

SIA Provendi asset management AIFP Privacy Policy, Version 2.0

1. About Us

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

The present privacy policy (hereinafter referred to as the Policy) is developed in accordance with 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, and repealing Directive 95/46/EC (GDPR) (hereinafter referred to as the Regulation), and our goal is to provide you with information about personal data processing which is carried out by SIA Provendi asset management AIFP, registration No 40203438204, registered address: Elizabetes iela 13-1, Riga, LV-1010, as the data controller (hereinafter referred to as the Manager or “us”), and INDEXO REAL ESTATE FUND AS, uniform registration number 40203443258, registered address: Elizabetes iela 13-1, Riga, LV-1010 (hereinafter referred to as the Fund or “us”), and companies of its group in the Baltics which own the real estate directly (hereinafter referred to as the Companies or “us”).

Within the scope of the Policy, the “group companies” shall mean business companies incorporated in the Baltic States where the Fund has a decisive influence providing direct or indirect shareholding that exceeds 50% of the voting capital.

2. We Care for Your Privacy

The present Policy contains a description of how we carry out processing of data of our customers, representatives or contact persons of such customers, business partners, website visitors, our own employees and candidates for vacancies (applicants), and other persons whose data may come into our possession in the course of business conducted by us.

We presume that before use of our website (domain address) or upon becoming our customer you have read this Policy of ours and have accepted its terms and conditions. This is the most current version of the Policy. We reserve the right to make amendments and update the present Policy, if necessary.

The goal of this Policy is to provide you with a general insight into activities of personal data processing performed by us and purposes thereof; however, we kindly ask you to bear in mind that additional information about processing of your personal data may be provided in other documents (such as service agreements, collaboration agreements) either.

We hereby inform you that the terms and conditions contained in this Policy pertain to processing of personal data solely.

In addition to these terms and conditions, you may also read the following additional personal data processing notices:

- You can read about data used for cookies and related information in the Cookie Policy (available at www.indexore.lv).

We are aware that the personal data is your valuable and will process it subject to the confidentiality requirements and taking care of security of your personal data in our possession.

3. For what purposes do we process your personal data and what are the legal grounds for personal data processing?

We will process your personal data for performance of our key functions, including:

Purpose	Personal Data Categories	Legal Grounds
Provision and procuring of investment services: in order to provide the investment services stipulated in a contract or laws and regulations, to ensure the legitimate interests of the Manager, the Fund, their shareholders, or third parties arising out of the law; in order to enter into a contract, etc.	Identification data (first name, last name, personal identity number, date of birth, data of an ID document); Contact information (address, phone number, email address); Financial information (bank account number, information about income, investment commitment); Information about tax residency (tax residency country, taxpayer's number, citizenship, country of residence (domicile)). Additional information on what Personal Data we are processing will be shown in documents of the Manager and the Fund either (application forms, contracts, etc.).	To enter into and to perform a contract.

<p>For the purposes of performing duties set out in the Alternative Investment Fund and Their Managers Act and for the purposes of ensuring goals of anti-money laundering (AML) and combating the financing of terrorism (CFT) and proliferation financing (CPF): in order to procure compliance with the Anti-Money Laundering and Combating the Financing of Terrorism and Proliferation Financing Act, ensuring the due diligence of customers, business partners, investors and shareholders in accordance with the laws and regulations, ensuring identification of politically exposed persons, and ensuring maintenance of the share ledger, recording of investors, etc.</p>	<p>Identification data (first name, last name, personal identity number, date of birth, data of an ID document); Contact information (address, phone number, email address); Financial information (bank account number, information about income, investment commitment); Information about tax residency (tax residency country, taxpayer's number, citizenship, country of residence (domicile)); Information about the status of a politically exposed person (PEP); Special category data (information about criminal record, if the person has provided such information).</p>	<p>To perform the duties stipulated by law.</p>
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<p>For the purposes of ensuring operations in real estate management and rent; in order to ensure drafting, concluding, and performing of a tenancy / rent contract for premises, and proving the fact of conclusion thereof; maintenance of filing records and the house file, delivery of invoices, administration of payments, reviewing of applications and grievances from customers, etc.</p>	<p>Identification data (first name, last name, personal identity number, date of birth, data of an ID document); Contact information (address, phone number, email address); Financial information (bank account number); Information about family members (first name, last name, personal identity number); Information contained in the contracts (number, date, maturity date, obligations); Data of utility services (level of consumption of water, power, heat, gas, etc.); Information about settlement of accounts, debt recovery, data of verification of solvency, etc.</p>	<p>To enter into and to perform a contract, as well as to perform the duties stipulated by law.</p>
<p>Procuring of human resources management: in order to ensure organization and provision of personnel recruitment process, establishment and maintenance of employment relationship, etc.</p>	<p>Identification data (first name, last name, personal identity number, date of birth, data of an ID document); Contact information (address, phone number, email address); Financial information (bank account number); Information about education (data of documents confirming education, place of work, job title, occupation, membership in professional associations, length of service).</p>	<p>To enter into and to perform a contract, as well as to perform the duties stipulated by law. During the recruitment process the grounds for data processing are consent of the person.</p>

<p>Prevention of criminal offences at a real estate, ensuring and maintaining of security and order: video surveillance at the real estate of the Companies and indoors for the purpose of procuring our security, that of our customers and visitors, and physical security of the property, etc.</p>	<p>Video recording</p>	<p>To ensure our legitimate interests.</p>
<p>Administration of payments and arrangement of bookkeeping: for the purpose of administering settlement of accounts (including drafting of certificates and reports, etc.), employee payroll matters, and to comply with the requirements of the law governing bookkeeping.</p>	<p>Identification data (first name, last name, personal identity number); Financial information (bank account number, payment information).</p>	<p>To perform the contract, as well as to fulfil the duties set out in the law.</p>
<p>Recovery of debts: in certain cases, we might be in need to recover debts if contractual obligations are not fulfilled.</p>	<p>Identification data (first name, last name, personal identity number, date of birth, data of an ID document); Information contained in the contracts (number, date, maturity date, obligations); amount of debt obligations.</p>	<p>To perform the contract and to protect our legitimate interests.</p>
<p>Organization of recordkeeping: recording and storing of documents, outgoing and incoming correspondence, contracts, etc.</p>	<p>All other personal data referred to hereinabove and hereinafter that arises from the documents at our disposal;</p>	<p>Depending on the type of documents, it may be stored in order to enforce one's legitimate interests, for example, to defend the interests in court, or in order to comply with requirements of the law.</p>

<p>For the purposes of marketing, advertising and communication: we can process personal data for the purposes of marketing and advertising, as well as in order to ensure communication with customers, insert data in information databases, so as to procure marketing and information campaigns.</p>	<p>Identification data (first name, last name, personal identity number, date of birth); Contact information (address, phone number, email address).</p>	<p>The processing is conducted on the grounds of your consent.</p>
<p>In order to ensure communication (through email, phone or in person): compilation and handling of queries, proposals, grievances and other information in order to prepare answers and ensure communication with the addressee.</p>	<p>Identification data (first name, last name, personal identity number, date of birth); Contact information (address, phone number, email address).</p>	<p>The processing is carried out on the grounds of your consent.</p>
<p>Cookies: cookies are text files which are created and saved in your device, you being a user of internet (on a computer, mobile phone, etc.), upon visiting our website. Cookies “remember” visitors’ experience and basic information, thus improving convenience of use of the website, diagnose issues and deficiencies in operation of the website, collect statistics on habits of users, as well as ensure comprehensive and convenient use of functionalities of the website.</p>	<p>Location, device, IP address and browser used, the website from which you reached our website.</p>	<p>Mandatory cookies are placed automatically; consequently, the processing is conducted for performance of the duties stipulated by law. As regards all other cookies, the processing is conducted on the grounds of your consent.</p>

4. Who can access your personal data?

We carry out appropriate measures to process your personal data in accordance with the applicable law and ensure that no third parties access your personal data without having legal grounds for processing of your personal data.

The following persons will be able to access your personal data, if necessary:

- Our employees or expressly authorised persons who need it for performance of their official duties;
- Our outsourced service providers and other business partners in line with the services rendered and solely for performance of the functions in the necessary scope, for example, accountants, data base developer / technical maintenance specialist, etc.;
- Government and municipal authorities in cases stipulated by law, for example, the State Revenue Service, law enforcement agencies, municipalities, tax authorities, sworn bailiffs, supervisory authorities (such as the Bank of Latvia), as well as courts, insolvency administrators, third parties who maintain registers (for instance, population register, debtors' register, and other registers);
- Third parties, upon thorough consideration whether such transfer of data has relevant legal grounds, for example, out-of-court dispute resolution institutions, external appraisers, private parties maintaining the registers.

We carry out appropriate measures and thoroughly verify our outsourced service providers and business partners in order to ensure processing and protection of your personal data, as well as transfer thereof to business partners and outsourced service providers in accordance with the applicable law. We carefully select personal data processors and, upon effecting the transfer of data, evaluate its necessity and the volume of data to be transferred. The transfer of data to the processors is conducted subject to requirements of confidentiality and secure processing of personal data, as well as the requirements set out in the law.

5. Is your personal data sent outside the countries of the European Union (EU) or the European Economic Area (EEA)?

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

6. How long will we store your personal data?

Your personal data shall be stored as long as the storage is necessary for the respective purposes of the personal data processing, as well as in accordance with requirements of the applicable law.

Upon assessing duration of storage of the personal data we take into account the effective requirements of the law, aspects of performance of contractual obligations, your instructions (for instance, in case of the consent), as well as our legitimate interests.

The most common timelines for storage of personal data:

- We will store the personal data that is necessary for performance of contractual obligations until the contract is fulfilled and insofar other timelines for storage are met (see below);
- We will store the personal data that is to be stored in order to meet the requirements of the law for the duration set out in the respective law. For example, the Accounting Act stipulates that source documents are to be stored until such day when they are necessary to establish the beginning of an economic transaction and follow its course, while for no less than 5 years;
- We will store the data necessary to prove fulfilment of our obligations for the duration of general period of limitation in accordance with the statute of limitation set out in the laws and regulations – 10 years in the Civil Act, 3 years in the Commercial Act, and other timelines subject to the statute of limitation stipulated by the Civil Procedure Act for bringing an action in court;
- We will store the personal data that is necessary for performance of the duties set out in the law within the scope of various timelines for storing documents stipulated by the law, for instance, until the deadline established by the Anti-Money Laundering and Combating the Financing of Terrorism and Proliferation Financing Act: 5 years after termination of a relationship;
- We will store a curriculum vitae (CV, resume) submitted by you for a specific vacancy and documents enclosed thereto until closing of the competition, as well as for at least 6 months thereafter in order to secure against possible claims and legal proceedings against us. Conversely, if you have submitted CV and the enclosed documents without addressing them for a specific vacancy, we will store your CV and the documents enclosed thereto for 1 year. You will always have a right to recall your consent for storage of such data. If an employment contract is closed with you, then CV and the documents enclosed thereto may be attached to your employee file, if necessary, and stored throughout the validity period of the employment contract;
- Video surveillance recordings are stored for no longer than six months. Recordings are deleted automatically in a chronological order according to the time of recording. Certain recordings may be stored for a longer period of time, if it is necessary for achievement of certain objectives, such as for the purpose of investigating incidents and criminal offences.

A longer period of storage of personal data is allowed in order to comply with requirements of the law concerning the minimum duration of storage of documents or information, or to protect our legitimate interests, for instance, in case of legal proceedings.

When the abovementioned data storage period has lapsed, we will delete your personal data in a secure manner or render it unavailable or else – unidentifiable, so that they cannot be associated with you.

7. What are your rights as a data subject with respect to your personal data processing?

Updating of Personal Data

If changes have occurred in your personal data which you have provided to us, for example, changes in the personal identity number, address for communication, modification of phone number or email address, we kindly ask you to contact us and provide us with the most current information, so that we would be able to fulfil the respective purposes of personal data processing.

You Right to Access Your Personal Data and Correct It

In accordance with the provisions of the General Data Protection Regulation, you have a right to request from us access to your personal data that is in our possession, request correction, erasure, restriction of processing thereof, object to processing of your personal data, as well as a right to data portability in cases and under the procedure established by the General Data Protection Regulation.

We respect this right of yours to access your personal data and exercise control over it; therefore, in case we receive a request from you, we will respond to it within the timelines set out by the laws and regulations (usually no later than within one month, provided there is no special request that takes longer to prepare the answer) and, if possible, we will respectively correct or delete your personal data.

You may obtain information about your personal data in our possession or exercise other rights of you as the data subject by contacting us.

Upon receipt of your request, we will evaluate its content and possibility of identifying you, and, subject to the respective situation, we reserve the option to ask you to identify yourself in addition in order to ensure security of your data and disclosure thereof to the respective party.

Recall of the Consent

If the processing of your personal data is based on the consent given by you, you shall have the right to recall it at any time, and we will not subsequently process your personal data, which we had processed on the grounds of the consent, for the respective purpose anymore. However, we hereby inform that the recall of consent cannot affect the personal data processing that is necessary for compliance with the requirements of the law or which is based on the contract, our legitimate interests or other grounds stipulated by laws and regulations governing lawful processing of data.

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

8. Where can you file a grievance regarding matters concerning the personal data processing?

If you have any queries or objections concerning the processing of your personal data conducted by us, we kindly invite you to approach us first.

If you still believe that we have not been able to mutually resolve the issue that has occurred, and you believe that we violate your right to the personal data protection, you have the right to submit a complaint to the Data State Inspectorate or bring an action in court in accordance with the law.

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

We mainly collect your information in order to fulfil the contractual obligations assumed, to perform the legal duties binding on us, and to exercise our legitimate interests. In these cases, we need to obtain certain information in order to accomplish the respective purposes; consequently, failure to provide such information may jeopardize commencement of a business relationship or fulfilment of a contract. If the data is not mandatorily necessary, whereas the provision of it might assist in improving the service, upon collection of such data, we will note that provision of such data is voluntary.

10. How do we obtain your personal data?

We may collect your personal data in any of the following manners:

- 1) From you, when you provide it to us for services to be rendered or for the purpose of investments, or in the course of entering into a mutual contract, or if you submit any submission to us, send us emails or call us, or upon filing an application and CV in order to participate in a competition for a vacant position;
- 2) From business partners, for the purpose of fulfilment of contracts, when data is received from you, or in cases where the contract is concluded with a third party and the latter has identified you as a contact person;
- 3) On website www.indexore.lv, using cookies;
- 4) When such is provided by third parties:
 - a. Maintainers of databases set out by law, registers;
 - b. Government authorities, supervisory authorities, and law enforcement agencies, and their officials.
- 5) From an applicant if they have identified your personal data for the purposes of receiving references on their performance.

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

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

12. Protection of Your Data

Your personal data is safe with us, because we carry out all necessary measures in accordance with the effective laws, guidelines, internal policies and procedures governing the data protection.

We operate, at all times, in accordance with the highest standards of security. We use the latest technologies, various security software – firewalls, authentication software, data encryption – in order to protect your personal data and preclude access to them by third parties, accidentally or deliberately, denying unauthorized access, as well as in order to avoid deliberate or accidental loss of personal data, disclosure or destruction thereof.

In the event that circumstances occur which might jeopardize security of your personal data, we will notify thereof on the phone, in writing or by posting information on our website.

We do not assume any liability for the loss or leakage of your personal data in cases when it has occurred due to your own fault, as well as we kindly invite to be responsible and read security terms for operation of a computer or internet, and be especially cautious upon giving your personal data, such as an ID document, to anybody.

13. Contact Information for Communication Regarding Matters of Personal Data Protection

If you have any queries or grievances with regard to the present Policy or the processing of your personal data, then you can contact us or write to us in one of the following ways:

- 1) Submit a respective application in person and identify yourself at our office at the address: Elizabetes iela 13 - 1, Riga, LV-1010;
- 2) Submit a respective application by sending it to us in mail to the following address: Elizabetes iela 13 - 1, Riga, LV-1010;
- 3) Submit a respective application by sending it to our email address: info@provendi.lv, signing it with a secure electronic signature for us to be able to identify you.

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