

This Privacy Policy (further - the Policy) provides information on how *INVL Financial Advisors FMĪ UAB* (further - *Financial Advisors* or **Personal Data Controller**) handles personal data and how *Financial Advisors*, including its branches in the Republic of Estonia and the Republic of Latvia, uses cookies on its websites and self-service portals. It also describes the main rights of the Data Subject under data protection legislation and provides contact details of *Financial Advisors* and Invalda INVL Group of Companies (further - *INVL Group*), in respect of which *Financial Advisors* may act as a data processor.

The present Policy applies to *Financial Advisors*, also *INVL Group* for which *Financial Advisors* may act as a data processor, and the persons who use, have used, have expressed an intention to use, or are otherwise linked to, the services provided by *Financial Advisors*, and/or are shareholders of *Financial Advisors*, and/or are and/or are associated with the activities carried out by *Financial Advisors*, in their mutual relationships.

Financial Advisors shall ensure the confidentiality of personal data in accordance with the requirements of the applicable legislation as well as the implementation of appropriate technical and organisational measures to protect personal data against unauthorised access, disclosure, accidental loss, alteration or destruction, as well as other unlawful processing. In processing personal data, *Financial Advisors* is guided by the General Data Protection Regulation, national laws on legal protection of personal data of Republic of Lithuania, Republic of Latvia and Republic of Estonia, and other legal acts governing this area.

Please note that the present Policy may be subject to future amendments to reflect changes in the legislation and *Financial Advisors* and *INVL Group's* activities, therefore we encourage you to review it periodically.

1. DEFINITIONS

Personal data subject (further - Data Subject) means a natural person (who uses, has used, has expressed an intention to use the services provided by *Financial Advisors* and / or the activities carried out by *Financial Advisors*, and / or is a *Financial Advisors'* shareholder) or an associated person of such a person (his/her representative, spouse, partner, etc.). A Data Subject is also a natural person associated with a customer and/or shareholder of *Financial Advisors*. **Personal Data Controller** means *INVL Financial Advisors FMĪ UAB*, whose services you use, have used, have expressed an intention to use, or of which you are a shareholder or whose activities you are associated with, including its branches in Republic of Latvia and Republic of Estonia.

INVL Group (*INVL*) means any company belonging to *INVL Group* which acts as the Personal Data Controller. In the context of this Policy, *INVL* may refer to *Invalda INVL AB*, *INVL Asset Management UAB*, *INVL Baltic Real Estate UTIB*, *INVL Technology UTIB*, *INVL Baltic Farmland AB*, *Mundus UAB*, asset management company, or all of them collectively.

Processor of Personal Data means a natural or legal person who processes personal data on behalf of or in the name of the Controller.

Personal Data means any information relating to a natural person - the Data Subject - whose identity is known or can be established, directly or indirectly, by reference to the data, such as a personal identification number, one or more physical, physiological, psychological, economic, cultural or social characteristics specific to that person.

Processing of Personal Data means any operation performed on personal data, such as collection, recording, accumulation, storage, classification, grouping, aggregation, alteration, communication, disclosure, use, logical and/or arithmetical operations, retrieval, dissemination, destruction or any other operation or set of operations.

General Data Protection Regulation (GDPR) means 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).

Other terms used in the Policy shall have the same meanings as defined in the GDPR and other legislation.

2. CATEGORIES OF PERSONAL DATA

Financial Advisors processes different categories of personal data, depending on the services or products that the Data Subject intends to use or uses. Personal Data may be obtained directly from the Data Subject, from the Data Subject's activities when using the Services and websites of *Financial Advisors* and / or *INVL*, and from external sources such as registers, media sources, search engines, and other third parties (such as debtors' registers, legal entities where the Data Subject is a shareholder, etc.), provided *Financial Advisors* has the consent of the Data Subject, or if this is provided for by law.

If a Data Subject does not agree to provide his/her personal data, *Financial Advisors* may not provide the services to him/her.

If a Data Subject provides *Financial Advisors* with the data of other persons related to the Data Subject, the Data Subject must obtain the consent of those persons and make them aware of the present Policy.

2.1. Main categories of Personal Data

The main categories of Personal Data, include but are not limited to:

- Personal identification data, such as name, surname, personal identification number, date of birth, identity document details, photo, signature;
- Contact details, such as residential or mailing address, telephone number, email address;
- Details of education, financial experience, investment knowledge and objectives;
- Financial data, such as data on assets, income, liabilities;
- Bank account details;

- Data related to the implementation of the Know Your Customer principle, such as data on professional activities, origin of funds, beneficial owners, registered tax country and tax code, nationality, information on the Data Subject's involvement in politics;
- Data about the Data Subject's relatives, such as information about the political involvement of close family members;
- Data relating to the provision of services and customer satisfaction data, such as data relating to the performance or non-performance of contracts, transactions entered into, contracts in force or expired, requests, applications, claims filed, as well as feedback from the Data Subject about the services;
- Data collected by means of communication and other technical means, such as video surveillance data, data collected by telephone, e-mail, data relating to the Data Subject's visits to the websites or self-service portals of *Financial Advisors* and / or *INVL* (for example, the Internet Protocol (IP) address, the Data Subject's login data to the self-service portal, website traffic history, alias on social networks, etc.);
- Details about the interests and needs of the Data Subject provided in the process of interacting with *Financial Advisors* staff;
- Data obtained in compliance with legal requirements, such as data obtained in response to queries from notaries, tax authorities, courts, bailiffs;
- Data relating to the imposition of any sanctions and negative media coverage;
- Details of legal representatives (acting by proxy or otherwise);
- Details of payers and payees, including heirs;
- Data on relations with legal persons, such as details of the legal person's manager, shareholder, member of the board of directors or other governing body, beneficial owner and similar data necessary for the purpose of performing a transaction on behalf of the legal person.

The amount of a particular Data Subject's data being processed depends on the types of services used and the relationship with *Financial Advisors*.

2.2. Special categories of Personal Data

Financial Advisors shall process special categories of Personal Data exclusively subject to the consent of the Data Subject, or if such processing is provided for by legal requirements.

3. PURPOSES AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

Financial Advisors may process personal data on the following grounds: performance of a contract concluded with the Data Subject or the intention to conclude a contract, the Data Subject's consent to the processing of his/her personal data for a specific purpose, and the performance of *Financial Advisor's* statutory obligations. *Financial Advisors* may also process personal data in the framework of the concept of legitimate interest (e.g. to enhance IT security), after complying with the requirements of the GDPR. Under the conditions provided by the applicable law, one or more of the above legal grounds may apply to the processing of the same personal data of the Data Subject.

Financial Advisors may process the Data Subject's data for the following purposes (including, but not limited to, the cases where the Data Subject's individual consent to the processing is obtained):

- to provide the services of *Financial Advisors* (for the purpose of entering into, performance or termination of a contract) and to carry out other activities, including personal identification, eligibility and acceptability as well as risk assessment, as provided for in the law applicable to the activities of *Financial Advisors*;
- to inform the Data Subject about his/her service, sales, securities management and other contracts with *Financial Advisors*;
- to provide information and assistance on documents concerning the provision of services pending in the self-service portal;
- to comply with legal obligations, including the implementation of the Know Your Customer principle and the prevention of money laundering and terrorist financing (ensuring compliance with all requirements relating to the imposition of sanctions, the monitoring of transactions, the identification of the beneficial owner and the politically exposed person (by collecting and verifying information on whether the Data Subject, his/her close family members and/or his/her close associates are politically exposed persons));
- to deal with complaints from Data Subjects;
- to inform the Data Subject about *Financial Advisor's* services and news;
- to maintain relationship with Data Subjects, including query management and communication on social networks;
- to ensure the security of *Financial Advisors* and Data Subjects as well as their property through video surveillance;
- to assess the quality of the conclusion and performance of *Financial Advisors* and *INVL's* contracts and the services provided by *Financial Advisors* and *INVL*, to seek feedback on the services provided, the service and the quality thereof, to carry out market research, and to organise games and promotions for Data Subjects;
- to analyse and forecast the Data Subject's usage patterns and needs for *Financial Advisors* and *INVL* services and the transactions carried out, in order to ensure the most appropriate service and personalised offers to the Data Subject;
- to protect, maintain and improve technical measures and IT infrastructure to prevent abuse of services and ensure proper service;
- to bring, enforce and defend legal claims
- for other legitimate purposes as defined by law.

4. RIGHTS OF THE DATA SUBJECT

Data protection legislation guarantees the right of the Data Subject to apply to the Personal Data Controller so that upon establishing the identity of the Data Subject, the Personal Data Controller:

- provides information on whether it processes the Data Subject's personal data and, if so, informs the Data Subject about the processing of his/her personal data, what personal data are processed, what sources they are obtained from, for what purpose and how they are processed (including automated decision-making, its implications for the Data Subject and its consequences for him/her), for how long they are retained, and to whom they are disclosed (the right of access to their personal data);

- corrects or updates incorrect, incomplete or inaccurate personal data of the Data Subject (the right to request the correction of personal data);
- in certain circumstances listed in the GDPR (where personal data have been processed unlawfully, the basis for the processing has ceased to exist, etc.) – erases the Data Subject's personal data (the right to request the erasure of personal data – "the right to be forgotten");
- in certain circumstances listed in the GDPR, restricts the processing of the personal data of the Data Subject, except for storage (where personal data are processed unlawfully, during the period when a request from the Data Subject concerning the accuracy of the data or the processing of the data is being examined, etc.) (the right to restrict the processing of personal data),
- provides, in writing or in a commonly used electronic form, the Data Subject's personal data provided to the Data Controller which are processed by automated means on the basis of the Data Subject's consent, or on the basis of performing a contract, and, where possible, transfers such data to another service provider (the right of portability of personal data).

Where *Financial Advisors* processes the Data Subject's personal data on the basis of his / her consent, the Data Subject shall have the right to withdraw his / her consent at any time, and any processing based on such consent shall be terminated immediately. It should be noted that if one withdraws his/her consent, *Financial Advisors* may not be able to offer certain services or products to the Data Subject, but will continue to use the Data Subject's personal data, for example, in performing a contract with the Data Subject, or if required by law.

The Data Subject shall have the right to object at any time:

- to the processing of his/her personal data; if the processing of personal data takes place on the basis of the legitimate interests of the Personal Data Controller, the Data Subject shall give the Personal Data Controller a legal justification of the objection; the justification shall be given in writing or by any other means which permits identification of the Data Subject;
- to the processing of his/her personal data for direct marketing purposes (including profiling for such purposes), in which case he/she has the right not to provide reasons for such objection;
- to a fully automated decision, including profiling, where such decision-making has legal implications or similar significant effects on the Data Subject. This right shall not apply where such decision-making is necessary for the purposes of entering into, or performing, a contract with the Data Subject, where it is permitted under applicable law or where the Data Subject has given his or her explicit consent.

If the Data Subject considers that his/her personal data are processed in violation of his/her rights and legitimate interests under applicable legislation, the Data Subject shall have the right to lodge a complaint regarding the processing of his/her personal data with the national data protection authority (address in the Republic of Lithuania - A. L. Sapiegos g. 17, 10312 Vilnius, website address: <https://vdai.lrv.lt>; address in the Republic of Latvia - Elijas iela 17, Rīga, LV-1050, website address - <https://www.dvi.gov.lv/lv>; address in the Republic of Estonia - Tatari 39, Tallinn 10134, website address - <https://www.aki.ee/et>). We kindly ask you to first contact *Financial Advisors* with any queries you may have, so that we can resolve them as quickly as possible.

5. PROCEDURE FOR HANDLING REQUESTS TO EXERCISE THE RIGHTS OF A DATA SUBJECT

The Data Subject must submit his/her request for the exercise of the rights to Personal Data Controller. Contact details of *Financial Advisors* and its branches are available on www.invlseimosbiuras.com, www.familyoffice.lv, www.invl.ee.

In order to ensure that the personal data processed by *Financial Advisors* is not disclosed to any person who is not entitled to receive it, upon receipt of a Data Subject's request for the provision of data or the exercise of other rights, the identity of the Data Subject shall be established as a first step. If the identity verification process is successful, *Financial Advisors* shall provide information on the action taken in response to the request of the Data Subject; the information shall be provided without undue delay, but in any event within one month of receipt of the Data Subject's request. Depending on the complexity of the request, or if the Data Subject has made multiple requests, *INVL* shall have the right to extend the one-month period by a further two months, informing the Data Subject before the end of the first month and stating the reasons for such extension.

The Data Subject shall not be charged a fee to receive information about his/her personal data which is being processed (or to exercise any other rights). However, *Financial Advisors* may charge a reasonable fee if the Data Subject's request is manifestly unfounded, repeated or disproportionate.

6. RECIPIENTS OF PERSONAL DATA

The Controller may disclose / transfer the Data Subject's personal data to the following third parties including, but not limited to, the ones assisting the Personal Data Controller in the performance and administration of services:

- companies providing information technology services (to maintain, improve and update information systems);
- companies providing website administration and related services;
- companies providing document storage and archive management services;
- postal service companies (to send reports, other communications to the Data Subject);
- auditors;
- companies owned by *INVL* (subject to the Data Subject's consent, or if based on other legal grounds);
- agents used by *Financial Advisors*, who transfer contacts of potential customers;
- credit and financial institutions, including Nasdaq Vilnius Stock Exchange, financial services intermediaries, the central depository, third parties involved in the enforcement, settlement and reporting cycle of trading in investment instruments;
- legal, tax and other consultants, where *Financial Advisors* intermediates in purchasing and/or providing their services on the terms of contracts concluded between *Financial Advisors* and the Data Subject;
- debtors' registers collecting information on overdue payments, and debt collection companies;
- companies offering the services of a call centre, if *Financial Advisors* uses them;

- Companies engaged by *Financial Advisors* to provide quality assessment of the of services offered by *Financial Advisors* (including the collection of feedback on the services, customer service and quality), market research, games and promotions for Data Subjects;
- other third parties engaged by *INVL* to assist *INVL* in the provision of the services and the performance of its obligations under applicable laws and other regulations.

Data are also provided to:

- state agencies and institutions, other persons performing their statutory functions (e.g. law enforcement authorities, bailiffs, notaries, tax administration authorities, authorities supervising the collective investment undertakings controlled or managed by *Financial Advisors*, including but not limited to the Bank of Lithuania, the Financial Crime Investigation Service, the Competition Council and other relevant authorities in other countries supervising the activities carried out by *Financial Advisors*);
- the State Tax Inspectorate in order to implement the Agreement respectively between the Government of the Republic of Lithuania, the Government of the Republic of Latvia, the Government of the Republic of Estonia and the Government of the United States of America on Improving the Enforcement of International Tax Obligations and the Implementation of the Foreign Account Tax Enforcement Act, and other international obligations of the Republic of Lithuania in this area.
- If *Financial Advisors* decides to sell, buy, merge or otherwise reorganize *Financial Advisors* businesses, this may involve *Financial Advisors* disclosing and/or transferring personal data to prospective or actual buyers and their advisers, or receiving personal data from sellers and their advisers.

It should be noted that data on Data Subjects who are *Financial Advisors* clients, whose are investors in *INVL* feeder funds and who hold more than 25% of the assets of a feeder fund are transferred to the managers of the feeder funds, including those established in Luxembourg, who provide such data to the managers of the registers of final beneficiaries, as required by the legislation applicable to the feeder fund manager. Data on an investor in a feeder fund may also be passed on to the manager of the feeder fund (who in turn may pass it on to supervisory authorities, including those in Luxembourg) if it is established that the investor is conducting a suspicious transaction, or if there are other concerns regarding the implementation of anti-money laundering requirements.

Financial Advisors shall take appropriate measures and ensure that the processing of personal data by other persons to whom personal data may be provided takes place in accordance with *Financial Advisor's* instructions and applicable law, and that such other persons implement appropriate personal data security measures.

7. RETENTION PERIOD FOR PERSONAL DATA STORAGE

The processing of personal data shall be limited to the time necessary for the purposes of the processing. The retention periods for personal data storage are defined in internal regulations, taking into account the nature of the contracts concluded with the Data Subject, *Financial Advisor's* legitimate interest or legal requirements (e.g. accounting, anti-money laundering requirements, limitation period for claims, etc.).

As a general rule, *Financial Advisors* shall process the personal data collected in the context of its services for as long as the Data Subject uses *Financial Advisor's* services, and retain such data for a period of 10 years after the Data Subject ceases to use those services.

NIIf the Data Subject makes enquiries using the contact forms provided on *Financial Advisors* and / or *INVL* corporate websites, the information provided in such forms, including the contact details of the Data Subject, shall be retained until the enquiry is processed and for a maximum of 2 years from the time of the enquiry, unless a longer retention period is otherwise legally permitted.

For the purpose of submitting evidence (in the course of disputes/complaint proceedings), *Financial Advisors* shall process the marketing consent data for the duration of validity of the consent, and shall retain the data for 2 years after the withdrawal/expiry of the consent.

8. GEOGRAPHICAL SCOPE OF PROCESSING

Financial Advisors generally processes personal data of the Data Subject exclusively within the territory of the European Union / European Economic Area (EU/EEA). All the data about the Data Subjects' of the *Financial Advisor's* branches in the Republic of Latvia and the Republic of Estonia will be accessible and transferred to the *UAB INVL Financial Advisors* established in the Republic of Lithuania for the purpose of the proper performance of the services under the agreements and to enable sound and prudent management of the Company. The information sharing will be performed with appropriate safeguards for the Data Subject's privacy and in line with applicable confidentiality obligations.

Data subject's data may be transferred to a data controller or data processor located in another EU/EEA country, for example, when an external service provider hired by *Financial Advisors* is established in another country.

In some cases, personal data of Data subject can be transferred to and processed in countries outside of the EU/EEA when there is a legal basis for it and one of the following conditions is met:

- The country outside the EU/EEA in which the Data Recipient is located ensures an adequate level of protection of personal data as decided by the European Commission.
- The Data Controller or Data Processor implements appropriate data security measures, for example, the transfer of personal data is carried out in accordance with a contract containing standard terms and conditions approved by the European Commission or other standard terms and conditions approved in accordance with the established procedure, an approved code of conduct, or the Data Recipient is certified.

- Derogations for specific situations apply, for example, in case of the Data subject's explicit consent, performance of a contract with the Data subject, conclusion or performance of a contract concluded in the interest of the Data subject, establishment, exercise or defense of legal claims, important reasons of public interest.

9. AUTOMATED DECISION-MAKING

In certain cases *Financial Advisors* takes its decisions by automated means:

- in order to ensure the most appropriate service to the Data Subject and to send marketing offers tailored to the Data Subject's needs, and to improve the quality of the services offered by *Financial Advisors*, *Financial Advisors* may automatically analyse the Data Subject's personal data, including information about the use of services, the needs of the Data Subject as well as his/her behaviour on *Financial Advisors* and / or *INVL*'s corporate websites and self-service portals. It should be noted that *Financial Advisor's* analysis of Data Subjects' data does not have any legal or similar significant effect on Data Subjects. The Data Subject may object at any time to the processing of his/her personal data for direct marketing purposes and set his/her browser to refuse all or some of the cookies.

10. VIDEO SURVEILLANCE

Video surveillance may be one of the measures implemented in the framework of legitimate interest of *Financial Advisors* to protect persons and property. The areas where video surveillance is carried out shall be marked with special signs.

In the context of video surveillance, the personal data processed by *Financial Advisors* shall include the facial image and video recording of the Data Subject while the Data Subject is inside or outside the premises. For the above purpose, video recordings shall be retained for a maximum of 14 calendar days from the date of recording. In the case of incident investigation, the recording may be retained for as long as the investigation or legal process is ongoing.

Video information may be provided to law enforcement authorities when necessary to investigate criminal offences or infringements.

11. DIRECT MARKETING

Direct marketing activities include sending newsletters, *Financial Advisors* and / or *INVL* service offers (including personalised offers) and information about new *Financial Advisors* and / or *INVL* services, ongoing promotions, the possibility to participate in competitions or marketing campaigns, asking for Data Subject's feedback on the quality of services and customer service, participating in surveys or market research. *Financial Advisors* may also provide direct marketing offers from third parties on the basis of the Data Subject's individual consent. E-mails and calls whose content relates to the performance of contracts are not considered to be direct marketing activities.

When using the Data Subject's personal data for direct marketing purposes, *Financial Advisors* shall be guided by the consent given by the Data Subject for such processing of personal data. Where the Data Subject has not given his/her consent but uses *Financial Advisors* services, and has not objected to the processing of data for direct marketing purposes, during the provision of its services, *Financial Advisors* may, on the basis of *Financial Advisors* legitimate interest, send emails to the Data Subject containing offers for similar goods or services.

On the basis of the legitimate interest to know whether the marketing messages sent to the Data Subject are relevant, *Financial Advisors* shall collect information on the messages sent to the Data Subject, whether the Data Subject has read them, the time when he/she read them and the links he/she clicked on.

At the end of the validity period of consent to direct marketing, *Financial Advisors* may contact the Data Subject about renewal of the consent.

We may also carry out direct marketing and inform the Data Subject about *Financial Advisors* services and offers by displaying advertisements on third-party media platforms such as Facebook, Instagram, Messenger and LinkedIn:

- where the Data Subject has consented to the transfer of his/her data to the above controllers for this purpose;
- where *Financial Advisors*, as the account administrator, selects the appropriate settings, based on its target audience and its performance management and promotion objectives. In this case, *Financial Advisors* has no influence on the specific user of the social media platform to whom the advertisement will be displayed; the implementation of the option to opt-out of such advertisements shall be the responsibility of the operator of the social media platform.

The personal data provided by the Data Subject and *Financial Advisors* on social media platforms are processed jointly with the operator of the social media platform. For more information on the processing of data by the controller of the social media platform, please refer to the privacy policy of the respective controller:

- Facebook, Instagram, Messenger Privacy Policy is available at <https://www.facebook.com/privacy/explanation>;
- LinkedIn Privacy Policy is available at <https://www.linkedin.com/legal/privacy-policy>.

12. CONTACT DETAILS

- **INVL Financial Advisors FMI UAB** (code 304049332, address 14, Gynėjų St., Vilnius, tel. +370 527 90601, e-mail seimosbiuras@invl.com, website address www.invlseimosbiuras.com, email address of the Data Protection Officer dap@invl.com);

- **INVL Financial Advisors FMI UAB branch in the Republic of Latvia** (code 40203508874, address Elizabetes 10B, Riga, LV-1010, tel. +371 67 092 988, e-mail familyoffice@invl.lv, website address www.familyoffice.lv, email address of the Data Protection Officer dap@invl.com);
- **INVL Financial Advisors FMI UAB branch in the Republic of Estonia** (code 16835480, address Maakri 23a, 10145 Tallinn, tel. XXXX, e-mail familyoffice@invl.ee, website address www.invl.ee, email address of the Data Protection Officer dap@invl.com);
- **Invalda INVL AB** (code 121304349, registered office address 14 Gynėjų St., Vilnius, tel. 8 527 90601, e-mail info@invaldainvl.com, website address www.invaldainvl.com);
- **INVL Asset Management UAB** (code 126263073, address 14, Gynėjų St., Vilnius, tel. 8 700 55959, email info@invl.com, website address www.invl.com, email address of the Data Protection Officer dap@invl.com);
- **INVL Baltic Real Estate UTIB** (code 152105644, address 14, Gynėjų St., Vilnius, tel. 8 5279 0601, e-mail breinfo@invl.com, website address www.invlbalticrealestate.lt);
- **INVL Technology UTIB** (code 300893533, address 14, Gynėjų St., Vilnius, tel. 8 527 90601, e-mail info@invltechnology.lt, website address www.invltechnology.lt);
- **INVL Baltic Farmland AB** (code 303299781, address 14, Gynėjų St., Vilnius, tel. 8 525 95056, e-mail farmland@invaldainvl.com, website address www.invlbalticfarmland.com);
- **Mundus UAB, asset management company** (code 303305451, address 14, Gynėjų, Vilnius, tel. 8 629 16488, e-mail info@mundus.lt, website address www.mundus.lt).

13. COOKIES

Cookies are a piece of certain information stored on a visitor's computer when they visit *Financial Advisors* and / or *INVL* websites.

Cookies are used to identify the visitor as a previous visitor to the website and to collect website traffic statistics, to display visitor-specific advertising and to improve the functionality of the self-service portal. Please note that visitors can always change their preferences or refuse to accept cookies by changing their browser settings. The option to delete cookies is available in all browsers. You can also configure your browser settings to accept only relevant cookies, or to receive a warning message each time you decide whether you want to store cookies on your computer. Please note that disabling cookies may prevent some features of the websites from working.

More information about cookies can be found at:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>
<https://www.allaboutcookies.org/>

A list of the cookies used by websites invlseimosbiuras.com, www.familyoffice.lv and www.invl.ee is provided in the Cookie Policy available at <https://www.invl.com/slapuku-politika/>, <https://www.invl.ee/kupispolitika>, <https://invl.lv/sikdatnu-politika/>. These Cookie Policies allow you to change or withdraw your consent to the use of cookies on www.invlseimosbiuras.com, www.familyoffice.lv or www.invl.ee at any time.

Cookies used by *Financial Advisors* on self-service portals:

Cookie name	Purpose of the cookie	Moment of creation	Period of validity	Data used
invl	Mandatory cookie – to ensure the customer's session with the server.	Establishing a session between the customer's browser and the server.	One session	ID of the customer's session with the server (the cookie does not store any personal information and is automatically deleted when the browser window is closed)
__AntiXsrfToken	Mandatory cookies are used to support the basic functionality of the e-portal. Ensures additional protection.	Upon accessing the ePortal	One session	Cookies do not store any personal information and are automatically deleted the browser window is closed.

The websites of *Financial Advisors* may contain links to third-party websites, legislation, as well as to social networks (e.g. an option to share the content of the website on Facebook and LinkedIn, Instagram, as well as YouTube). It should be noted that the third-party websites whose links are included in the websites of *Financial Advisors* are subject to the privacy policies or equivalent documents of those websites, and *Financial Advisors* does not accept any responsibility for the content of the information provided by those websites, their operation or the provisions of their privacy policies.

Financial Advisors has the right to unilaterally amend the present Privacy Policy at any time by informing Data Subjects of the essential changes via the websites of *Financial Advisors*