



# AS Mintos Marketplace Policy on Processing Data of Investor's Heirs

**APPROVED**

with AS Mintos Holdings Supervisory Board decision No. LVMM/02-03-05-2025-2 of  
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**Document owner:** DPO/Investor Success Team

## History of modifications

Version	Entry into force	Changes
1.0	07.02.2025	New document

## DEFINITIONS

The following key terms, when used as capitalised terms in this Policy on Processing Data of Investor's Heirs, shall have the following meaning:

<b>Term</b>	<b>Definition</b>
GDPR	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, i.e., General Data Protection Regulation.
Group Company	Legal persons controlled by AS Mintos Holdings, a joint stock company, registered under the laws of the Republic of Latvia, registration No. 40103902690.
Heir	A natural person who, based on inheritance documentation (e.g., inheritance certificate, will, or court ruling), is entitled to claim rights related to a deceased Investor's account.
Investor	A natural person who is registered and accepted on the Mintos platform <a href="http://www.mintos.com">www.mintos.com</a> as an investor in accordance with the agreement between Mintos and the Investor.
Mintos	AS Mintos Marketplace, a joint stock company, registered in the Commercial Register of Latvian Enterprises on 1 June 2015 with the registration No. 40103903643.
Personal data	Any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Policy	This AS Mintos Marketplace Policy on Processing Data of Investor's Heirs

## 1. Introduction

- 1.1. This Policy outlines Mintos' approach to processing Personal data of Heirs, ensuring compliance with the General Data Protection Regulation (GDPR). It applies to all requests from individuals claiming to be Heirs of investors and the associated verification process.
- 1.2. The terminology used in this Policy such as controller, processor, processing and other terms shall have the meaning as described to it in the GDPR, unless defined in the definitions.
- 1.3. If the Heir is under 18 years of age, Mintos will also process their guardian's Personal data according to this Policy. Therefore, unless otherwise specified, any references to the Heir's Personal data in this Policy should be interpreted as also referring to their guardian's Personal data, where applicable.

## 2. The types of Personal data

- 2.1. Mintos may process the following Heirs' Personal data:
  - 2.1.1. **Identification data:** for example, name, surname, date of birth, gender, national identification number;
  - 2.1.2. **Personal information:** for example, country of residence;
  - 2.1.3. **Inheritance documentation:** for example, death certificate, will, court rulings, or certificates of inheritance.
  - 2.1.4. **Contact Information:** for example, address, phone number, e-mail;
  - 2.1.5. **Financial Data:** for example, bank account details, to facilitate fund transfers;
  - 2.1.6. **Family Data:** Information regarding family members or dependents, guardianship, such as names, dates of birth, and relationship to the Heir.
  - 2.1.7. **Guardianship data:** if the Heir is under 18 years of age, Mintos will process the information mentioned in 2.1.1.-2.1.6. about the guardian of the Heir as well.

## 3. The legal basis for processing

- 3.1. Mintos processes Heirs' Personal data under the following legal grounds:
  - 3.1.1. **Legal Obligation (Article 6(1)(c) GDPR):** To comply with applicable laws, including inheritance and tax laws.
  - 3.1.2. **Legitimate Interests (Article 6(1)(f) GDPR):** To ensure the rightful transfer of funds to legitimate Heirs.
  - 3.1.3. **Consent (Article 6(1)(a) GDPR):** Where processing involves voluntary submission of data by the Heirs.

## 4. Data Collection and Verification Process

- 4.1. Heirs are required to:
  - 4.1.1. Submit a written request to Mintos via the official communication channels.
  - 4.1.2. Provide the necessary documentation to verify their identity and heirship as per Mintos request.
  - 4.1.3. Cooperate with any additional verification steps required by Mintos, including legal consultations if necessary.
- 4.2. Mintos reserves the right to verify the authenticity of inheritance documents with relevant authorities or institutions as necessary. Mintos will validate the documents and process the request within a reasonable timeframe, subject to compliance, including anti-money laundering and sanctions (AML) checks according to the relevant legislation and Mintos internal policies and procedures
- 4.3. Mintos ensures that only the Personal data strictly necessary for verifying heirship, fulfilling inheritance-related obligations and AML-related obligations is collected and processed.

## 5. Disclosure of Personal data to third parties

- 5.1. Heirs' Personal data may be shared only with the following third parties under strictly controlled conditions:
  - 5.1.1. **Group Companies:** Data may be shared with subsidiaries, affiliates, or parent companies within the same corporate group.
  - 5.1.2. **Professional Advisors:** Including accountants, auditors, legal advisors, and other professional consultants.
  - 5.1.3. **Government Authorities:** Data may be disclosed when required by law to comply with legal obligations, including tax, social security and AML regulations;
  - 5.1.4. **Other entities** involved in the legal resolution of inheritance claims.
- 5.2. Mintos ensures that all third parties involved in data processing comply with GDPR requirements and that adequate safeguards are in place.

## 6. Security and storage of Personal data

- 6.1. Mintos takes the protection of Heirs' data seriously and implements appropriate technical and organizational measures to secure Personal data from unauthorized access, alteration, disclosure, or destruction. These include:
  - 6.1.1. **Electronic Data:** Stored on secure servers with access limited to authorized personnel. Strong encryption protocols are applied to safeguard sensitive data.
  - 6.1.2. **Paper Records:** Stored in locked cupboards accessible only to authorized staff members.
  - 6.1.3. **Data Storage Locations:** All Heirs' data, whether electronic or paper, is stored within the European Union (EU) and complies with applicable EU data protection laws.
- 6.2. The access to Heirs' Personal data within Mintos is limited to only those Mintos employees who have a good business reason to access or know this information. This is achieved through both technical solutions and physical access rights, as well as proper training and education of Mintos employees who have built appropriate safeguards.

## 7. International Data Transfers

- 7.1. Mintos primarily stores and processes Heirs' Personal data within the European Union (EU). However, in certain circumstances, it may be necessary to transfer Personal data to recipients located outside the EU or European Economic Area (EEA), for example, if external service providers are engaged.
- 7.2. When such international transfers occur, Mintos will ensure that adequate safeguards are in place to protect Personal data in accordance with applicable data protection laws. These safeguards include, but are not limited to:
  - 7.2.1. **Standard Contractual Clauses:** Data transfers to countries outside the EU/EEA are governed by Standard Contractual Clauses approved by the European Commission, ensuring that Personal data is subject to the same level of protection as it would be within the EU.
  - 7.2.2. **Adequacy Decisions:** Where applicable, transfers may be made to countries that have been deemed to provide an adequate level of data protection by the European Commission.
  - 7.2.3. **Additional Safeguards:** In some cases, Mintos may implement supplementary measures, such as encryption or data anonymization, to further protect Personal data.
- 7.3. Heirs will be informed if their Personal data is subject to an international transfer outside the EU/EEA and can request more information about the safeguards in place by contacting Mintos DPO.

## 8. Retention periods

- 8.1. Mintos retains Personal data related to Heirs for 10 years after all inherited funds are paid out, or as required by legal obligations, whichever is longer.
- 8.2. After the retention period expires, Personal data will be securely deleted, anonymized, or otherwise rendered inaccessible in a manner that ensures it cannot be reconstructed or retrieved.

- 8.3. In certain cases, Mintos may retain Personal data beyond the standard retention periods to comply with legal obligations or in the event of a legal claim, dispute, or investigation.

## 9. Rights of Heirs

- 9.1. Heirs have the following rights under GDPR:

- 9.1.1. **Right to Access** - To access their Personal data processed by Mintos
- 9.1.2. **Right to Rectification** - To request corrections to inaccurate or incomplete data
- 9.1.3. **Right to Erasure (Right to be Forgotten)** - To request deletion of data, subject to legal and contractual obligations.
- 9.1.4. **Right to Restrict Processing** - To limit data processing in specific circumstances.
- 9.1.5. **Right to Data Portability** - To request data transfer in a structured, commonly used format.
- 9.1.6. **Right to Object** - Heirs have the right to object to the processing of their data, especially if the processing is based on Mintos' legitimate interests. Mintos will cease processing unless it demonstrates overriding legitimate grounds, such as fraud prevention, compliance with legal obligations, or dispute resolution
- 9.1.7. **Right to Withdraw Consent** - Where Mintos processes data based on consent, Heirs have the right to withdraw consent at any time. This will not affect the lawfulness of data processing prior to the withdrawal.
- 9.1.8. **Right to Lodge a Complaint** - To file a complaint with a supervisory authority if they believe their data is not processed in accordance with GDPR (Datu Valsts inspekcija, [www.dvi.gov.lv](http://www.dvi.gov.lv)).

## 10. Withdrawal of Consent

- 10.1. Where Mintos processes data based on consent, Heirs have the right to withdraw consent at any time. This will not affect the lawfulness of data processing prior to the withdrawal. However, withdrawing consent may limit Mintos' ability to fulfill certain actions, such as granting access to the Investor's account or transferring funds, as required under the inheritance certificate or other documents proving inheritance rights.
- 10.2. **Process for Withdrawal** - Heirs wishing to withdraw consent can do so by submitting a written request to DPO [dpo@mintos.com](mailto:dpo@mintos.com). Upon receipt of the request, Mintos will process consent withdrawal requests within 30 days of receipt, unless legal grounds necessitate continued processing. Mintos will promptly cease the processing of the Personal data concerned, unless there are legal grounds to continue processing (e.g., compliance with legal obligations).

## 11. Contact Information

- 11.1. For inquiries or to exercise data protection rights, Heirs can contact Mintos at:

**Email:** [dpo@mintos.com](mailto:dpo@mintos.com)

**Mailing Address:** DPO, AS Mintos Marketplace, Skanstes street 52, Riga, LV-1013, Latvia

## 12. Responsibility, updates and control

- 12.1. This Policy shall be reviewed and renewed by the DPO once needed, at least every two years.
- 12.2. The DPO together with Investor Success Lead shall continuously monitor the effectiveness of the application of the Policy, and improve it if necessary.