

## PRIVACY POLICY

The present Privacy Policy (hereinafter – the “**Policy**”) sets out the general regulations for processing of personal data of the customers of **UAB “NS Pay”**, holding an electronic money institution licence for restricted activity (hereinafter – the “**Data Controller**” or “**us**”), their representatives, other persons related to our activities or provision of services, visitors of the website (which integrates our solution of electronic money account management and payment services) (hereinafter – “**you**”).

Please be advised that your personal data controller is:

UAB "NS Pay"	
Legal entity code	305652931
Registered office address	Vašingtono a. 1-62, Vilnius, Republic of Lithuania
Phone number	+3706 0433674
E-mail	<a href="mailto:info@nspay.lt">info@nspay.lt</a>

Should you have any questions regarding the protection of your personal data or this Policy, we recommend that you contact us immediately using the contact details above.

Please be advised that when processing your data we also adhere to:

- (i) the General Data Protection Regulation;
- (ii) the Law on the Legal Protection of Personal Data of the Republic of Lithuania;
- (iii) the Law on Electronic Communications of the Republic of Lithuania; and
- (iv) other applicable legal acts as well as the instructions and recommendations of the supervisory authorities.

When processing your personal data, we adhere to the principles of legality, good faith, transparency, limitation (reduction) of scope and duration, accuracy of data processing, we do not collect, do not require data subjects to provide and do not process data that is not necessary. The data controller shall also establish measures and procedures in its activities to ensure maximum and effective security of personal data.

This Policy may be subject to updating. Following the update of this Policy, the latest version is published on the website [www.nordstreet.com](http://www.nordstreet.com), where our solution for the management of electronic money accounts and the provision of payment services has been integrated (hereinafter – the “**System**”). This website is administered by UAB Nordstreet, the operator of the crowdfunding platform Nordstreet (hereinafter – the “**Platform**”) (legal entity code: 304565690; registered office address: Naugarduko g. 19, Vilnius, Republic of Lithuania) (hereinafter – the “**Operator**”).

We process your personal data for the following purposes:

- (i) for the purpose of providing services;
- (ii) for direct marketing purposes;
- (iii) upon your queries submitted to the Data Controller;
- (iv) for the purpose of compiling statistics and / or reports;

The basis, scope, data retention periods as well as other circumstances related to the processing of your personal data, in each case, are defined in detail hereinbelow.

### 1. Processing of personal data for the purpose of providing services

- 1.1. The System is a solution integrated into the Platform maintained and administered by the Operator, with the help of which you are able to open your electronic money account and use our payment services to conclude crowdfunding agreements on the Platform and receive payments made by project owners under crowdfunding agreements concluded.

- 1.2. In providing our services, we adhere to the Law on Electronic Money and Electronic Money Institutions of the Republic of Lithuania, the Law on Payments of the Republic of Lithuania, other applicable legal acts and contracts and / or agreements concluded with customers.
- 1.3. For proper provision of our services, we also process your data for the following purposes related to the provision of our services:
  - 1.3.1. the implementation of **money laundering and terrorist financing prevention requirements** (provided for in applicable legislation and our internal policies);
  - 1.3.2. **recovery of debts to us** (in accordance with the concluded agreements);
  - 1.3.3. **implementation of other requirements applicable to our operations**.
- 1.4. The data controller manages the personal data required for provision of such a service – basic personal data (name, surname, year of birth, age, etc.), contact data (telephone number, e-mail address), user account login data, financial data (information about transactions executed in the System, such as details of the beneficiary, time and date of the transaction, size of the transaction, etc.).
- 1.5. We receive the above data directly from you (when you provide them) or from other sources (for example, state databases, such as the systems administered by the State Enterprise Center of Registers, etc.). Your data may also be transferred to us by the Operator for the purpose of compliance with the money laundering and terrorist financing prevention requirements. We note that in all cases the legal basis for the processing of this data is the performance of the contract you have concluded with us.
- 1.6. We will retain your personal data for the purpose of providing the services for 10 years from the date of performance of the agreement or execution of a transaction, unless the legal acts provide for longer retention periods for such data (unless a longer retention period would be set in the applicable legal acts).

## **2. Processing of personal data for direct marketing purposes**

- 2.1. The Data Controller may send information through the information channel of your choice (e.g. by e-mail) in order to provide information related to the activities of the Platform and other news. In the latter case, the Data Controller processes the personal data, provided by you, for the purpose of direct marketing.
- 2.2. The Data Controller is controlling your basic personal data (name, surname), contact data (telephone number, e-mail address, etc.), and other personal data that you have provided to us, for direct marketing purposes.
- 2.3. The data subject is the source of the relevant personal data processing, i.e. you yourself submit your personal data in the System, which are processed by the Data Controller for the said purpose.
- 2.4. Your consent constitutes a legal basis for the processing of this data.
- 2.5. The retention period of your personal data is 3 years from the date of submission of such data to the Data Controller, unless you withdraw your written consent before the expiry of the term.
- 2.6. The Data Controller, in accordance with Article 69 (2) of the Law on Electronic Communications, may also process the data of existing customers for the purpose of direct marketing on the basis of the legitimate interest of the Data Controller.
- 2.7. You have the right to refuse the information sent to you at any time. You can do this by contacting us in writing (by e-mail to [info@nspay.lt](mailto:info@nspay.lt)).

## **3. Processing of personal data upon submission of queries by you**

- 3.1. When you contact the Data Controller by e-mail, telephone or in any other way, the Data Controller shall process the personal data provided by you in order to administer the received queries, ensure the quality of services being provided and, if necessary – to comply with various legal requirements and protect the interests of the Data Controller. The legal basis for the processing of this data in the cases provided for is the legitimate interest of the Data Controller.
- 3.2. When submitting a query, please observe at least the minimum requirements for the protection of personal information – do not provide excessive personal data that is not necessary for the intended purpose, i.e. for drawing up of a query, complaint, letter or request.

- 3.3. The personal data provided by you along with the query to the Data Controller is generally retained for up to 3 years. The retention period may depend on the content and nature of the personal data provided to the Data Controller, as well as other circumstances. Where it is necessary for the protection of the rights and legitimate interests of the Data Controller (or other persons), proper administration of queries, handling of a complaint or settlement of a dispute, as well as in other cases specified in legal acts, your personal data may be retained for a longer period.

#### **4. Processing of personal data for statistical and / or reporting purposes**

- 4.1. The Data Controller may process the personal data provided by you for statistical purposes, since the Data Controller, as an entity holding an electronic money institution licence for restricted activity, is subject to legal requirements related to the submission of reports on the Data Subject's activities to the Bank of Lithuania.
- 4.2. The data concerned are processed in such a way that it would be no longer possible to identify a particular data subject.
- 4.3. Personal data processed for this purpose is normally retained for up to 3 years. The retention period may be longer, depending on the content and nature of the data processed and the requirements of the applicable legislation.

#### **5. Recipients of the personal data**

- 5.1. In the course of its activities, the Data Controller may use certain service providers (for example, companies providing data storage services, companies developing and maintaining software, companies providing communication services, etc.) to which your personal data may be transferred. Your personal data will only be transferred to the respective service providers if and to the extent necessary for the provision of their respective services.
- 5.2. The data recipient may also provide your personal data to the following data recipients:
  - 5.2.1. state institutions and registers;
  - 5.2.2. courts, notaries, bailiffs, law enforcement agencies, etc.;
  - 5.2.3. other third parties involved in the provision of our services and / or having a legal basis to obtain such data.
- 5.3. In all cases, reasonable efforts shall be made to ensure, in pursuance of legal requirements, that personal data are not lost or misused.

#### **6. Rights you have as data subjects**

- 6.1. As data subjects, you have the following rights:
  - 6.1.1. **Access to your personal data and find out how they are being processed.** You have the right to receive a confirmation that your personal data are being processed by the Data Controller, as well as the right to access your personal data being processed and other related information.
  - 6.1.2. **Request correction of incorrect, inaccurate or incomplete data.** If you believe that the information about you processed by the Data Controller is inaccurate or incorrect, you are entitled to request that this information be changed, updated or corrected.
  - 6.1.3. **Request deletion of your personal data (“right to be forgotten”).** In certain circumstances specified in the legal acts (e.g. when personal data are being processed unlawfully, the basis for processing the data has disappeared, etc.), you are entitled to request that the Data Controller delete your personal data.
  - 6.1.4. **Request restriction of the processing of your personal data.** In certain circumstances specified in the legal acts (e.g. when personal data is processed unlawfully, etc.), you are entitled to request that the Data Controller restrict the processing of your data.
  - 6.1.5. **Request to transfer of your personal data to another data controller or provide it directly in a form convenient for you.** In certain cases, you are entitled to transfer the data, which are processed by us with your consent and are processed by automated means, to another data controller.

- 6.1.6. **Disagree with the processing of your personal data even if they are being processed on the basis of a legitimate interest**, unless there are legitimate reasons for such processing or they are intended to be used for bringing, enforcing legal claims or defending against them.
- 6.1.7. **Revoke your consent to the processing of your personal data**. In cases where your personal data are being processed on the basis of a separate consent, you are entitled to revoke your consent to the processing of your personal data at any time. In this case, the Data Controller will stop processing these personal data of yours.
- 6.2. Please refer to us you queries concerning the exercise of the rights you have as data subjects in writing, by e-mail to [info@nspay.lt](mailto:info@nspay.lt).
- 6.3. If you believe that your personal data are being processed unlawfully or that your rights regarding the processing of personal data are violated, please contact us by e-mail to [info@nspay.lt](mailto:info@nspay.lt). Your queries will be satisfied or your queries will be rejected indicating the reasons for rejection within 30 calendar days from the date of submission of the query. The specified period of 30 calendar days may be extended by another 30 calendar days with prior notice, if the query concerns a large volume of personal data. The response to the query will be provided by e-mail. Upon examining your query, we will notify you of the results and the steps we have taken to fulfil your query, or provide you with information on what further actions you can take if your query has not been fulfilled or satisfied.
- 6.4. You also have the right to contact the State Data Protection Inspectorate if you believe that your personal data are being processed in violation of your rights or legitimate interests arising from the relevant legal acts. You can forward complaints to the State Data Protection Inspectorate in accordance with the complaint submission and examination procedures established by the Inspectorate, which can be found at: <https://vdai.lrv.lt/lt/veiklos-sritys-1/skundu-nagrinejimas> / <https://vdai.lrv.lt/en/services>. However, before contacting the State Data Protection Inspectorate, we encourage you to first contact the Data Controller immediately. Thereby we will be able to find the solution to the problem most expeditious and optimal for both parties.