

AML Privacy Notice

Why we need the information?

The information collected with this questionnaire will be used for EY to perform the client and its beneficial owner identification and verification as required by anti-money laundering legislation (Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing as well as local money laundering and terrorist financing prevention legislation¹). In addition, we also process identification and background information as part of our client acceptance procedures, which include our audit independence, conflicts checks, reputational and financial checks, and to fulfil any other legal or regulatory requirements to which we are subject.

The checks we could perform include the following:

- ▶ Identity verification: proof of name and address
- ▶ Ultimate beneficial ownership of corporate and other legal entities
- ▶ Conflicts checks: to avoid a conflict of interest with any other client
- ▶ Anti-money laundering, proceeds of crime and terrorist financing checks
- ▶ Politically exposed persons (PEP) checks
- ▶ Adverse media checks, in certain cases
- ▶ Government sanctions list checks
- ▶ Independence checks

The data gathered will be treated with strict confidentiality and in accordance with the applicable anti-money laundering and data protection laws and professional regulations.

What is our legal ground for processing the information?

The legal ground for EY to process personal data contained herein is:

- ▶ Compliance with a legal or regulatory obligation to perform client due diligence when entering into business relationship with a client as required by AML Act
- ▶ Our legitimate interest in understanding any conflict of interest or challenge with regard to independence legislation
- ▶ Our legitimate interest in supporting other EY Member Firms identification efforts and compliance with legal or regulatory obligations
- ▶ Our legitimate interest in safeguarding EY against inadvertently dealing with the proceeds of criminal activities or assisting in any other unlawful or fraudulent activities (for example, terrorism).

Sharing information with other EY member firms

EY may share the information provided in this questionnaire with other firms from the EY global network for following reasons:

- ▶ The provision of the services
- ▶ Complying with regulatory and legal obligations to which we are subject
- ▶ Conflict checking



- ▶ Risk management (including client acceptance procedures performed by other EY member firms) and quality reviews
- ▶ Our internal financial accounting, information technology and other administrative support.

Only limited number of individuals in these other EY Member Firms, who might need to know the information to perform their functions, will have access to the data and will process it for the purposes as stipulated in this privacy notice.

The information will be processed in the jurisdictions in which the respective EY Member Firms operate (EY office locations are listed at www.ey.com). List of EY Member Firms could be found [here](#).

The transfer of personal data among EY Firms is subject to the EY Binding Corporate Rules available at https://www.ey.com/en_gl/data-protection-binding-corporate-rules-program.

Your obligation to inform data subjects whose information you provide to us

You warrant that you will inform the relevant individuals that their data has been provided to EY in relation to the above purposes and that it will be recorded in the systems of EY and will be processed as described in this notice.

How you can contact us

Any questions, complaints or requests for exercising rights related to protection of personal data can be submitted to:

- ▶ Estonia: privacy@ee.ey.com
- ▶ Latvia: privacy@lv.ey.com
- ▶ Lithuania: privacy@lt.ey.com

More information on how EY processes personal data is available at [Privacy statement | EY - Global](#).

¹ Money Laundering and Terrorist Financing Prevention Act of the Republic of Estonia; Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing of the Republic of Latvia; Law on the Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania