

# UAB NORDSTREET PRIVACY POLICY FOR INVESTORS

**Last updated on: 25 May 2020**

UAB Nordstreet takes care of the protection of your information. We comply with the European Union's General Data Protection Regulation (GDPR) and other laws protecting your information that we collect, use and store in our Company.

## **1. How should I read this Privacy Policy?**

This Privacy Policy will answer key questions about how we collect, use and store information about you. Should you have any questions or any part of this notice be unclear, we are ready to help you as described in Article 13 of this Privacy Policy. Please note that any form of word “we” in this Privacy Policy refers to our Company as defined in Article 2 of the Privacy Policy.

## **2. Who is responsible for protecting my information?**

We are: UAB Nordstreet;  
Our company code: 304565690;  
Our address: Konstitucijos ave. 26, Vilnius;  
Email: info@nordstreet.com  
Tel. No: +370 667 37669

## **3. Why do you collect information about me?**

By registering on the crowdfunding platform we manage, you have entered into an agreement with us on the use of the “Nordstreet” platform. We collect, use and store your data for the following reasons:

- so that we can perform this agreement and enable you to properly use our crowdfunding platform;
- so that we can meet the legal obligations relating to the prevention of money laundering and terrorist financing that apply to us;
- for statistical purposes - we collect **generalized and anonymized** information on invested amounts, financed loans and similar criteria for using the crowdfunding platform. You can find more information by clicking [this link](#).

## **4. What information should I give you and why?**

In order to register and invest in our crowdfunding platform, you must provide us with:

- identification data (name, surname, date of birth);
- your country of residence;
- contact details (email, phone number);
- information on investment experience (by filling up a questionnaire).

## **5. Do you collect information about me from other entities?**

You can invest in our crowdfunding platform only by opening an account in the “Paysera LT”, UAB, which means that from this company we can obtain your information related to your identification, which we need in order to properly comply with money laundering and terrorist financing prevention requirements.

## **6. What is the legal basis for collecting information about me?**

We collect information about you lawfully, since your information is required:

- to enter into and execute a contract with you (Article 6 (1 (b)) of the GDPR);
- to fulfil legal obligations in the fields of taxation, accounting, prevention of money laundering and terrorist financing and in other areas (Article 6 (1 (c)) of the GDPR).

## **7. Do you collect any sensitive information about me?**

No sensitive information about you is collected.

#### **8. Do you make automatic decisions? Are you profiling me?**

No automatic decisions are made. We may take profiling actions with respect to you, if you agree to at least one of our direct marketing tools. You can find more information about this in **the privacy policy of our direct marketing content recipients**.

#### **9. Do you transfer the information about me to anyone?**

When processing your personal data, we may transfer it to the following data recipients:

- state and local municipal authorities (e.g.: the Bank of Lithuania, and etc.), in the cases and to the extent provided for in the legislation;
- project owners to the extent necessary to enable project owners to implement their tax obligations;
- our service providers, such as companies providing accounting, archiving, communication, data warehousing, information management systems and similar services, that are subject to confidentiality and security obligations under personal data protection legislation;
- companies providing legal services, law firms, when it is necessary to protect our legitimate interests;
- public or private entities carrying out audits or inspections that are subject to the data non-disclosure obligation.

#### **10. Do you transfer information about me outside the European Economic Area (the European Economic Area comprises all EU Member States plus Norway, Iceland and Liechtenstein)?**

Information about you is not transferred outside the European Economic Area.

#### **11. How long do you store information about me?**

Information about you related to the performance of the contract and the fulfilment of the legal obligations applicable to us will be stored in accordance with the Law on Crowdfunding and the Law on the Prevention of Money Laundering and Terrorist Financing - for 10 years after the date of the financing transaction or 8 years after the termination of business relations with you (please note that this period may be extended for an additional period of 2 years upon receipt of an instruction from the competent authorities), whichever is the later.

#### **12. What are my rights?**

If you wish to take the actions below, please contact us as described in Article 13. Please note that these rights are subject to the statutory conditions and exceptions:

- **To submit a request for access to available information about you, provided that we process your personal data by which we can identify you;**
- **To submit a request to correct or add to the available information about you;**
- **To submit a request to delete information about you, when:**
  - **We process your data on the basis of consent;**
  - **We process your data unlawfully;**
  - **Your data is processed on the basis of our legitimate interest and you dispute our legitimate interest;**
  - **Your data is no longer needed to achieve the purposes for which it was collected;**
  - **we have a legal obligation to delete information about you;**
- **To submit a request to restrict the processing of the available information about you, when you dispute the accuracy of the data or object to the data processing, disagree to the deletion of your unlawfully processed data, or need the data to make, enforce or defend legal claims;**
- **To dispute the collection, use and storage of your information in our company, when we process your data with the legitimate interest as the basis for data processing;**

- **To submit a request to export your data, provided that you have provided us with the data in a structured and commonly used format and have given your consent to the processing of such data or we have to process this data in order to fulfil the contract with you;**
- **To submit a complaint to the State Data Protection Inspectorate (more information may be found at [vdai.lrv.lt](http://vdai.lrv.lt)).**

### **13. How can you help me?**

Should you have any questions, comments or complaints about how we collect, use and store data about you, we are ready to help you. Should you need any help, please contact us by email [info@nordstreet.com](mailto:info@nordstreet.com)