

CLIENT PERSONAL DATA PROCESSING NOTICE

The Client Personal Data Processing Notice stipulates the procedure whereby Company processes personal data of clients and private individuals related to him/her while providing Services.

The following terms are used in the document:

Services – construction services, design and projecting services, residential and commercial furnishing, individual management of investment property, provision of lease/rental.

Notice – Client Personal Data Processing Notice.

Client – a private individual or a corporate entity to whom the Company provides Services under the Terms and Conditions of agreement. The Client, in the understanding of the Notice, is also a potential client of the Company who furnished the Company with information with an aim to establish contractual relationship on providing Services, and the former clients of the Company.

Processing – any activities with Personal Data, including but not limited to: collection, storage, alteration, transfer, erasure.

Personal Data – any information relating directly or indirectly to the Data Subject.

Data Subject – the Client (a private individual) and private individuals, the processing of whose information is related to the provision of Services to the Client (a private individual or a corporate entity). The related persons are, including but not limited to: the Client's representatives, whose Personal Data the Company processes to fulfil the Terms and Conditions of agreement or in scope of another legal relations with the Client, shareholders and owners of the Client (a corporate entity), contact persons, relatives, co-borrowers and other private individuals related to the Client.

Company – depending on the context:

1) limited liability company «UNEEK», unified registration number No. 40203025668, legal address: Vidus street 5 - 1, Riga, LV-1010, and/or

2) limited liability company «UNEEK PROPERTIES», unified registration number No. 40203367749, legal address: Vidus street 5 - 1, Riga, LV-1010.

CATEGORIES OF PERSONAL DATA

Within a framework of providing services, the Company may collect and process various information about the Data Subject. This information comprises, including but not limited to, the following categories and types of Personal Data:

Identification data and contact details: name, surname, identity number, details and a copy of identity document, a signature sample, date and place of birth, address, phone number, e-mail address;

Information on operation and status: citizenship, an operation type, a position, a scope of authority, tax residence, the taxpayer identification number, a residence permit, education and professional experience, marital status, related business partners and persons, connection of the operation with the Republic of Latvia, presence on the list of persons who are banned to establish contractual relationship with, negative information or reputation, the status of politically exposed person or relation with such a person, the purpose of using Services, investment goals;

Information on financial status: the type and value of assets on accounts, data on the owned company shares or corporate equity, owned property, amount of income, details on debts and liabilities, solvency, turnover for a period, average balance;

Information concerning service use: the account number, payment details;

The Company receives information, which includes Personal Data, directly from both the Data Subject, his/her representatives or related persons and public sources, public and private registers and/or databases of various countries, including but not limited to: from the Enterprise Register, the Land Register etc.

The Company may request or process information about the Data Subject when establishing contractual relationship, during and after cooperation. Depending on the service the Company renders, the Company may request Personal Data on the basis of applicable law and for signing and/or fulfilment of provisions of contract between the Company and the Client. Refusal to provide Personal Data can result in limitation of rendering services or make their rendering impossible since the Company lacks all necessary information.

PURPOSES FOR PROCESSING OF PERSONAL DATA

The Company processes Personal Data according to requirements of laws and regulations, provisions of applicable contracts and its legitimate and legal interest for implementation, including but not limited to, the following purposes:

The logo for UNEEK, featuring the word "UNEEK" in a white, stylized, sans-serif font against a dark blue background. The letters are bold and modern, with a slight shadow effect.

To ensure rendering of services

Primarily the Company processes Personal Data to enter into contractual relationship with the Client for rendering services, for taking necessary actions prior to entering in the contract, for implementation of the contracts signed with the Client, for assessment of the Client and the persons involved in a transaction with an aim to define a possibility and provisions for cooperation, for due execution of transactions with the Client, for settlements with the Client, for communication with the Client.

The Company processes Personal Data for rendering services on the basis of a respective contract with the Client or in respect of taking actions prior to its signing on the Client's request, on the basis of the legitimate interests of the Company to provide the services to the Client, which he/she wishes to receive, and for performing legal obligations of the Company in relation to the provision of specific service.

To ensure performance of legal obligations of the Company

The activity of the Company is governed by a number of laws and regulations which oblige the Company to Process Personal Data. Including but not limited to the Company processes Personal Data with an aim to meet anti-money laundering and counter-terrorism and proliferation financing requirements, to identify and monitor the Client's activity, to withhold taxes, to submit reports, to maintain accounting records and bookkeeping, to manage records, to conduct audits, to keep assets, to make payments, to meet international and national sanctions, to cooperate with public and private bodies.

The Company processes Personal Data to perform its legal obligations, based on applicable requirements of laws and regulations in the sphere of Service's activity, anti-money laundering and counter-terrorism and proliferation financing, tax liabilities and bookkeeping, lending, executing deals, international sanctions, activity of public bodies and requirements of other laws and regulations applicable to the Company. The Company also processes Personal Data on the basis of its legitimate interests to ensure comprehensive compliance with provisions of the law and prevent from violation, make internal assessment and promote the compliance with the statutory requirements, to meet requirements of the supervisory body.

To ensure risk management

Within the cooperation with the Client the Company processes Personal Data to monitor the observance of the Client's liabilities and its compliance with the set norms and requirements of the Company, to keep evidence and information on the course of cooperation, to disclose and prevent illegal actions, to protect the Company against damage, to recover debts, to protect rights of the Company, to represent the Company's interests in the course of examination of claims and disputes.

In order to manage risks the Company processes Personal Data based on the necessity to perform the agreement with the Client or take actions prior to its signing, based on the Company's legitimate interests to ensure meeting the cooperation conditions, to prevent potential damages, and to protect interests of the Company and/or the Client, to ensure security of the Company and/or the Client and to perform legal obligations of the Company in regard to risk management.

To ensure the Company's legitimate interests

The Company may process Personal Data to improve the quality of its services, to provide the Client with additional services or to develop new products, to carry out internal analysis and statistics, to support the activities of the Company and compliance with the internal administration procedures, to improve and test the Company's technical infrastructure, to ensure the cooperation with the Company's counterparties, to obtain necessary consultations from outsource specialists, to examine complaints or applications of the Client or other persons, to manage the rights and obligations of the Company under the signed contracts.

The Company processes Personal Data based on the necessity to perform the contract with the Client, based on the Company's legitimate interests to ensure the activities and development of the establishment, to improve the quality of its services, to support the technical infrastructure, to perform the Company's liabilities towards the counterparties, based on the legitimate interests of the Company's counterparties related to the provision of services to the Client, and to perform the legal obligations of the Company in regard to financing and commercial activity.

RECIPIENTS OF PERSONAL DATA

The Company is entitled to transfer Personal Data, including, but not limited to, to the following recipients:

- state and supervisory bodies, bailiffs, investigation bodies, courts, tax authority, insolvency administrators, notaries, subjects of investigative activities, and other representatives of state authorities within the framework of relevant requests, fulfilment of the Company's legal obligations, filing of reports;
- counterparties of the Company or the Client, and other persons who are involved in the execution of orders or transactions of the Client, rendering of services to the Client or custody of assets;
- counterparties which ensure that the Client signs documents with a qualified electronic signature or which provide services of validation and/or retention thereof;
- persons who register and record the right of ownership, transactions, collaterals, corporate entities, legal relations or statuses, events or other facts related to the activities of the Client or the Company, including, but not limited to, commercial registers, as well as other public and private registers;
- persons related to the protection of rights and interests, filing of claims, legal proceedings, dispute resolution, including, but not limited to, lawyers, state and arbitration courts, mediators, bailiffs, ombudsmen, alternative dispute resolution mechanisms;
- the Company's auditors within the framework of the audit, drawing up of financial reports, and carrying out of other inspections;
- persons providing technical support to the activities of the Company, including, but not limited to, IT and business service providers, consultants, postal couriers, translators, communications operators, developers;
- authorized representatives of the Client or the Data Subject.

RIGHTS OF DATA SUBJECT

The Data Subject as a whole has the following basic rights in respect of the Processing of Personal Data:

- the right to request the rectification of his/her Personal Data, if they are incorrect or contain incomplete information;
- the right to erase his/her Personal Data, as far as permitted by laws and regulations and legitimate interests of the Company and the Client;
- the right to request information on whether the Company processes Personal Data, and to access such data, as far as permitted by laws and regulations about the confidentiality of information;
- the right to withdraw his/her consent to the Processing of Personal Data, in cases where the actions with Personal Data are not grounded by the laws and regulations, and the necessity to fulfil the contract with the Company or legitimate interests of the Company, and there are no other legal grounds for Processing;
- the right to object to the Processing if it is justified exclusively by the legitimate interests of the Company and in a particular situation does not correspond to the more important interests of the Data Subject. In the situations, when the Processing is based on the requirements of the laws and regulations, the Data Subject is not entitled to object to the Processing of the respective Personal Data;
- the right to require restriction to the Processing for the period, while the Company considers the request by the Data Subject to rectify the incorrect Personal Data or the validity of respective Processing, and the right to request a temporary retention of Personal Data, if the Processing of Personal Data is found to be ungrounded, but the Data Subject objects to their removal;
- the right to file a complaint with the State Data Inspectorate (11/13, Blaumana Street, Riga, LV-1011, Republic of Latvia) regarding issues related to the procedure of the Processing of Personal Data.

All requests related to the execution of the rights of Data Subjects must be addressed to the Company in writing. The Company examines the request within the period stipulated by the laws and regulations. If necessary, the Company may request additional information from the Data Subject, which is necessary for the execution of the request. The rights of the Data Subject are subject to the terms and restrictions which are stipulated in the laws and regulations, and the above list of rights is only informative.

FINAL PROVISIONS

The Data Subject can contact the Company regarding the Processing of Personal Data - by sending a written request to the address: Vidus Street 5-1, Riga, LV-1013, the Republic of Latvia, e-mail address: info@uneek.lv. Messages for the Data Protection Officer must be marked as "To the data protection specialist". The Notice applies to all Clients and Data Subjects irrespective of the time of establishment of contractual relationship with the Company or the receipt of the services. The Notice is applicable also to those Clients and Data Subjects whose Personal Data the Company received prior to the publishing of the Notice, and the former Clients of the Company.

The Company has right to change the text of the Notice.