# **Privacy Policy**

#### Controller and its contact information

Limited liability company "RSGA", registration number: 40003811272, registered office: Mārupes iela 4, Riga, LV-1002, Latvia ("RSGA").

# To whom this Privacy Policy applies

This privacy policy applies to personal data processing performed by RSGA regarding:

- individuals customers of RSGA (including current, potential and former customers):
- visitors to websites maintained by RSGA;
- persons whose data are processed on social networks in relation to marketing activities organised by RSGA.

The Privacy Policy applies to personal data processing regardless of the format in which a person has provided their data – be it in person, on an RSGA website, on paper, or electronically.

## What personal data are processed

Personal data are deemed to include any information on an identified or identifiable individual.

RSGA processes the following personal data:

- Name, surname
- Identity code
- Address
- E-mail address
- Phone number
- Bank account number and other information relevant to a payment
- Information voluntarily provided via a contact form provided on an RSGA website

#### Personal data protection

RSGA values the safety and protection of your data. RSGA is bound by personal data protection regulations that follow from 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 (General Data Protection Regulation), and from the Personal Data Processing Law of the Republic of Latvia.

RSGA complies with personal data protection legislation, which includes the observance and protection of your rights as the data subject. In implementing personal data protection requirements, RSGA considers the ensuing risks as well as the organisational, financial and technical resources available to RSGA.

For data protection, RSGA applies the available technological capabilities, considering existing risks to privacy and organisational, financial and technical resources reasonably available to RSGA, including the application of the following security measures:

firewalls:

- intrusion protection and detection software;
- other protective measures consistent with the state of the art in hardware development.

# Purpose of personal data processing

RSGA processes personal data for the following purposes:

- to support services involving the placement and execution of an order, and related consultations, as well as settlement administration;
- buyer identification;
- development of new goods and services;
- advertising of goods and services and other commercial purposes;
- review of objections or claims;
- customer retention, loyalty facilitation, satisfaction measurements;
- debt recovery and collection;
- property protection and the safety of other persons.
- other specific purposes for which an individual's consent has been received, including, but not limited to the maintenance and enhancement of websites and mobile applications, business planning and analytics.

## Legal basis for personal data processing

Agreement conclusion and execution

RSGA services are provided on the basis of a written or verbal agreement between the customer and RSGA. RSGA performs personal data processing to the extent necessary for concluding and executing an agreement.

# Regulatory compliance

In certain cases, RSGA may process personal data to ensure compliance with regulatory enactments. For instance, data on received payments are processed for tax administration purposes.

#### Consent

In some cases, RSGA may request consent to personal data processing. In such cases, consent is requested prior to commencing personal data processing, having acquainted the data subject with the planned data processing.

Consent may be requested for the receipt of commercial notifications or e.g. surveys. By expressing one's opinion in a survey and leaving one's contact information (e-mail, phone number, a person consents to RSGA contacting them using the provided contact information, with regard to the assessment provided.

Consent is not mandatory, and one may also withhold consent to the processing of their personal data. An individual is further entitled to, at any time, revoke consent previously provided, either in the manner in which it was provided or by contacting RSGA. The revocation of consent does not process data processing performed prior to the revocation. Revocation of consent cannot disrupt the processing of data performed on any other legitimate basis.

### Legitimate interest

It is in the interest of RSGA to maintain successful business operations and provide services while protecting its assets and fulfilling its financial obligations. Thus, RSGA may perform personal data processing only to the extent necessary for safeguarding its legitimate interests:

- verifying the identity of an individual prior to the purchase of certain goods or services:
- ensuring debt collection;

- contact in matters addressed by an individual;
- conducting customer attraction and/or retention activities;
- segmenting the customer base for more effective provision of services;
- developing and enhancing its goods and services;
- advertising its goods and services by sending commercial notifications;
- sending other messages on the progress of agreement execution and events substantial to execution, and performing polls regarding goods and services and the experience of using them;
- preventing fraudulent activities against RSGA;
- maintaining corporate governance, financial and business records and analytics;
- maintaining effective corporate governance processes;
- maintaining and improving service quality;
- administrating payments;
- informing the public about its activities.

## **Automated decision-making**

RSGA may perform automated decision-making. With regard to such activities, RSGA provides separate notification in accordance with the applicable legislation. Automated decision-making which produces legal consequences (e.g. the adoption or rejection of a decision) may be performed only in the course of concluding or executing an agreement between RSGA and the relevant person, or on the basis of consent.

## Categories of personal data recipients

RSGA may forward personal data to service providers that enable the company's company activities and perform processing of personal data on behalf of and upon the assignment of RSGA (data processors). For instance, RSGA may involve IT service providers to maintain an RSGA website. Other data processors include:

- marketing activities;
- construction waste recycling landfills;
- accounting service providers, lawyers, tax advisors;
- other parties ensuring the core activities of RSGA and provision of related services

RSGA ensures that data processors involved in processing personal data on behalf of and upon the assignment of RSGA maintain confidentiality and provide adequate protection.

Personal data may also be forwarded to other parties not engaged in processing personal data on behalf of and upon the assignment of RSGA (data administrators). These include:

- law enforcement authorities;
- hanks
- other parties, given a substantiated request on their part, in accordance with the procedure and to the extent specified in external regulations.

## Transfer of personal data outside the EU

RSGA does not transfer personal data outside the European Union or the European Economic Area.

#### **Duration of personal data retention**

RSGA stores and processes personal data while at least one of the following criteria applies:

- for as long as a service agreement is in force, or a service is being provided;
- while the data are necessary for some purpose for which they have been collected:
- while an application made by an individual is fully reviewed and/or executed;
- while, in accordance with the procedure specified in external regulations, RSGA or the customer may pursue their legitimate interests (e.g. submit objections or raise a claim in a court of law);
- while RSGA has the legal obligation to retain the data;
- while consent to the relevant personal data processing is in force, unless some other legal basis for data processing exists.

Once the circumstances listed herein cease to apply, personal data are deleted or destroyed.

# Access to personal data and other rights

Any individual (data subject) is entitled to receive information as specified in the applicable legislation pertaining to the processing of their data, and to receive a copy of their personal data, to request that RSGA supplement, rectify or delete the data, or restrict processing of their data. A data subject is entitled to object to processing (including the processing of personal data performed on the basis of the legitimate interests of RSGA), and the right to data portability.

Contact information for matters of personal data processing or protection:

- Address: Mārupes iela 4, Rīga, LV-1002
- E-mail address: info@rsga.lv.

To verify the identity of an applicant, questions and requests addressed to RSGA should be made in writing and signed either by hand or using a digital signature.

RSGA ensures the fulfilment of data processing and protection requirements in accordance with the applicable legislation and, in the event of objections, takes reasonable action to resolve an objection. However, if this is not possible, the data subject is entitled to contact a supervisory body – the Data State Inspectorate.

The data subject is entitled to receive one copy of their personal data being processed by RSGA, free of charge.

## **Commercial messages**

RSGA may send commercial messages to customers regarding similar goods or services. Other commercial messages may be sent only with prior consent from the relevant individual.

An individual may at any time refuse the receipt of further commercial messages:

- by sending an e-mail to the address: info@rsga.lv;
- by calling +371 27700700;
- by submitting a written application to the office of RSGA;
- by using the automated option of refusing further messages provided in a commercial message, i.e. by clicking the unsubscribe link at the bottom of the relevant commercial message (e-mail).

RSGA suspends the sending of commercial messages as soon as the relevant request is processed. Request processing may take up to 3 business days.

#### Website visits and cookie processing

RSGA websites may use cookies. Cookies are files placed by websites on user computers to recognise the users and simplify use of a website. For more information on cookies and how to manage or delete them, please visit www.aboutcookies.org.

Purposes of cookie placement:

- improving the website usage experience;
- gathering and analysing statistical information about visits to a website.

Web browsers may be configured in such a way as to warn a customer about the use of cookies and allow the choice to either accept or reject them. Failure to accept cookies will not prevent the use of a website but may limit its usefulness.

RSGA websites may place links to third party websites with their respective usage and personal data processing policies, for the comprehensiveness of which RSGA is not responsible.

#### Miscellaneous

RSGA is entitled to modify and update the Privacy Policy by publishing the updated version on an RSGA website.