

## Finbite personal data processing principles

### 1. General Provisions

Finbite OÜ (hereinafter: Finbite) principles of processing personal data (hereinafter: the principles) provide the manner and basic principles of how Finbite processes your personal data.

Finbite belongs in the Omniva group and is a subsidiary of AS Eesti Post. The Omniva Group also includes the parent AS Eesti Post and subsidiaries Maksekeskus AS in Estonia, Omniva LT UAB in Lithuania and Omniva SIA in Latvia. Affiliate Post11 OÜ is also part of the group.

According to these principles, personal data is any information based on which a person is directly or indirectly identified or can be identified.

Processing is according to these principles any activity Finbite executes with the personal data either per single data units or in aggregate, collecting, changing, using, organising, preserving, forwarding, erasing, destroying, etc., manually, automatically or in another manner.

Finbite shall ensure the confidentiality of personal data within the legislation regulating data protection and implement appropriate technical and organisational measures to protect personal data from unauthorised access, illegal processing or disclosure, accidental loss, changing or destruction.

#### Contact details of Finbite

Personal data processor is Finbite OÜ.

Registry code: 16077631

Address: Pallasti 28, Tallinn, 10001

Telephone: +372 664 3311

Email: [info@finbite.eu](mailto:info@finbite.eu)

#### Data

#### Protection

#### Official

A data protection expert shall assist Finbite in ensuring personal data protection requirements. The data protection expert is the contact person if you have any inquiries and/or questions regarding personal data protection and personal data processing in Finbite.

Finbite data protection expert contact information is:

OÜ Finbite Data Protection Expert

Pallasti 28, 10001 Tallinn

E-mail: [info@finbite.eu](mailto:info@finbite.eu)

#### Purposes and legal grounds for processing personal data

Finbite provides services aimed at legal persons. Within the services provided, Finbite mainly processes the personal data forwarded by its business clients within the provided service. Generally, Finbite processes the personal data on the conditions agreed with the business clients, with the aims adhering to its own justified interest or the obligation pursuant to law.

When providing service to its business clients, Finbite is handled as the data processor. When operating as a data processor and processing personal data, Finbite adheres to the requirements of the guides submitted by its business clients, i.e. the data controllers, or legislation. In such case, the responsible person shall be responsible for disclosing information on processing personal data and to obtain additional information, you need to contact the data controller.

Regarding personal data collected while providing the service, Finbite may process personal data pursuant to justified interest to:

- discover security breaches and prevent malevolent incidents that may bring about illegal processing of personal data;
- protect the interests of its clients and Finbite as a company and its employees;
- supplement, develop, maintain and test Finbite applications, technical systems and info technological infrastructure.

As the data controller, Finbite mostly collects personal data directly from you and processes this personal data pursuant to justified interest with the following aims:

- customer service offers and processing customer calls;
- carrying out customer surveys for feedback and analysing the received feedback;
- improving the service and service quality pursuant to the received feedback.

In some instances Finbite may request your consent for processing personal data. The consent includes information for this specific processing. You have the right to withdraw your consent at any time.

Finbite may process your personal data to perform obligations from the law, for example, to answer the inquiries from legal protection institutions.

### **Categories of personal data**

As the data controller, Finbite may process the following personal data categories:

- person's data, e.g. name, job title, position;
- contact information, e.g. telephone number, e-mail address;
- data obtained while performing an obligation pursuant to the law, e.g. data received or derived from or the inquiries of investigative bodies;
- communication data, e.g. audio recordings gathered when you communicate with Finbite by telephone. Other data collected by email, messages and other communication channels as well, for example when you visit the Finbite website;
- information on satisfaction, e.g. satisfaction with the services offered by Finbite.

### **Rights of the customer**

Pursuant to the legislation regulating data protection, you have the following rights:

- apply for amendment of your data if this data is insufficient, incomplete or faulty;
- contest the processing of your personal data if use of personal data is based on justified interest;

- apply for your personal data to be erased. Submission of the application for erasure does not mean that the data is erased for sure. For example, Finbite does not erase your personal data if Finbite has an obligation to store data pursuant to law. Also, Finbite does not erase data if the aim of preserving personal data is to prepare, submit or defend a legal claim and handle a complaint;
- limit the processing of your personal data;
- obtain information on whether Finbite is processing personal data and if it is, then obtain access to the said data;
- obtain your data that you have submitted and which is processed based on consent or to perform a contract in writing or in a generally used electronic format, and if technically possible, submit this data to other service providers (transfer of data);
- retrieve your consent for processing your personal data;
- apply that a decision based solely on automated decision-making, incl. profile analysis, is not made concerning you if it means legal consequences concerning you or impacts you significantly. Finbite informs the clients of automated decisions beforehand;
- submit complaints on use of personal data to the Data Protection Inspectorate (website [www.aki.ee](http://www.aki.ee)) if you find that the processing of your personal data breaches your rights and interests adhering to the legislation regulating data protection.

You can let Finbite know of your wish to execute your rights using the contact information provided in the principles.

### **Personal data receivers**

Finbite may use other persons, i.e. partners, when providing services. If our partners develop a need for processing personal data when providing a service, we will do everything in our capacity to make sure that the processing of personal data is legal and safe. Finbite ensures that respective data processing agreements are signed with the partners and respective measures are implemented that ensure safe processing of your data and protection of your rights.

When processing personal data, Finbite may share the personal data with institutions and surveillance institutions that process the personal data as data controllers.

### **Using cookies**

When you visit the Finbite website, Finbite uses cookies. Cookies are tiny text files comprising of letters and numbers that are downloaded and saved on your computer or another device (e.g. telephone) when you visit the website. Finbite uses cookies primarily to ensure technical functioning and convenient use of websites. We ask for your consent for using certain cookies.

Used cookies are listed in the rules available at [www.finbite.eu](http://www.finbite.eu).

### **Forwarding data**

Finbite processes, incl. stores, personal data in countries located in the European Union or the European Economic Area. Finbite does not forward data into third countries that do not have similar personal data protection laws that meet European Union standards. If forwarding personal data to a third country is unavoidable, Finbite shall take appropriate measures to ensure legal processing of personal data. Appropriate measures are, for example:

- a valid contract that includes the standard terms of the contract developed by the European Union or approved instructions and other similar items that meet the conditions of the General Data Protection Regulation of the EU;

- the country of location of the personal data receiver has sufficient data protection levels according to a decision made by the European Commission.

### **Personal data processing deadlines**

Finbite stores personal data until it is necessary for achieving the aim of personal data processing. This means that personal data processing preservation dates vary according to the aims of collecting the data. When the preservation deadline arrives, Finbite erases or anonymises the personal data.

### **Validity of the principles and amendments**

Finbite updates the principles when necessary to ensure that the principles are compliant and up to date. For example, when we add new personal data processing aims or when new personal data is collected. The currently valid version of client data processing principles is available on Finbite's website at [www.finbite.eu](http://www.finbite.eu).