

## **General Principles for the Processing of Personal Data**

Unioneed Savings and Loan Association's greatest value is its reliable customer relationships. For the best service and for the correct performance of all contractual relations, we collect and store the data of you and other persons communicating with you in accordance with the legislation in force in the Republic of Estonia.

Processing of personal data means any act performed with personal data, including the collection, recording, organization, storage, modification and disclosure of personal data; granting access, making inquiries and extracts; use, transmission, cross-use, aggregation, closure, deletion or destruction; or any of the foregoing, regardless of the way in which the operations are carried out and the means used.

### **Purpose of the processing of personal data**

We follow the principle of processing personal data only on a legal basis and to the minimum extent necessary to achieve the lawful activities and purpose of the Unioneed Savings and Loan Association. We process data only to the extent that ensures the performance of the tasks of the Unioneed Savings and Loan Association as well as the fast and high-quality service of members and customers.

The Unioneed Savings and Loan Association may process personal data in the provision of financial products (loans and sureties) and for the performance of other tasks arising from its Articles of Association.

When providing its services, the Unioneed Savings and Loan Association receives information that contains personal data, including sensitive and private information. In the interests of privacy, we restrict access to personal data to the extent provided by legislation.

The composition of personal data depends on the specific service, but the Unioneed Savings and Loan Association always takes into account the principle of minimum, i.e. only those personal data that are necessary for the provision of the service are collected.

The Unioneed Savings and Loan Association processes personal data only in accordance with the General Data Protection Regulation of the European Union, the Personal Data Protection Act and other legislation regulating the protection of personal data. We have put in place appropriate technical and organizational procedures in case personal data is processed without authorization or in order to prevent unlawful processing, transmission, theft, loss or destruction of data. The goal of the Unioneed Savings and Loan Association is to ensure the least possible invasion of privacy.

Employees of the Unioneed Savings and Loan Association who need personal data to perform their work tasks have access to personal data. The organization of work ensures that the processing of personal data contravenes the inviolability of the private life of individuals as little as possible.

### **Legal bases for the processing of personal data**

The Unioneed Savings and Loan Association processes personal data on the basis of consent, unless there are other legal grounds, and the data subject has given their consent to the processing

of their data. The consent given by the data subject must specify the specific purpose or purposes of the processing of personal data, the data processor (Unioneed Savings and Loan Association, or the co-liable processor involved, or authorized processor). The Unioneed Savings and Loan Association shall inform the data subject upon obtaining consent about which personal data is being processed.

In order to carry out contracts, the Unioneed Savings and Loan Association processes personal data for the preparation, execution and monitoring of contracts under the law of obligations, including the conclusion of loan, suretyship, advisory and employment contracts, and if needed, for the preparation of legal claims based on contracts and for the protection of legal claims. The purposes of personal data processing in the performance of contracts may be: identification of a member of the borrower's management body, surety, employee; performance of contractual obligations, monitoring of the performance of contractual obligations, communication with the other party, performance or ensuring payment obligations; submission, realization, and protection of claims. As a rule, special types of personal data (such as health data) are not processed for the purpose of carrying out contracts.

In order to fulfill legal obligations, the Unioneed Savings and Loan Association processes personal data for the purposes and to the extent provided by legislation. Here, the Unioneed Savings and Loan Association processes personal data in order to fulfill obligations arising from tax laws or the Employment Contracts Act.

A legitimate interest is the interest of the Unioneed Savings and Loan Association to use personal data in order to perform the necessary tasks of its business. Such tasks include credit risk assessment, direct marketing and asking customers or members for feedback during the term of the contract; setting interest rates, developing loan services, fraud prevention, business and compliance risk management, IT system network security, the Unioneed Savings and Loan Association information security.

Profile analysis is the automatic processing of personal data to assess customer risks and their personal characteristics (including creditworthiness) and the use of existing services to analyze or forecast their customer risks, loan needs, preferences and interests, and to accordingly offer them relevant services. Profile analysis is used in advising customers, assessing risks, for marketing purposes and decision-making, such as to manage customer risks, evaluate loan products and check transactions in the fight against fraud.

### **Recievers of personal data**

If justified, the Unioneed Savings and Loan Association may process personal data (incl. special types) for the preparation, submission and protection of legal claims.

The Unioneed Savings Loan Association does not disclose personal data to third parties, unless the respective obligation arises from legislation or they have the consent of the data subject.

The Unioneed Savings and Loan Association's business partners process personal data on behalf of the Savings and Loan Association only for the purpose for which the Savings and Loan Association processes the collected personal data, and in accordance with the applicable legislation.

The Unioneed Savings Loan Association may transfer personal data to competent state authorities in order to fulfill an obligation arising from law.

### **Rights of the data subject**

The data subject has the right to demand the correction of his or her personal data if incorrect data has been discovered. The data subject also has the right to inspect his or her data at any time and to receive information on the purposes and deadlines for data processing. To do this, contact the Unioneed Savings and Loan Association. If the data subject finds that the Unioneed Savings and Loan Association has violated his or her rights in the processing of personal data, he or she has the right to file a claim for termination of the violation with the Data Protection Specialist of the Unioneed Savings and Loan Association.

The Data Protection Specialist of Unioneed Savings and Loan Association is:

- Viljar Subka (e-post: [viljar@dcollectio.ee](mailto:viljar@dcollectio.ee)).

The Unioneed Savings and Loan Association's Data Protection Specialist may be contacted for any questions concerning the processing of personal data by the Unioneed Savings and Loan Association.

The data subject has the right to request the deletion of his or her data, i.e. the right to be forgotten if the personal data of the data subject are processed with consent or a legitimate interest.

The data subject has the right to object to the processing of personal data at any time if the Unioneed Savings and Loan Association processes the data on the basis of the performance of its tasks or a legitimate interest. An objection must be submitted in writing or in a form that can be reproduced in writing. Upon receipt of the objection, the Unioneed Savings and Loan Association shall consider legal interests and, if possible, terminate the data processing. The right of objection cannot be exercised if the Unioneed Savings and Loan Association proves that personal data is processed in a lawful manner or basis.

The Unioneed Savings and Loan Association shall respond to the data subject without undue delay, but not later than within 30 calendar days after receipt of the digitally submitted and signed application. The deadline for replying to the data subject may be extended by 60 calendar days, taking into account the complexity of the application and the volume of data. Upon extension of the deadline for reply, a notification to that effect shall be forwarded to the data subject without delay.

The data of a deceased person can be requested by the heir, the deceased's spouse, the deceased's parents and grandparents, children and grandchildren, sister or brother.

In order to release personal data, the deliverer of the data must be convinced that he/she is dealing with the person who has the right to receive the respective data. Therefore, the data applicant must, if necessary, prove his or her identity or the right to request the data. If, in the case of a telephone inquiry, it is not possible to ascertain that the data is requested by the person entitled, they have the right to request that the application be made in writing together with the necessary evidence.

If a personal data breach occurs and it poses a potential threat to the persons's rights and freedoms, the required documentation will be formalized and measures will be taken to put an

immediate end to the breach. If the breach is likely to pose a serious threat to the data subject's rights and freedoms, the data subject shall be informed of it. The purpose of the information is to enable the data subject to take the necessary precautionary measures to alleviate the situation.

### **Storage of personal data**

The Unioneed Savings and Loan Association considers the protection of personal data to be very important for mitigating risks and preventing threats, and they use organizational, physical and information technology security measures, including an appropriate level of data protection to ensure the integrity, availability and confidentiality of data.

The Unioneed Savings and Loan Association stores personal data for the period necessary to achieve the purposes of personal data processing or until the term for storage of personal data provided by law (such as accounting data for 7 years).

At the end of the storage period, the data shall be anonymised or deleted. Upon expiry of the storage period, the data shall not be deleted if there is a circumstance which precludes it, including the need to protect a legal claim.

The data subject has the right to apply to the Data Protection Inspectorate and the court in case of a violation in the processing of his or her personal data.

Contact details of the Data Protection Inspectorate:

Phone: 627 4135

e-mail: [info@aki.ee](mailto:info@aki.ee)

address: Tatari 39, Tallinn 10134

### **Use of cookies**

Unioneed Savings and Loan Association's websites use cookies. A cookie is a small block of text data in a data subject's web browser that is sent by the website to the cookie file in the data subject's computer.

There are two types of cookies:

- Persistent cookies that remain permanently in the cookie file on the data subject's computer. They can be used, for example, to identify the data subject as a returning visitor to the website and to adapt the content of the website to the needs of the data subject, or to collect statistics.
- Session cookies are temporary and they disappear when you leave the website or close your browser. Session cookies may be used to enable certain features of the website, such as requesting a service or product.

Users of the Unioneed Savings and Loan Association websites are considered to have accepted cookies if cookies are allowed in their browser settings.

The data subject can always decide whether or not to allow cookies in web browsers. If cookies are not desired by the data subject, the web browser can be set to automatically disable cookies or to notify whenever a website asks for permission to add a cookie.