

Personal data processing notice for Alexela cards

General information

The personal data processing notice for Alexela cards (hereinafter also: Notice) provides information on how and where we process your personal data as you apply for and use the Alexela card (hereinafter also: Card), and on other matters related to the Card.

The Notice applies to all Cards issued by AS Alexela (contact information: alexela(at)alexela.ee and 6290 000), such as Home Cards, Payment Cards, Discount Cards, etc. In certain cases, the Notice also applies to other cards issued by Alexela Group companies. In all of the cases given above, you will be informed of this Notice and given an opportunity to read it.

We would hereby like to point out that this Notice is for notification purposes only and is not part of the agreement to be signed with you.

The controller of the personal data (hereinafter also: Data) related to your Card is the Alexela Group company (hereinafter also: Company) that issues the Card to you.

This Notice and the list of companies and cooperation partners that are part of Alexela are available on Alexela's website at (<https://www.alexela.ee/privaatsus>), in a convenience store or in Alexela's office (Roseni 11, 10111 Tallinn).

The concepts related to personal data protection, used in the Notice, are defined in this Notice, the agreement or Estonian and European Union legislation. The agreement may elaborate on this Notice.

We do our best to keep the Notice updated. We will notify you of major changes concerning you on Alexela's website (<https://www.alexela.ee/privaatsus>) or in any other reasonable manner, e.g. by e-mail.

You can read the general privacy policy of Alexela Group on the website (<https://www.alexela.ee/privaatsus>), in a convenience store or in Alexela's office (Roseni 11, 10111 Tallinn).

Personal data. What kind of personal data do we process?

Personal data is information concerning you as a physical person, that is, a data subject, through which you are identified or identifiable.

We have categorised your personal data as follows:

- **Data identifying a person**, such as: first and family name, personal identification code, date of birth, personal identification documents, etc.;
- **Contact information**, such as: e-mail address, address, phone number, etc.;
- **Interaction information**, such as: speech recording, information collected via e-mail;
- **Financial information**, such as: information on credit, liabilities or transactions, etc.;
- **Special categories of personal data** are as follows: racial or ethnic background, political opinions, religious or philosophical beliefs or membership in trade unions, genetic data,

biometric data used for unique identification of a person, health data or information on the sex life or sexual orientation of a physical person;

- **Other information related to the Card**, such as: information on consumption, name of home filling station, information on participation in campaign games, etc.

Personal data collection

Alexela collects your personal data from various sources, but for the most part, we collect data from yourself. For example, we receive data from you if you apply for or renew/replace the Card, enter into an agreement, use the Card, etc. In addition to the cases referred to above, we can collect your data from registers, if necessary.

The composition of the personal data collected depends on the following, for example:

- Which Card you apply for and/or which agreement you enter into;
- The purpose of the Card for you: purchase of products or consumption of services provided by Alexela Group;
- Which consents you give to the processing of your personal data.

In collecting personal data, we are governed by the principles established in Estonian and European Union legislation, e.g. the principles of minimalism and purposefulness.

Please note that it is not our goal to collect special categories of personal data, but these may accidentally become known to us, e.g., if you send the respective data to us by any means.

The grounds and purpose of personal data processing

In processing personal data, we are governed by the personal data processing principles established in legislation. We process the data related to the Cards on four grounds which are the following: performance of an agreement, performance of a legal obligation, consent, and legitimate interest.

For the **performance of an agreement**, we process your data, for example, for the following purposes: application for the Card, replacement/renewal of the Card, for providing discounts for the products and services offered with the Card, identifying the buyer or the person authorised by the buyer, if necessary; conducting customer surveys, creating customer history, assessing and preventing business risks related to the Card, analysing consumption habits, drawing up invoices and notices related to the agreement and sending these to you, processing phone calls related to the Card, documenting any service-related activities if necessary, sending you Card-related information, etc.

The purposes of processing personal data for the performance of an agreement may be specified in an agreement signed or to be signed.

In the performance of legal obligations, we are required to process your personal data if prescribed by grounds established in legislation. In this case, neither we nor you have the right to decide on the processing of your personal data. On this ground, we are required to process your personal data, for example, for the following purposes: accounting, responding to requests by government offices, notifying supervision authorities of any violations, notifying the data subject of any violations, mandatory assessment of creditworthiness when granting credit, etc.

When processing on **consent**, we process your personal data only to the extent and for the purposes you have consented to. For example, when applying for or replacing/renewing a Card, or at any other time, you can consent to receiving promotional offers and notifications via electronic channels (SMS, MMS, e-mail).

Generally, granting consent means ticking a box, which is not mandatory, for example, when applying for a Card.

You have the right to withdraw your consent at any time and your consent will be valid until withdrawn or until a new consent is given. The withdrawal of your consent will not apply retroactively. Depending on the method of granting and withdrawing consent, the decision may apply during a certain period of time. If you give your consent on paper, longer delays may occur in the application.

In processing your personal data based on **legitimate interest**, we process the data if necessary and in compliance with the rights and interests of you as a data subject.

Legitimate interest is expressed both in promoting business and in offering you better services and/or products and providing data and information security.

For example, based on legitimate interest, we have the right to process the personal data according to the data exchange process used within Alexela Group.

Please note that the Notice concerns various Cards, so the purposes of the collection and processing of personal data may differ. For example, if you apply for a Payment Card, we ask you to provide more information than required for a regular Home Card.

Processing of personal data for marketing purposes

If you apply for a Card, enter into an agreement or perform any transactions in self-service or in relation to the Card, you can consent to the receipt of promotional offers and notices (hereinafter: Marketing) via electronic channels (SMS, MMS, e-mail). Your consent to Marketing is obtained according to legislation.

The easiest way to give your consent to Marketing is to tick a respective box when applying for a Card or entering into an agreement. Also, consent to Marketing can be given later, in the self-service for the Card, for example.

You have the right to withdraw your consent at any time in the self-service for the Card (<https://iseteenindus.alexela.ee/Account/Login>), by clicking on the link provided at the end of the Marketing message or by sending an e-mail to loobu@alexela.ee (the e-mail needs to be sent from the same address you have provided to us with regard to the Card. Then, we can identify that it is you who wants to withdraw the consent. If the withdrawal application has not been sent from the appropriate e-mail address and we are unable to identify you, we will contact you), or by any other means offered by Alexela Group.

If you consent to Marketing, you generally consent to the receipt of offers from Alexela Group companies and their cooperation partners. The cooperation partners and Alexela Group companies are listed on the website: <https://www.alexela.ee/privaatsus/>. Please note that the offers will be sent by us, that is, Alexela. In Alexela Group, we make personal Marketing offers to you based on your consumption habits.

Who else besides the controller can process your personal data?

In addition to the company issuing the Card, your personal data can be processed by other Alexela Group companies, for making management decisions, offering services and/or products, for example.

Also, the cooperation partners of the controller who process your personal data on behalf of the controller. According to the General Data Protection Regulation of the European Union, they are processors, who will not use the personal data for any purposes other than agreed with the controller, such as for preparing and delivering the Card, ensuring the functioning of the Card.

An Alexela Group company will have the right to forward your personal data to competent state authorities (e.g. the court, police) if required by law.

Personal data processing security

Alexela applies appropriate technical and organisational security measures to guarantee the integrity, availability and confidentiality of your personal data.

The employees at Alexela are subject to the duty of confidentiality and will be provided personal data protection related trainings.

In processing personal data, Alexela's cooperation partners – processors – are required to ensure the necessary and appropriate technical and organisational security measures regardless of the location of the processor. As a whole, Alexela's cooperation partners are located in Estonia, the European Union and the European Economic Area, but may in certain cases be located outside of these areas.

Preservation of personal data

We will preserve your personal data until necessary to achieve the purposes of the processing. Also, in order to perform the duty to preserve the data as prescribed by legislation, or to settle any potential disputes.

Generally, we will preserve any Card-related information until necessary until the expiry of the limitation period for any claims arising from the relationship between you and us, except where legislation prescribes a longer period of preservation. This need and duty may arise, for example, in order to preserve the data for accounting purposes, in which case the period of the preservation of personal data would be seven years after the expiry of the agreement.

If a Card is not issued or the request for a Card is suspended, the data related to this process are deleted within a year and a half unless a longer period for preservation is prescribed by legislation.

Rights concerning personal data

Right to access the personal data

You have the right to access your personal data, including their sources and purpose of use, at any time. In most cases, you can access the data related to your Card in Alexela's self-service at: <https://iseteenindus.alexela.ee/Account/Login>. You can access the information on the processing of all personal data related to the Cards subject to this Notice by e-mailing a relevant request to the Alexela Group company that issued the Card or by sending a written request to Alexela's office (Roseni 11, 10111 Tallinn). To access the data, you need to duly identify yourself (for example, sign the request digitally or identify yourself with your ID-card).

We will respond to your request within 30 days but have the right to extend the response deadline by 60 days if there is a justified need. Should this be necessary, we will send you a relevant notice and a reason for extending the response deadline.

Right to rectification

If you find that any data you have presented in the Card application or the agreement or in the use thereof are incorrect or if your data have changed, you can generally change the data in the self-service for

our Card (<https://iseteenindus.alexela.ee/Account/Login>), but you can always e-mail a relevant request or send a written request to Alexela's office (Roseni 11, 10111 Tallinn). To rectify the data, you need to duly identify yourself (sign the request digitally or identify yourself with your ID-card, for example).

Right to restrict processing

In certain cases, you have the right to restrict the processing of the personal data related to the Card by e-mailing a relevant request or sending a written request to Alexela's office (Roseni 11, 10111 Tallinn). To exercise this right with regard to the Card, you need to duly identify yourself (sign the request digitally or identify yourself with your ID-card, for example).

Please note that the exercise of this right entails the use of exact wording and may result in, for example: The suspension of the functioning of your Card (including Card discounts), temporary suspension of the issue of a Card, etc.

This right can be executed if you wish to: (i) contest the accuracy of your personal data; (ii) identify unlawful data processing; (iii) request or avoid the deletion of personal data, that is, the data subject needs the personal data for the establishment, exercise or defence of legal claims; or (iv) object to the consideration of legitimate interest, and the data subject wishes to seek restriction of the respective processing until a decision is made.

Right to data portability

According to legislation, you have the right to request the transfer of your personal data, which is restricted by several identifiers, as established in legislation.

Please note that such transfer of personal data is possible if it is feasible and the controller deems it safe. If the other party is unable to accept the personal data, the Alexela Group company will not be held responsible.

This right can be exercised by e-mailing a relevant request to the controller or sending a written request to Alexela's office (Roseni 11, 10111 Tallinn). To transfer the data, you need to duly identify yourself (sign the request digitally or identify yourself with your ID-card, for example).

Right to object

You have the right to object to the processing of your personal data by us, which we do based on legitimate interest.

In case of any objections, we assess the legitimate interests and discontinue the respective processing if possible.

This right cannot be exercised in a situation where we need to establish, exercise or defend a legal claim, and in any other procedures provided for in legislation.

This right can be exercised by e-mailing a relevant request to the controller or sending a written request to Alexela's office (Roseni 11, 10111 Tallinn). To object to the processing of your data, you need to duly identify yourself (sign the request digitally or identify yourself with your ID-card, for example).

Right to erasure (“right to be forgotten”)

In certain cases, you have the right to be forgotten, that is, request that your personal data be erased.

This right can be exercised by e-mailing a relevant request to the controller or sending a written request to Alexela’s office (Roseni 11, 10111 Tallinn). To request the erasure of your data, you need to duly identify yourself (sign the request digitally or identify yourself with your ID-card, for example).

Right to contact the controller, a supervisory authority or court

If you wish to receive additional information about the processing of personal data and about consents, you can always contact the controller. For example, you can contact Alexela in the cases given in this Notice by using the contact information provided.

If you find the information you have received to be insufficient or think the terms of processing your personal data are violated, you can contact the Data Protection Officer of Alexela Group at andmekaitse@alexela.ee.

You have the right to turn to the Data Protection Inspectorate or a court for the protection of your personal data. You can contact the Data Protection Inspectorate for consultations on and assistance in personal data protection.

Amendment and application of the Notice

Alexela has the right to unilaterally change the content of the Notice according to Estonian and European Union legislation.

The Notice will be applicable to all data subjects who are subject to the personal data notice for Alexela cards, including the cards issued before the Notice becomes effective.

Alexela will notify all data subjects of this Notice and any changes made in it according to the procedure provided for in legislation.

The Notice is valid since 1 November 2018

Last updated on 27 May 2019