover the administrative expenses.
- 5.3. Right to rectification. You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you supplemented.
- 5.4. In some cases, you have the right to the erasure of your personal data. Such cases include the following: (i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) you withdraw your consent to processing and there are no other legal basis to process data; (iii) you object to the processing under certain rules of applicable data protection laws; (iv) the processing is for direct marketing purposes; (v) the personal data have been unlawfully processed. However, please note that there are exclusions of the right to erasure in some cases. Such exclusions include the cases when processing is necessary: (i) for exercising the right of freedom of expression and information; (ii) for compliance with our legal obligation; (iii) for the establishment, exercise or defence of legal claims.
- 5.5. In some cases, you have the right to restrict the processing of your personal data. Such cases include the following: (i) you contest the accuracy of the personal data; (ii) processing is unlawful but you oppose erasure; (iii) we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, enforcement or defence of legal claims; (iv) you have objected to processing, pending the verification of that objection.
- 5.6. You have the right to object to our processing of your personal data on grounds relating to your particular situation, in cases when the processing is necessary for the performance of a task carried out in the public interest or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms. Furthermore, we will be able to process such data if processing is for the establishment, enforcement or defence of legal claims.
- 5.7. Right to data portability. To the extent that the legal basis for our processing of your personal data is (i) a consent; or (ii) the performance of a contract or steps to be taken at your request prior to entering into a contract, you have a right to receive your personal data in a systematised, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 5.8. If you consider that our processing of your personal data infringes data protection laws you have a right to lodge a claim with the State Data Protection Inspectorate, A. Juozapavičiaus g. 6, LT-09310 Vilnius, [www.ada.lt](http://www.ada.lt).
- 5.9. In case the legal basis for our processing of your personal information is a consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

## 6. ABOUT COOKIES

- 6.1. Cookies are small text files containing identifier that is sent by a web server to your web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

- 6.2. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## 7. COOKIES THAT WE USE

In the website, we use cookies of four main types:

- (a) required cookies – used to ensure proper performance of the website, security of customers and their data, provision of high quality services and effortless set-up of an account;
- (b) functional cookies – used to allow the browsing on our website and use of its functions;
- (c) analytic cookies – used to enable us to recognise and calculate website visitors and monitor how the visitors move around the website. It helps us to improve the browsing experience of website users, to analyse the use of system and, accordingly, to improve the provided services;
- (d) advertising cookies – used to monitor the behaviour of users and to optimise the advertising campaigns accordingly.

## 8. COOKIES USED BY OUR SERVICE PROVIDERS

- 8.1. Our service providers also use cookies that may also be stored on your computer when you visit our website.

8.2. We use the following cookies:

- (a) Google Analytics cookies – to monitor our website traffic. Cookies used for this purpose help us detect website errors as well as measure website bandwidth. You can view the privacy policy of *Google Analytics* [here](#);
- (b) DoubleClick co – to control the display of ads to our users. Cookies used for this purpose help us distinguish users that already use our services and reduce or stop displaying our ads to such users. You can view the privacy policy of *DoubleClick* [here](#);
- (c) Facebook cookies – to manage the display of ads to our users. Cookies used for this purpose help us distinguish users that already use our services and reduce or stop displaying our ads to such users. You can view the privacy policy of *Facebook* [here](#);
- (d) Google Tag Manager cookies – to control advertising cookies. Cookies used for this purpose help us to distribute ads to users in a proper manner. You can view the privacy policy of *Google Tag Manager* [here](#);
- (e) Adform cookies – to receive statistical information on website visits and to evaluate your wish to receive ads. This cookie does not receive personal data from applications or by any other way. You can view the privacy policy of *Adform* [here](#);
- (f) finbeeveralui.lt cookies – to ensure smooth and safe website operation and to provide you with an opportunity to login to your account, etc. This cookie does not receive personal data from applications or by any other way.

## 9. HOW CAN YOU MANAGE COOKIES?

- 9.1. Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can obtain up-to-date information about blocking and deleting cookies via information provided in the relevant browser website, for example, [Chrome](#); [Firefox](#); [Internet Explorer](#); [Safari](#).
- 9.2. Blocking all cookies will have a negative impact on the usability of many websites.
- 9.3. If you block cookies, you will not be able to use all the features on our website.

## 10. THIRD PARTY WEBSITES

On the website, you may find links to and from partner sites, information sources and related party websites. Please note that such third party website that you visit by clicking on links have their own privacy policies and we take no responsibility regarding such privacy policies. We

recommend to familiarise with privacy policies of such websites before providing any personal data.

**11. CHILDREN PERSONAL DATA**

11.1. The services of our website are targeted to persons that are 18 or older.

11.2. If we have reason to believe that we process personal data of a person under the aforementioned age without having a consent from the holder of parent rights, we will delete such personal data.

**12. CHANGES TO THE NOTICE**

Any changes to this notice will be published on the website and, in case of any material changes, we will inform you about such changes by e-mail.