

SIA Provendi Asset Management AIFP Privacy Policy

1. About Us

SIA Provendi Asset Management AIFP manages INDEXO REAL ESTATE FUND AS, which is registered in Latvia as a real estate fund. The objective of the fund is to make medium and long-term investments in various real estate properties and businesses that own real estate in the Baltic region.

This privacy policy (hereinafter referred to as "the Policy") has been developed in accordance with the requirements of 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 (hereinafter referred to as "the Regulation"). Our goal is to provide you with information about the processing of personal data of natural persons carried out by SIA Provendi Asset Management AIFP, registration number 40203438204, legal address: Daugavgrīvas iela 7B, Rīga, LV-1048 (hereinafter referred to as "the Manager" or "we"), and INDEXO REAL ESTATE FUND AS, unified registration number 40203443258, legal address: Daugavgrīvas iela 7B, Rīga, LV-1048 (hereinafter referred to as "the Fund" or "we"), and the group companies in Latvia that directly own real estate (hereinafter referred to as "the Companies" or "we"):

- SIA E89, unified registration number 42103085029, legal address: Daugavgrīvas iela 7B, Rīga, LV-1048;
- SIA PB10, unified registration number 45403051334, legal address: Daugavgrīvas iela 7B, Rīga, LV-1048;
- SIA V61, unified registration number 40203393205, legal address: Daugavgrīvas iela 7B, Rīga, LV-1048.

2. We Care About Your Privacy

This policy describes how we process the data of our clients, client representatives or contact persons, business partners, website visitors, our employees, candidates for vacant positions (applicants), and other individuals whose data may come into our possession during our commercial activities.

We assume that before using our website (domain address) or becoming our client, you have read this policy and accepted its terms. This is the current version of the policy. We reserve the right to make amendments and update this policy as needed.

The purpose of this policy is to provide you with a general overview of our data processing activities and purposes. However, please note that additional information about the processing of your personal data may be provided in other documents (such as service agreements, and cooperation agreements).

Please be informed that the provisions of this policy regarding the processing of personal data apply only to the processing of personal data of natural persons.

In addition to these terms, you can also review the following additional notices regarding the processing of personal data:

- For information on the use of cookies and related data, you can refer to the Cookie Policy (available at www.indexore.lv).

We are aware that personal data is valuable to you, and we will process it while respecting confidentiality requirements and ensuring the security of your personal data in our possession.

3. For What Purposes Do We Process Your Personal Data and What Is the Legal Basis for Personal Data Processing?

We will process your personal data for the fulfillment of our main functions, including:

Purpose	Categories of Personal Data	Legal Basis
Provision of Investment Services: To provide investment services as defined in the agreement and regulatory enactments, ensuring compliance with legal provisions arising from the legitimate interests of the Manager, the Fund, its shareholders, investors, or third parties; To conclude agreements, etc.	Identification data (name, surname, national ID number, date of birth, identification document data); Contact information (address, phone number, email address); Financial information (bank account number, income information, investment); Information on tax residence (tax residence country, taxpayer number, citizenship, country of residence). Additional information about the Personal data we process will also be visible in the Manager's and Fund's documents (application forms, contracts, etc.).	For the conclusion and execution of the contract.
For the fulfillment of obligations set forth in the Law on Alternative Investment Funds and Their Managers and ensuring the prevention of money laundering and terrorism and proliferation financing: to ensure compliance with the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing, conduct due diligence on clients, business partners, investors, and shareholders per regulatory requirements, ensure the identification of politically exposed persons, maintain a shareholder register, investor records, etc.	Identification data (name, surname, national ID number, date of birth, identification document details); Contact information (address, phone number, email address); Financial information (bank account number, income information, investment); Information about tax residency (tax residence country, taxpayer number, citizenship, country of residence); Information about the status of politically exposed persons; Special category data (information about convictions if the person has provided such information).	For the fulfillment of legal obligations.
Management and leasing operations for real estate: to ensure the preparation, conclusion, and execution of residential/non-residential space lease agreements, the maintenance of records and home affairs, invoice delivery,	Identification data (name, surname, national ID number, date of birth, identification document data); Contact information (address, phone number, email address); Financial information (bank account number);	Conclusion and execution of the contract, as well as the fulfillment of legal obligations determined by law.

settlement administration, handling customer applications and complaints, etc.	Information about family members (name, surname, national ID number); Information in contracts (number, date, term, obligations); Utility service data (consumption volume of water, electricity, heating, gas, etc.); Information about payments, debt recovery, enforcement, creditworthiness check data, etc.	
Ensuring personnel management: to organize and ensure the personnel selection process, establish and maintain labor legal relations, etc.	Identification data (name, surname, national ID number, date of birth, identification document data); Contact information (address, phone number, email address); Financial information (bank account number); Information about education and work experience (data from education certificates, workplace, profession, position, type of occupation, participation in professional associations, length of work experience).	Conclusion and execution of the contract, as well as fulfillment of obligations stipulated by law. The basis for data processing in the selection process is the individual's consent.
Prevention of criminal offenses in real estate, ensuring security and order: video surveillance on the premises and indoors of company real estate to ensure the safety of ourselves, clients, and visitors, as well as property protection, etc.	Videorecording	To secure our legitimate interests.
Payment administration and accounting organization: to administer payments for provided services (including the preparation of statements and reports, etc.), and employee salaries, and comply with regulatory requirements for accounting.	Identification data (name, surname, national ID number); Financial information (bank account number, payment information).	For the execution of the contract and the fulfillment of legal obligations.
Debt recovery: In certain cases, we may need to recover debts if contractual obligations are not fulfilled.	Identification data (name, surname, national ID-number, date of birth, identification document data);	For the execution of the contract and the protection of our legitimate interests.

	Information in contracts (number, date, term of validity, obligations); Outstanding debt.	
Records management: keeping track of and storing documentation, outgoing and incoming correspondence, contracts, etc.	All personal data previously and hereafter specified, derived from the documents in our possession.	Depending on the type of documentation, it may be stored to pursue our legitimate interests, such as defending interests in court, or to comply with regulatory requirements.
For marketing, advertising, and communication purposes: we may process personal data for marketing and advertising purposes, as well as to ensure communication with clients, include data in informational databases, and conduct marketing and informational campaigns.	Identification data (name, surname, national ID-number, date of birth); Contact information (address, phone number, email address).	Processing is carried out based on your consent.
Communication (via email, by phone, or in person) is ensured by collecting and processing questions, suggestions, complaints, and other information to prepare responses and facilitate communication with the addressee.	Identification data (name, surname, national ID-number, date of birth); Contact information (address, phone number, email address).	Processing is carried out based on your consent.
Cookies: Cookies are small text files created and stored on your device (computer, tablet, mobile phone, etc.) when you visit our website. Cookies "remember" the visitor's experience and basic information, thereby improving the convenience of using the website. By using cookies, data on the history of website use is processed, problems and deficiencies in the operation of the website are diagnosed, statistics of user habits are collected, and the complete and convenient use of the website's functionality is ensured.	Location, device, IP address, and the used web browser, the website from which you accessed our website.	Certain necessary cookies are placed automatically; therefore, processing occurs to fulfill legal obligations. As for other cookies, processing is carried out based on your consent.

4. Who Can Access Your Personal Data?

We take appropriate measures to process your personal data in accordance with applicable laws and ensure that third parties without a legal basis for processing your personal data do not have access to it. Your personal data may be accessed by:

- Our employees or directly authorized individuals who require it for the performance of their job duties;
- Our external service providers and other partners according to the services provided and only to the extent necessary for the performance of required functions, such as accountants, database developers/technical support, etc.;
- State and municipal authorities in cases specified by law, such as the State Revenue Service, law enforcement authorities, municipalities, tax authorities, sworn bailiffs, supervisory authorities (e.g., the Bank of Latvia), as well as courts, insolvency administrators, third parties maintaining registers (e.g., population register, debtors register, and other registers);
- Third parties, carefully assessing whether there is an appropriate legal basis for such data transfer, such as alternative dispute resolution authorities, external evaluators, and private individuals maintaining registers.

We take appropriate measures and carefully assess our external service providers and partners to ensure the processing, protection, and transfer of your personal data in accordance with applicable laws. We carefully select data processors and, when transferring data, assess the necessity of such transfer and the scope of data to be transferred. Data transfer to processors is carried out while adhering to the requirements of confidentiality and secure processing of personal data, as well as the requirements specified in the laws.

5. Are Your Personal Data Transferred to Countries Outside the European Union (EU) or the European Economic Area (EEA)?

Your personal data is not processed in countries located outside the EU/EEA.

6. How Long Will We Retain Your Personal Data?

Your personal data is retained for as long as necessary for the respective purposes of personal data processing and in accordance with applicable legal requirements. When assessing the duration of personal data storage, we consider existing regulatory requirements, the aspects of contractual performance, your instructions (e.g., in the case of consent), and our legitimate interests.

Common retention periods for personal data include:

- Personal data necessary for the performance of contractual obligations is retained until the contract is fulfilled and until other retention periods expire;
- Personal data required to comply with legal requirements is retained for the periods specified in relevant regulations. For example, the Accounting Law stipulates that supporting documents must be retained until the day they are needed to determine the beginning of each economic transaction and to track its progress, but not less than 5 years;
- Data to prove the fulfillment of obligations is retained according to general limitation periods, as specified in regulations - 10 years under the Civil Law, 3 years under the Commercial Law, and other periods, taking into account the limitation periods specified in the Civil Procedure Law for bringing claims;
- Personal data necessary for the fulfillment of obligations under specific laws is retained within the time frames set by the respective documents. For example, in accordance with the

Prevention of Money Laundering and Terrorism and Proliferation Financing Law, data related to these matters is retained for 5 years after the termination of the relationship;

- CVs submitted for a specific job vacancy and accompanying documents are retained until the end of the competition and for at least 6 months thereafter to protect against potential claims and litigation against us. If you have submitted a CV and accompanying documents without addressing a specific job vacancy or have given consent to use your CV and accompanying documents for future selections, we will retain your CV and accompanying documents for 1 year. You always have the right to withdraw your consent for the storage of such data. If an employment contract is concluded with you, CVs and accompanying documents may be added to your employee file and stored for the entire duration of the employment relationship, as needed;
- Video surveillance recordings are retained for no longer than six months. Recordings are automatically deleted in chronological order from the time of recording. Certain recordings may be retained for a longer period if necessary for specific purposes, such as the investigation of incidents and violations of the law.

A longer retention period for personal data is permissible to meet legal requirements for the minimum term of a document or information storage or to protect our legitimate interests, such as in the case of litigation. Once the above-mentioned data retention period has expired, we will securely erase your personal data or make it inaccessible or unidentifiable so that it can no longer be associated with you.

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7. What are your rights as a data subject regarding the processing of your personal data? Data Subject Rights.

Data Update:

If there are changes in the personal data you have provided to us, such as changes in the national ID number, contact address, phone number, or email, please contact us and provide us with the updated data so that we can achieve the relevant purposes of personal data processing.

Access and Correction Rights:

In accordance with the General Data Protection Regulation (GDPR), you have the right to request access to your personal data held by us, request its correction, deletion, processing restriction, object to the processing of your data, and exercise the right to data portability in accordance with the GDPR.

We respect your rights to access and control your personal data. Upon receiving your request, we will respond within the statutory deadlines (usually no later than one month, unless there is a specific request requiring a longer time to prepare a response), and if possible, we will correct or delete your personal data accordingly.

You can obtain information about your personal data held by us or exercise other rights as a data subject by contacting us. Upon receiving your request, we will evaluate its content and your identification possibilities. Depending on the situation, we reserve the right to request additional identification to ensure the security and disclosure of your data to the appropriate person.

Withdrawal of Consent:

If the processing of your personal data is based on your consent, you have the right to withdraw it at any time. We will no longer process the relevant data for the intended purpose upon withdrawal.

However, please note that withdrawing consent does not affect the processing of data necessary for compliance with legal requirements, contractual obligations, our legitimate interests, or other legal bases for lawful data processing.

You can also object to the processing of your personal data if the processing is based on legitimate interests or is used for marketing purposes (e.g., sending commercial communications).

8. Where can you lodge a complaint regarding issues related to the processing of personal data?

If you have any questions or objections regarding the processing of your personal data by us, we encourage you to contact us first. If you believe that we have not been able to mutually resolve the issues and you believe that we are still violating your rights to data protection, you have the right to lodge a complaint with the Data State Inspectorate or file a claim in court in accordance with applicable laws.

9. Why do you need to provide us with your personal data?

Primarily, we collect your information to fulfill contractual obligations, comply with mandatory legal obligations, and pursue our legitimate interests. In these cases, obtaining certain information is necessary to achieve the intended purposes; therefore, not providing such information may jeopardize the initiation or execution of contractual relationships. If data is not mandatory but providing it could help improve the service, we will indicate that data provision is voluntary.

10. How do we obtain your personal data?

We may obtain your personal data through the following methods:

- 1) From you, when you provide it to us for the purpose of service provision, mutual agreement processes, or when you submit applications, emails, or call us. This includes when you submit applications and CVs for participation in job competitions for vacant positions;
- 2) From business partners for the fulfillment of contractual obligations, either directly from you or, in cases where a contract is concluded with a third party, and you are indicated as a contact person;
- 3) Through the website www.indexore.lv, using cookies;
- 4) When provided by third parties:
 - a) Maintainers of databases as required by legislation;
 - b) State institutions, supervisory authorities, law enforcement agencies, and their officials.
- 5) From applicants when they provide feedback, including your personal data.

11. Is automated decision-making used for your data?

We do not use your data for automated decision-making.

12. Data protection:

Your personal data is secure with us as we take all necessary measures in accordance with current data protection laws, guidelines, and internal policies.

We always work to the highest security standards, utilizing the latest technologies, and security software such as firewalls, authentication programs, and data encryption to protect your personal data. This is to prevent unauthorized access, intentional or accidental disclosure, and to avoid the deliberate or accidental loss, disclosure, or destruction of personal data.

If circumstances arise that may jeopardize the security of your personal data, we will inform you by phone, in writing, or by publishing information on our website.

We are not responsible for the loss or leakage of your personal data if it occurs due to your fault. We encourage you to be responsible and familiarize yourself with the rules of computer and internet use, especially when disclosing personal data such as identity documents.

13. Contact information for inquiries about data protection:

If you have any questions or complaints about this policy or the processing of your personal data, you can contact us by:

- 1) Submitting a relevant application in person and identifying yourself at our office: Daugavgrīvas iela 7B, Rīga, LV-1048;
- 2) Sending a relevant application by mail to the following address: Daugavgrīvas iela 7B, Rīga, LV-1048;
- 3) Sending a relevant application to our email: info@indexore.lv, signing it with a secure electronic signature for identification purposes.

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