

# **DISCIPLINA OÜ**

## **PRIVACY POLICY AND DATA CONTROL POLICY**

### **1. Introduction**

**DISCIPLINA OÜ** needs to collect and use certain types of information about the physical and legal persons that wish to participate in the DISCIPLINA ICO:

The personal information must be collected and dealt with appropriately in accordance with the company AML and KYC policies and in accordance with this Privacy Policy drawn up in accordance with the Estonian personal data protection act and International standards.

Any data collected during the performance of ICO whether is collected on paper, stored in a computer database, or recorded on other material is subject to this policy and is protected under the law.

### **2. Data Controller**

Disciplina OÜ and its officers and employees shall be collectively referred to as the Data Controller under this policy, which means that it determines what purposes personal information held will be used for. It is also responsible for cooperating with the state regulatory organs regarding the correct application of the state legislation, and the correct use and disclosure of information.

### **3. Disclosure**

Disciplina OÜ may share data with the state regulatory organs and other authorities when that is required by the applicable law or the provisions of the AML policy.

The ICO participant will be made aware in most circumstances how and with whom their information will be shared.

Every ICO participant shall agree with this policy and shall consent to his data being used in accordance with the provisions of this policy and the AML policy regarding analysis of data and disclosure of data.

There are circumstances where the law allows DISCIPLINA OÜ to disclose data (including sensitive data) without the data subject's consent.

These are:

- a) Carrying out a legal duty or as authorised by the Financial Inspection of Estonia or any other competent legal authority.
- b) Protecting vital interests of any party, including the ICO participant.
- c) The information was already made public by other third parties.

- d) For the conducting of any legal proceedings, obtaining legal advice or defending any legal rights.
- e) Disclosing data to state authorities under the AML policy in order to avoid or prevent money laundering.

To this end, DISCIPLINA OÜ will adhere to the Principles of Data Protection, as detailed in the Estonian personal data protection act.

Specifically, the Principles require that personal information:

- a) Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
- b) Shall be obtained only for the purpose of the AML policy and shall be processed only in order to adhere to the risk analysis under the AML policy or to further develop the strategy of the company.
- c) Shall be adequate, relevant and not excessive in relation to those purposes.
- d) Shall be accurate and, where necessary, kept up to date.
- e) Shall not be kept for longer than is necessary, but for no less than set by the AML policy.
- f) Shall be processed in accordance with the rights of data subjects under the Estonian personal data protection Act.
- g) Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorized or unlawful processing or accidental loss or destruction of, or damage to, personal information.
- h) Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of Individuals/Service Users in relation to the processing of personal information.

DISCIPLINA OÜ will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information.
- Meet its legal obligations to specify the purposes for which information is used.
- Collect and process appropriate information, and only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements.

- Ensure the quality of information used.
- Ensure that the rights of people about whom information is held, can be fully exercised under this policy. These include:
  - The right to be informed that processing is being undertaken,
  - The right of access to one's personal information,
  - The right to provide information necessary to correct the information, should it be inaccurate.
- Take appropriate technical and organizational security measures to safeguard personal information.
- Ensure that personal information is not transferred abroad without suitable safeguards.

#### **4. Data collection**

Informed consent is when:

- Any ICO user or his authorized representative clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data. The access to the company AML policy and this privacy policy are considered sufficient to provide the ICO user with access to all the necessary information.
- And then gives their consent by accepting the Terms and Conditions.

DISCIPLINA OÜ will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected by completing a registration form for the participation in the ICO.

When collecting data, DISCIPLINA OÜ will ensure that the Individual/Service User:

- a) Clearly understands why the information is needed.
- b) Understands what it will be used for and what the consequences are should the ICO participant decide not to give consent to processing.
- c) As far as reasonably possible, grants explicit consent by registering on the website of DISCIPLINA and participating in the ICO by filling out the requested forms.
- d) Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress.
- e) Has received sufficient information on why their data is needed and how it will be used.

## **5. Data Storage**

Information and records relating to service users will be stored securely and will only be accessible to authorised staff members.

Information will be stored for only as long as is needed under the AML policy or required legal act and will be disposed of appropriately.

## **6. Data access and accuracy**

All ICO participants shall have the right to access the information DISCIPLINA OÜ holds about them. DISCIPLINA OÜ will also take reasonable steps to ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition, DISCIPLINA OÜ will ensure that:

- Everyone processing personal information understands that they are contractually responsible to follow good data protection practice.
- Everyone processing personal information is appropriately trained to do so.
- Everyone processing personal information is appropriately supervised.
- It deals promptly and courteously with any enquiries about handling personal information.
- It will regularly review and audit the ways it holds, manages and uses personal information.
- It regularly assesses and evaluates its methods and performance in relation to handling personal information.
- All staff members are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them.

This policy will be updated as necessary to reflect best practice in data management, security and control.

In case of any queries or questions in relation to this policy, please contact the DISCIPLINA OÜ Data Protection Officer.