

Privacy Policy

These rules apply to the company "Smile Holding" (SIA "Smile Holding") Ltd., and to companies belonging to its group (collectively hereinafter referred to as E100) and to the websites they operating. E100 ensures user privacy. We care about protecting the privacy of people who provide us with their contact and personal data. This policy sets out the types of personal information we collect, how we use it, the entities we can share it with, and the choices of users about how we can use it. We also describe the steps we take to secure this data and how to contact us about our privacy protection practices.

E100 complies with the principles 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 (General Data Protection Regulation) – GDPR

Data collection

As a service provider, we can create direct relationships with the user, and in turn, as part of these relationships, user can choose to provide us with its personal data.

The administrator of personal data of website users is "Smile Holding" (SIA "Smile Holding") Ltd., based in Latvia, 4A Gredu Street, Riga, LV-1019.

These data may be transferred, among others when applying for a product offered through E100, subscribing to the E100 information list, participating in promotions or surveys, applying for a job at E100. As soon as person provide us with this data, the data subject ceases to be anonymous. When submitting applications for business relationships and during these business relationships, we receive personal information of user about transactions from financial institutions and other entities. We may also receive information about user from payment processing companies, from publicly available information systems, credit reporting agencies and commercial information services.

When submitting an E100 application for products or services via our website or through one of our sales representatives, user may decide to provide us with its company details and / or your personal details.

Here are the types of personal information we may receive:

- Contact details (such as name, postal and email address, telephone and fax numbers)
- Business contact details (such as position, department and organization name)

- Information about the applicant and co-applicant (such as name, postal and e-mail addresses, telephone and fax numbers, date of creation or date of birth and identification numbers)
- Username and password
- Financial information
- Contact details of other people whom the user allows us to contact
- User-contributed content (for example comments)
- Employment information
- Unique identifier of the mobile device
- Geographical location data
- Other information

Collection of anonymous data

E100 collects some information, such as cookies and web beacons, when user visit our site. The collection of cookies and beacons depends on the consent of the visitor to the E100 website and is collected only if the "I agree" option is selected. If you choose "I do not agree" files will not be collected. The data we collect in this way include, but are not limited to: IP address, type of web browser, operating system, URL of pages from which users have been redirected, information on actions taken during visits to the site and dates and times of visits to the site. A "cookie" is a text file placed on your computer's hard disk or in the memory of a mobile device by a website or server. The "web beacon", also referred to as the internet tag, pixel tag or pure GIF, is used to transmit feedback to the server. We use cookies and other internet technologies to enrich user experience by managing our site and contact programs.

The cookie itself does not contain any data that leads to personal identification.

Cookies

If the user's browser settings allow the collection of cookies, and the user of the E100 web page directly express consent on the collection of cookies on the website, then we have the ability to store on the user's computer a small amount of information about what part of the site visited and which features he likes best. This allows us to tailor the content viewed by the user to his interests. We can also use cookies to identify authorized users so that they do not have to re-enter their username and password. By allowing us to better understand the way of use our site, cookies can help us provide users with a better and more adequate experience in using the internet. No third-party websites have access to the cookies we store on user's computer.

Most web browsers allow users to modify security settings so they can accept or reject cookies. The user does not need to have cookies enabled to visit our website, but without them its access to some areas may be limited and navigation adapted to the individual needs of the user may not be available. More information about the cookies we use and the purposes for which we use them can be found in the Cookie Policy.

Web beacons

Like many other websites, E100 can use web beacons. Web beacons help us to better understand network traffic and behavior of users visiting our website, as well as assess the response to our promotions. This information does not lead to the identification of specific users and is only used to create an overall picture showing how users use our site. Users can, if they wish, deactivate pixel tags by setting their web browser to bypass images, and deactivating JavaScript.

Telephone calls

As part of some transactions, user will contact us by phone or we will call to user. It is also possible to contact for these purposes via online chats. Please be aware that it is common practice for E100 to monitor and in some cases record this type of interaction for personnel training or quality control purposes, or to maintain evidence of a particular transaction or interaction.

Data Sharing

We do not sell or otherwise disclose the personal information we collect about users, except as described herein or except as otherwise disclosed to user when collecting data. We share data to conduct transactions or other activities related to our business relationship. We may disclose the personal data we collect to companies from the capital group, affiliated companies, subsidiaries, traders, suppliers and other entities participating in the process of concluding contracts with Clients of the E100 capital group. We may also share this data with our service providers who perform services on our behalf. We do not authorize these service providers to use or disclose this data, except when necessary to perform certain services on our behalf or comply with legal requirements. We require these service providers, under the concluded contract, to properly protect the privacy and personal data that they process on our behalf.

We may share data with business partners with whom we cooperate. Business partners may contact the user regarding products or services that may be interested in. Third parties may use personal data in accordance with their own privacy policy. We suggest user read the

third party privacy policy if uses these features. We reserve the right to provide personal data in the event of sale or transfer of all or part of our business or property. If such a sale or transfer occurs, then we will make every effort to instruct the recipient to use the personal data received from the user in a manner consistent with our privacy policy. After completing such a sale or transfer, the user may contact the entity that received the user's personal data regarding any questions regarding the processing of this data.

User rights and choices

The user may have certain rights regarding its personal data that we store. We offer the user the right to choose which personal data we collect.

The user may decide not to disclose its personal data to the E100 group by refusing to grant consents expressed while performing activities with E100. The user may choose not to have a unique cookie identification number assigned to its computer in order to avoid aggregation and analysis of data collected on our websites.

The user may stop receiving marketing communications from us by mail, following the unsubscribe instructions contained in the content of a particular promotion. User can also resign from receiving promotional materials. User may withdraw any prior consent given to us or at any time, for justified reasons, prohibit us from processing personal data. Since then, we will begin to follow the preferences expressed by the user. In some cases, withdrawal of consent to our use or disclosure of user's personal data will mean that user will not be able to use certain products or services we offer.

If user is located in the European Economic Area, user may prohibit us from sharing its personal data with third parties, except for: (i) service providers we have employed to provide services on our behalf, (ii) if we sell or transfer all or part of our business or property, (iii) if the disclosure is dictated by legal requirements or procedures, or (v) if we deem that such disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of alleged fraud or other illegal activity. If user is located in the European Economic Area, we use its personal data only for the purposes set out in the terms of this privacy policy and in other regulations that we have notified the user, unless we have legal basis, such as consent to use them for other purposes. If required by law, the E100 receives the user's prior consent when collecting for the purpose of processing (i) personal data for marketing purposes and (ii) personal data deemed relevant under applicable law.

Information security

The registered office of Smile Holding is in Latvia. All user information can be transferred to and stored in a secure database in Latvia or in databases belonging to E100. If we transfer user's data to other countries, we will protect it as described in this privacy policy. The data we collect can be transferred outside the country of the user's country of origin. They can also be processed by employees operating outside the country of origin of the user, who work for us or for one of our suppliers. These employees may participate, inter alia, in the performance of the order made by the user, in the processing of payment data, and in the provision of ancillary services. By providing personal data, the user agrees to this transfer, storage or processing. If user provides us with the details of other employees or persons in the user's organization, it is its responsibility to ensure that it has their consent. We will take all reasonable steps to secure data and protect it in accordance with this privacy policy. E100 has a data protection program whose task is (i) to secure and maintain the confidentiality of the user's personal data; (ii) protection against expected threats and risks to the security or integrity of the user's personal data; (iii) protection against unauthorized access or use of the user's personal data that could result in serious harm or inconvenience to user or its entity if such violation would occur; and (iv) compliance with applicable law. Our contracts with suppliers and service providers similarly oblige them to protect the user's personal data.

Unfortunately, the transmission of information via the internet is never completely secure. Although we will do everything to protect the user's personal data, we cannot guarantee the security of the data transmitted to our websites. Users provide this data at their own risk. We use all reasonable preventive measures, including appropriate technical, administrative and physical procedures, to protect users' personal data against loss, misuse or modification. The information the user provide to us is stored on our secure servers. In accordance with applicable law, the user may has the right to request access to and information about your personal data that we have, to update and correct irregularities in its personal data, and to request that the data be blocked or deleted. The right to access personal data may in some circumstances be limited by local law. To update your preferences, request that information be removed from our contact list, or to submit a request, please contact us by email.

Terms of Use

By using the website and E100 services, the user agrees to the use of its personal data in the manner specified in this privacy policy and any other terms and / or conditions of which the user will be notified. E100 reserves the right to access and disclose personal and contact information as part of compliance with applicable laws, final governmental requirements, and court orders. [For important reasons], such as [introduction of new services, discontinuation

of existing services or significant change of legal regulations that we are obliged to comply with], we may be forced to change the content of our privacy policy. In this case, we will inform about changes on this page. We encourage users to visit this page to learn about any changes. By continuing to use this site, it means that the user agrees to this privacy policy; using this site after publishing a modified privacy policy means that the user agrees with the modified privacy policy.

Our contact details

If the user wants to resign from receiving electronic, fax or telephone messages from E100, or if the user wants to update its data, ask that its data be deleted, or want to ask for details about the data we have, please send an email to gdpr@e100.eu. Please send any further questions regarding this privacy policy or complaints by e-mail to: gdpr@e100.eu

Changes to the privacy policy

We will update this privacy policy from time to time to reflect changes in our business operations. If we change the way in which we use users' personal data, or if the purposes or entities to which we disclose this data change, then we will post a notification of these changes to our website and further use of this website by the user after the publication of the modified privacy policy will mean, that the user agrees with the modified policy.