Bondora

PRIVACY POLICY

1. ABOUT THIS PRIVACY POLICY

1.1. This Privacy Policy provides an overview of what personal data of the bondora.nl Portal User (hereinafter also **you**) the Lender (hereinafter **Bondora** or **us**) processes when providing services via the Portal, how and for which purposes it does this, and what your rights are regarding your personal data.

We follow very strict rules established for the processing of your personal data, which derives from the European Union and Estonian legislation on the protection of personal data, including the European Union General Data Protection Regulation (hereinafter **General Regulation**). The terms contained in this Privacy Policy have the same meaning as described in the bondora.nl Terms of Use and General Regulation.

2. CONTROLLER AND CONTACT DETAILS

The controller of your personal data is Bondora AS (Estonian register code 11483929; postal address A.H. Tammsaare tee 56, Tallinn 11316, Estonia). You can find the form required to contact us here .

3. COLLECTION OF PERSONAL DATA

3.1. We generally collect personal information necessary to enter into an Agreement with you and perform it. Given our field of activity, it also includes collecting various background information to fulfill our various obligations deriving from the law.

3.2. We collect personal data from the following sources:

- yourself (e.g., data submitted and shared by you); and
- third parties (e.g., public sources, , credit rating agencies (such as BKR, EDR, Focum), cooperation partners, and companies belonging to the same group as us).

We collect personal data from third parties that allow us to assess your creditworthiness and apply due diligence measures to prevent money laundering and terrorism financing, including to verify the information you provide to us.

Before we enter into an agreement with you, we want to assess any potential payment risks. This allows us to determine whether we will enter into an agreement with you and which conditions we will apply. For this purpose, we will also provide your data to credit information agencies. They check personal data and provide credit information reports with a risk profile. You can read the privacy statements of the agencies we engage here: EDR and Focum.

We may also collect personal data automatically (e.g., the way you use the Platform, digital devices you use, and cookies) for statistical purposes.

4. USE OF YOUR PERSONAL DATA

4.1. To provide services to you through the Portal, you may be required to provide our partners or us with the information necessary to provide the services. If you do not provide this information, we are not able to provide services to you. Such information is always marked accordingly.

4.2. We use your personal data for the following purposes and on the following legal grounds:

Personal data	Purposes of Processing	Legal grounds
• Data that allows us to identify you (e.g., name, date of birth, sex, identity card data) • Contact details (e.g., email address, mobile phone number, postal address) • Financial data (e.g., income, financial situation, other financial liabilities, current bank account transactions, past payment behavior) • Personal data (e.g., marital status, relationship status, information on dependents, and property) • Information about your job and education (e.g., level of education, profession, employer, position) • Information about your identity document (incl. copy of identity document, document number)	Deciding on the conclusion of the Agreement and its conditions (incl. identification, assessment of creditworthiness, determination of the maximum credit limit, application of the principles of responsible lending, the fulfillment of obligations arising from the Money Laundering and Terrorist Financing Prevention Act)	• Preparation for the conclusion of the Agreement (Section 6 (1) (b) of the General Regulation) • Fulfillment of legal obligation (Article 6 (1) (c) of the General Regulation and the Law of Obligations Act (application of the principle of responsible lending) and the Money Laundering and Terrorist Financing Prevention Act)

Personal data	Purposes of Processing	Legal grounds
• Details of the loan applied for (e.g., loan amount, purpose, date of monthly payments) • Other information (e.g., the language of communication)		
• Data that allows us to identify you (e.g., name, date of birth, sex, and identity card data) • Contact information (e.g., email address, mobile phone number, postal address) • Financial data (e.g., current bank account number, payment behavior) • Your user account information (e.g., email address or other social media account information if preferred) • Data of transactions made on the Platform (e.g., services used on the Platform, concluded agreements, the fulfillment of obligations, communication) • Other information (e.g., the language of communication)	Conclusion and performance of the Agreement (incl. contacting you in connection with the Agreement)	• Conclusion and performance of the Agreement (Article 6 (1) (b) of the General Regulation)
• Contact information (e.g. email address, mobile phone number,	Contacting for direct marketing	• Your consent (Article 6 (1) (a) of the General Regulation)

Personal data	Purposes of Processing	Legal grounds
postal address or any other electronic means)		
• Segment information (e.g. data used to categorize individuals into distinct groups or segments based on demographics, behavior, preferences, or other relevant factors)	Segmenting customers into groups based on specific criteria and profiling them to better understand their needs and preferences in order to conduct targeted marketing activities	• Our legitimate interest in marketing our products and services and making offers suitable for you (Article 6 (1) (f) of the General Regulation) We will only process your personal data if we are satisfied that our legitimate interests do not outweigh your interests or fundamental rights and freedoms for which personal data must be protected. As such, processing takes place with personal data that is not particularly sensitive. As we use this data for foreseeable and useful purposes to you (i.e., to make offers of interest to you), we consider it justified.
• Contact information (email address) • Information of performance of the Agreement • Information provided by you through the survey • Segment information (e.g. data used to categorize individuals into distinct groups or segments based on	Conducting surveys to collect and use feedback to develop and improve the quality of our portal, products, and services, and linking this feedback with existing segmentation data.	• Our legitimate interest in ensuring the quality, development, and competitiveness of our Platform and services (Article 6 (1) (f) of the General Regulation) We will only process your personal data if we are satisfied that our legitimate interests do not outweigh

Personal data	Purposes of Processing	Legal grounds
demographics, behavior, preferences, or other relevant factors)		your interests or fundamental rights and freedoms for which personal data must be protected, as such processing takes place with personal data that is not particularly sensitive. As we use this data for foreseeable and useful purposes (i.e., to make offers of interest to you), we consider it justified.
• Your Feedback on our Portal and services	Sharing your feedback on our webpage with other customers, providing insights and experiences about our platform and services.	• Your consent (Article 6 (1) (a) of the General Regulation)
• Data on transactions made on the Platform and browsing data (e.g., services used on the Platform, Agreements concluded, the fulfillment of obligations, IP-address, type of browser, preferences, habits, satisfaction, communication, data on participation in consumer games, and campaigns organized by the Lender)	Developing and improving the quality of our Platform and services (e.g., analyzing how and with which devices Users typically navigate our Platform to make it more user-friendly; analyzing which products and services are popular to develop these as a priority; and analyzing the profile of the users that do not perform their responsibilities to improve our systems, etc.)	• Our legitimate interest in ensuring the quality, development, and competitiveness of our Platform and services (Article 6 (1) (f) of the General Regulation) We will only process your personal data if we are satisfied that our legitimate interests do not outweigh your interests or fundamental rights and freedoms for which personal data must be protected. As such processing takes place with personal data that is not particularly sensitive, and as we use this data based

Personal data	Purposes of Processing	Legal grounds
		on accrual, i.e., not in relation to you individually, we consider it justified.
• Data related to your real estate, business and business prohibitions • Your bank account information • Contact information (e.g phone number, e-mail address)	Developing (incl testing) and improving the quality of our platform and services (eg we will analyze how to improve the credit model more accurately and better, taking into account data describing your financial behavior and situation, to provide a better and more accurate creditworthiness assessment to ensure even better compliance with responsible lending).	• Our legitimate interest in ensuring the quality, development, and competitiveness of our Platform and services (Article 6 (1) (f) of the General Regulation) We will only process your personal data if we are satisfied that our legitimate interests do not outweigh your interests or fundamental rights and freedoms for which personal data must be protected. As such processing takes place with personal data that is not particularly sensitive, and as we use this data based on accrual, i.e., not in relation to you individually, we consider it justified.
• Your bank account information	Providing additional services to you via our Portal	• Your consent (Article 6 (1) (a) of the General Regulation)
• All your relevant personal data	Fulfillment of our legal obligations deriving from the law	• Fulfillment of our legal obligations deriving from the law (Article 6 (1) (c) of the General Regulation)
• All your relevant personal data	Protecting our rights and interests (e.g., if you do not fulfill the Agreement or there appears such suspicion)	• Our legitimate interest in protecting our rights and interests (Article 6

Personal data	Purposes of Processing	Legal grounds
		(1) (f) of the General Regulation) We will only process your personal data if we are satisfied that our legitimate interests do not outweigh your interests or fundamental rights and freedoms for which personal data must be protected. As we generally process your personal data only when it is essential to protect our rights and interests (i.e., if there has been a breach by our or there is a suspicion of this), we consider it justified.

4.3. We may also process your personal data for other purposes under your consent. The purpose of the processing and other details, in this case, is described in the consent.

4.4. **If the legal basis for the processing of your personal data is our or a third party's legitimate interest, you have the right to obtain additional information and to object to such processing at any time.** To do so, please contact us using the contact details available at the bottom of the Portal.

5. AUTOMATED DECISIONS AND PROFILE ANALYSIS

5.1. We use an automated process to decide whether to approve or reject your loan application. As part of our automated process, all categories of data we have collected about you for creditworthiness purposes are assessed (see above). The system calculates your credit rating based on the risks associated with the different data categories and the coefficients assigned to them. Based on this, you will be offered a loan on the terms you have requested or other terms (e.g. with a smaller loan amount or a different repayment term than wanted), or your application will be rejected. The purpose of creditworthiness assessment is to make fair and responsible loan decisions and fulfill our legal obligation to assess your creditworthiness before granting a loan.

5.2. In addition to creditworthiness assessments, we make automated decisions in the process of risk management, including assessment of risk of fraud, money laundering and terrorist financing.

5.3 Additionally, we use automated decision-making in the process of adjusting loan payment schedules.

5.4. Automated decisions and profiling allow us to improve the fairness of our decision-making process (reducing the potential human error, discrimination, and abuse of power), reduce the risk that you will not pay back the loan, and allow us to make decisions in less time and improve efficiency.

Automated decisions and profile analysis are necessary for concluding an Agreement between us. Creditworthiness assessment is a largely standardized and mandatory procedure for creditors built on the applicable principles of responsible lending and based on mathematical formulas. The automated creditworthiness assessment ensures a fairer result as it eliminates the human subjective factor and treats all credit applicants equally. Using the same or a similar model manually would take a disproportionate amount of time to assess each borrower's creditworthiness and thus becomes significantly more costly for us. Our human resource needs would significantly increase if we were to ensure that the quality of service is maintained when assessing creditworthiness manually. To prevent money laundering, terrorist financing and breach of sanctions regimes, we use automated processes for monitoring transaction data. It would not be possible to process the relevant data manually (i.e., without automated solutions) due to the large volume.

5.5. Our automated processes are regularly tested, evaluated, and inspected to ensure fairness, efficiency, and impartiality. For them to work, it is also necessary that the information you provide to us is accurate and up-to-date.

5.6. You have the right to have direct personal contact, the right to express your views, the right to be heard on a decision taken following such an assessment, and the right to challenge that decision. To do so, please contact us using the contact details at the bottom of the Portal.

6. TRANSFER OF PERSONAL DATA

When we process your personal data, we also transfer your personal data to our processors and third parties. Such transmission shall take place only under the following conditions.

6.1. **Processors.** We use carefully selected service providers (processors) to process your personal data. In doing so, we remain fully responsible for processing your personal data.

We use, among other things, the following processors: providers of marketing and survey services and tools, providers of money laundering and terrorist financing and sanctions management intelligence services, creditworthiness assessment service providers, customer support service providers, accounting service providers, server management and server hosting providers, IT service providers, and other companies belonging to the same group with Bondora, who provide services to us.

If you would like more detailed information about our processors (e.g., their names and locations), please contact us using the contact details at the bottom of the Portal.

6.2. **Third Parties.** We will only share your personal data with third parties if set out in this Privacy Policy, if required by applicable law (e.g., if we are required to share personal data with authorities) or under your consent or order.

We may share your personal data with the following third parties:

- payment service providers, to perform agreements. In this case, the legal basis for the transfer of personal data is the performance of an agreement between us (GDPR Art. 6(1)(b));
- credit agencies, to assess your creditworthiness. In this case, the legal basis for the transfer of personal data is our legal obligation to assess your creditworthiness (GDPR Art. 6(1)(c));
- credit assessment service providers, to test the quality of the creditworthiness assessment. In this case, the legal basis for the transfer of personal data is our legitimate interest (GDPR Art. 6(1)(f));
- companies belonging to the same group with Bondora, for the purposes of our internal administration. In this case, the legal basis for the transfer of personal data is our legitimate interest (GDPR Art. 6(1)(f));
- companies belonging to the same group with Bondora, for the purposes of direct marketing. In this case, the legal basis for the transfer of personal data is your consent (GDPR Art. 6(1)(a));
- to other credit and financial institutions and insurance providers to provide the service requested by you or to assess the reliability and risk associated with the request (GDPR Art. 6(1)(b));
- potential or actual buyers and pledgees of claims. In this case, the legal basis for the transfer of personal data is our legitimate interest in transferring the data and documents

related to the claim to the buyer and/or pledgee upon assignment of the claim (GDPR Art. 6(1)(f));

- potential or actual investors and/or creditors of Bondora or other companies belonging to the same group with Bondora. In this case, the legal basis for the transfer of personal data is our legitimate interest (GDPR Art. 6(1)(f));

- authorities and law enforcement agencies, to fulfill our legal obligations deriving from law. In such a case, the legal basis for the transfer of personal data is fulfilling our legal obligation deriving from law (GDPR Art. 6(1)(c)), e.g. to comply with administrative decisions or requests of public authorities;

- payment default registers, credit bureaus (e.g BKR) and other third parties where we are disclosing information about obligations and outstanding debts; In this case, the legal basis for the transfer of personal data is our and third parties' legitimate interest in implementing responsible lending principles; (GDPR Art. 6(1) (c) or (f)).

- collection agencies, attorneys, bailiffs, and other persons concerned, to protect our rights and interests. In this case, the legal basis for the transfer of personal data is our legitimate interest in protecting our rights and interests (GDPR Art. 6(1)(f)).

- auditors, to perform our statutory obligations. In such a case, the legal basis for the transfer of personal data is our legal obligations deriving from the law (GDPR Art. 6(1)(c) and the Auditors Activities Act of the Republic of Estonia);

- in the legitimate interests of us or our counterparty, if such transfer is necessary to transfer our activities or assets due to the transaction or to assess the perspectives of such a transaction. In this case, the legal basis for the transfer of personal data is our or our counterparty's legitimate interest in concluding the transaction or assessing its perspectives (GDPR Art. 6(1)(f)). We will only transfer your personal data if we are sure that our or our counterparty's legitimate interests outweigh your interests or fundamental rights and freedoms for which personal data must be protected.

6.3. **If the legal basis for the processing of your personal data is our or a third party's legitimate interest, you will have the right to obtain additional information and to object to such processing at any time.** To do so, please contact us using the contact details at the bottom of the Portal.

7. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN UNION

7.1 In general, we do not transfer your personal data outside the European Union, but our processors and third parties, to whom we transfer the personal data, may process your personal data outside the European Union. Where necessary, the transfer will only take place if we have a legal basis for such action, including, in particular, if the recipient: (i) is located in a country that the European Commission considers having an adequate level of protection of personal data, or (ii) is acting under an agreement that meets the requirements of the European Union for the transfer of personal data to processors outside the European Union.

8. RETENTION OF PERSONAL DATA

We retain your personal data for as long as we are required by law to do so, for as long as necessary for the purposes for which the personal data was collected, or for as long as it is necessary to protect our legal interest and rights.

8.1. Personal data processed in relation to the application process, creditworthiness assessments and the conclusion and performance of the agreement.

Under the Estonian Creditors and Credit Intermediaries Act, we must retain all information and documents relating to the providing and servicing of credit for the duration of our legal relationship and three years after that. After this period, we assess whether it is necessary to retain the personal data for longer for specific purposes.

8.2. Personal data processed for anti-money laundering purposes, etc.

Under the Estonian Money Laundering and Terrorist Financing Prevention Act, we must retain your personal data and various documents five years after the end of the business relationship with you.

8.3. Personal data in bookkeeping materials

Under the Estonian Accounting Act, we must retain accounting source documents seven years from the end of the respective financial year or until the date they are necessary to ensure compliance with the requirements for the traceability of an economic transaction, but not less than seven years),

9. SECURITY OF PERSONAL DATA

9.1. We ensure that Users' personal data is only available to such employees who, due to their duties, need to have access to such data. All Bondora employees are required to maintain the confidentiality of the data and may not share the information with third parties, except for the purposes set forth above.

9.2. Personal data is stored and archived on a secure server that only a few people have access to. Security is guaranteed by strict privacy standards met by conscientious third-party partners.

9.3. We use several Internet security measures to ensure the secure processing, transmission, and archiving of personal data.

The servers are located in a data center in Frankfurt, Germany, and is operated by Telehouse, one of the world's 200 leading companies. A separate agreement has been concluded with Virtion GmbH for server management. These companies allow us to offer better availability and growth potential of our IT resources and greater flexibility.

All their activities comply with a number of standards, including ISO 27001:2005 (Information security management systems), BS25999-2:2007 (Business continuity management), PCI-DSS (Payment card industry), ISO 9001:2008 (quality standards), and ISO 14001:2004 (Environmental management system standard).

Companies have established round-the-clock physical and virtual surveillance of the system. All data center movements are monitored by short-range card readers and infrared sensors that detect unauthorized persons. In Bondora, security breaches are detected, monitored, and repelled by software and hardware security walls.

10. YOUR RIGHTS

10.1. You have all the rights of the data subject with regard to your personal data to the extent required by the applicable data protection legislation, including:

- the right to receive relevant **information** on the processing of personal data;
- the right to receive **confirmation** whether personal data is being processed;
- the right to receive a **copy** of personal data;
- the right to request that we **rectify** inaccurate personal data or **supplement** incomplete personal data;
- the right to request **deletion** of personal data if: (i) the personal data is no longer necessary for the purpose for which it was collected or otherwise processed; (ii) you withdraw your consent for processing your personal data, and there is no other legal basis for processing the personal data; (iii) you object to the processing of personal data, and there are no overriding legitimate reasons for the processing; (iv) you object to the processing of your personal data for direct marketing purposes; (v) personal data has been processed

unlawfully; or (vi) personal data must be deleted to fulfill our legal obligation deriving from the law. Notwithstanding the preceding, you do not have the right to request the deletion of personal data if the processing is necessary: (a) to fulfill an obligation under our law; or (b) to formulate, file, or defend legal claims;

- the right to request a **restriction** on the processing of personal data if: (i) you challenge the accuracy of the personal data for a period of time that allows us to verify the accuracy of the personal data; (ii) the processing of personal data is unlawful, whereas you do not request the deletion of personal data, but the restriction of use; (iii) we no longer need personal data for processing purposes, but they are necessary for you to make, file or defend legal claims; or (iv) you have objected to the processing of your personal data while we check that our legitimate reasons outweigh your reasons. If the processing of personal data is restricted, we may nevertheless store it, or process it: (a) with your consent; (b) to formulate, file, or defend legal claims; (c) to protect the rights of another natural or legal person; or (d) in the overriding public interest;

- the right to **portability** of the data, i.e., the right to receive personal data that you have provided to us in a structured, publicly available format and machine-readable form, and the right to transfer this data to another controller if: (i) the processing is with your consent or for contract or performance purposes; and (ii) processed automatically. If technically feasible, you have the right to request that we transfer the data directly to another controller. In exercising your right, we cannot infringe on the rights and freedoms of others;

- the right to **object** at any time to the processing of personal data in the legitimate interest of us or a third party, depending on our specific situation. In such a case, we will not further process personal data unless we prove that the processing is for a valid legitimate reason that outweighs your interests, rights, and freedoms or to make, file, or defend legal claims. If your objection concerns the processing of your personal data for the purposes of direct marketing, we do not have the right to process your personal data further;

- the right to **withdraw consent** at any time. To do so, you may contact us using the contact details at the bottom of the Portal or use other options described in obtaining consent.

10.2. To exercise your rights, please contact us using the contact details at the bottom of the Portal. We will respond to your request within one month at the latest. In some instances (taking into account the complexity and number of the requests), we have the right to extend the due date for replying by two months. In this case, we will notify you.

10.3. If you believe that your rights have been violated, please contact our Data Protection Officer via dpo@bondora.com immediately to resolve the situation. However, you have the right to complain to the Member State's supervisory authority where you have your permanent residence or place of work, or to the following data protection authorities of the countries where we operate:

In Estonia	Data Protection Inspectorate (the lead supervisory authority for Bondora)	www.aki.ee info@aki.ee Tatari 39, 10134 Tallinn
In Latvia	State Inspectorate	www.dvi.gov.lv pasts@dvi.gov.lv Elijas iela 17, Riga, LV-1050
In Finland	Office of the Data Protection Ombudsman	https://tietosuoja.fi tietosuoja@om.fi Lintulahdenkuja 4, 00530 Helsinki
In the Netherlands	Data Protection Authority	https://www.autoriteitpersoonsgegevens.nl Hoge Nieuwstraat 8, 2514 EL The Hague
In Denmark	The Danish Data Protection Agency (Datatilsynet)	https://www.datatilsynet.dk/ dt@datatilsynet.dk Carl Jacobsens Vej 35, 2500 Valby
In Spain	Spanish Data Protection Agency	https://www.aepd.es/es C/ Jorge Juan, 6. 28001 – Madrid

11. COOKIES

We use cookies, which are small text files that a website server stores on your hard drive. This allows us to collect certain information from your web browser. You can find more information about our cookie policy here.

12. LINKS TO OTHER THIRD-PARTY WEBSITES

Links to third-party websites from the Platform or any other Bondora website, or vice versa, are just quick links to services or topics that are useful to the users of our Platform. Please note that third-party websites may have different privacy policies and/or security standards, we encourage you to review them.

13. CHANGES TO THE PRIVACY POLICY

Suppose our personal data processing practices are changed, or we need to change this privacy policy due to applicable law, the practices of judicial or competent supervisory authorities, or the guidelines of competent supervisory authorities, we have the right to unilaterally change this privacy policy at any time. In that case, we will notify you via the Portal or email within a reasonable period of time before the changes take effect.

14. GOVERNING LAW

Since Bondora is a company registered in the Republic of Estonia, Estonian law applies to the processing of your personal data.

This Privacy Policy was last updated on 1st of October, 2025.