

## **Privacy Policy**

### ***The Controller***

1. The controller is SetGo Estonia OÜ (hereinafter: SetGo), a company established in Estonia and registered with the Estonian Commercial Register under no. 14648590.
2. To contact SetGo please send an e-mail to [info@setgo.ee](mailto:info@setgo.ee) . Otherwise please address your correspondence to the following address:

SetGo Estonia OÜ  
Tina 7-16,  
Tallinn, 10126  
Estonia

3. To contact the data protection officer of SetGo, please write to [dataprotectionofficer@setgo.ee](mailto:dataprotectionofficer@setgo.ee) or to the following address:

Data Protection Officer  
SetGo Estonia OÜ  
Tina 7-16,  
Tallinn, 10126  
Estonia

### ***General Policy of Data Processing***

4. SetGo operates website [www.setgo.ee](http://www.setgo.ee) that is exclusively dedicated to corporate clients. In accordance with guidance from Estonian Data Protection Inspectorate (available at: <https://www.aki.ee/et/kas-juriidilise-isiku-esindaja-voi-tema-kontaktisiku-andmete-lekohaldub-isikuandmete-kaitse> ), data of legal persons and their representatives shall not be considered as personal data and GDPR shall not apply.
5. SetGo has taken several measures to limit accidental processing of personal data. The most crucial measure is placing the access to all services provided, including those needing data input, into the registered users' section of the website. It is technologically restricted to become a registered user of this website as a natural person.
6. Therefore, the processing of person data by SetGo is limited to:
  - 6.1. Incidents where a natural person acting as himself or herself has been able to bypass different restricting measures and has been able to submit its personal data to SetGo;
  - 6.2. Incidents where a natural person has been submitting data to SetGo acting as a representative of a legal person, then ceases to be such representative, but SetGo needs to keep processing the submitted data due to its contractual relationship with legal person thereof, applicable accounting rules, KYC/AML procedures or other similar regulations.

## ***Processing of Personal Data***

7. SetGo may process personal data for the purpose of
  - 7.1. performance of its contractual duties to legal person that was represented by the data subject. The basis of processing personal data is article 6(1)(b) of the [General Data Protection Regulation](#).
  - 7.2. performance of its contractual duties to other persons. The basis of processing of personal data is article 6(1)(f) of the [General Data Protection Regulation](#).
  - 7.3. sending marketing materials to legal person that was represented by data subject. The basis of processing of personal data is article 6(1)(a) of the [General Data Protection Regulation](#).
  - 7.4. compiling analytics about the use of this website. The basis of processing of personal data is article 6(1)(f) of the [General Data Protection Regulation](#).
  - 7.5. performance of due diligence measures set forth in the laws on prevention of money laundering and similar laws even if the law itself does not require performance of such measure, but market practice does (*i.e.*, if financial institutions decline to transact with SetGo if such measures are not taken). The basis of processing of personal data is article 6(1)(f) of the [General Data Protection Regulation](#).
8. Other than the personal data submitted on this website, SetGo
  - 8.1. may collect data about
    - 8.1.1. location (including IP address and time-zone) from which the data subject accesses this website,
    - 8.1.2. time when the data subject accesses this website and
    - 8.1.3. model of the device which the data subject uses to access this website and the device-ID, and
  - 8.2. receives data from partners or service providers to whose page the data subject is redirected in process of transacting with SetGo or whose services run as plug-ins on this webpage. For instance, the providers of identification service or of digital signature or Estonian Commercial Register.
9. SetGo may transfer personal data collected by it to recipients belonging to the following categories:
  - 9.1. Internet service providers,
  - 9.2. providers of servers (hosting),
  - 9.3. providers of identification services and digital signature services,
  - 9.4. providers of business registration;
  - 9.5. providers of corporate services being offered on SetGo's website;
  - 9.6. providers of AML/KYC services,
  - 9.7. providers of analytics,
  - 9.8. software developers and technical support providers.
10. Furthermore, SetGo's service providers in the fields of IT and marketing who process personal data in the same servers where SetGo stores personal data may have access to

personal data. In addition, professional advisors (*e.g.*, attorneys, auditors) and financial institutions who are subject to duties of confidentiality may gain access to such data when providing services to SetGo.

11. SetGo may make certain decisions about data subjects solely by automated processing, and such decisions could have legal implications for data subjects.
12. SetGo does not transfer personal data outside the European Union.
13. Without prejudice to the data subject's right to erasure, SetGo stores personal data for the longer of the following periods:
  - 13.1. the period on the passing of which contractual claims from the contract, that is connected to the personal data, become statute-barred;
  - 13.2. the period for which SetGo must keep collected information under applicable laws (including, but not limited to, applicable laws on prevention of money-laundering and financing of terrorism) where SetGo is under a duty, whether contractual or not, to keep such information or where the best market practice requires it.
14. SetGo may obtain biometric data about data subjects from providers of identification service or from providers of digital signature. In that event processing is based on article 9(2)(a) of the [General Data Protection Regulation](#).

### ***Rights of the Data Subject***

15. The data subject has the following rights:
  - 15.1. to obtain from SetGo confirmation whether personal data concerning him or her is processed,
  - 15.2. where personal data concerning him or her is processed, obtain from SetGo the information listed in article 15(1) of the [General Data Protection Regulation](#),
  - 15.3. to request that SetGo rectify incorrect personal data pertaining to the data subject,
  - 15.4. to provide to SetGo additional data so that incomplete personal data pertaining to the data subject is completed,
  - 15.5. to request that SetGo deletes, on conditions set forth in article 17 of the [General Data Protection Regulation](#), personal data pertaining to the data subject,
  - 15.6. to request that SetGo restrict processing personal data pertaining to the data subject in situations explained in article 18(1) of the [General Data Protection Regulation](#),
  - 15.7. to receive from SetGo, in .csv format, the personal data which he or she has provided to SetGo,
  - 15.8. to object, on conditions set forth in article 21 of the [General Data Protection Regulation](#), to processing of his or her personal data when SetGo processes the personal data for the purposes of other legitimate interests pursued by SetGo,
  - 15.9. to withdraw consent for processing biometric data. Withdrawal of consent shall not affect the lawfulness of processing the data prior to the withdrawal. Please note that

in that event SetGo might be unable to transact with you and with the legal person you are representing in any way whatsoever,  
15.10. to lodge a complaint with a supervisory authority (Andmekaitse Inspektsioon, info@aki.ee, Tatari 39, Tallinn 10134, Estonia).

16. To exercise any of the rights referred to in clause 155 (except for the right to lodge a complaint with a supervisory authority) the data subject should write to SetGo using the details set forth in clause 2. SetGo shall answer to the request without undue delay and in any event within one month of the receipt of the request (that period may, taking account of the circumstances, be extended by two months). The time of answering will depend on the number of requests SetGo receives as well as on the content of a particular request.

### ***Tokens***

17. SetGo uses tokens (JSON Web Tokens, JWT), to provide user credentials. The tokens perform three purposes:

- 17.1. To authenticate the user without providing a password;
- 17.2. To identify the role of the authorized user;
- 17.3. To define the expiry of the token.

### ***Cookies***

18. SetGo uses cookies only in the registered users' section of the website. The cookies are used for two purposes:

- 18.1. To remember the e-mail address that a registered user uses for log-in; and
- 18.2. To remember the language preference of a registered user.

19. Third parties (such as the providers of analytics and identification services) may place cookies to your device also.

20. Most browsers allow you to control cookies, including turn off their acceptance by your device, through their settings' preferences. However, if you turn off the ability of your device to accept such cookies, you may lose access to this website and the services provided via it.

21. Most devices also allow you to delete the cookies which have already been set into your device. Browser manufacturers provide help pages relating to cookie management in their products.

- 21.1. [Chrome](#)
- 21.2. [Microsoft Edge](#)
- 21.3. [Internet Explorer](#)
- 21.4. [Firefox](#)
- 21.5. [Safari](#)
- 21.6. [Opera](#)

22. If you access this website without changing your browser settings, SetGo will assume that you agree to receive the cookies which third parties place into your device when you use this website.

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