



# Privacy Policy

Baltic Finance Service Group OÜ

BFSG

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This Privacy Policy describe how Baltic Finance Service Group OÜ further collects, processes and uses your data when you use any service of this website [bfsfroup.ee](https://bfsfroup.ee) (hereinafter the “Website”) and / or any service we provide to you.

The nuances of processing your data may also be described in the Client Agreements, Terms and Conditions or in other documents related to the services.

This Privacy Policy forms part of the Website Terms and Conditions that govern your use of this Website as a whole, and should be read as if the Terms and Conditions and Privacy Policy were a single document.

Any use of the Website or of our services and / or interaction, you, as a user of our Website or as our Client, (“User”, “Client” or “you”) means that you agree to the provisions of this Policy and confirm that you have read and understood all the provisions set out in the Policy.

We process Personal Data in accordance with this Privacy Policy and in accordance with applicable laws, including the General Data Protection Regulation (2016/679) (“GDPR”) and applicable national data protection laws in Estonia (“Data Protection Laws”).

## 1. GLOSSARY

**GDPR:** Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

**BFSG:** Baltic Finance Service Group OÜ (further BFSG or we)

**Terms and Conditions:** regulated under General Terms and Conditions available on the Website

**Policy:** this Privacy Policy

**Person (You):** any person using the BFSG Website and/or any person using any services offered by BFSG (incl user)

**Data controller of personal data:** Baltic Finance Service Group OÜ, registry code 14425223, address Pärnu mnt 27-7, 10141 Tallinn, Estonia (incl data controllers authorized by BFSG).

**Data Protection Officer-** The responsible person appointed by the BFSG

## 2. PERSONAL DATA

The phrase “Personal Data” in this Policy means any information that identifies you as an individual or can reasonably be used to identify you as one of the aforementioned persons, including for the following purposes:

- Contractual purpose – BFSG needs to process the Client’s Personal Data in order to conclude a service agreement with the Client and provide services to the Client;
- Compliance – BFSG needs to process the Client’s personal data in order to fulfill obligations in accordance with applicable laws, such as compliance with anti-money laundering and anti-fraud requirements, enforcement of international financial sanctions, compliance with legal requests and orders of state bodies with which BFSG is obliged to cooperate ;
- The purpose of personalization is to comply with BFSG’s liabilities and obligations in accordance with the privacy policy;
- Search for candidates for the position;
- Accounting purpose – for financial accounting and bookkeeping, invoicing;

- Implementation of document circulation;
- Analytical purpose – BFSG needs to process the Client’s Personal Data in order to manage, analyze and improve the Services, Website.
- The purpose of communication is to contact you;
- Comply with other legal, regulatory and legal requirements.

### 3. COLLECTION OF PERSONAL DATA

#### a) Professional services.

We collect information provided by our Client or on behalf of our Clients, or information that we find on our own as part of the provision of professional services. This collection of Personal Data is necessary to fulfill our obligations to Clients, as well as in our legitimate interests as a law firm to provide legal advice to our Clients and potential Clients. As part of our professional obligations, we take all appropriate measures to ensure the confidentiality and integrity of the Personal Data of our Clients, prospective Clients and former Clients.

When providing professional services, we may supplement the Personal Data provided by you with personal data that was obtained from other sources.

#### b) Technical information

When you visit this Website, we may collect technical information that, by itself, does not identify you by name. However, this information may include, for example, your IP address (Internet Protocol), which pages you visit on this Website, other pages you visit on the Internet, and which browser you used to view this Website. This technical data is used to measure and improve the performance of this Website, to help diagnose problems with our server, to administer this Website, to see where Website traffic is coming from, and to identify our users. We may also collect other non-personal information through this Website / Affiliated Applications, such as Website activity and usage preferences, also known as demographic or profile data. We do not currently combine the data described in this paragraph with your Personal Data, but we reserve the right to do so in the future.

#### c) Google Analytics

BFSG uses services of third party service providers such as Google, which use their own cookies and third party cookies or other third party identifiers together to collect data about Customer interaction with ad impressions and other service features in relation to our website.

Clients can set preferences for how Google advertise to them using the Google Ads Settings page. Alternatively, Client may opt-out by visiting the opt-out page of the Network Advertising Initiative or by continuously using the opt-out browser add-on for Google Analytics.

BFSG uses Google Analytics to measure and value access and traffic to the public areas of our website, and to generate reports on user navigation for our website administrators.

BFSG takes measures to protect technical information collected by Google. The collected data will be used only as necessary to solve technical problems, administer the website and determine the preferences of visitors.

#### d) Cookies

We use cookies to receive information about how you use our Website. Cookies enable us to provide you with a more user-friendly and accessible format to use the Website. Such files usually do not contain any data that would allow us to identify you as a specific natural person.

#### 4. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

We, like other professional service providers, engage third parties located in other countries to effectively fulfill our tasks. In this regard, personal data may be transferred outside the countries in which we and our Clients are located.

When transferred abroad, data may be transferred to countries outside the European Economic Area (“EEA”) and to countries in which specific procedures for the protection of personal data are not regulated by law.

We have taken steps to ensure that all personal data is adequately protected and that any transfer of personal data outside the EEA is lawful. When we transfer personal data outside the EEA to a country that, according to the European Commission, does not provide an adequate level of protection for personal data, the data transfer is carried out on the basis of an agreement that includes EU requirements for transferring personal data outside the EEA, for example, standard contractual clauses approved by the European Commission.

##### **The Personal Data stored by us may be transferred to:**

- Third parties who provide us with application/functionality, data processing or IT services.
- Third parties who otherwise assist us in providing goods, services or information.
- Auditors, lawyers, translators and other professional consultants.
- Other partner firms and/or intermediaries and/or contractors.

We may transfer personal data to other companies if such transfer is necessary for administrative purposes, as well as for the provision of professional services to our Clients (for example, for the provision of consulting services by companies in various territories).

- As well as professional service providers through programs and applications (such as accounting programs/applications, translation services/applications, etc.)

We engage third parties in order to provide services more efficiently, as well as to ensure the availability, operation and management of our internal IT systems, servers. These persons include, but are not limited to, IT providers, cloud software-as-a-service providers, identity management, website management and hosting, data analytics, backups, security and data storage providers. The servers that provide and support this cloud infrastructure are located in secure data centers around the world, and personal data can be stored on any of them.

- Law enforcement agencies or other government and regulatory agencies or other third parties, in accordance with applicable laws or regulations.

From time to time, we receive requests from third parties who have the right to require the disclosure of personal data, for example, in order to verify our compliance with applicable laws and regulations, to investigate an alleged crime, to establish, use or protect legal rights. We will disclose personal data upon receipt of a relevant request only if applicable law or regulation requires such disclosure.

#### 5. CHANGES TO THIS PRIVACY POLICY

We can make any changes to this Policy at our discretion. If we make any changes to the Policy, the revised version of this Policy is published on our Website. We recommend that you periodically check if any changes have been made to the Policy.

## 6. CLIENT'S RIGHTS IN RELATION TO THE COLLECTION OF PERSONAL DATA

- Access to personal data: you, as a Client, have the right to see information about your personal data and/or the list of data that we hold about you as a data controller.
- Right to change personal data: to update the personal data provided to us, write to us at: [info@bfsgroup.ee](mailto:info@bfsgroup.ee) or, if applicable, contact us through the corresponding registration/contact page on the Website or amend the personal data stored in the respective applications, through which you registered.

Where practicable, as soon as we become aware that any personal data processed by us is out of date, we will correct (where applicable) according to the updated information you provide.

- Request information: BFSG will provide all information regarding the client itself that the Client is entitled to receive under this Policy. The current version of the Policy is available on the website at any time.
- Withdrawal of consent: If the processing of personal data is carried out on the basis of consent, individuals have the right to withdraw their consent at any time. As a rule, we do not process personal data on the basis of consent (since in most cases we use other legal grounds). To revoke your consent to the processing of your personal data, write to us at: [info@bfsgroup.ee](mailto:info@bfsgroup.ee).
- The right to restrict or object to the processing of personal data: you have the right to restrict or object to the processing of your personal data at any time if there are reasonable grounds in your particular situation, if the processing of data is not required by law.
- In case, if we are unable to provide compelling legal grounds for data processing or arguments in favor of establishing, exercising or defending legal claims, we will no longer process or restrict the processing of personal data.

### Other rights of data subjects

This Privacy Policy contains information about what personal data we collect from you and how it is used. In addition to the aforementioned rights of access, modification and restriction or objection to processing, individuals may have other rights to the personal data we hold, such as the right to erasure/deletion and the right to data portability.

## 7. COMPLAINTS

We hope that you will never need this information, but if you want to file a complaint about the use of personal data by our company, write to us at: [info@bfsgroup.ee](mailto:info@bfsgroup.ee), detailing the essence of your claims. We review and provide answers to all complaints sent to us.

You have the right to lodge a complaint with the Data Protection Authority ("DPA") if you believe that your Personal Data is being improperly processed or your rights as a data subject have been violated by us. You can file a complaint by contacting the DPA of the relevant jurisdiction, i.e. at the place of the alleged violation of your rights as a data subject or improper processing of your data, or at the place of residence or work.

The scope of this Policy covers the following DPAs: Estonian Data Protection Inspectorate: <http://www.aki.ee/en>

## 8. CONSENT TO THE PROCESSING OF PERSONAL DATA

The data processing agreement (Annex 1) is an integral part of this Policy.

If you have any questions regarding this Policy, or you want to know how and for what we process personal data, please write to us at [info@bfsgroup.ee](mailto:info@bfsgroup.ee)

## Consent to the processing of personal data

I declare that, as a Data Subject, by filling out the feedback form on the Website, I confirm the following:

- 1) I have received, read and understand the information provided in accordance with the Privacy Policy set out in this BFSG's Privacy Policy;
- 2) I admit that the Data Controller (BFSG), in compliance with the law or its contractual obligations, may be required to provide my Personal and sensitive/vulnerable data to authorized bodies or institutions in accordance with the intended purpose, and hereby I agree to such provision of data without additional notifications and consent on my part;
- 3) I am aware of my rights under the Regulation and the Data Protection Principles.

I hereby give my voluntary and explicit consent to the collection, processing, transfer and use of my Personal and sensitive/vulnerable data for the purposes specified in the aforementioned BFSG's Privacy Policy.