

Aquarium Investments, JSC IPS Personal data processing principles

(effective from 04.02.2026, version 3.0)

1. GENERAL PROVISIONS

- 1.1. JSC “Aquarium Investments” IPS (hereinafter – the Company) hereby establishes the procedures according to which the Company processes client data.
- 1.2. The Principles of Personal Data Processing (hereinafter – the Principles) apply if the Client uses, has used, has expressed an intention to use, or is otherwise connected with any of the services provided by the Company, or if the Client has expressed a wish to receive information about the Company’s services or its activities.
- 1.3. The Principles apply to all Clients, to the processing of all Client data, and to client relationships established prior to the entry into force of the Principles. Additional terms and conditions governing the processing of Client data may also be set out in contracts and other documents related to the services.

2. DEFINITIONS

- 2.1. **A Data Processor** is any natural or legal person that processes Client data on behalf of the Company.
- 2.2. **The Data Controller** is the Company.
- 2.3. **Client data** means any information relating to the Client that is known to the Company and that the Company has obtained in the course of the relationship with that Client, as well as any information that the Company has lawfully acquired from public registers, databases or other publicly available sources, or has received from third parties.
- 2.4. **Processing of personal data (Client data)** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 2.5. **Disclosure of Client data** means the disclosure of Client data to data processors and third parties, whether by transmission, dissemination or otherwise making the data available.
- 2.6. **Client**, for the purposes of these Principles, means any natural person who uses, has used or has expressed the intention to use the services provided by the Company, or who has expressed a wish to receive information about the Company or the services it provides.
- 2.7. **Third party** means any natural or legal person other than the Client, the Company or a data processor.
- 2.8. **The Company** is Aquarium Investments, JSC IPS, reg. No.: 40003764029, address: Elizabetes street 3 – 1, Riga, LV-1010, phone +371 67222002, e-mail: info@aqrm.com.

3. BASIC PRINCIPLES OF DATA PROCESSING

- 3.1. The Company processes Client personal data in accordance with 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, and repealing Directive 95/46/EC (General Data Protection Regulation – hereinafter “GDPR”), the Latvian Personal Data Processing Law, the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing, other applicable laws and regulations, these Principles, and agreements concluded between the parties
- 3.2. The Company processes, discloses or transfers Client personal data only:
 - 3.2.1. To handle necessary measures before closing the contract;
 - 3.2.2. When required by law or other legal obligations;
 - 3.2.3. With the Client’s consent;
 - 3.2.4. When necessary for the Company’s legitimate interests.
- 3.3. The Company ensures the confidentiality of Client personal data in accordance with applicable legal requirements and implements appropriate technical, organisational, physical and IT security measures to monitor the processing of personal data and to protect it against unauthorised or unlawful access, processing or disclosure, as well as against accidental loss, alteration or destruction.
- 3.4. The Company requires all data processors to implement appropriate security measures and to comply with the confidentiality obligations set by the Company. The Company imposes contractual obligations on data processors to ensure the protection of Client personal data in line with these Principles and applicable law.

- 3.5. The Company has the right, depending on the type of communication channel and the applicable security level, to restrict the volume or scope of data provided to the Client.
- 3.6. The Company collects and processes Client personal data only to the extent necessary to achieve the purposes set out in these Principles

4. CATEGORIES OF PERSONAL DATA, LEGAL BASES AND PURPOSES OF PROCESSING

- 4.1. For the purposes of exercising rights and obligations arising from applicable laws and regulations, performing the contract concluded with the Client, taking steps at the Client's request prior to entering into the contract, ensuring the performance of the contract, and protecting the Company's legitimate interests, the Company processes personal data for the following purposes:
 - 4.1.1. Identification data, which is mainly processed to identify the Client, to fulfil the contract, to comply with legal obligations, and to safeguard the Company's legitimate interests;
 - 4.1.2. Client contact information - used to ensure effective communication and information exchange between the Company and the Client, based on the Client's consent or the Company's legitimate interests;
 - 4.1.3. Client professional data - used to assess the Client's knowledge and experience, to offer appropriate services, and to comply with legal obligations, the Company's legitimate interests, or the Client's consent;
 - 4.1.4. Client financial information and source of funds — used to evaluate the Client's reliability and solvency, to understand the Client's financial behaviour, to prevent money laundering, terrorism financing and proliferation financing, and to offer suitable services, based on the Company's legal obligations and legitimate interests;
 - 4.1.5. Family data - processed to fulfil obligations arising from applicable laws and regulations, to manage client relationships, and to assess risks;
 - 4.1.6. In order to supplement and verify the data provided by the Client, to establish or maintain business relationships, to make decisions related to those relationships, or to carry out client due diligence or other investigations required by law, the Company is entitled to obtain information about the Client from third parties, as well as from databases and publicly available sources to which the Company has lawful access.
- 4.2. The Company may obtain information from Latvian or foreign credit institutions or other financial institutions where necessary to conduct due diligence in compliance with the requirements of the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing.
- 4.3. The above-mentioned data are also processed for the purposes of performing the contract, establishing, exercising, defending and enforcing the Company's legal claims, taking steps at the Client's request prior to entering into a contract, and pursuing the Company's legitimate interests in fulfilling its legal obligations.

5. DISCLOSURE OF CUSTOMER DATA TO PERSONAL DATA PROCESSORS AND THIRD PARTIES

- 5.1. The Company discloses Client personal data only in accordance with the purposes of processing Client personal data set out in these Principles.
- 5.2. Client personal data is disclosed to the following recipients, for the corresponding purposes of processing:
 - 5.2.1. Persons involved in the provision of the service and the performance of the contract concluded with the Client, in order to ensure the conclusion or performance of the contract;
 - 5.2.2. Credit institutions, financial institutions, and financial service intermediaries, in order to provide the services to the Client and to prevent potential fraudulent activities;
 - 5.2.3. Service providers whose outsourcing services the Company uses (in whole or in part) in accordance with the procedures laid down in applicable laws and regulations, provided that such persons comply with the organisational, physical, and information technology security requirements established by the Company concerning the confidentiality and protection of Client personal data;
 - 5.2.4. Other third parties, where necessary to protect the Company's violated or disputed rights;
 - 5.2.5. Other third parties located abroad, where such disclosure is necessary for the performance of the contract with the Client.
- 5.3. The Company is required by law to disclose Client personal data in order to comply with obligations under applicable regulatory enactments.

6. CHANGES TO CLIENT PERSONAL DATA AND CESSATION OF PROCESSING OF CLIENT PERSONAL DATA

- 6.1. The Client shall submit information or requests to the Company in writing or in a form that can be reproduced in writing.
- 6.2. The Client is obliged to immediately notify the Company of any changes to the Client's personal data, including changes to name, surname, address, means of communication, e-mail address (including change of tax residence), and changes to rights of representation.
- 6.3. The Company regularly verifies whether the Client's personal data is complete and accurate.
- 6.4. The Client has the right to request rectification of their personal data if changes have occurred or if the data is inaccurate for any other reason.
- 6.5. The Client has the right to request that the Company cease processing and/or disclosure of their personal data, grant access to the data, and/or erase the personal data held by the Company. These rights do not apply where the personal data that the Client requests to be erased is processed on other legal grounds, for compliance with a legal obligation, or for the pursuit of the Company's legitimate interests.
- 6.6. The Company processes Client personal data for as long as necessary to achieve the purposes of processing, to fulfil obligations arising from applicable laws and regulations, and to protect the Company's legitimate interests.

7. CLIENT'S RIGHTS AND THEIR PROTECTION

- 7.1. Unless otherwise provided by applicable laws and regulations, the Client has the right to:
 - 7.1.1. Access their personal data, obtain a copy of their personal data from the Company, and receive information from the Company regarding the categories of personal data processed, the sources of such data, and the purposes of processing, unless otherwise stipulated by law.
 - 7.1.2. The Company shall provide the Client with their personal data, supply the requested information, or justify any refusal to do so in accordance with applicable laws and regulations, no later than within 30 (thirty) days from receipt of the request. This period may be extended by up to 2 (two) months depending on the complexity or number of requests; the Company shall inform the Client of any such extension within one month of receiving the request;
 - 7.1.3. Receive information from the Company about third parties to whom their personal data has been disclosed;
 - 7.1.4. Request rectification of their personal data where a legal basis exists;
 - 7.1.5. Request the Company to cease processing of their personal data;
 - 7.1.6. Request restriction of processing of their personal data;
 - 7.1.7. Exercise any other rights granted under applicable data protection legislation.
- 7.2. If the Client believes that their rights have been violated in the course of processing their personal data, the Client may submit a request to the Company to cease such violation.
- 7.3. In case of violation of the Customer's rights, the Customer has the right to apply to the Data State Inspectorate (<https://www.dvi.gov.lv/lv>) or to the court at any time.
- 7.4. For explanations regarding the processing of personal data or to submit complaints, the Client may contact the Company by e-mail at: info@aqrm.com.

8. TERRITORY OF PROCESSING

- 8.1. Client personal data is primarily processed within the European Union / European Economic Area (EU/EEA). However, in certain cases, it may be transferred to and processed in countries outside the EU/EEA.
- 8.2. Any transfer and processing of Client personal data outside the EU/EEA shall occur only where there is a valid legal basis and appropriate safeguards are implemented in accordance with applicable data protection legislation.

9. CHANGES TO THE PRINCIPLES OF PERSONAL DATA PROCESSING

- 9.1. The Company reserves the right to unilaterally amend these Principles at any time. The Company shall inform the Client of any changes to the Principles in advance by publishing a notice on the Company's website at aqrm.com.