

PRIVACY POLICY

Updated "20" September 2023

Laboratory of Seven Possibilities, Financial Institution, incorporated in Perkunkiemio g. 13-91, LT-12114 Vilnius, Lithuania, payment institution license no. 22 dated 2022/06/14 issued by Board of the Bank of Lithuania, respects your rights to integrity and recognizes importance of protecting personal information (as defined below) that you have provided to our team. This Privacy Policy describes how we collect, store, and use personal information you provide to us through the website, as well as through phone or emails that you may have with us.

Laboratory of Seven Possibilities, UAB

Registration number 306026599

Address: Perkunkiemio g. 13-91, LT-12114 Vilnius, Lithuania

Consent

Using this website, you confirm that you have read this Privacy Policy and agree with methods described herein regarding the collection, use and disclosure of personal information provided to us by the Company. This is complete and comprehensive site privacy policy that replaces any earlier version. We reserve the right to amend this Privacy Policy in accordance with terms and conditions set out in this document at any time, so we encourage you to visit this page frequently, regularly visit this Privacy Policy and receive information about any changes to it.

It is important that you carefully read our Privacy Policy because it provides conditions applied to natural entities that visit our Internet website, carry out communication with our company or provide personal data in another manner. Please regularly read this relevant version of the document because its content may change in the future.

The following information includes the following purposes of data management: (i) conclusion and performance of contracts with clients on payment and/or provision of other related services, as well as identification of the client; (ii) authorization of payment operations performed with payment cards; (iii) selection of candidates for a job position; (iv) administration of appeals and requests; (v) communication by e-mail; (vi) use of

cookies; (vii) conclusion and performance of contracts with natural entities. The Privacy Policy also describes your rights of a data subject, supply of data to the recipients thereof and other conditions of management of personal data applied to the personal data managed by the company for all of the abovementioned purposes.

By providing our clients that are legal entities with payment and/or other related services and by concluding contracts with them for this purpose, we manage the following personal data of our clients' representatives and beneficiaries: first name, surname, age, date of birth, personal identification number, data of identification document, workplace, position, e-mail address, place of residence (address), telephone number. We obtain these data directly from the data subject, client or the center of registers. We manage the data on the grounds for performance of obligations of performance of contract as well as the ones laid down in the legislation (including prevention of money laundering). We store the data for 10 years from the day of expiry of transactions or business relationships with the client. We provide the data to banks and other recipients indicated in the present policy.

We manage the names, surnames, payment card numbers, verification values (CVVs), and validity dates of payment cards in order to authorize payment operations carried out with them. We get information directly from our client's legal entities (traders) and data subjects, for which the card holder is compensated for the goods or services they provide. We keep track of information regarding the basis for fulfilling contractual and legal responsibilities. From the day that transactions or business relationships with clients expire, we store the information for 10 years. Banks and other recipients listed in the current plan receive the data from us.

The express consent of your free will to communicate via email and to include specific data within serves as the basis for managing your personal information for this purpose. The efficiency of the contract and the fulfillment of legal obligations are additional justifications for data management.

The proportion principle may be applied to the management of your email address, correspondence content, and related data. The person with whom you will connect directly via email will first be able to see these details. However, there are times when different employees may read your correspondence, such as when you are being replaced, looking into potential legal or regulatory violations, or performing other similar tasks.

We use this data above to be able to answer your question, comment or complaint, as well as your requests (particularly to support) to evaluate your application. Thus, this data is

used by us to establish or execute our (future) contract with you and to establish legitimate interests in cooperation process. We also use the above data to legitimately do business with you and manage our internal administration, establish and comply with the terms of agreement, legality of conducting market research so that we can improve our products and services.

PROCESSING DATA

The user's personal data is processed without term limit, in any legal way, including in personal data information systems using or without the use of automation.

The administration of the site takes necessary organizational and technical measures to protect the user's personal information from improper or accidental access, destruction, modification, blocking, copying, distribution, as well as other misconduct by third parties.

The administration of the site together with User takes all necessary measures to prevent losses or other adverse consequences caused by the loss or disclosure of personal data of User. We use this data to ensure security and integrity of the financial sector in an effort to identify, prevent and counter unlawful conduct, and to comply with our legal obligations to Know Your Customer and Anti-Money Laundering, for example, under the Dutch Financial Supervision Act (Wft) and the Dutch Law on the Prevention of Money Laundering and Terrorism Financing (Wwft).

USE OF COOKIES

Cookie is a small file made of letters and number that is recorded in your browser or hard-disk drive. For different purposes, different cookies are used. Cookies also help to distinguish you from other Internet website users, therefore ensure more pleasant experience of Internet website use and allow improving Internet website.

The majority of browsers allow rejecting all cookies and certain browsers provide the possibility to reject only cookies of third parties. So, you can use these possibilities. But please pay attention to the fact that blocking of all cookies will have negative effect on the use of the Internet website and without cookies you will not be able to use all services provided in the Internet website.

Our Internet website uses the following cookies:

- performance improvement (session) cookies. They are intended for the improvement of Internet website and collect general (anonymous) information on Internet website use;

- analytical (observation cookies from Google Analytics). These cookies allow recognizing and counting website visitors and observing how visitors navigate through the Internet website and use it. This helps improving performance of the Internet website, for example, ensuring that the users are able to freely find what they are looking for. The grounds for management of data collected by these cookies is consent;
- functional cookies. These cookies are used to recognize Internet website visitors when they return to the Internet website. This allows providing the content adapted to the needs of website's visitors in social medias, to remember the information relevant to the clients. The grounds for management of data collected by these cookies is the consent provided by clients.

YOUR DATA PROTECTION

We use variety of administrative, management and technical security measures to protect your personal information. Our Company adheres to various international standards of control aimed at transactions with personal information, which include certain controls to protect information collected on the Internet.

Our employees are trained to understand and implement these controls and are familiar with our Privacy Notice, regulations and instructions. However, while we are committed to protecting your personal information, you must also take steps to protect it.

We strongly encourage you to take all possible precautions while online. Our services and websites provide measures to protect against leakage, unauthorized use and alteration of the information we control. While we do everything we can to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent illegal access to this information by third-party hackers.

The law of the Republic of Lithuania shall apply to the present Privacy Policy and mutual relationships of the data subject and the controller. All disputes arising from the present Privacy Policy and the mutual relationships of the data subject and the controller shall be settled by negotiations and if they shall fail, they shall be settled at a competent court of the Republic of Lithuania in accordance with the address of the registered office of **Laboratory of Seven Possibilities, Financial Institution**.

GET IN TOUCH WITH US

Issues, comments, requests or complaints regarding this Privacy Policy and the way your personal data is handled are welcome and can be addressed to our DPO through contact form on the website.