



1. Who we are and important information

- 1.1. This Privacy Policy ("**Policy**") informs you how XPATE collects, use, and process your personal data when using our Website, services or platforms (collectively referred to as "**Services**") and your choices about said data. This Policy does not apply to third-party websites, products or services.
- 1.2. You consent to your personal data being transferred outside the EEA. XPATE's is committed to protecting your privacy and personal data. Your personal data may be transferred to and processed at a destination outside the EEA, including countries that have data protection rules different from your own. You can see more information about data transfers in section – below.
- 1.3. XPATE SIA is a company incorporated in Latvia (registered number: 40203411426) with an office at Dzirnavu Street 42, Riga LV-1010 (hereinafter "**XPATE**", "**xpate**", "**we**", "**us**", or "**our**" as applicable). XPATE is a controller of the personal data collected and processed for the Services as defined in the Data Protection Regulations, unless stated otherwise.

2. Definitions

- 2.1. **Data Protection Regulations** - means as applicable and binding on you or us or the Services:
 - 2.1.1. the EU General Data Protection Regulation 2016/679 ("**GDPR**");
 - 2.1.2. the EU e-Privacy Directive (Directive 2002/58/EC) ("**e-Privacy Directive**");
 - 2.1.3. any national implementations of (i) and (ii).
- 2.2. **you, your** – an identified or identifiable individual (i.e. a Data Subject as defined in the Data Protection Regulations) who is applying, accessing or using our Services, directly or indirectly, either on his or her own account or on behalf of a corporate entity. This includes an individual acting as an existing customer or as a prospective customer of xpate, or an individual acting on behalf of a corporate entity, including any principals (managing and financial directors, other directors and officers, shareholders, partners and beneficial owners of the corporate entity), as well as any member of staff or an employee accessing or using xpate services on behalf of a corporate entity.
- 2.3. **EEA** – European Economic Area;
- 2.4. **Websites** – the xpate website at www.xpate.com and other websites where XPATE offer the Services, as updated from time to time;
- 2.5. **xpate group** – means XPATE and its Affiliates from time to time, where "**Affiliate**" means, in relation to XPATE, any person or entity Controlling, Controlled by or under common Control or ownership with XPATE. "**Control**" of an entity means the power, direct or indirect, to direct or cause the direction of the management and policies of such entity, whether by contract or otherwise.

3. Data Protection Officer

- 3.1. For any inquiries or additional information in relation to this Policy or personal data processing, please contact our Data Protection Officer by e-mail: dpo@xpate.com or by sending a written statement to our registered address defined on the first page.

4. When do we collect information about you?

- 4.1. We collect and process personal data about you in various instances, including but not limited to the following:
 - **Registration and contact forms on Websites.** If you wish to establish a business relationship with us, find out more about our services or if you have any other question for us, you may be asked or offered to

fill out an electronic application or registration form on our Websites with your initial identity and contact information. We also collect your electronic device information at that time.

- **Website visits.** When you visit xpate Websites, we collect information about your activity with the help of cookies or equivalent technologies. More information about the cookie files used by xpate can be found in xpate's [Cookie Policy](#).
- **Entering your account with xpate.** When you enter your xpate online account as a customer, we may obtain personal data to identify you from other visitors of the Website. Data such as device and browser information are collected at that time.
- **Using xpate services.** We collect and process information about you while you are using our Services, for example, by verifying your identity, correcting your contact details, managing your payment details, processing your payments, and ensuring the security of your account and our services.
- **Communication with xpate.** We collect information when you communicate to us via email, phone call, Live Chat, Websites and other means. We also process your personal information when we are contacting you.
- **Customer surveys.** When you participate in our customer survey, we will store the involved personal information.

5. How do we collect personal data?

Personal data, or personal information, means any information about an identified or identifiable individual. It does not include anonymous data, which cannot be linked back to the individual. We will collect and process personal data about you as follows:

5.1. Information you give us

- 5.1.1. You may give us information about yourself when using our Services, contact us, or in other ways, for the purposes and legal basis indicated in Section 6 below.
- 5.1.2. We will be informing you regarding the specific data that is required for us to collect from you in accordance with the reasonable steps that need to be taken in the course of establishing a business relationship with you or providing a service that you wish to use. The data collected at each stage shall be proportionate to the services we provide to you and the data collection purposes at the time.
- 5.1.3. In providing the personal data of any individuals other than yourself, you confirm that you have obtained consent from such individuals to disclose their personal data to us or are otherwise entitled to provide this information to us. You also confirm that you have brought this Policy to their attention if legally necessary, and have received their consent to our collection, use and disclosure of such personal data for the purposes set out in this Policy.

5.2. Information we collect about you from third parties

- 5.2.1. We may collect your personal data from or with the help of the categories of third parties listed below for the purposes and legal basis indicated in Section 6. Exactly which third parties are involved and for which purposes will depend on which service you use. This may include:
 - the payment service providers you use to transfer money to us will provide us with your personal information, including your name and address, as well as your financial information, including your bank account details;
 - business partners may provide us with your name and address, as well as financial information, including card payment information;
 - advertising networks, analytics providers and search information providers may provide us with pseudonymised information about you, including confirmation of how you found our website;
 - in some jurisdictions, we may check the information you have provided to us with governmental or private identity record databases or with credit reference agencies to confirm your identity and to combat fraud.
- 5.2.2. When we collect your personal data from or via third parties, we take reasonable contractual, legal, technical, and organizational measures to process your personal data with an adequate level of protection and in accordance with applicable law. The data collected shall be proportionate to the

services we provide to you and the data collection purposes at any given time.

5.3. Depending on which services you choose to use, we may collect the following information about you in the course of the business relationship, either ourselves or via third parties:

- **Contact and identification information** – audio recordings, photos and video recordings of you and your ID card etc.
- **Biometric information** – video, photo data of you that is collected during your identity verification when using our services and may be processed via our specialized service providers.
- **Information on orders** – details about the goods/services you purchase or order including, for example, type of goods or shipment tracking number.
- **Financial information** – financial information collected from third parties such as your income, potential credit commitments, negative payment remarks etc.
- **Transaction information** - xpate saves your information such as transaction type, transaction amount, your identifying information (such as IBAN, name, email, address) for the purpose of providing XPATE's services.
- **Information about the interaction between you and xpate** – how you use the services, including technical data such as page response times, download errors, personal preferences; your interactions with our customer service, etc.
- **Recorded conversations** – we may record telephone conversations if you call our customer service and web-site chats, and sometimes when we call you, if we inform you about this at the start of the call.
- **Device information** – e.g. IP address, language settings, browser settings, time zone settings, operating system and platform and screen resolution.
- **Service-specific information** – in order to provide you with some of our services we may collect and process additional personal data that is not covered by the above categories.

6. What personal data do we process, for what purpose, and why is it lawful for us to do so?

6.1. Depending on which Services you use, xpate may process your personal data for the purposes and based on the legal basis listed below.

Purpose of the processing	Personal data	Legal basis for the processing
Administer our relationship with you in different ways, for example to process your payment	Contact and identification information, payment information, information on goods/services, financial information, information about interaction between you and xpate, information about the interaction between you and products/services, device information, and service-specific information	Fulfil contractual obligations
Create and send information to you in electronic format (non-marketing)	Contact and identification information, payment information, information on goods/services, financial information, information about interaction between you and xpate, device information, and service-specific information	Fulfil contractual obligations

<p>Assess which is the most suitable way to contact you to inform you about outstanding matters</p>	<p>Contact and identification information, financial information (if we have this available) and information about the interaction between you and xpate</p>	<p>xpate has a legitimate interest in being able to contact you in the most effective way</p>
<p>Conduct customer satisfaction surveys regarding our Services (for example, after you have contacted xpate's customer service) via email, SMS, phone or through other means</p> <p>You can object to this at any time. you will also be informed about your right to opt-out from these communications every time your email or phone number is used for this purpose</p>	<p>Contact and identification information, information on goods/services, information about interaction between you and xpate, and information about the interaction between you and products/services</p>	<p>xpate has a legitimate interest in conducting customer satisfaction surveys</p>
<p>Carry out AML checks</p>	<p>Contact and identification information, biometric information, financial information, information about interaction between you and xpate</p>	<p>Comply with legal requirements</p>
<p>Prevent IT attacks (for example DDoS attacks) toward xpate's services, as part of our efforts to keep our services safe and secure</p>	<p>Contact and identification information, information about interaction between you and xpate, information about the interaction between you and products/services, as well as device information</p>	<p>xpate has a legitimate interest in keeping our Services safe and secure</p>
<p>Improve our services, training and quality assurance, as well as documenting what has been discussed and decided between you and xpate</p>	<p>Recorded telephone conversations, web chat discussions</p>	<p>xpate has a legitimate interest in improving our services, and in conducting training and quality assurance</p>
<p>Transfer your data to products/services, suppliers and other recipients</p>	<p>All of the personal data categories under Section .</p>	<p>Varies depending on recipients, for example, xpate has a legitimate interest to use suppliers to provide its services, and we may have legal obligations to share data with authorities. Data sharing with payment service providers and international payment systems is necessary to carry out the</p>

		payment contract with you
Carry out risk analysis, fraud prevention and risk management (for example, through verifying your identity and carry out checks with fraud prevention agencies and similar agencies)	Contact and identification information, biometric information, payment information, information on goods/services, financial information, information about interaction between you and xpate, information about the interaction between you and the products/services, special categories of personal data and device information	<p>xpate and other parties (foremost, our customers) have a legitimate interest in risk management of xpate's business, for example, handling fraud risk</p> <p>Comply with legal requirements</p> <p>Special categories of data are processed based on your explicit consent.</p>
Perform debt collection services, i.e. to collect and sell debt	Contact and identification information, information on goods/services, financial information, information about interaction between you and xpate, information about the interaction between you and the products/services	xpate has a legitimate interest in collecting and selling debt

Product improvement and research

Purpose of the processing	Personal data	Legal basis for the processing
Anonymise your personal data for product development in order to analyse customer behaviour	Contact and identification information, payment information, information on goods/services, financial information, information about interaction between you and xpate, information about the interaction between you and the products/services, device information, and service-specific information	xpate has a legitimate interest in anonymizing your personal data for product development to analyse customer behaviour
Perform data analysis for product improvement and product testing (for example, to improve risk and fraud models)	Contact and identification information, payment information, information on goods/services, financial information, information about interaction between you and xpate, information about the interaction between you and the products/services, device information, information from external sanctions lists and PEP lists, and service-specific information	xpate has a legitimate interest in performing data analysis for product improvement and product testing

Enable internal research and creation of statistical models	Contact and identification information, payment information, information on goods/services, financial information, information about interaction between you and xpate, information about the interaction between you and the products/services, device information, and service-specific information	xpate has a legitimate interest in enabling internal research and to create statistical models
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Compliance and to protect xpate from legal claims

Purpose of the processing	Personal data	Legal basis for the processing
Comply with applicable laws, such as anti-money laundering and bookkeeping laws, and regulatory capital adequacy requirements	Contact- and identification information, biometric information, payment information, information on goods/services, financial information, information about interaction between you and xpate, information about the interaction between you and the products/services, device information, information from external sanctions lists and PEP lists, and service-specific information	Comply with laws
Perform screening against lists of persons subject to sanctions, and lists of persons who are Politically Exposed Persons	Contact and identification information, biometric information, information from external sanctions lists and PEP lists	Comply with laws
Protect xpate from legal claims, and enforce xpate's legal rights	All of the personal data categories under section 5.3.	xpate has a legitimate interest in protecting itself from legal claims, and in enforcing its legal rights

To provide marketing

Purpose of the processing	Personal data	Legal basis for the processing
To provide marketing and offers regarding our services to you	Contact and identification information, information about interaction between you and xpate, information about the	xpate has a legitimate interest in providing marketing and offers to you

You may always opt out by contacting us	interaction between you and the products/services, and service-specific information	
To decide which marketing to provide to you. This processing also ceases when you opt out from receiving marketing	Contact and identification information, information on goods/services, information about interaction between you and xpate, information about the interaction between you and the products/services, device information, and service-specific information	xpate has a legitimate interest in deciding which marketing to provide to you
To provide links that are sponsored to products and services	Information on goods/services, information about interaction between you and xpate, information about the interaction between you and the products/services, device information, and service-specific information	xpate has a legitimate interest in providing links that are sponsored to promote its products/services

NOTICE TO OUR MERCHANTS

We may collect, use and disclose certain personal data about your customers when acting as your service provider. You are responsible for making sure that your customer's privacy rights are respected, including ensuring appropriate disclosures about third party data collection and use. You must comply with the personal data protection laws of your country of origin and of those countries in which you offer products or services and, in particular when processing and sending personal data to us in the context of using the Services and submitting transactions. If you entered into our Merchant Services Agreement, you are also responsible for compliance with the requirements set out in our Merchant Services Agreement.

7. Data retention periods

- 7.1. We store your personal data in accordance with the legal basis and purposes of processing the data. The data is destroyed when we no longer need it for the applicable purposes of processing. Principles that govern certain processing activities include the following:
- a) Personal data collected by us in accordance with the applicable Anti-Money Laundering laws and requirements is stored for a minimum of 5 years but not more than 10 years after the conclusion of the business relationship with you or after your last transaction. The applicable retention period is extended in any of the following cases:
 - a. We are required to retain the personal data under any enactment or for the purpose of court proceedings;
 - b. you have given us your consent to the retention of your personal data (until you withdraw your consent); or
 - c. We have reasonable grounds for believing that the personal data needs to be retained for the purpose of legal proceedings.
 - b) Personal data included in service contracts concluded with us is stored for 10 years after the end of the contract.
 - c) Personal data related to debt management is retained for up to 10 years after payment of the debt.
 - d) Where processing of personal data is done for direct marketing purposes, personal data is stored until our business relationship with you ends or until you withdraw your consent.

- e) Personal data may be retained due to other legal obligations applicable to us in accordance with the respective time frames related to those obligations.

8. xpate's profiling and automated decision making

8.1. Profiling is any form of automated processing of personal data used to assess certain personal characteristics of you to analyse or predict, for example, the economic situation, personal preferences, interests, place of residence. We use profiling based on the personal data we have about you to take individual or automated decisions about you, for the following purposes:

8.1.1. Decisions without legal or similarly significant effect

xpate makes the following decisions without legal or similarly significant effects for you:

- Predicting what marketing content would be of interest to you. you can always object to this and deregister from the marketing and this profiling, by contacting us.
- Deciding on the most suitable way to contact you concerning outstanding debt.

8.1.2. Decisions with legal or similarly significant effect

Automated decision making with legal effects, or automated decisions with similarly significant effect, means that some decisions in our services are solely based on automatic means, without any interaction from any of our employees, and carry a significant impact on you as a consumer with them. By making such decisions in an automated fashion, xpate increases objectivity and transparency in the decisions.

8.2. We use this type of automated decision making when we:

- Decide to approve your application;
- Decide whether you pose a fraud or money laundering risk if our processing reveals that you display behaviour consistent with money laundering or fraudulent conduct, that your behaviour is inconsistent with your previous use of our services, or that you appear to have deliberately hidden your identity. xpate also checks whether a specific customer is listed on a sanctions list.

8.3. A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you.

8.4. you always have the right to challenge an automated decision which carries a legal or similarly significant effect (together with the profiling connected to it), by contacting us using the contact channel offered by xpate for the relevant service or product, or the email given in section 1 of the present Policy. Upon your request, an xpate employee will then look at your case.

9. Who might we share your personal data with?

9.1. We implement the necessary measures to process your personal data in compliance with relevant laws and regulations and to ensure that your personal data is not disclosed to third parties without a relevant legal justification. However, you are responsible for the consequences if you allow third parties to access the personal data stored in your account.

9.2. We may share your personal data with the categories of recipients and for the purposes listed below. Exactly which recipients we share your personal data with, and for which purposes, will depend on which service you use. When we share your personal data, we take all reasonable contractual, legal, technical, and organisational measures to ensure that your personal data is treated with an adequate level of protection and in accordance with applicable law.

9.3. Your personal data can be accessed by:

- **Employees of the xpate** or directly authorized persons who need it for the performance of work duties.
- **Suppliers and subcontractors.** xpate may share personal data with the suppliers and subcontractors we use to provide our Services to you. Suppliers and subcontractors are companies who are only entitled to process the personal data they receive from xpate on xpate's behalf. Examples of such suppliers and subcontractors are software and data storage providers, security providers, compliance service providers, and business consultants.

We will share your personal data with ComplyAdvantage. The terms of their privacy policy can be found at <https://complyadvantage.com/terms-and-conditions/#privacy-cookies>.

- **Payment service providers (“PSPs”) and financial institutions.** PSPs provide xpate with services for accepting and administrating electronic payments through a variety of payment methods including credit card, and bank-based payments such as direct debit, bank transfers, etc. Some PSPs also collect and use your information independently in accordance with their own privacy notices. This is for example the case if you use a digital wallet.

In addition, xpate may share your information with other financial institutions when you conduct transactions with your account, to perform the transactions.

- **Fraud prevention agencies and companies that supply identity lookups.** your personal data may be shared with fraud prevention agencies and companies that supply identity lookups to verify your identity, the accuracy of the data you have provided us with, and to prevent criminal activities. Fraud prevention agencies can hold your personal data for different periods of time. We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.
- **xpate group.** your information may be shared with companies within the xpate group, based on xpate's legitimate interest to conduct its business.
- **Social media companies.** If you contact us through social media such as Facebook or Twitter, your data will be recorded and processed by those companies, in accordance with their privacy notices.
- **A person holding a power of attorney of your affairs.** xpate will share your data with a person holding a power of attorney from you, allowing the person holding the power of attorney to receive such data. This sharing will be done based on your consent.
- **Authorities.** xpate may disclose necessary information to authorities such as the police, tax agencies or other authorities if we are required to do so by law, or under some circumstances if you have requested us to do so. One example of such legally required disclosures is disclosure for purposes of anti-money laundering and counter terrorist financing.
- **Debt Collection Agencies and other outstanding claims.** xpate may share your information when selling, or assigns to collect, unpaid debts to third parties, e.g. to debt collection agencies. This sharing of personal data is based on our contractual rights. The debt collection agencies or any other purchasers may process your personal data in line with their own privacy notices, or on xpate's behalf.

9.4. If we need to transfer your personal data to a third country (i.e. a country outside the EEA), we will do it under one of the following conditions:

- The destination country has been recognised by the European Commission respectively as ensuring an adequate level of personal data protection (i.e. there is an “Adequacy decision” in relation to this country).
- Other appropriate safeguards exist for the data transfer (including but not limited to binding corporate rules, standard data protection clauses in the cooperation agreement or an approved code of conduct, in accordance with Article 46 of the GDPR).
- In the absence of the above safeguards, in cases allowed by the applicable legislation including if you have given your explicit consent for the transfer or if the transfer is needed for:
 - the performance of a contract between you and us,
 - conclusion or performance of a contract concluded in your interest,
 - establishment, exercise or defence of legal claims,
 - important reasons of public interest.

9.5. You may request information regarding specific safeguards by contacting xpate using the contact details in section 1.

9.6. xpate does not sell or rent any of the collected information to third parties. It will be used to deliver our Services.

10. Data Security

10.1. Your data's security is important to XPATE. While we strive to protect your personal information, internet transmission is not entirely secure. We cannot guarantee the security of your data during transmission, so any data you send is at your own risk. Once we have received your information, we use strict procedures

and security features to ensure it stays secure, including:

- 10.1.1. Communications over the Internet between you and XPATE systems are encrypted using strong asymmetric encryption;
- 10.1.2. When information you've given to us is not in active use, it is encrypted at rest.
- 10.2. We are regularly audited to confirm that we remain compliant with our security certifications, including PCI-DSS. We also request periodic pen-testing to check that we meet the highest security standards.
- 10.3. We restrict access to your personal information to those employees of XPATE who have a business reason for knowing such information and third-party service providers' processing data on our behalf. All XPATE employees who have access to your personal data are required to adhere to this Policy. In addition, contracts are in place with third-party service providers that have access to your personal data, to ensure that the level of security and protective measures required in your jurisdiction is in place, and that your personal data is processed only as instructed by XPATE.

11. Choices available to you

- 11.1. You have choices when it comes to the privacy practices and communications described in this Privacy Policy. Many of the choices are explained when you sign up to or use the XPATE's Services.
- 11.2. **Choices relating to the Personal Data collection and use.** You may decline to provide personal data when requested. In this case, you might not be able to use crucial parts of xpate's services or become a customer. You also have the ability to avoid sharing information collected from the device you use while accessing xpate's Websites (including but not limited to location and usage data) and used by xpate through the settings of your browser or device.
- 11.3. **Choices relating to communication.** The XPATE may send you advertisement about the services and products via including but not limited to email, text messages and push notifications. You may refuse or change preferences of these marketing communications in your xpate online account settings. Additionally, you may receive notifications with important information related to our business relationship with you and the provision of our services to you. These important communications may not be refused; however, you can choose the channel and format through which you prefer to receive these messages in your online account or by contacting xpate.
- 11.4. **Change of your personal data.** You can check the data you have provided to us at any time by contacting xpate or any other channel we have made available for you from time to time.

12. Your data protection rights

- 12.1. We ensure the correctness of personal data, according to the information that comes to our disposal when you use our services, or by independently submitting a request to supplement or update your personal data, presenting documents justifying the changes. If you stop using our services and the mutually concluded contract is terminated or terminated in any other way, we start recording the period after which the data will be destroyed and do not require you to submit information for updating the data.
- 12.2. **Right to be informed.** you have the right to be informed about how we process your information. We do this through this Privacy Policy, other information on our Websites, and by answering your questions sent to us.
- 12.3. **Right to access your data.** You may request a copy of your data if you would like to know what personal data we process about you. This copy of your personal data may also be transmitted in a commercially reasonable machine-readable format (i.e. "data portability").
- 12.4. **Right to rectification.** You have the right to correct inaccurate or incomplete information we hold about yourself.
- 12.5. **Right to erasure.** You have the right to request deletion of your personal data, for example, when it is no longer necessary for us to process the data for the purpose it was collected, or when you have withdrawn your consent. However, there may be certain legal obligations preventing us from immediately deleting some of your personal data.
- 12.6. **Right to restrict processing of your data or object to our processing.** If you believe your information is incorrect or that we use your data unlawfully, you have the right to ask us to stop the processing. You

may also object to our processing where you believe there are circumstances that would make such processing unlawful. Furthermore, you can always object to us using your data for direct marketing.

12.7. **Right to challenge an automated decision.** You have the right to challenge an automated decision made by xpate if this decision carries with it legal or similarly significant effects. See section 8 “xpate’s profiling and automated decision making” of the present Policy for more information on how xpate uses automated decisions.

12.8. **Right to withdraw consent.** Where we process your data based on your consent or explicit consent, you may withdraw this consent at any time. You can do this by contacting xpate with your specific request.

12.9. **Right to lodge a complaint.** We encourage you to contact us if you have any questions in relation to the present Policy. In case you have not received a satisfactory reply or solution from us, however, you have the right to lodge a complaint with your national supervisory data protection authority. Please see section 15 below on how to submit any Complaints.

12.10. Before providing information about your data, we must make sure that you are the true subject of the personal data to whom the request or application applies.

12.11. Upon receiving your request and ascertaining your identity, we shall provide you with an answer within one month from the moment of receiving the application. We will send the answer to you by mail to the contact address indicated by you in a registered letter or by e-mail, taking into account the desired response indicated by you as much as possible type of receipt.

12.12. We perform all necessary actions to ensure the fulfillment of your rights in accordance with the laws and regulations in force. In the event that you have objections related to the exercise of your rights, you have the right to complain before a supervisory authority. See more details in Section 15.

12.13. We have the right not to fulfill the request under the following circumstances:

- If it is not clearly worded;
- If we cannot identify you as the Data Subject;
- If the answer to such a request was already given;
- If the amount of requested information is disproportionate;
- If the request is unfounded (not attributable to us, and no explanations are provided as to why the request must be fulfilled);
- If the laws and regulations stipulate that we are not entitled to provide such information or if we are obliged to store certain personal data.

13. Children’s Privacy

13.1. xpate services do not address anyone under the age of 18 (hereinafter Children). xpate does not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided XPATE with Personal Data, please contact xpate.

14. Privacy policy changes notification

14.1. xpate reserves the right to periodically make updates to this Privacy Policy. Every customer will be notified via their chosen communication channel about material changes that have been made to stay informed regarding how xpate is processing personal data.

15. Submission of Complaints

15.1. If you, as the Data Subject, have any concerns about how we process personal data, please contact our Data Protection Officer by e-mail: dpo@xpate.com or by sending a written application to our address at the beginning of this Policy.

15.2. If you, as the Data Subject, believe that we process personal data inappropriately, you have the right to submit a complaint to the data protection supervisory authority about our data processing: <https://www.dvi.gov.lv/en/services/complaint-concerning-processing-personal-data>.