

PRIVACY POLICY

We are happy that you are the customer of **SIA "DSD"** and that you entrust us your personal data or that of your employees and grant us the right to process the data in accordance with our Privacy Policy (hereinafter referred to as the Policy).

The purpose of this Privacy Policy is to provide the natural person with information on purpose, scope, protection, processing period of the personal data and the rights of the data subject during the collection period of data, as well as while processing the customer's personal data.

The Policy is applicable in relation to cooperation partners (natural persons) and contact persons of the cooperation partners (natural and legal persons) of **Limited Liability Company "DSD"**, including in relations with cooperation partners established prior to effective date of this Policy.

Definitions

Cooperation Partner is any person who uses or has expressed a wish to use any services of the **Limited Liability Company "DSD"**.

Personal Data is any information directly or indirectly related with the Cooperation Partner (natural person), as well as information regarding contact persons (employees and/or authorised persons) of the Cooperation Partner (natural and legal person).

Processing is any action performed with any Personal Data.

Controller of Personal Data Processing

Controller of Personal Data Processing is **Limited Liability Company "DSD"**, reg. No. 40103626709, registered office at Paula Lejiņa iela 5-70, Riga, LV-1029, telephone +371 22442253 (hereinafter referred to as **DSD** and/or **Service Provider**).

Applicable Laws

- Regulation (EU) No. 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).
- Personal Data Processing Law.
- Other regulatory enactments regulating the obligations of the Controller to perform certain actions with the personal data.

Privacy Policy

Privacy Policy provides information about how **DSD** collects, processes, stores, shares, deletes and protects the Personal Data; thus, ensuring that the Personal Data is processed legally, with integrity and transparency. Policy is applicable to processing of any data of a natural person.

DSD processes data collected from service provision in order to ensure performance of contractual obligations between the Controller of Personal Data Processing and a Cooperation Partner, as well as for legitimate interests of the Controller of Personal Data Processing, for example, creation and management of registration accounts of Cooperation Partners.

Categories of Personal Data

Personal Data is collected from the Cooperation Partner. Categories of the Personal Data which **DSD** mostly, but not limited to collects and processes is:

identification data, for example, name, surname, personal identity number, data of the identification document;

contact information, for example, address, telephone number, electronic mail address.

Purpose/Aim and Legal Basis of the Processing of Personal Data

In accordance with Article 6(1)b) of the General Data Protection Regulation, personal data is processed for the purposes of conclusion and execution of agreement in order for **DSD** to be able to provide services.

In compliance with Article 6(1)c) of the General Data Protection Regulation, the personal data is processed for the purposes of performance of **DSD** legal obligations – **DSD** is entitled to process the personal data in order to comply with the requirements of the regulatory enactments, as well as to provide answers to lawful requests of the state and local governments.

In compliance with Article 6(1)f) of the General Data Protection Regulation, personal data is processed for **DSD** legitimate interests – considering **DSD** interests, which are based on providing a high-quality service and timely support to the Cooperation Partner.

Possible Data Recipients

DSD does not disclose Personal Data or any information regarding service provision or obtained during validity period of the agreement to the third parties, except:

- if the personal data needs to be transferred to the respective third party within the framework of the signed agreement in order to perform any function necessary for performance of the agreement or delegated by law (for example, to the bank within the framework of settlements);
- in accordance with a clear and explicit consent of the Cooperation Partner or contact person of the Cooperation Partner;
- to the persons specified by external regulatory enactments upon their reasonable request in accordance with the procedure and to the scope required by the regulatory enactments;
- in cases specified by the external regulatory enactments, for the purposes of protection of legitimate interests, for example, when **DSD** submits a claim to the court or other state institutions against a person who has infringed upon the legitimate interests of **DSD**.

Rights of the Cooperation Partners or its Contact Person as a Data Subject

Right to information, that is, right to receive information whether **the Service Provider** processes the Personal Data, and if so, to receive information on their Personal Data that is processed and reasons for processing.

The right to access their data, that is, the right to request access to their Personal Data and to receive their Personal Data that has been submitted to the **Service Provider** and that is processed in a written form or in any of the most used electronic formats.

The right to correct data, that is, the right to request correction of their Personal Data if data is inadequate, incomplete or incorrect.

The right to delete data, that is, the right to request deletion of their Personal Data, for example, if the Personal Data is no longer necessary for the purpose for which it was collected, or Personal Data is processed illegally.

The right to restrict the processing, that is, the right to restrict the processing of their Personal Data in accordance with the applicable regulatory enactments, for example, at the time when the **Service Provider** evaluates the right to deletion of the Personal Data.

The right to data portability, that is, the right to receive their Personal Data submitted to the **Service Provider** in a structured, widely used and machine-readable format, and to transfer the data to another **Service Provider**.

The right to object against the data processing, that is, the right to object against processing of their Personal Data that is performed for legitimate interests of the **Service Provider**.

The right to submit complaints regarding processing of the Personal Data to the Data State Inspectorate (www.dvi.gov.lv), if the processing of the Personal Data infringes upon the person's rights and interests in accordance with the applicable regulatory enactments.

Duties of the Cooperation Partners or its Contact Person as a Data Subject

Data Subject is responsible for providing of true, valid and complete data both when signing the agreement (ordering the service) and during performance of the agreement (during service provision).

In case of changes to the Personal Data, the Data Subject is obliged to inform **DSD** immediately by sending written information to the electronic mail address mentioned in the clause of these regulations on Contact Information or to the registered address of **DSD**.

Geographic Territory of the Data Processing.

Personal Data will be processed in the European Union/ European Economic Area.

Retention Period of Data

Personal Data will be processed only as long as it is necessary to achieve the aim of processing. Retention period may be based on agreement signed with the Cooperation Partner (after relationships between **DSD** and the Cooperation Partner or after **DSD** has been informed that the data subject is no longer the contact person of the Cooperation Partner); personal data is deleted if retention is not necessary to achieve another aim of processing, for legitimate interests of **DSD** or for performance of the requirements of the applicable regulatory enactments (for example, laws on accounting, prevention of the laundering of the proceeds of crime, time limitation, civil law, etc.).

Contact Information

Cooperation Partner may contact **DSD** on matters of protection of personal data, including regarding withdrawal of consent, requests, exercise of the rights of data subject and complaints on processing of personal data.

Contact information of the responsible person of DSD regarding personal data protection: telephone +371 22442253, e-mail info@dsdgroup.lv, Aleksandra Mirecka.

Updated on 25 of May 2018