

# PRIVACY POLICY

## 1. DEFINITIONS

**Controller:** SIA “AT SURVEY” is the Controller of your personal data to whom you have submitted your personal data on the basis of a contractual relationship or pre-contractual relationship, or whose Services you (or the legal person or entity whose true beneficiary you are) intend to use.

**Service:** any service provided by “IBIK.LV”;

**Personal data:** any information related to an identified or identifiable natural person;

**Personal data processing:** any activity performed with personal data, e.g., data collection, registration, organizing, structuring, storage, access, amendment, deletion, disclosure, transfer, limitation, or other activity;

**Client:** natural person or “you” who uses or has expressed an intent to use the service;

**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 (General Data Protection Regulation);

**Client data:** any information about the client, including the client’s personal data and any confidential information about the client;

**Sensitive personal data:** personal data about the individual’s racial or ethnic origin, political opinion, religion or beliefs, trade union membership, genetic or health status or sexual orientation;

## 2. PROCESSING CLIENT PERSONAL DATA

We want to offer products and services the most suitable for you. To do so, we process your personal data. Transparency of the process and data privacy are important to us, which is why we want you to know how and for what purpose we collect and analyse your data.

### How we process personal data

We collect it if you request our services and products or already use them, or if you contact us.

We process your data, for example, to provide our services, fulfil regulatory requirements, or improve our products and services. We do not store your data for longer than necessary to provide our services. In the majority of cases, we need to follow laws and regulations that govern the storage of the data collected.

You are the owner of your personal data, and we want you to know that we respect your privacy. This is why we have updated our Privacy Policy. You can contact us at any time should you have any questions.

“IBIK.LV” (hereinafter “we”, “our”, “IBIK.LV” or “us”), when processing personal data, undertakes to protect the privacy of people’s data. Personal data processing carried out by “IBIK.LV” is governed by the European General Data Protection Regulation (GDPR) and applicable national laws and regulations. This Privacy Policy generally describes how we summarise, share, and protect personal data. More information about personal data processing is included in contracts and other documents related to the provision of the service.

### **3. GENERAL INFORMATION**

When does this Privacy Policy apply? This Privacy Policy applies when you use, have used, or have expressed your intent or interest in using “IBIK.LV” services. It also applies when you are indirectly related to a service (e.g., someone has purchased a service for you). It is also applicable when a relationship has been established before this Privacy Policy comes into effect, and if you have provided and/or “IBIK.LV” has obtained your personal data.

What kind of my personal data are processed? A specific scope of personal data to be processed depends on the type of service and your relationship with “IBIK.LV”. The primary activity of “IBIK.LV” is related to offering free items and services. We process your personal data to provide and improve these services. Moreover, “IBIK.LV” also processes the personal data of its corporate and private clients, and supplier representatives. The personal data summarised and processed by us include the following information:

- identification data, e.g., name, surname, middle name, identity number (national identification number, client ID, employee code), date of birth, taxpayer ID, contact details, e.g., residence address or correspondence address, phone number (e.g., landline and mobile number), email address, language of communication;
- digital identification data, e.g., social media or Skype profile ID.

How does “IBIK.LV” collect my personal data? Primarily, “IBIK.LV” obtains personal data directly from the person to whom the data are related. For example, if you:

- Request our services;
- Interact with “IBIK.LV” (e.g., visit our website) or for any other reason provide your contact details to “IBIK.LV”;
- Sign a contract where the other contracting party or its representative does not have to be the client (e.g., a contract or agreement with a legal person,

providing the details of a contact person or representative). Within the “IBIK.LV” company, all structural units of “IBIK.LV” have access to personal data disclosed to “IBIK.LV” to the extent where such access is necessary for administrative purposes or in legitimate interests of “IBIK.LV”. We obtain your personal data from other external sources, such as public and private registers, other companies and state authorities if this is in our legitimate interests or in other cases under applicable laws and regulations.

- We summarise data (cookies) about user interaction with our websites and apps.

#### **4. WHY DOES “IBIK.LV.LV” SUMMARISE AND PROCESS MY PERSONAL DATA?**

First and foremost, we need your personal data to be able to provide our services to you. We will always require some personal data regardless of the service you have chosen, e.g., your identification data or contact information, preferred language of communication, etc. However, for some services, due to their nature, additional information will be required.

Data about the usage of our websites and apps are summarised for statistical purposes in order to improve our websites and apps and display adapted content.

#### **5. ADVERTISING AND DIRECT MARKETING**

Who receives “IBIK.LV” advertising and direct marketing messages? Our advertising and direct marketing messages (e.g., about our services and related campaigns) are sent to those clients who have agreed to receive direct marketing and advertising offers from “IBIK.LV”. These clients receive “IBIK.LV” offers and direct marketing messages using their preferred communication channels. “IBIK.LV” may offer its services to existing clients on the basis of legitimate interests.

How can I give my consent to receiving advertising and direct marketing messages? Clients can give their consent to receiving advertising and direct marketing messages by signing a direct marketing consent form or requesting direct marketing messages under a contract concluded between us. Clients already receiving direct marketing messages from us will continue receiving such messages after GDPR comes into effect.

What type of advertising and direct marketing activities does “IBIK.LV” perform? “IBIK.LV” sends offers and direct marketing messages. Services and products may also be advertised at different client events organised by “IBIK.LV”.

Can I object to the processing of my personal data for direct marketing purposes? Clients may at any time and free of charge object to the processing of their personal data for direct marketing purposes. To exercise this right, please contact the structural unit of “IBIK.LV” whose direct marketing materials you no longer want to receive.

Clients may refuse to receive our offers or any other advertising and direct marketing messages using the link provided in the email or following other instructions provided in the direct marketing message.

## **6. PERSONAL DATA SHARING AND PROTECTION**

Who can I access my personal data? Your personal data within “IBIK.LV” can only be accessed by persons having such permission; your personal data can also be accessed by third parties involved by “IBIK.LV”, as well as other persons for whom such access is provided or allowed in the laws and regulations. If personal data processing is carried out on behalf of “IBIK.LV” by third parties, “IBIK.LV” shall involve only such third parties who can provide sufficient guarantee of taking technical and organisational measures to ensure that such processing complies with the requirements of GDPR and applicable laws and regulations and that your rights are safeguarded. Processing activities performed by processors (third parties) shall always be governed by the Privacy and Data Processing Agreement or other special provisions agreed upon by “IBIK.LV” and such processor.

Payment processing is provided by the payment platform [www.makecommerce.lv](http://www.makecommerce.lv), therefore our company transfers the personal data necessary for the execution of payments to the owner of the platform - a licensed payment institution Maksekeskus AS.

How does “IBIK.LV” protect my personal data? To protect your personal data from unauthorised access, unlawful processing or disclosure, accidental loss, amendment or destruction, we take appropriate measures to fulfil the requirements of applicable laws and regulations. Such measures include technical protection measures, e.g., appropriate choice and configuration of computer systems, ensuring the security of corresponding connections, protection of data and files, as well as organisational measures, e.g., limiting access to such systems, files, and objects.

## **7. YOUR RIGHTS REGARDING PERSONAL DATA PROCESSING**

What are my rights? “IBIK.LV” wants to ensure fair and transparent personal data processing where the individual is always able to exercise all the rights that follow from applicable laws and regulations. In particular, you have:

- The right to access your personal data processed by “IBIK.LV”. Upon your request, “IBIK.LV”: confirms whether the personal data related to you are processed and provides information about the processing purposes, personal data categories, and personal data recipients or categories of recipients to whom personal data have been disclosed; informs you about the personal data being processed and the information available about the data source; provides information about the logic of automated personal data processing in case of automated decision-making;

- The right to request a rectification of inaccurate personal data; if personal data processing is based on consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on this consent before withdrawal;

The right to receive the processed personal data in a structured, commonly used and machine-readable format and in certain circumstances have the right to transmit the data to another controller;

- In certain circumstances you have the right to request that your personal data are deleted or their processing is limited;
- You also have the right to submit a claim to the supervisory authority – the Data State Inspectorate in Latvia.

Upon request of the data subject, the Controller, within 30 days after receiving the request, shall provide the requested information or a justified written refusal to do so.

## **8. HOW LONG DOES “IBIK.LV” STORE PERSONAL DATA?**

How long does “IBIK.LV” store my personal data? Personal data are stored in accordance with applicable laws and regulations and no longer than necessary. The period for the storage of personal data is determined by “IBIK.LV” and depends on the corresponding contract and the basis for the processing of personal data. Please contact us if you wish to obtain more information about the storage period and the principles we use to determine the storage period for the personal data processed by us.

## **9. FINAL PROVISIONS**

Legal certification and validity. This Privacy Policy does not constitute a legally binding contract between “IBIK.LV” and the client; these are our personal data protection guidelines. Since we are constantly improving and developing our services and websites, we can, from time to time, introduce amendments to our Privacy Policy. Such amendments shall not diminish your rights. In case of significant changes and if we believe it to be mandatory, we will inform you about the changes no later than 1 (one) month before such changes come into effect via the “IBIK.LV” website, postal services, email, messages, or as we may otherwise choose to. The Privacy Policy is also available upon request at our customer service points. Have questions? If you have any questions or concerns in relation to the processing of your personal data performed by “IBIK.LV”, or if you wish to exercise any of your rights, please contact us by phone or email.