

# Privacy and Cookie Policy



Effective from: 11.10.2024.

This Privacy Policy is designed to explain to natural persons (data subjects) how TigSiPay SIA (hereinafter - the Company) processes and protects their personal data. The Company's data processing practices are based on Regulation (EU) 2016/679 of the European Parliament and of the Council of 17 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation), as well as on the laws and regulations in force in the Republic of Latvia.

## INFORMATION ABOUT THE CONTROLLER

Company: TigSiPay SIA

Reg. No: 40203344731

Registered office: 7 k-1 Skanstes Street, Riga, LV-1013

TigSiPay is a licensed electronic money institution supervised by the Bank of Latvia and has the right to provide payment services.

## CONTACT DETAILS FOR PERSONAL DATA PROTECTION

If you have any questions about our Privacy Policy or the processing of your personal data, you can send us an email to: [dati@tigsipay.com](mailto:dati@tigsipay.com)

## WHY DOES SOCIETY NEED YOUR PERSONAL DATA?

The main purpose of our processing of personal data is to comply with our contractual obligations, legal duties and legitimate interests. The processing of personal data is essential for the achievement of our objectives and failure to do so may impede the performance of our business or contractual obligations. If the provision of personal data is not mandatory but may improve the quality of our services or offer you better contractual terms and/or offers, we will inform you of this.

## WE MAY OBTAIN YOUR PERSONAL DATA IN DIFFERENT WAYS, SUCH AS:

- When you enter into a contract with us;
- When you contact us by submitting applications, emailing or calling us;
- When you register for our online services;
- When you log in to our website [www.tigsipay.com](http://www.tigsipay.com);
- When you sign in to the TigSiPay mobile app;
- When you visit our website [www.tigsipay.com](http://www.tigsipay.com), we use cookies;
- When we enter into a contract with a third party who identifies you as a contact person;
- When we receive information from third party databases, for example to check your status as a politically exposed person or to check you against sanctions lists (Latvian, OFAC, UN, EU, etc.);
- Where we receive information from CCTV footage.

## CHARACTERISTICS OF OUR PROCESSING OF PERSONAL DATA

We collect and process personal data received from customers or customer representatives when they enter into a contract with us to open an electronic money account in our system. However, in certain cases we may obtain personal data from external sources, such as publicly accessible registers or third party partners who offer services on our platform or purchase services for their employees.

## THE CATEGORIES OF PERSONAL DATA WE PROCESS INCLUDE:

- Identification and profiling data, such as name, surname, personal identification number, date of birth, politically exposed person status, identity document data (e.g. copy of passport, ID card), mobile phone number.
- Contact details such as address, phone number, email address.
- Tax residency details such as country of residence, taxpayer number, nationality.
- Data obtained in the performance of duties under laws and regulations, such as information from investigative authorities, notaries public, tax administrations.

- Information on transactions and account status, such as transaction history, balance, related payments.

## PERSONAL DATA DISCLOSURE AND SECURITY

We pay great attention to the security and confidentiality of your personal data. We apply appropriate technical and organisational measures to protect your personal data from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

Our Privacy Policy governs how we process personal data from our customers, customer representatives, business partners and visitors to our website. While this document provides basic information about our data processing methods, we encourage you to consult other documents that may supplement the information contained herein (e.g. service agreements, cooperation agreements, etc.).

## CONTACT

Cookies are information in the form of a small text file (often consisting only of a string of numbers and letters, identifying the device, but may also contain other information) that the browser of the device used (computer, tablet, mobile phone or other device) (such as Google Chrome, Microsoft Edge, Firefox, Opera, etc.), according to its settings, stores on the device's hard drive when visiting the Company's websites and allows the website to recognise the device. Cookies are created and the information they contain is determined by the Company's website server, which uses cookies whenever a person visits the website. A cookie can be considered as an identification card of an Internet user, which provides information to the website for each subsequent time the person visits it. Cookies perform various functions, such as storing information previously searched for on a website, language and font size preferences, allowing you to move freely around a website, remembering your habits and preferences, thus improving your website experience. They also help to offer advertising that is more relevant to a person's interests.

Cookies are not dangerous and cannot be used to spread viruses. Similarly, by storing cookies on the device's hard drive, they cannot access and read other information stored on the device's hard drive, obtain your email address, etc. Cookies contain and transmit to the Company's website server as much information as the person has allowed.

### The following cookies are used on the Company's websites:

#### *Session or temporary cookies:*

They are stored in the device's memory and only exist until the device's web browser is closed, i.e. when you stop using the internet (cookies are deleted). These cookies help the Company's website to identify how the user of the device moves from page to page, remembering the actions performed on the previous page, and to ensure the security and basic functionality of the website. Session cookies are never stored on the device's hard drive, nor do they collect any information from the device. Session cookies are discontinued at the end of the device's web browser session and if the session has been inactive for a certain period of time.

#### *Persistent cookies*

They are saved on your device's hard drive and are not deleted when you close your device's web browser. Persistent cookies identify a person as a user of the Company's website and help to remember information about him or her and about actions previously taken on the website when returning to the website at a later date. Cookies are stored on the device for a specific period of time, depending on the type of cookie. This type of cookie is used, for example, to analyse the number of users of a website, the average time spent on a given section of the website, how a person got to the website and how the website is used. By analysing the data, improvements can be made to the website.

The cookies used on the Company's websites can be divided into 4 categories:

*Necessary cookies* - are essential to enable a person to use the Company's website, to identify themselves, to access the website safely; they allow the website to remember the choices made by a person (e.g. user name, language used, etc.), thus improving and personalising the website, as well as to provide basic website functions. These cookies do not track a person's browsing activities on other websites and do not collect information about them.

*Functional cookies* - Functional cookies help to perform certain functions, such as sharing website content on social media platforms, collecting feedback and other third-party functions.

*Statistics cookies* - collect information about how the website is used, such as which pages were visited, how quickly pages loaded, which links a person clicked on, and whether links lead to a working page. This information is not used to identify a person. The information collected is anonymised.

*Performance cookies* - are used to understand and analyse key performance indicators on the website to help provide a better experience for visitors.

*Marketing cookies*, including service offer cookies - collect information about a website user's habits and create a user profile. These cookies are used to serve ads that are more relevant to a person's interests, limit the number of times an ad is viewed, help measure the effectiveness of an advertising campaign, and understand a person's behaviour after viewing an ad.

The Company uses cookies from third parties such as Google, Bing, Facebook to create ads and optimise marketing communications. Third-party advertisers use cookies stored on a person's device to measure the effectiveness of advertising and to personalise the content of displayed advertising. Information collected by third party advertisers may include data such as geo-location data (derived from an IP address).

#### **Types of cookies, grounds for use and purpose, and time of storage on the website**

The Company uses necessary (functional) cookies on the basis of the Company's legitimate interests, and statistical, analytical and marketing cookies, including service offer cookies, on the basis of the consent provided by the person, in order to:

- take care of the functioning and security of the website and online services, such as making the website easier to use, protecting against fraudulent activity;
- make the website and online services easier to use by analysing how people use our websites, what services they use and what services they are interested in, so that we can improve them;
- offer content and services of interest to the person, including service offers, on social networks, mobile apps and other websites.

For your information, without giving your consent to the use of marketing and statistical cookies, the Company uses third-party solutions to measure website traffic, collect anonymised information (without assigning an ID identifier and without obtaining the user's IP address) about website users' visits and clicks.

#### **Controlling, opting-out and deleting cookies**

When opening the Company's website, the visitor is provided with a notice on the use of cookies, including, provided with the possibility to give - consent to the use of functional, statistical, performance and marketing cookies, including service offerings, by clicking on "Accept All", to cancel or adapt cookies to their needs by using the "Consent preferences" icon and the "Save my preferences" button, or not to accept the use of cookies by clicking on "Reject All", thereby denying the Company the possibility to use the above-mentioned cookies. By not making a choice and continuing to use the website, the Company will consider that the person has not given his/her consent to the use of the above cookies.

The latest versions of all the most popular browsers (such as Google Chrome, Microsoft Edge, Firefox, Mozilla, Opera, etc.) allow their users to control cookies by changing the browser settings on your device. Users can set their own settings in their device's browser, allowing them to accept or reject all or certain cookies, or to be notified when new cookies are sent to their device. To do this, the user must activate the settings in their device's browser (usually located under "Help", "Tools" or "Edit"). More information on how to control cookies according to your device's browser can be found at: [www.aboutcookies.org](http://www.aboutcookies.org) However, it should be noted that if cookies are rejected or disabled, a person may not be able to use all the features and benefits of the Company's website fully and comfortably.

#### **THIRD PARTIES WHO MAY HAVE ACCESS TO YOUR DATA:**

- Our employees or authorised persons who need to do so in order to carry out their job;

- Our partners related to the provision of our services, such as IT maintainers, legal advisors, database developers, etc;
- State and local government institutions in cases provided for in laws and regulations;
- Third parties who have a legal basis to access your data, such as courts, debt collectors, etc.

We make every effort to ensure that your personal data is protected and processed in accordance with applicable law and we take responsibility for the processing of your data.

The Company is obliged to maintain personal data processing systems in application of the Law on Prevention of Money Laundering, Terrorism and Proliferation Financing. These systems may include information on customers and other persons, whether or not a business relationship has been entered into or terminated, as well as their beneficial owners and authorised persons.

- It is important to note that in this context, the processing of personal data is not subject to standard data subject rights, which are generally set out in laws and regulations. In such situations, the data subject does not have the right to request information about the processing, including the purposes of the processing, the recipients and the sources of the data.
- Under this law, the data subject also has no right to access his or her data or to have them altered, destroyed, suppressed or suppressed. The State Data Inspectorate is the body responsible for ensuring that the processing of personal data complies with the regulatory requirements, where the data subject is prohibited by law from being informed.

If you have any questions or objections regarding the processing of your personal data, we encourage you to contact us in the first instance. However, if you believe that we are violating your data subject rights and we have not been able to resolve the situation after receiving your objections, you have the right to lodge a complaint with the Data Inspectorate. The website of the Inspectorate [www.dvi.gov.lv](http://www.dvi.gov.lv) contains sample applications and other related information.

Although we process your personal data, we do not use it for automated decision-making.

**Necessary cookies that are stored automatically when you visit the website:**

Name	Provider	Description	Duration	Goal
cookieyes-consent	cookieyes.com	CookieYes sets this cookie to remember users' acceptance preferences so that these preferences can be saved for future visits to this website. It does not collect or store any personal information about visitors to the site.	1 year	Required for the site to work
NID	google.com	Google sets this cookie to display a Google map to the user.	6 months	Required for the site to work

**Optional cookies, which are stored in the browser only after the visitor has given their consent:**

Name	Provider	Description	Duration	Goal
_ga_*	google.com	Google Analytics sets this cookie to store and track page views.	1 year 1 month 4 days	Statistics
_ga	google.com	Google Analytics adds this cookie to calculate visitor, session and campaign data and to track site usage for the Site Analytics Report. This cookie stores information anonymously and assigns a randomly generated number to recognise each unique visitor.	1 year 1 month 4 days	Statistics