



SIA "DN OPERATOR" PRIVACY POLICY

Comes into force on 29.06.2026, version 1.3

In this Privacy Policy SIA "DN Operator" is an investment service provider that, within the framework of providing the service, provides you with information about the processing of your personal data, your right to privacy and its protection, as well as your right to access information.

This Privacy Policy introduces the processing of personal data implemented by SIA "DN Operator" and the exercise of the rights arising from this processing in relation to customers, representatives of clients or investment partners, representatives of cooperation partners and suppliers, visitors of SIA "DN Operator" website <https://debitum.investments/>.

1. TERMS

- 1.1. **You** – the person whose Personal Data we process.
- 1.2. **Debitum or us** – SIA "DN Operator".
- 1.3. **Privacy Policy** – this Privacy Policy.
- 1.4. **Processing** – any actions we take with your Personal Data, such as collecting, recording, storing, viewing, using, disclosing your Personal Data, coordinating, deleting or otherwise making them available, and not only.
- 1.5. **Personal data** – any information that relates or could apply to you, such as your name, surname, personal identification number, address, telephone number, e-mail address, contact information, information included in signing and authentication certificates, information related to user authentication, etc.
- 1.6. **Special categories of personal data** – personal data revealing racial or ethnic origin, genetic data, biometric data for the purpose of carrying out unique identification of a natural person, health data or data on the sex life or sexual orientation of a natural person.
- 1.7. **Consent** – any freely and knowingly given confirmation by which you consent to the Processing of your Personal Data for the relevant purpose(s).
- 1.8. **Regulation** - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.04.2016 on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
- 1.9. **Data State Inspectorate** – an independent institution that supervises the application of the Regulation in the Republic of Latvia.

2. WHO PROCESSES YOUR PERSONAL DATA?

- 2.1. The controller of your Personal Data is SIA "DN Operator", registration No. 42103092209, address: Dzirnau street 67, Riga, Latvia, LV-1011, phone +371 200 05452, e-mail support@debitum.investments, website <https://debitum.investments/>.
- 2.2. Your personal data may also be processed on our behalf by our cooperation partners who help us provide services to you. Taking care of the security of your personal data, we carefully evaluate each cooperation partner before starting cooperation.

IMPORTANT TO KNOW!

Debitum implements the principle in its activities towards customers – Consult first! Within the framework of this principle, we invite you to ask unclear questions about the processing and protection of personal data to our specialists. Taking care of the lawfulness of the processing of personal data and compliance with your rights, Debitum has appointed a data protection officer who, at your request, will provide you with advice on the compliance of our personal data processing with the terms and procedures approved by Debitum, as well as legal acts of the European Union and Latvia.

- 2.3. You can contact us with all questions related to the processing of your personal data, including the processing of personal data by our cooperation partners. Our team, as well as our data protection officer, will be happy to help you.

IMPORTANT TO KNOW!

Please note that we will not provide you with information about a third party unless you have an authorisation under which you are entitled to receive information about that person.



3. FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

- 3.1. Debitum, as the controller of the processing of your personal data, must determine the purposes of the processing of your personal data before starting the processing of your personal data. In this section, we mention the basic purposes within the framework of which we process your personal data on a daily basis. If you would like to receive more detailed information about the main purposes and sub-purposes in which Debitum processes your personal data, we invite you to contact us and receive our consultation.
- 3.2. Debitum processes personal data for the following purposes:
- 3.2.1. If you are a client (investor) –
 - 3.2.1.1. Registering you on our investment platform by creating a Client account for you;
 - 3.2.1.2. Provision of investment services
 - 3.2.1.3. Conducting customer due diligence activities in accordance with the requirements of legislation, including biometric identification
 - 3.2.1.4. Providing advice on our services
 - 3.2.1.5. Customer relationship management, including payment execution, mutual communication and other issues
 - 3.2.1.6. Video surveillance to ensure the safety of premises, material assets and visitors
 - 3.2.1.7. Implementation of advertising and marketing activities
 - 3.2.1.8. Conducting surveys
 - 3.2.1.9. Examination of applications, applications and complaints
 - 3.2.2. If you are a representative of the client (investor) (including the beneficial owner) –
 - 3.2.2.1. Registering your company on our investment platform by creating your company's Client account
 - 3.2.2.2. Provision of investment services
 - 3.2.2.3. Conducting customer due diligence activities in accordance with the requirements of legislation, including biometric identification
 - 3.2.2.4. Providing advice on our services
 - 3.2.2.5. Customer relationship management, including communication
 - 3.2.2.6. Video surveillance to ensure the safety of premises, material assets and visitors
 - 3.2.2.7. Conducting surveys
 - 3.2.2.8. Examination of applications, applications and complaints
 - 3.2.3. If you are a representative of a company (including the beneficial owner) who attracts financing through Debitum –
 - 3.2.3.1. Establishing cooperation with the company you represent, including performing activities related to the inspection of the company you represent before starting business relations
 - 3.2.3.2. Provision of investment attraction services, including communication on our cooperation issues
 - 3.2.3.3. Management of cooperative relations, including communication
 - 3.2.3.4. Video surveillance to ensure the safety of premises, material assets and visitors
 - 3.2.3.5. Conducting surveys
 - 3.2.3.6. Examination of applications, applications and complaints
 - 3.2.4. If you are a person interested in the services provided by Debitum or our activities –
 - 3.2.4.1. Providing advice on the services we provide
 - 3.2.4.2. Video surveillance to ensure the safety of premises, material assets and visitors
 - 3.2.4.3. Implementation of advertising and marketing activities
 - 3.2.4.4. Examination of applications, applications and complaints
 - 3.2.5. If you are a website visitor –
 - 3.2.5.1. Ensuring website performance
 - 3.2.5.2. Ensuring the safe operation of the website
 - 3.2.5.3. Assessment of your habits, if you have given your consent
 - 3.2.6. If you are a representative of a cooperation partner or supplier:
 - 3.2.6.1. Management of cooperation issues between cooperation partners and suppliers
 - 3.2.6.2. Organization of procurements and conclusion of contracts, their execution
 - 3.2.6.3. Communication on cooperation issues



IMPORTANT TO KNOW!

In daily activities of Debitum, there may be situations when it is necessary to carry out the processing of personal data for some purpose, which may not be indicated here. In such cases, before starting the processing of personal data, our specialists make sure that the chosen purpose is proportionate and that the planned personal data processing activities will not create additional risks to your rights and interests, observing the requirements of personal data safety.

4. WHAT KIND OF PERSONAL DATA DO WE HOLD ABOUT YOU?

4.1. Debitum may process the following personal data of yours:

4.1.1. If you are a client (investor) –

- 4.1.1.1. **Identification data** – your name, surname, personal identity number, date of birth, gender, identification document number, picture, other data from the submitted identification document.
- 4.1.1.2. **Special categories of personal data** – biometric personal data obtained during your remote identification by evaluating your facial features, as well as personal data that reveals membership of political organisations (i.e. if you have the status of a politically exposed person in relation to your activities in a political organisation).
- 4.1.1.3. **Contact information** – your phone number (optional), e-mail address, address of residence.
- 4.1.1.4. **Client data** – your client number, registration date, status, investment platform log-in data.
- 4.1.1.5. **Client's due diligence data** – place of birth, country of residence, nationality, amount of planned investments, type and amount of income, field of employment, data on verification of sanctions restrictions, publicly available information obtained during the research, status mark of a politically exposed person, level of risk of the client.
- 4.1.1.6. **Transaction data** – the number of the transaction made with you, the amount of investments.
- 4.1.1.7. **Payment data** – your bank account number, payment date, amount.
- 4.1.1.8. **Customer survey data** – survey name, date of sending, date of response, survey questions and answers provided.
- 4.1.1.9. **Video data** – Video surveillance at Debitum objects, i.e. office premises, date of recording.

4.1.2. If you are a representative of the client (investor) (including the beneficial owner) –

- 4.1.2.1. **Identification data** – your name, surname, personal identity number, date of birth, basis of representation, identification document number, picture, other data from the submitted identification document.
- 4.1.2.2. **Data on relationship with the client** – position, basis of representation, number of shares (%).
- 4.1.2.3. **Research data of the client's representative** – country of residence, nationality, data on the verification of sanctions restrictions, publicly available information obtained during the research, status mark of a politically exposed person.
- 4.1.2.4. **Special categories of personal data** – biometric personal data obtained during your remote identification by evaluating your facial features, as well as personal data that reveals membership of political organisations (i.e. if you have the status of a politically exposed person in relation to your activities in a political organisation).
- 4.1.2.5. **Contact information** – your phone number, e-mail address.
- 4.1.2.6. **Client data** – log-in data of the investment platform.
- 4.1.2.7. **Customer survey data** – survey name, date of sending, date of response, survey questions and answers provided.
- 4.1.2.8. **Video data** – Video surveillance at Debitum objects, i.e. office premises, date of recording.

4.1.3. If you are a representative of a company (including the beneficial owner) who attracts financing through Debitum –

- 4.1.3.1. **Identification data** – your name, surname, personal identity number, date of birth, basis of representation, identification document number, picture, other data from the identification document.
- 4.1.3.2. **Data on the relationship with the client** – position, basis of representation.
- 4.1.3.3. **Research data of the client's representative** – country of residence, nationality, data on the verification of sanctions restrictions, publicly available information obtained during the research, status mark of a politically exposed person.
- 4.1.3.4. **Special categories of personal data** – personal data revealing affiliation with political organisations (i.e. if you have the status of a politically exposed person in relation to your activities in a political organisation)



- 4.1.3.5. **Contact information** – your phone number, e-mail address.
- 4.1.3.6. **Video data** – Video surveillance at Debitum objects, i.e. office space, date of recording.
- 4.1.4. If you are a person interested in the services provided by Debitum or our activities –
 - 4.1.4.1. **Identification data** – your name, surname, if necessary – personal identification number.
 - 4.1.4.2. **Contact information** – your phone number, e-mail address.
 - 4.1.4.3. **Video data** – Video surveillance in Debitum objects, date of recording.
- 4.1.5. If you are a website visitor –
 - 4.1.5.1. **Information collected by cookies**
- 4.1.6. If you are a representative of a cooperation partner or supplier:
 - 4.1.6.1. **Identification data** – **your name, surname, if necessary – personal identification number.**
 - 4.1.6.2. **Contact information** – **your phone number, e-mail address.**
 - 4.1.6.3. **Video data** – Video surveillance in Debitum objects, date of recording.

IMPORTANT TO KNOW!

Debitum may also need to process other types of personal data within the scope of daily activities, which may not be mentioned in this Privacy Policy. In any case, you have the right to contact us and find out specifically what types of personal data we process about you.

5. WHY DO WE PROCESS YOUR PERSONAL DATA AND WHAT ARE THE GROUNDS FOR THIS?

- 5.1. We process your personal data on the basis of at least one of the following grounds:
 - 5.1.1. the conclusion and performance of a contract to provide you with a service, or
 - 5.1.2. to comply with our statutory obligations, or
 - 5.1.3. to pursue our, your or third party's legitimate (legitimate) interests, having previously assessed whether these interests in processing your personal data are proportionate to your right to privacy or,
 - 5.1.4. based on your consent, if we obtain one.

6. HOW DO WE OBTAIN YOUR PERSONAL DATA?

- 6.1. We collect your personal data:
 - 6.1.1. when you provide them to us:
 - 6.1.1.1. when filling out applications, concluding contracts for the receipt of services;
 - 6.1.1.2. identifying yourself using a remote identification solution;
 - 6.1.1.3. providing information to our employees or business partners;
 - 6.1.1.4. by contacting us by post, email, phone or in person;
 - 6.1.1.5. using cookies on our website.
 - 6.1.2. when they are provided to us by third parties:
 - 6.1.2.1. The company you represent;
 - 6.1.2.2. credit institutions, maintainers of public and private registers;
 - 6.1.2.3. public authorities and their officials (for example, sworn bailiffs).

7. TO WHOM DO WE SHARE YOUR PERSONAL DATA?

- 7.1. We transfer your personal data:
 - 7.1.1. our cooperation partners related to the provision of our services – for example, provision of remote identification, verification of sanctions restrictions
 - 7.1.2. our business partners who develop and maintain our information systems
 - 7.1.3. in cases specified by law, to state/local government institutions on the basis of written requests or binding obligations laid down by law
 - 7.1.4. Debitum for auditing companies, consultants.



IMPORTANT TO KNOW!

Within the framework of the processing of your personal data, access to your personal data is limited to our authorized employees and our cooperation partners, who need it for the performance of their work duties and who process your personal data only in accordance with the purposes and grounds of personal data processing specified in this Privacy Policy, in compliance with the technical and organizational requirements for the processing of personal data specified in legal acts, as well as in the internal legal acts of Debitum.

8. DO WE DO AUTOMATED DECISION-MAKING?

- 8.1. When processing your biometric data for the purpose of remote identification, we perform automated processing of your personal data, as a result of which a decision is made on the successful completion of the identification process, which allows Debitum conclude a contract for the receipt of the service, or unsuccessful completion, which restricts further actions. Taking into account the above, if you are denied the opportunity to receive Debitum services directly due to the unsuccessful completion of the remote identification process, you have the right to contact Debitum with an application and request a review of this decision with the involvement of a Debitum employee.
- 8.2. When processing your personal data for the other purposes provided for in this Privacy Policy, we do not make automated individual decisions. When starting this type of processing of your personal data, we will provide information about it.

9. DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE EU/EEA?

- 9.1. We do not transfer your Personal Data outside the European Union or the European Economic Area.

10. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

- 10.1. How long we store your personal data without ensuring their deletion or anonymization depends on the purposes for which we process them and by what criteria we evaluate the storage periods of your personal data.
- 10.2. The terms of storage of your personal data are determined according to the following criteria:
 - 10.2.1. Legal obligation under the debt legislation to keep documents or records of the information system. For example, the Law on the Prevention of Money Laundering, Terrorism and Proliferation Financing stipulates that customer due diligence data must be stored for 5 years after the termination of the business relationship or longer, extending the term for another 5 years at the request of the responsible state institutions.
 - 10.2.2. Implementation of your legitimate (legitimate) interests and those of third parties. For example, we may store various contract documents, the personal data contained in them, for up to 10 years after the termination of the relevant contract.
 - 10.2.3. if the processing of your personal data is carried out on the basis of consent, Debitum will store this document and related information for 5 years from the moment of withdrawal of consent in order to provide proof of lawful processing of personal data in the previous period of time.

IMPORTANT TO KNOW!

When evaluating the terms of storage of personal data, we take into account the requirements of the legal acts, as well as the legitimate interests of Debitum in determining the terms of storage of various documents. If, in the course of the evaluation, we find different grounds and purposes for determining the terms of storage of personal data, for example, there is a difference between the storage period specified in a legal act for one purpose and the period specified for the protection of our interests for another purpose, this will be a sufficient basis for storing your personal data for the longest of these two periods. After the expiry of the storage period, we will ensure the deletion or anonymization of your personal data.

11. WHAT WILL BE THE CONSEQUENCES IF YOU DO NOT PROVIDE US WITH YOUR PERSONAL DATA?

- 11.1. We ask you to provide personal data only because it is necessary for us for any of the purposes specified in this Privacy Policy, for example, to enter into a business relationship with you, to conclude a contract with the company you represent, to provide a service or to fulfill obligations specified in the legal acts. If you do not provide us with your personal data, this may limit or prevent cooperation with you, for example, Debitum will not be able to provide you with a service.
- 11.2. We process your personal data only in accordance with a predetermined purpose and to the extent necessary for it. We do not ask you to provide more personal data than we need. We also guarantee the non-disclosure and safety of your personal data.



12. WHAT ARE YOUR RIGHTS IN RELATION TO THE PROCESSING OF PERSONAL DATA WE CARRY OUT?

12.1. Within the framework of compliance with the requirements of the legislation regulating the protection of privacy and personal data, we provide you with the rights by submitting a written request to us:

12.1.1. access your personal data

WE EXPLAIN: We may, in certain cases, ask you to specify the scope of your request so that we understand for which information and which processing operations the request relates, as well as ask you to explain the grounds for the request. In cases where this is not permitted by law, we will not be able to provide you with information about certain processing operations of your personal data, for example, if the information has been provided to law enforcement authorities.

12.1.2. correct your personal data if you reasonably believe that your personal data is inaccurate, supplement incomplete personal data.

WE EXPLAIN: In the event that there have been changes to your personal data, you are obliged to inform us of these changes. On the other hand, if you have established that we process inaccurate or incomplete personal data of yours, please inform you about the need to make corrections to them. If necessary, Debitum is entitled to require you to present documents justifying the correction.

12.1.3. delete your personal data (exercise the "right to be forgotten") if: - you believe that your personal data is no longer necessary or cannot be used for the original purposes of processing this personal data; - You reasonably believe that your personal data is being processed unlawfully; - The deletion of your personal data is determined by the terms of storage of documents specified for us by external and internal legislation.

WE EXPLAIN: We will ensure the deletion of your personal data at our disposal in our record-keeping and processing systems, as well as with our cooperation partners, if the personal data is no longer necessary for the purposes for which it is processed. We will not be able to ensure the erasure of your personal data if we have to continue such processing, for example, in accordance with the law, ensuring the storage of information or documents, as well as in cases where we will have other legitimate interests in continuing the processing.

12.1.4. You may restrict the processing of your personal data, including the erasure of personal data, if:

12.1.4.1. If you contest the accuracy of your personal data, the restriction will only apply to the period during which we will be able to verify the accuracy of your personal data. If you believe that the processing of your personal data is unlawful and you object to the erasure of personal data by requesting instead the restriction of the use of personal data, the restriction will apply only to the period reasonably specified by you. We no longer need your personal data, but they are necessary for you to exercise or defend legal rights and interests, to bring claims, etc.; the restriction will only apply to the term reasonably specified by you. If you object to the processing of your personal data by us on the basis of our legitimate interests, the restriction only applies to the time we carry out such an assessment of such legitimate interests.

WE EXPLAIN: If you have submitted a request to Debitum regarding the restriction of the processing of your personal data in accordance with the procedure provided for in this Privacy Policy, we will still have the right to process your Personal Data, for example, in order to exercise or defend legitimate rights and interests, t.sk. the rights of another natural person or legal entity, to bring claims.

12.1.5. transfer your personal data, which we have received from you, established contractual obligations, and the processing of which we carry out by automated means, for your personal use or transfer to another service provider, if there are no obstacles to such transfer of personal data.

IMPORTANT TO KNOW!

Please be informed that the information subject to the portability of your personal data may also contain data of third parties, therefore, when transferring personal data, we will evaluate the impact of the transfer of personal data requested by you in relation to the rights and freedoms of third parties.

12.1.6. object to the processing of your personal data based on Debitum's legitimate interests. Debitum stops such processing immediately, but only for the period until Debitum performs an evaluation and does not indicate compelling legitimate purposes of the processing of personal data that override your interests, rights and freedoms.



IMPORTANT TO KNOW!

Debitum will have the right to process personal data if it is necessary, e.g. to exercise or defend legitimate rights and interests, to bring claims (for the purpose of legal proceedings).

- 12.1.7. withdraw the given Consent, if any, for the processing of your personal data for the relevant purpose for which it is required, at any time. However, you should take into account that such withdrawal of consent will not affect the lawfulness of the processing of your personal data prior to the withdrawal of consent.
- 12.1.8. request a review of an automated individual decision made during the remote identification process if such a decision obstruct you from receiving Debitum services.

12.2. HOW TO SUBMIT A REQUEST?

- 12.2.1. You can submit your request by e-mail by signing the request with a secure electronic signature. Upon receipt of your request, we will evaluate it and, if necessary, ask you to specify the scope of the request, for which information and which processing operations the request relates, as well as to explain the grounds for the request, if this could help us to provide you with a better quality response. If the request is prepared and/or submitted by a third party, we always invite you to present or attach a power of attorney that directly indicates the scope of the authorization associated with the submission of this type of request. The request should be sent to [the suport@debitum.investments](mailto:suport@debitum.investments) e-mail address.

12.3. HOW LONG WILL IT TAKE TO PROCESS YOUR REQUEST?

- 12.3.1. We will respond to your request no later than one month from the moment of receipt of your request. If necessary, taking into account the volume of your request, we have the right to extend the deadline for the execution of the request by two months. In this case, we will inform you about the reasons for the extension and delay within a month from the moment of receipt of the request.

12.4. HOW WILL WE PROVIDE INFORMATION ON YOUR REQUEST?

- 12.4.1. We will ensure that information on your request is issued to you by sending you a secure e-mail.

12.5. WILL YOU HAVE TO PAY FOR THE PROCESSING OF THE REQUEST?

- 12.5.1. Your request is processed free of charge. However, in the event that we conclude that your requests are regularly repeated, manifestly unfounded or excessive, we will be entitled to charge you a reasonable fee for the processing of your request or refuse to comply with your request by informing you in advance due to the administrative costs associated with providing information or communication or performing the requested activity (t.sk. employee resource costs).

13. WHAT SHOULD I DO IF YOU BELIEVE YOUR PRIVACY HAS BEEN VIOLATED?

- 13.1. Debitum confirms that it ensures the processing of your personal data in accordance with the requirements specified in the legislation and the Privacy Policy. However, if you believe that we have violated your right to privacy by processing your personal data, you have the right to submit a complaint for consideration to Debitum or the Data State Inspectorate for the protection of your interests (please find additional information here: www.dvi.gov.lv).

IMPORTANT TO KNOW!

Debitum implements the principle in its activities towards clients – Consult first! Within the framework of this principle, we invite you to ask unclear questions about the processing and protection of personal data to our data protection officer by writing: dati@debitum.investments.

14. HOW DO WE ENSURE THE SECURITY OF YOUR PERSONAL DATA?

- 14.1. We guarantee the non-disclosure and security of your personal data by taking appropriate technical and organizational measures, ensuring the physical and environmental security of your personal data, restricting the right of access to your personal data, transmitting your personal data in a secure manner when necessary, providing protection measures for the computer network, personal devices, data backup, etc., thus also ensuring the protection of your Personal Data against illegal access, use or disclosure.



- 14.2. Within the framework of our personal data processing, access to your personal data is limited to our authorized employees and authorized employees of our cooperation partners, who need it for the performance of their work duties and who process your personal data in compliance with the technical and organizational requirements for the processing of personal data specified in the legislation.
- 14.3. The cooperation partners to whom we have entrusted the processing of your personal data have been carefully evaluated and informed about the set of measures they must take to ensure the processing, confidentiality and protection of your personal data in accordance with the requirements of the legislation before starting cooperation.
- 14.4. If, within the framework of cooperation, when performing various tasks, cooperation partners process your personal data at our disposal, the relevant cooperation partners are considered to be processors or separate controllers/joint controllers and we have the right to transfer your personal data necessary for the performance of these activities to the cooperation partners to the extent necessary for the performance of these activities. Our cooperation partners will ensure the fulfilment of the requirements for the processing and protection of your personal data in accordance with the procedures specified in the legislation and will not use your personal data for other purposes.

15. HOW TO CONTACT US?

- 15.1. In case of questions related to the processing of your personal data, you can contact us by writing to the e-mail address support@debitum.investments, or our data protection officer dati@debitum.investments and you will be provided with all the necessary information related to the processing of your personal data, t.sk. answers to unclear questions. All information will be passed on to the responsible employee, who will provide an answer to your request.

16. HOW WILL WE PROVIDE UP-TO-DATE INFORMATION ABOUT THE PROCESSING OF YOUR PERSONAL DATA?

- 16.1. In order to always have up-to-date information about the processing of your personal data, we will ensure regular review and updating of this Privacy Policy in accordance with the requirements of the legislation. Therefore, we invite you to get acquainted with this current version of the Privacy Policy from time to time on our website <https://debitum.investments/en/> in the section "Privacy Policy".