



Tirgus un sociālo pētījumu centrs
LV1010, Rīga, Bruņinieku iela 8a-5
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SIA "LATVIJAS FAKTI"

General privacy policy

1. Controller of personal data processing

1.1. The Controller of personal data processing is SIA "Latvijas Fakti", registration number: 40103083424, address: Bruņinieku iela 8A – 5, Rīga, LV – 1010, phone number: +371 67314002, e-mail address: latfacts@latfacts.lv, website <https://www.latvianfacts.lv/en>

2. Processor of personal data:

2.1. SIA "Latvijas Fakti", registration number: 40103083424, address: Bruņinieku iela 8A – 5, Rīga, LV – 1010, adhering to terms defined by SIA "Latvijas Fakti" and using technical and organizational data protection measures, will process personal data of the recipient of the service (hereinafter – Customer) and other personal data within the framework defined by legislation of the Republic of Latvia and the European Union. Other data processors associated with or authorized by SIA "Latvijas Fakti" also have rights to receive and process Customer data.

3. Applicable legislation:

3.1. Regulation 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 (hereinafter - General Data Protection Regulation);

3.2. Personal Data Processing Law;

3.3. Archives Law;

3.4. Accounting Law;

3.5. Electronic Documents Law;

3.6. other legislation.

4. What is privacy policy?

4.1. Privacy policy (hereinafter – Policy) provides information on ways in which SIA "Latvijas Fakti" gathers, processes, stores, shares, deletes and protects data of Customers and other persons, ensuring that Customer personal data is processed lawfully, in good faith and in a transparent manner to the Customer. The Policy is attributed to personal data of the Customer, data processing of any personal data and to the service provided for the Customer.

4.2. If SIA "Latvijas Fakti" updates this Policy, all changes made will be published to the SIA "Latvijas Fakti" website <https://www.latvianfacts.lv/en>, in the section "Privacy policy".

4.3. To provide the Customer with the best products and services and to ensure, maintain, protect, and improve current products and services, SIA "Latvijas Fakti" processes data collected from the services provided.

5. What personal data does SIA "Latvijas Fakti" process?



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5.1. Categories of personal data processed by SIA "Latvijas Fakti" depends on the products and services used by the Customer. SIA "Latvijas Fakti" has a right to process these categories of personal data for purposes mentioned in Clause 7 of this Policy:

5.1.1. name, surname, personal code / birth date, correspondence address, telephone number and e-mail address;

5.1.2. bank data;

5.1.3. personal identification document data (number of the document, date and place of issue, etc.);

5.1.4. communication data – recorded information on SIA "Latvijas Fakti" or Customer phone calls, e-mail, letter or other information concerning Customer communication with SIA "Latvijas fakti";

5.1.5. data which the Customer provides to SIA "Latvijas Fakti" on their own volition;

5.1.6. video surveillance footage and images.

5.2. SIA "Latvijas Fakti" processes the following data during provision of services for purposes mentioned in Clause 7 of this Policy:

5.2.1. phone numbers or names, surnames, and phone numbers of other persons responsible (only with consent of these data subjects) provided by the Customer which can be contacted by necessity if the Customer cannot be reached.

5.2.2. other personal data with consent of the data subject depending on services provided to the Customer.

6. What is the basis of Customer personal data processing?

6.1. Customer's consent – the Customer as a subject of personal data personally consents to the collection and processing of personal data for specific purposes. Customer's consent for purposes of direct marketing (to inform about new and individualized offers) will be attributed to SIA "Latvijas Fakti" activities after the General Data Protection Regulation comes into force. Customer's consent is based on their own free will and independent decision which can be made at any time, thereby allowing SIA "Latvijas Fakti" to process personal data for purposes defined. Customer's consent is binding if it is expressed verbally (during a phone call after identification of the Customer) or in writing (by filling in a form at the office of SIA "Latvijas Fakti" after sending an electronic request after identification of the Customer). The Customer has a right to withdraw their consent at any time by using communication channels provided by SIA "Latvijas Fakti". The changes requested will come into force within three working days after receiving the request. Withdrawal of consent does not impact the legality of processing which was based on consent before the withdrawal.

6.2. Entering and fulfilling a contract – for SIA "Latvijas Fakti" to be able to enter and fulfil a contract with the Customer, providing high quality services for the Customer, it has to compile and process specific personal data gathered before entering the contract with SIA "Latvijas Fakti" or during the period of validity.



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6.3. Legitimate interests of SIA “Latvijas Fakti” – adhering to interests of SIA “Latvijas Fakti” which are based upon provision of quality services and timely support to the Customer, SIA “Latvijas Fakti” has a right to process Customer personal data to the extent objectively necessary according to purposes defined in Clauses 7.1. to 7.3. of this Policy. Legitimate interests of SIA “Latvijas Fakti” is the processing of personal data when providing direct services.

6.4. Execution of legal obligations – SIA “Latvijas Fakti” has a right to process personal data to comply with demands defined in legislation and to provide answers to legal inquiries from the state and municipalities.

6.5. Protection of vital interests – SIA “Latvijas Fakti” has a right to process personal data to protect vital interests of the Customer or other persons, for example, if processing is necessary for humanitarian purposes, for monitoring natural disasters or human caused epidemics or during emergency humanitarian situations (terrorist attacks, technogenic disasters etc.).

6.6. Execution of official mandates or public interests – SIA “Latvijas Fakti” has a right to process data to fulfil tasks concerned with public interests or to exercise official mandates legally provided to SIA “Latvijas Fakti”.

7. For what purposes will SIA “Latvijas Fakti” process Customer personal data?

7.1. SIA “Latvijas Fakti” processes personal data to ensure high quality, timely services appropriate to the Customer when contractual relations with SIA “Latvijas Fakti” are in force:

7.1.1. for managing relations (including remotely) with the Customer, ensuring entrance into and fulfilment of the contract as well as ensuring realization of processes concerning the contract;

7.1.2. for reviewing Customer’s complaints and to ensure support (including technical support) concerning services provided;

7.1.3. for efficient management of cash flows including management of Customer’s payments and debts;

7.1.4 for video surveillance concerning the safety of property, health, and life.

7.2. SIA “Latvijas Fakti” processes personal data to foster the development of the industry and to offer new services to Customers, such as:

7.2.1. new surveys and various offers concerning them;

7.2.2. statistical data of SIA “Latvijas Fakti” is processed for market analysis and development of the business model.

7.3. SIA “Latvijas Fakti” processes personal data to shape and maintain SIA “Latvijas Fakti” internal processes, to ensure circulation of documents and other internal processes (such as archiving contracts and other documents) to the extent necessary.

7.4. SIA “Latvijas Fakti” has a right to process data for purposes specified below as well as other purposes with the unambiguous consent of the Customer:

7.4.1. to check Customer’s personal data in debt history data bases before entering into a contract in order to evaluate Customer’s capabilities of fulfilling obligations defined in the



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contract, and this check is also necessary during the period of validity of the contract so that the Customer can be offered new and more modern products and services;

7.4.2. for popularizing the image of SIA "Latvijas Fakti" in the market by sending the Customer kind wishes, by awarding bonuses, and organizing surveys to improve existing products and services and to create new products.

8. Does the Customer have a right to limit analysis of their data?

8.1. The Customer has a right to object to processing of their personal data or to withdraw from receiving commercial notifications by informing SIA "Latvijas Fakti" verbally (during a phone call after identification of the Customer) or in writing (by filling in a form at the office of SIA "Latvijas Fakti" or after sending an electronic request signed with a secure electronic signature). The changes requested will come into force within three working days and can be attributed to all or some (depending on wishes of the Customer, but not applicable to data without which fulfilment of the contract is impossible) of the personal data given by the Customer. Changes will not impact the legality of personal data processing which was conducted before receiving Customer's objections or refusal.

9. How does SIA "Latvijas Fakti" collect Customer personal data?

9.1. SIA "Latvijas Fakti" obtains Customer personal data when the Customer:

9.1.1. uses services provided by SIA "Latvijas Fakti" (in the office or remotely, conducting previous identification of the Customer);

9.1.2. signs up to receive news, notices or other services from SIA "Latvijas Fakti";

9.1.3. asks SIA "Latvijas Fakti" for broader information concerning the product or service used by the Customer or gets in touch with SIA "Latvijas Fakti" concerning a complaint or to demand information, identifying the Customer;

9.1.4. partakes in contests, lotteries or surveys;

9.1.5. is recorded by SIA "Latvijas Fakti" video surveillance equipment in the SIA "Latvijas Fakti" office.

9.2. SIA "Latvijas Fakti" may process Customer personal data which is received from a third person, if the Customer has consented to it (for example, from debt history database administrators etc.)

10. At what times is Customer personal data processed?

10.1. SIA "Latvijas Fakti" will process Customer personal data when at least one of the following circumstances can be applied:

10.1.1. a contract between the Customer and SIA "Latvijas Fakti" is valid and in force;

10.1.2. storage deadline of personal data is specified or derived from legislature of the Republic of Latvia or the European Union.

10.1.3. to the extent that it is necessary for the realization and protection of SIA "Latvijas Fakti" legitimate interests;



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10.1.4. until the Customer has not withdrawn consent for processing of personal data.

11. Sharing Customer personal data

11.1. To provide the Customer with services, SIA "Latvijas Fakti" may share Customer personal data with:

11.1.1. partners involved in provision of services commissioned or used by the Customer;

11.1.2. debt collection agencies, credit bureaus, debt history database administrators or other organizations concerned with debt collection;

11.1.3. cessionaries; to ensure efficient management of cash flows, SIA "Latvijas Fakti" has a right to cede interests in bringing an action against a debtor or debtors.

11.1.4. SIA "Latvijas Fakti" has an obligation to provide information on personal data to criminal justice agencies, courts, or other state or municipal agencies if it follows legislation or requests for information from the respective agencies.

11.3. SIA "Latvijas Fakti" will issue Customer personal data only to the extent necessary adhering to legislative requirements and objective circumstances of the specific situation.

11.4. SIA "Latvijas Fakti", if necessary, retains a right to transmit Customer personal data to other service providers (partners involved in providing services) if it is needed to provide the best possible services to the Customer.

12. How does SIA "Latvijas Fakti" protect Customer personal data controlled by it?

12.1. SIA "Latvijas Fakti" ensures, consistently overviews, and improves protection measures to protect Customer personal data from unauthorized access, accidental loss, disclosure or deletion. For this purpose, SIA "Latvijas Fakti" utilizes modern technology, technical and organizational requirements, including firewalls, system bypass detection and analysis programs, and data encryption.

12.2 SIA "Latvijas Fakti" carefully checks all service providers who, with the authorization of SIA "Latvijas Fakti", process Customer personal data, and evaluates whether partners (personal data processors) utilize appropriate safety measures in accordance with SIA "Latvijas Fakti" delegation and legislation requirements. This delegation by SIA "Latvijas Fakti" with data processor is made after a separate agreement in which the data collector commits adhering to legislative requirements. Partners are not allowed to process Customer personal data for their own purposes.

12.3. SIA "Latvijas Fakti" does not take responsibility for any unauthorized access to personal data or loss of personal data if it is not dependent on SIA "Latvijas Fakti", for example, in cases when the Customer is at fault or is negligent.

12.4. In cases when Customer personal data is endangered, SIA "Latvijas Fakti" will notify the Customer.

13. What rights does the Customer have?

13.1. Turn to SIA "Latvijas Fakti" to receive copies of personal data controlled by SIA "Latvijas Fakti".



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13.2. Correct all personal data about themselves controlled by SIA "Latvijas Fakti", applying for changes verbally (during a phone call after identification of the Customer) or in writing (by filling in a form at the office of SIA "Latvijas Fakti" or after sending an electronic request signed with a secure electronic signature).

13.3. The Customer has a right to gain information about individuals or legal persons which have received information about the Customer from SIA "Latvijas Fakti" during a specific period. SIA "Latvijas Fakti" will not give information to the Customer about state agencies driving criminal proceedings, which are subjects of investigatory operations, as well as abiding by any other laws prohibiting giving out information about specific agencies or institutions.

13.4. Demand the deletion of data or demand to limit processing data which is no longer necessary to process, according to initial purposes warranting their collection and processing (right to be forgotten).

13.5. The Customer has a right to portability of their data by changing the service provider.

13.6. Turn to SIA "Latvijas Fakti" or personal data management agency (Data State Inspectorate, www.dvi.gov.lv/en) with questions concerning personal data processing.

13.7. Turn to the person at SIA "Latvijas Fakti" responsible for personal data protection to receive information about Customer personal data processing and protection.

"APSTIPRINU"

SIA "LATVIJAS FAKTI" valdes loceklis

Aigars Freimanis

2024. gada 2.janvārī