

**Why do you collect my data?**

We use data to provide you with our services, improve our products and services, send notifications, offers and promotions, to protect our and third party rights and interests, and to comply with the laws and regulations.

**How do you collect my data?**

When you provide it to us directly, use our products or website, through cookies and similar technologies, and we may collect data from third parties.

**What information do you collect about me?**

We may collect such information as your name, identity/identification number, date of birth, gender, address, email, phone, employment data, IP address, Device ID, location, financial and payment information, including data on your liabilities.

**Do you share my data?**

We may share your data to provide you with services, develop new services, carry out creditworthiness and risk assessment, for debt collection purposes, when we sell all or part of our business, as well as to comply with the laws and regulations.

**What rights do I have over my data?**

You may ask what data we hold about you, to correct your personal data, to delete your personal data that is no longer necessary for processing, and in some cases oppose the processing of personal data. You may opt-out of marketing messaging and certain data collection and use.

**Do you make automatic decisions about me?**

We do automatic creditworthiness and risk assessments to decide whether to issue loan and maximum loan amount.

## **Our privacy policy**

We at 4finance respect your privacy and are committed to preserve your right to lawful processing and to the protection of your personal data. Our Privacy Policy offers you a clear explanation of the use of your personal data or any data we may collect about you.

You can be assured that we protect the information we collect. By using our sites, products or services, you agree to the collection, use and sharing of your data in accordance with this Privacy Policy.

Please visit <http://www.4finance.com> for more information about us.

This Privacy Policy is updated from time to time; therefore, it should be reviewed occasionally. We last changed our Privacy Policy on September 23, 2017. See our [archive](#) for further information.

## **WHY DO YOU COLLECT MY DATA?**

We use data we collect about you to provide services to you, improve our products and services; provide support; and send notifications, offers, and promotions, to protect our and third party rights and interests, and to comply with the law.

We use information about you to:

- process your application and provide services to you;
- verify your identity (this may include also use of face recognition, voice, fingerprint or other biometrics technologies, as well as online identification systems);
- subsequently carry out credit checks and assess your ability to repay the loan and offer you appropriate services before establishment of a contractual obligation;
- identify and prevent any fraud, money laundering, terrorism financing and other criminal activities;
- fulfill our legal obligations, arising, for example, from the credit consumer act, anti-money laundering and counter terrorism financing law, laws regulating accounting;
- contact you, including informing you on any changes regarding us, our services or our contractual relationship;
- recover any funds owed to us;
- ensure and improve the quality of services;
- administer and improve our websites, keep them safe and ensure that content is presented in the most effective manner for you on your device;
- develop and offer new services;
- for statistical and market research purposes, to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- advertise (on websites and in mobile service, by post, email, telephone or SMS) our company, our group company and relevant third party products and services, including, tailoring our offers towards your personal preferences;
- test, update and implement new technologies regarding identification, risk and creditworthiness assessments, fraud prevention, anti-money laundering and counter terrorism financing; and
- any other lawful use that is relevant to our relationship with you.

## **HOW DO YOU COLLECT MY DATA?**

We collect information in three ways:

1. when you provide us information, for example, face to face, when filling our applications (including at our partners and agents), on our websites, via social media, by mail, e-mail, phone, "Live Chat" or any other media or service,
2. automatically, when you use our website or products, and
3. when provided to us by third parties, for example, credit registers, our other group companies or partners.

Much of our automatic collection is done through the use of things like cookies, tracking beacons and similar technologies. Please see our [cookie and tracking policy](#) for more information.

## **WHAT INFORMATION DO YOU COLLECT ABOUT ME?**

Data can be collected and processed during the operations of our websites, mobile applications or use of our services, or when you communicate with us by any means.

### **Information you give to us**

We may collect any information you provide us:

- When you register on our website, use our website or mobile applications, fill out any forms or apply for loan products or any other product or service on our website, to our personnel or at our partners, or any other way we provide.
- When you report a problem, or communicate with us regarding our products or services.
- When you participate in discussion boards, comment on our blog or use other social media functions on our website, promotion or survey, other activities carried out via our websites or social media.
- When you enter a competition, promotion or survey in any way, including at our partners and on social media.
- If for any other reason you communicate with us by the above mentioned methods.

The information you give us may include: your name (surname, first aname), identity/identification number or personal code, address, e-mail address and phone number, date of birth, gender, marital status, number of juvenile children, employment status, employer name, work phone number, monthly income and expenses, financial and credit card information, bank account number, transactions in bank accounts, personal description, voice recording (incomming and outgoing calls), your photo or image, image of your identification document, signature and any other information you choose to provide us.

We will record and store, and may use information you provide us in ways listed above. We also may record our communication via phone.

## **Information we collect about you automatically.**

With regard to each of your visits to the website or use of our mobile applications we may automatically collect the following information:

- **Technical information**, including device type, the Internet protocol (IP) address and Internet service provider (ISP) used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, screen resolution, location, font encoding;
- **Information about your visit**, including the full Uniform Resource Locators (URL) clickstream to, through and from the website (including date and time); products you viewed or searched for; referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page, date/time stamp, and/or clickstream data, and any phone number used to call our customer service number.

Please see also section “How do you collect my data?”

## **Information we receive from third parties.**

We may request information about you from third parties, for example, other our group companies, or credit bureaus. We do that in accordance with the current data protection regulation, and where it is necessary we will obtain your prior consent. We may receive information about you:

- in the course of any application that you make for a loan or similar product we may:
  - seek information about you, your creditworthiness, your financial standing, past and present liabilities and debts, employment position, relevant registers (including registers containing information on income, credit history, debts against third persons, addresses, invalid ID documents, fraud, money-laundering and terrorism financing, and politically exposed persons), agencies, financial institutions, other our group companies, and other third persons, and publicly available sources;
  - receive information you have provided to credit brokers and our business partners when you apply for services;
  - receive information from banks, financial and payment institutions regarding your payments to us.
- from other 4finance group companies and business partners with whom we cooperate regarding competitions, promotions or surveys you participate in;

- from business partners in technical, payment and delivery services, advertising networks, analytics providers, search information providers when they provide services to us;
- in any other case when you consented to data disclosure to us.

### **How long do you keep my data?**

We may keep your personal data for time after you stop being a customer, to ensure our legal interests in case of dispute with client, or as required by law. However, we typically keep your personal data no longer than is reasonably necessary given the purposes for which the data was collected, generally to fulfil our contractual obligations towards you, exercise our legitimate interests, or as required by statutory retention periods.

### **DO YOU SHARE MY DATA?**

We may disclose your personal data to other 4finance group companies for internal administrative purposes.

We may share your information with other 4finance group companies and selected third parties for the performance of our contractual obligations with you and for the other purposes described in this policy:

- who provide services on our behalf to identify and authenticate you;
- who help with our business activities such as website hosting and development, risk assessments and fraud detection, debt collection and customer service, anti-money laundering and counter terrorism financing purposes, provide analytics on use of our services, assist in marketing activities;
- to offer and provide services and develop new ones;
- at any time when we are legally required to we may disclose information about you're your use of our services and your visits to our websites such as to comply with law and legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, prevent and investigate fraud, or respond to a government request;
- to identify, investigate and prevent fraud and help in fraud protection in order to reduce credit risk;
- to identify, investigate and prevent money laundering and terrorism financing activities;
- we may share your personal data with providers of similar services such as consumer loan companies and credit bureaus, as well as agencies, relevant national authorities and non-governmental organizations, and other third parties in order to ensure a full assessment of your solvency;
- when processing and collection of direct debits or other payments due from you under the loan agreement, we may also share your personal data with third party payment processing service providers;

- in case of your default or improper fulfilment of commitments, we can transfer the data of your outstanding liabilities to debt recovery service providers, credit information bureaus, as well as providers of legal services.
- we may share your personal data with analytics and search engine providers that assist us in the improvement and optimisation of the Website.
- selling any or all of our business, or assigning your liabilities against us to a third party may result in sharing your information;
- for any other purposes listed in Section “WHY DO YOU COLLECT MY DATA?”

When transferring data, we are committed to ensure that the data receiver follows the same security measures for storage and processing of personal data, as we do.

Your personal data may be processed, stored and transferred to third parties in the manner and amount as provided in this Privacy Policy, the contract(s) concluded between you and us, and consents you give to us time to time.

Locations outside your country or the European Economic Area – for example U.S.A. – may be used for processing (including storage) the data we collect about you. The information we transfer may be shared with our service providers. It may include such processes as processing a payment, data analysis (including fraud, risk and credit checks), collecting data on use of our websites and services, for advertising purposes (including behavioral advertising), or offering support for your service or product needs.

We take all reasonable action to ensure the safety of your personal data in agreement with this Privacy Policy and applicable legal acts. For example, we use European Commission standard clauses agreement, EU-US Privacy Shield program, and authorisation of respective data protection authorities to ensure your data is safe.

## **WHAT RIGHTS DO I HAVE OVER MY DATA?**

You have the right to ask us about the personal data we process about you, the purpose and nature of the processing, and to provide information on who we share it with (unless the disclosure of such information is prohibited by law). You may request a copy of the information we process about you in order to verify the information we have on you. The copy may be requested free of charge.

You have the right to request that we update, correct, or delete (assuming that this does not impact the services we are providing to you) your personal data at any time. Please note that we may reject requests which risk the privacy of others or are unreasonable or repetitive, or would require disproportionate effort. . We are however subject to certain legal obligations which prevent us from immediately deleting your personal data. Such obligations derive from anti-money laundering laws, tax laws and consumer rights laws.

You shall inform us in the event there are changes in information you have provided to us in process of entering into the contract(s) or our future cooperation, as well as if you are determined that your personal data we process are inaccurate.

You have the right to opt-out of (or unsubscribe from) receiving our email newsletters, bulletins, SMS messages or other similar promotional information at any time in your user profile on our website, or contacting us. Also, at the bottom of each e-mail with commercial communication message we will provide link for opt-out from receiving our promotions. Please be aware that our messages may include important or useful information about your products, discounts and other useful offers.

We work hard to protect your personal data and keep it safe. However, if you think we have breached your rights please contact us to resolve the issue. You also have a right to lodge a complaint with data protection authority. List of EU data protection authorities and their contact information can be found [here](#), and contact details of data protection authorities in countries we operate outside EU can be found [here](#).

## **DO YOU MAKE AUTOMATIC DECISIONS ABOUT ME?**

To process your application very fast we do automatic creditworthiness and risk assessments to decide whether to issue loan and maximum loan amount.

## **WHAT CHANGES HAVE YOU RECENTLY MADE?**

We may change this Privacy Policy at any time, and we will indicate the date the Privacy Policy was most recently updated. If there have been significant changes, we will highlight any such changes, and will attempt to directly alert you when possible. We will also keep prior versions of this Privacy Policy in an archive for your review.

We have made following changes to our privacy policy since the latest version:

- We've restructured our Privacy Policy to make it more readable and better to understand.

Follow this [link](#) to access previous versions of the Privacy Policy.

## **HOW CAN I CONTACT YOU?**

Please feel free to contact us with queries, requests, or comments you may have about our Privacy Policy or how we process your data. We welcome any communication via the email address [privacy@4finance.com](mailto:privacy@4finance.com).

You may also contact us by mail at:

Privacy Counsel  
AS 4finance  
Lielirbes iela 17A-8

Riga, LV-1046

Latvia

4finance group and our affiliates mean 4finance Group S.A. (incorporated in Grand Duchy of Luxembourg, registration no.: B 195643, address: 6, rue Guillaume Schneider, L-2522, Luxembourg) and companies it directly or indirectly owns or controls, including but not limited to:

- a. AS "4finance", Lielirbes iela 17A-8, Riga, LV-1046, Latvia
- b. SIA "4finance Media", Lielirbes iela 17A-10, Riga, LV-1046, Latvia
- c. SIA "4finance IT", Lielirbes iela 17A-10, Riga, LV-1046, Latvia and its branches situated within the European Union
- d. 4f Sales, Inc., 18851 NE 29th Avenue, Suite 410, Miami, FL 33180, USA
- e. Friendly Finance OÜ, Rotermanni 2, 10111 Tallinn, Estonia, and and companies it directly or indirectly owns or controls
- f. TBIF Financial Services B.V., "Westerdoksdiik 423, 1013 BX Amsterdam, The Netherlands, and and companies it directly or indirectly owns or controls

### **IS THERE ANYTHING ELSE I NEED TO KNOW?**

Our sites and products may contain links to third party sites. These third party sites have their own privacy policy. If you visit these sites you are subject to those policies.