

PRIVACY POLICY of Nordic Tax & Accounting OÜ

Effective as of: 01.01.2026

Controller	Nordic Tax & Accounting OÜ
Registry code	14305861
VAT No.	EE101993883
Address	Tornimäe 7-43, 10145 Tallinn, Estonia
E-mail	office@nordtax.ee
FIU activity licence	FIU000303

1. Introduction

1.1. This Privacy Policy explains how Nordic Tax & Accounting OÜ ("NTA", "we", "us" or "our") collects, uses, stores, discloses and protects personal data in connection with its professional services, website, client relationships, compliance procedures and business operations.

1.2. This Privacy Policy applies to clients, prospective clients, beneficial owners, shareholders, directors, management board members, contact persons, representatives, employees of clients, suppliers, service providers, website visitors, applicants and other individuals whose personal data is processed by NTA.

1.3. NTA processes personal data in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation, "GDPR"), applicable Estonian data protection legislation and other applicable laws.

1.4. This Privacy Policy should be read together with NTA's Terms & Conditions, Service Schedules, AML/KYC and Sanctions Policy, Data Processing Agreement and Cookie Policy, where applicable.

2. Controller and Contact Details

2.1. The controller responsible for the processing of personal data described in this Privacy Policy is Nordic Tax & Accounting OÜ, registry code 14305861, VAT No. EE101993883, with registered address at Tornimäe 7-43, 10145 Tallinn, Estonia.

2.2. For questions regarding personal data, privacy or data protection rights, the data subject may contact NTA by e-mail at office@nordtax.ee.

2.3. NTA has not appointed a Data Protection Officer unless expressly stated otherwise on NTA's website or in a separate notice. If a Data Protection Officer is appointed in the future, the relevant contact details will be made available.

3. Roles: Controller and Processor

3.1. NTA may act as a controller when it determines the purposes and means of processing personal data, including for client administration, invoicing, AML/KYC checks, legal compliance, website operation, marketing, recruitment, risk management and business administration.

3.2. NTA may act as a processor where it processes personal data on behalf of a client, for example in connection with payroll administration, accounting, bookkeeping, HR administration or other services where the client determines the purposes and means of processing.

3.3. Where NTA acts as a processor, a separate Data Processing Agreement shall apply or may be required before the relevant processing begins.

3.4. In some cases, NTA and the client or another professional advisor may act as independent controllers for their own legal and professional obligations.

4. Categories of Personal Data We Process

Category	Examples
Identification data	Name, personal identification code, date of birth, nationality, identity document data, copies of identity documents where required for AML/KYC or legal purposes.
Contact data	Address, e-mail address, telephone number, communication preferences and correspondence details.
Corporate and role data	Role in a company, management board membership, shareholder status, beneficial ownership, authority to represent, powers of attorney and relationship to a client entity.
AML/KYC and compliance data	Source of funds, source of wealth, ownership structure, business activity, risk profile, sanctions screening results, PEP status, adverse media information and due diligence records.

Financial and transaction data	Invoices, payments, bank account information where relevant to services, accounting records, tax data, payroll data, expense data and supporting documents.
Tax and residency data	Tax residency, tax identification numbers, place of effective management, permanent establishment information and cross-border tax-related information.
Employment and payroll data	Employment contracts, salary data, working time, vacation, sickness, benefits, tax allowances, social security data and HR administration data where payroll or HR services are provided.
Communication data	E-mails, letters, meeting notes, call notes, instructions, approvals, portal messages and other business communications.
Technical data	IP address, browser information, device information, log data, cookies, portal activity and security logs.
Website and marketing data	Website usage data, newsletter preferences, contact form submissions, event registration data and marketing interaction data.
Recruitment data	CV, application details, qualifications, employment history, references and interview notes.

5. Sources of Personal Data

5.1. NTA may collect personal data directly from the data subject, from the Client, from the Client's representatives, beneficial owners, shareholders, directors, employees, contractors or advisors.

5.2. NTA may also collect personal data from public registers, the Estonian Commercial Register, tax authorities, government databases, sanctions lists, PEP databases, adverse media sources, banks, payment providers, notaries, auditors, lawyers, accountants, service providers, websites and other publicly or lawfully available sources.

5.3. Where the Client provides personal data of other individuals to NTA, the Client is responsible for ensuring that it has a lawful basis to disclose such data and that the relevant individuals are informed where required by law.

6. Purposes and Legal Bases of Processing

Purpose	Legal basis
Providing services and managing client relationships	Performance of contract; legitimate interests; legal obligations.
Company formation, corporate services, legal address, virtual office and contact person services	Performance of contract; legal obligations; legitimate interests; AML/KYC obligations.
Accounting, bookkeeping, payroll and tax services	Performance of contract; legal obligations; legitimate interests.
Tax advisory and tax structuring	Performance of contract; legitimate interests; legal obligations where applicable.
AML/KYC, sanctions screening and risk assessment	Legal obligations; legitimate interests; public interest where applicable.
Invoicing, accounting and payment administration	Performance of contract; legal obligations; legitimate interests.
Communication and handling enquiries	Performance of contract; legitimate interests; consent where applicable.
Legal claims, risk management and dispute resolution	Legitimate interests; legal obligations; establishment, exercise or defence of legal claims.
Website operation, security and analytics	Legitimate interests; consent where required for cookies or similar technologies.
Direct marketing to business contacts	Legitimate interests or consent, depending on the communication and applicable law.
Recruitment	Pre-contractual steps; legitimate interests; consent where applicable.

7. Special Categories of Personal Data

7.1. NTA does not intentionally collect special categories of personal data unless such data is necessary for a specific

service, legal obligation, employment or payroll matter, legal claim or explicit client instruction.

7.2. Where special categories of personal data are processed, NTA will process such data only where a valid legal basis under GDPR applies, such as explicit consent, employment and social security obligations, substantial public interest, legal claims or another lawful basis.

7.3. Clients shall not provide special categories of personal data to NTA unless necessary for the agreed Services or requested by NTA.

8. AML/KYC, Sanctions and Compliance Processing

8.1. NTA is authorised by the Estonian Financial Intelligence Unit as a trust and company service provider under activity licence no. FIU000303.

8.2. NTA processes personal data for AML/KYC, sanctions screening, beneficial ownership verification, customer due diligence, risk assessment, suspicious activity handling and compliance with legal obligations.

8.3. This may include identity documents, beneficial ownership information, ownership structure charts, source of funds, source of wealth, PEP status, sanctions screening results, adverse media information and transaction explanations.

8.4. NTA may refuse, suspend or terminate Services where required personal data or due diligence information is not provided, is incomplete, inconsistent, suspicious or insufficient for compliance purposes.

8.5. NTA may be legally restricted from informing the data subject or Client about certain compliance actions, reports, internal risk assessments or disclosures to authorities.

9. Disclosure of Personal Data

9.1. NTA may disclose personal data where necessary for the purposes described in this Privacy Policy, the performance of Services, compliance with legal obligations, AML/KYC requirements, risk management, administration or protection of legal rights.

9.2. Recipients may include public authorities, tax authorities, the Commercial Register, the Financial Intelligence Unit, courts, notaries, auditors, lawyers, accountants, payroll service providers, IT providers, cloud service providers, document management providers, banks where disclosure is required by law or authorised by the Client, postal and courier service providers, external advisors and subcontractors.

9.3. NTA requires service providers processing personal data on its behalf to apply appropriate confidentiality, security and data protection safeguards.

9.4. NTA does not sell personal data.

10. International Transfers

10.1. NTA primarily processes and stores personal data within Estonia and the European Economic Area.

10.2. Where personal data is transferred outside the European Economic Area, NTA will ensure that an appropriate transfer mechanism is in place, such as an

adequacy decision, Standard Contractual Clauses or another lawful safeguard under GDPR.

10.3. International transfers may occur where the Client, its representatives, service providers, cloud providers or relevant authorities are located outside the European Economic Area.

11. Retention of Personal Data

11.1. NTA retains personal data for as long as necessary for the purposes for which it was collected, for the performance of Services, compliance with legal obligations, AML/KYC obligations, accounting and tax obligations, limitation periods, dispute resolution and legitimate business purposes.

11.2. Accounting records and supporting documents may be retained for the statutory retention period applicable under Estonian law.

11.3. AML/KYC records may be retained for the period required or permitted by applicable AML/KYC legislation and internal compliance rules.

11.4. Client relationship, contract, invoice and correspondence records may be retained for the duration of the relationship and thereafter for limitation, tax, accounting, evidentiary and legitimate business purposes.

11.5. Recruitment data will generally be retained for the recruitment process and a reasonable period thereafter, unless the applicant consents to longer retention.

11.6. NTA may retain personal data for a longer period where required for legal claims, investigations, authority requests, audits, disputes, sanctions compliance, AML/KYC purposes or where otherwise permitted by law.

12. Security

12.1. NTA applies appropriate technical and organisational measures to protect personal data against unauthorised access, disclosure, alteration, loss, destruction or misuse.

12.2. Such measures may include access controls, role-based permissions, confidentiality obligations, secure communication channels, backups, logging, device security, encryption where appropriate, staff awareness and vendor management.

12.3. No system is completely secure. The Client and data subjects are responsible for using secure passwords, protecting access credentials, using appropriate devices and informing NTA promptly of suspected security incidents.

13. Data Subject Rights

13.1. Subject to the conditions and limitations under GDPR and applicable law, data subjects may have the right to request access to their personal data, rectification, erasure, restriction of processing, data portability, objection to processing and withdrawal of consent where processing is based on consent.

13.2. Data subjects may also have the right to object to processing based on legitimate interests and to object to direct marketing.

13.3. Requests should be sent to office@nordtax.ee. NTA may need to verify the identity of the requester before responding.

13.4. Rights may be limited where necessary to comply with legal obligations, AML/KYC requirements, professional obligations, confidentiality obligations, legal claims, rights of others, statutory retention duties or other lawful grounds.

13.5. If a data subject considers that NTA has processed personal data unlawfully, the data subject may contact NTA first. The data subject also has the right to lodge a complaint with the Estonian Data Protection Inspectorate or another competent supervisory authority.

14. Marketing Communications

14.1. NTA may send business-related information, service updates, invitations, newsletters or marketing communications to business contacts where permitted by law, based on legitimate interests or consent where required.

14.2. Recipients may opt out of marketing communications at any time by using the unsubscribe mechanism, where available, or by contacting NTA at office@nordtax.ee.

14.3. Service-related, contractual, compliance, legal and administrative communications are not marketing communications and may continue to be sent where necessary.

15. Website, Cookies and Analytics

15.1. NTA may process technical data when users visit NTA's website or online services, including IP address, device data, browser data, logs, usage data and cookie-related information.

15.2. NTA may use cookies and similar technologies for website functionality, security, analytics, preferences and marketing where applicable.

15.3. Where required by law, non-essential cookies will be used only with consent. Further information may be provided in a separate Cookie Policy or cookie banner.

16. Automated Decision-Making

16.1. NTA does not generally make decisions based solely on automated processing that produce legal effects concerning data subjects or similarly significantly affect them.

16.2. NTA may use screening tools, databases, software, risk indicators or automated support tools for AML/KYC, sanctions screening, fraud prevention, security and administrative purposes. Final decisions may involve human review where required.

17. Client Responsibilities

17.1. Where the Client provides personal data to NTA, the Client shall ensure that such personal data is accurate, lawfully collected and lawfully disclosed to NTA.

17.2. The Client shall inform relevant individuals about the disclosure of their personal data to NTA where required by law.

17.3. The Client shall not provide excessive, irrelevant or unnecessary personal data to NTA.

17.4. Where NTA acts as processor, the Client remains responsible for determining the lawful basis, purposes, data subject notices and instructions for the processing, unless otherwise agreed.

18. Updates to this Privacy Policy

18.1. NTA may update this Privacy Policy from time to time to reflect changes in law, services, technology, business operations or compliance requirements.

18.2. The updated version may be published on NTA's website, sent by e-mail or made available through a client portal.

18.3. The date of the current version is stated at the beginning of this document.

19. Contact

19.1. For privacy-related questions, data subject requests or complaints, please contact:

Nordic Tax & Accounting OÜ
Tornimäe 7-43, 10145 Tallinn, Estonia
E-mail: office@nordtax.ee

19.2. Supervisory authority in Estonia: Estonian Data Protection Inspectorate (Andmekaitse Inspektsioon).