

I. GENERAL PROVISIONS

1. Your personal data controller is SIA "LENNDY", legal entity code 4020306671, address Gobas str. 1/2, Riga, Latvia LV-1016 (**Lenndy**) in providing peer to peer lending operator services. Lenndy contact details are published at www.lenndy.com. If the client has any questions regarding the Privacy Policy of Lenndy or wishes to obtain additional information on how to exercise the rights, the client can contact Lenndy by writing an email to hello@lenndy.com.
2. Personal data collected by Lenndy are processed in accordance with the General Data Protection Regulation and other Latvian legal acts.
3. This Privacy Policy is a supplement to the User agreement, which comes into force together with the User agreement after a client register in the peer to peer lending marketplace (**Platform**). This Privacy Policy provides for basic rules for collecting, storing, processing and retention of client's personal data and other information relating to the client, as well as the scope of processed personal data, the purposes, sources, recipients and other important aspects of data processing in using the services of Lenndy as a lending operator. It is therefore recommended to analyze the provisions of this Privacy Policy in detail prior to beginning to use the services of Lenndy.
4. The client can visit this website not providing any information about himself, however, if the client wants to open an account on the Lenndy Platform and/or use other services offered by Lenndy, Lenndy will ask the client to provide personal data indicated in the Platform's system and to carry out established identification procedures.

II. Purposes of the processing

5. The main purpose for which Lenndy collects client's personal data is to provide the **peer to peer lending operator services (Services)**. Lenndy is bound by law to establish and verify clients' identity prior to using Platform Services, also, at the time of the provision of the Services, to request further information. Taking this into account, clients must provide correct and complete information.
6. Purposes for data processing:
 1. **Providing Services to the client.** Upon submission of the registration application and registration on the Platform, personal data of the client is used to enter into the Agreement and create the client Account to be used as a means to receive the Services.
 - a) **Identifying the client, implementation of the "Know Your Client" principles.** Lenndy is obligated by the Latvian laws to identify customer before providing Services. In order to identify the client, Lenndy shall request the client to provide identity documents and other information, including but not limited, to confirm the fact that the client or his/her family member or his/her close person is a politically exposed person;
 - b) **Creating and maintaining the Account on the Platform.** Personal data is necessary to provide log in options on the Platform, to communicate with the client in case of any inquiries, to conduct surveys and to ensure a means by which the client can receive the Services;
 - c) **Execution of agreements with the client** or in order to take steps at the request of the client. The personal data processing is based on the conclusion and fulfilment of the Agreement and compliance with such legitimate interests of Lenndy as maintenance of the Account, improvement of the Service quality, informing the client about the activity in the Account and protection of its rights and interests in case of a dispute;
 - d) **Informing the client about Services.** Personal data for this purpose is processed in order to inform the client about the services provided by Lenndy, their prices, specifics, changes in terms of the agreements concluded with the client, for sending system and other messages relating to the provided Lenndy services.
 2. **Implementation of legal obligations of Lenndy.** In order to fulfill the statutory obligations in the fields of accountancy and anti-money laundering and terrorist financing prevention, Lenndy processes the client's personal data, including but not limited, information specified by the client in the client's questionnaire in accordance with the provisions of the laws and regulations of the Republic of Latvia.

- a) prevention of possible money laundering and terrorist financing, prevention of fraud, detection, investigation and informing of such activity, determination of politically exposed persons or financial sanctions imposed on the client;
 - b) execution of transfers of funds and transmission of necessary information together with a transfer in accordance with legislation;
 - c) continuous and periodic monitoring;
 - d) risk assessment;
 - e) updating clients' data in order to ensure their accuracy.
3. **DIRECT MARKETING.** FOR THIS PURPOSE, PERSONAL DATA ARE PROCESSED IN ORDER TO PROVIDE THE CLIENT WITH OFFERS ON THE SERVICES PROVIDED BY LENNDY. UPON APPLYING FOR RECEIPT OF DIRECT MARKETING THE CLIENT AGREES THAT CLIENT'S DATA, INCLUDING BUT NOT LIMITED CERTAIN TRANSACTION DATA (FUNDS INVESTED AND INCOMING PAYMENTS), IS USED TO PREPARE AN APPROPRIATE COMMERCIAL COMMUNICATION FOR THE CLIENT BASED ON THE CLIENT'S DATA AVAILABLE TO LENNDY. LENNDY PROCESSES CLIENT'S PERSONAL DATA UNTIL THE CLIENT WITHDRAWS THE CONSENT TO RECEIVE DIRECT MARKETING OR, IN SOME CASES, WHEN THE NECESSITY TO KEEP EVIDENCE THAT CONSENT HAS BEEN RECEIVED IS NO LONGER IN FORCE. WITH THIS DOCUMENT THE CLIENT CONFIRMS, THAT HE/SHE IS AWARE OF THE FACT THAT THE AFOREMENTIONED DATA MAY BE PROCESSED FOR THE PURPOSE OF DIRECT MARKETING, AND THAT THE CLIENT HAS THE RIGHT TO DISAGREE AND TO OBJECT THE USE OF HIS/HER PERSONAL DATA FOR THIS PURPOSE AT ANY TIME BY INFORMING LENNDY THEREOF IN WRITING VIA EMAIL TO HELLO@LENNDY.COM. WITHDRAWING CONSENT FOR RECEIVING DIRECT MARKETING DOES NOT AFFECT THE CONSENT GIVEN TO PROCESS INFORMATION OBTAINED THROUGH COOKIES.
4. **Protecting Lenndy's rights and interests.** The personal data processing is based on compliance with such legitimate interests of Lenndy as protecting Lenndy's rights and interests in case of a dispute with the client.
5. **Compilation of statistical data.** On the basis of the legitimate interest of Lenndy to compile statistical data regarding the Services used by the clients, to improve the Service quality and to develop Services, Lenndy, with the aim to analyse information related to the provision of the Services, processes summarised information regarding the client's data. For this purpose, personal data shall be processed in such a way that, by including them in the scope of statistical analysis, it is not possible to identify the data subjects concerned. THE CLIENT ACKNOWLEDGES THAT HE/SHE HAS THE RIGHT TO DISAGREE AND OBJECT PERSONAL DATA PROCESSING FOR SUCH PURPOSE AT ANY TIME AND IN ANY FORM BY INFORMING THEREOF LENNDY. However, Lenndy may continue to process the data for statistical purposes if it proves that the data is processed for compelling legitimate reasons beyond the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
6. **Use of cookies.** The portal uses cookies to maintain and improve the operation of the portal. Information on the use of cookies is available at Cookie Policy.
7. Profiling carried out by Lenndy involves processing of personal data by automated means for the purposes of legislation relating to risk management and continuous and periodic monitoring of transactions in order to prevent money laundering and fraud; such ongoing profiling is based on legitimate interests of Lenndy, the performance of a legal obligation and the execution of the agreement.
8. If the client fails to provide the personal data when processing of such data is necessary to enter into and fulfill the Agreement or required by the laws, Lenndy shall not provide the Services.

III. CATEGORIES OF CLIENT'S PERSONAL DATA

9. Lenndy processes the following categories of client's personal data:

Purpose	Categories of client's and representative's personal data	Legal basis
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<p>Providing Services to the client</p>	<p>Identification data: name, surname; date of birth; personal identity number; number and date of issue of the personal identification document, state and authority which has issued the document; scan copy of an identity document (ID card, passport, inland passport); information whether a client or a family member or a close person is a politically exposed person; a scan of power of attorney or other document, which confirms representative right to represent the person; e-signature data (if applicable).</p> <p>Contact data: address in the country of tax residence, country of tax residence, e-mail address, phone number, IP address.</p> <p>Additional data: monthly income amount and source (salary, reward, royalties, rent, assets sale, gift, legacy, other source); information about the planned number and amount of transactions; information about the amount of a transaction made to Lenndy's account; a client's workplace and position; field of business; nature of activity; a bank account number; preferred language.</p> <p>Transaction data: the client's invested funds, investments, transactions, incoming payments, claimed disbursements of money, information regarding the concluded assignment agreements, net annual return, selected currency, available funds, accountancy accounts.</p> <p>Communication data: the client's communication with Lenndy through the Platform via live chat, via email and/or by phone.</p>	<p>On the basis of execution of agreements and a legal obligation imposed on Lenndy, i. e. the Law on Prevention of Money Laundering and Terrorist Financing of the Republic of Latvia, and are required in order.</p>
<p>Implementation of legal obligations of Lenndy</p>	<p>Identification data: name, surname; date of birth; personal identity number; number and date of issue of the personal identification document, state and authority which has issued the document; scan copy of an identity document (ID card, passport, inland passport); information whether a client or a family member or a close person is a politically exposed person; a scan of power of attorney or other document, which confirms representative right to represent the person; e-signature data (if applicable).</p> <p>Contact data: address in the country of tax residence, country of tax residence, e-mail address, phone number, IP address.</p> <p>Additional data: monthly income amount and source (salary, reward, royalties, rent, assets sale, gift, legacy, other source); information about the planned number and amount of transactions; information about the</p>	<p>On the basis of a legal obligation imposed on Lenndy, i. e. the Law on Prevention of Money Laundering and Terrorist Financing of the Republic of Latvia, and are required in order.</p>

	<p>amount of a transaction made to Lenndy's account; a client's workplace and position; field of business; nature of activity; a bank account number.</p> <p>Transaction data: the client's invested funds, investments, transactions, incoming payments, claimed disbursements of money, information regarding the concluded assignment agreements, net annual return, selected currency, available funds, accountancy accounts.</p> <p>Other personal data required by the Law on Prevention of Money Laundering and Terrorist Financing (e. g., client's risk factors and risk group; transactions monitoring data; monitoring data of client's ongoing transactions, processed to ensure that the ongoing transactions conform to Lenndy available information about the client, data of a client's suspicion transactions and so on).</p>	
Direct marketing	<p>Identification data: name, surname.</p> <p>Contact information: e-mail address, phone number.</p>	On the basis of client's consent.
Protecting Lenndy's rights and interests	<p>Identification data: name, surname, address, date of birth, email address, phone number, payment account statements.</p> <p>Contact data: e-mail address, phone number, IP address.</p> <p>Communication data: correspondence with the client.</p>	On the basis of the legitimate interest of Lenndy.
Compilation of statistical data	<p>Identification data: name, surname.</p> <p>Contact data: e-mail address, phone number.</p> <p>Transaction data: funds invested and incoming payments.</p>	On the basis of the legitimate interest of Lenndy.

IV. DATA PROVIDERS

Lenndy client's personal data receive:

1. Direct from the client (providing an opportunity to fill out an account on Platform, by means of online communication, by phone, e-mail or other technical tools and communication channels);
2. In an automated way:
 - a. technical information that may contain client's IP address;
 - b. social network information and content that may contain identification and social account data;
 - c. cookies (more information in the section Cookies Policy).
2. From third parties:
 - a. publicly available resources (social networks, public registers, google);
 - b. our cooperation partners and affiliated companies (regarding the provision of payments, technical support or services);

- c. financial and payment institutions, including banks.

V. TRANSFER OF INFORMATION TO THIRD PARTIES

Lenndy and cooperation partners process the client's personal data within the European Economic Area. Lenndy has a right to disclose the client's data to the entities specified below:

1. to any person related to the fulfilment of commitments arising to Lenndy from the agreement (including to communications service providers, payment intermediaries, credit institutions, IT service providers, etc.);
2. to outsourced service providers that Lenndy has engaged in the provision of services arising from the agreement, insofar as such information is necessary for the performance of functions delegated to them;
3. to personal data processors, the supervisor whereof is Lenndy, insofar as such information is necessary for the performance of functions delegated to them;
4. upon handing over (transferring) a Claim to third parties;
5. to a third party, who is taking debt collection steps to recover debt from the client (such as debt collectors, lawyers, court bailiffs, insolvency administrators, etc.);
6. to Lenndy legal, accounting, or auditing service providers, ensuring that the said persons have undertaken not to divulge such information.

In the cases specified by law, Lenndy is obligated to disclose the client's personal data to state authorities.

Lenndy does not disclose any personal data to state authorities or third parties without a legal basis.

When delegating certain functions of Lenndy to personal data processors, Lenndy undertakes to guarantee appropriate technical and organisational security measures to ensure that the personal data processor upholds the security standards of Lenndy.

VI. WHERE AND HOW WE STORE INFORMATION

The data that Lenndy collects from clients will be transferred to and stored at a destination inside the European Economic Area (EEA). All information the client provides to Lenndy is stored securely on Lenndy's servers or servers of our partners.

Unfortunately, the transmission of information via the internet is not completely secure. Even though Lenndy will do the best to protect client's personal data, Lenndy cannot fully guarantee the security of client's data transmitted to Lenndy; therefore, transmission is at client's own risk. Once Lenndy have received client's information, Lenndy will use procedures and security features to try to prevent unauthorised access.

Lenndy respects the individual's right to privacy and makes all reasonable efforts to ensure the security and confidentiality of personal data and other information processed on this website. All employees of Lenndy who know the secret of personal data must keep it safe even after termination of the employment or contractual relationship. Lenndy may engage data processors and/or, at its sole discretion, hire other persons to perform certain functions on behalf of Lenndy. In such cases, Lenndy shall take necessary measures to ensure that such data is processed by the personal data processors in accordance with instructions of Lenndy, shall require to implement appropriate measures for the security of personal data and applicable legislation. In such cases, Lenndy shall ensure that such persons will be subject to the non-disclosure obligation and will not be able to use this information for any other purpose, except to the extent necessary to perform the functions assigned to them.

VII. LENGTH OF RETENTION OF INFORMATION

All client's related information, including information that is stored in the client's account and all communications with Lenndy, is stored as evidence confirming the identity of the client, conclusion of the

agreement, transactions made and fulfilment of the agreement and is kept until the fulfilment of the agreement, the data is no longer necessary to provide Services, the data storage timeframe or limitation period for legal proceedings established by the laws and regulations of the Republic of Latvia expires, whichever occurs later.

Below is a summary of some key considerations how long each piece of information is kept:

1. For accounting purposes, Lenndy stores the client's personal data in connection with the concluded and fulfilled agreement for no less than 5 years after the conclusion of the agreement.
2. For anti-money laundering and terrorist financing prevention purposes Lenndy stores the client's data in connection with verifying the identity of the client and the origin of the funds (including a copy of an identity document and all communication data) for 5 years after the conclusion of the agreement.

The limitation period for legal proceedings is 10 years in accordance with the Civil law of the Republic of Latvia. Due to the fact that transaction data is interconnected with the provision of Services, there may be situations where the transaction data is stored for a longer period of time in order to provide services to other clients.

VIII. RIGHTS RELATED TO PERSONAL INFORMATION

Lenndy respects the client's rights to access, manage and control the personal data that Lenndy processes. Once Lenndy receives a client's request to exercise any of the rights listed below, Lenndy will review the client's request and provide a response without undue delay and in any event within one month of receipt of the request. This time period may be extended if the client's request is complex or if due to the amount of received requests Lenndy cannot prepare a reply within the previously set time limit.

Should the client wish to exercise any of the rights listed below, the client can do so by submitting a request in one of the following ways:

- by sending an electronic request to hello@lenndy.com.
- by sending a signed request to Gobas str. 1/2, Riga, Latvia LV-1016.

An authorised person can submit a request on behalf of the client, provided that a valid power of attorney is enclosed with the request.

Lenndy reserves the right to request additional information from the client in order to verify the identity of the person, who has sent the request, and to protect the client's data from being disclosed to unauthorised persons.

The client has the right to access the personal data free of charge. However, if the client's requests are manifestly unfounded or excessive, Lenndy retains the right to charge a reasonable fee or to refuse to act on the request.

Below is a summary of client's specific rights.

Right of access. The client is entitled to receive information on whether or not Lenndy processes the client's personal data, and, if Lenndy processes said personal data, request a copy of the client's personal data undergoing processing. The client has the right to obtain the following information:

- purposes of the processing;
- categories of personal data being processed;
- personal data recipients or categories of such recipients;
- length of time the data will be stored (or criteria for determining the period);
- client's rights in connection to the data processing;
- available information on the data source (if the personal data was not obtained from the client);
- existence of automated decision-making.

Right to rectification, to the extent possible. The client is entitled to request Lenndy to rectify the client's inaccurate or incorrect personal data. Lenndy also provides the client with the option to rectify data in the account, however not all data may be rectified through this channel. We will need to verify that the amended data is true and accurate.

Right to erasure, to the extent possible. The client is entitled to request Lenndy to erase the client's data. This right can be exercised if one of the following grounds applies:

- purposes of the processing;
- personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- client withdraws the given consent;
- client objects to the processing;
- personal data has been unlawfully processed;
- personal data has to be erased for compliance with a legal obligation.

Lenndy reserves the right to reject the request to erase the client's personal data if there is a legitimate legal ground for doing so, for example, to comply with a legal obligation which requires processing, to establish, exercise or defend legal claims, or for statistical purposes, providing appropriate technical and organisational security measures.

Right to the restriction of processing. The client is entitled to request Lenndy to restrict processing if one of the following grounds applies:

- client contests the accuracy of the personal data, for a period that enables Lenndy to verify the accuracy of the personal data;
- processing is unlawful, and the client requests restriction opposed to the erasure of the personal data;
- Lenndy no longer needs the client's personal data, but the personal data is necessary for the client to establish, exercise or defend legal claims;
- client has objected to processing pending the verification whether the legitimate grounds for processing of Lenndy override those of the client.

Upon restricting the processing of the client's personal data, Lenndy will only process the client's personal data after receiving consent from the client, or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest. This does not apply to storing personal data.

Right to object to the processing of personal data. The client is entitled to object to the personal data processing activities concerning direct marketing or which are based on Lenndy's legitimate interests but given the basis of the client's particular situation they want to object to processing on this ground.

Right to data portability, to the extent possible. The client is entitled to request Lenndy to receive and transfer the client's personal data to the client or another data controller. The client can exercise this right insofar as the data has been provided by the client based on consent or a contract and the processing is carried out by automated means. This right also applies to raw data that has been provided by the client, relates to the client's activities or result from observation of the client, for example, activity logs, history of website usage. However, this does not apply to data that Lenndy creates, for example, client profiles created by analysing the raw data, risk assessments to comply with anti-money laundering rules.

Right to withdraw consent. The client is entitled to withdraw previously given consent at any time via the client's account. However, this will not affect the lawfulness of any processing carried out before a client withdraw his/her consent. This right applies to receiving commercial notices and overviews from Lenndy. For withdrawing consent regarding cookies please visit Cookies Policy).

Right to submit a complaint to the national personal data protection authority. In case of any uncertainty related to client's personal data, client is welcome to contact Lenndy and Lenndy will seek to

provide the client with an answer or find a solution to the client's issue. However, the client is entitled to submit a complaint to the national personal data protection authority regarding data processing activities conducted by Lenndy.

The contact information of the national personal data protection authority of the Republic of Latvia:
Data State Inspectorate, Blaumaņa iela 11/13-15, Riga LV-1011, Latvia, phone: +371 67223131,
email: info@dvi.gov.lv.

Right to contact Lenndy and obtain additional information on the processing of personal data. The client is entitled to contact Lenndy at any time and obtain additional information regarding processing activities.

IX. CHANGES IN THE PRIVACY POLICY

By visiting this website and/or using information contained therein, and/or the Services, the client acknowledges and confirms that the client has read the Privacy Policy, understands it and agrees with it. Lenndy reserves the right, at its sole discretion to alter the provisions of the present Privacy Policy, therefore, when visiting this website, the client has a responsibility to make sure that he/she is familiar with the latest version of the Privacy Policy that applies to the client at the time the client is visiting the website.

Any version of the Privacy Policy that is published on this Portal replaces all previous versions of the Policy and takes effect immediately upon posting or from the effective date as indicated.

Updated version date: 2018 January 21st.