

APPROVED
SIA "Rīgas nami"
August 20, 2024
board meeting no. VP/RN-2024-34/1.3-1

**INTERNAL RULES
SIA RĪGAS NAMI
PRIVACY NOTICE**

August 20, 2024

no. RN-2024-5-pol/2.1-2

*Developed in accordance with the General Data Protection Regulation
and the laws and regulations in force in the Republic of Latvia
in the field of data protection of natural persons*

INFORMATION ON THE PERSONAL DATA CONTROLLER

SIA Rīgas nami, registration No. 40003109638, legal address: Rātslaukums 5, Rīga, LV-1050.

Tel. +371 66957267, e-mail: rigasnami@rigasnami.lv

You can contact Uldis Sīpols, Personal Data Protection Specialist of SIA Rīgas nami, regarding data protection issues by calling +371 26658265 or by writing to rndatuspec@rigasnami.lv. Please note that the above-mentioned methods of contact with the Personal Data Protection Specialist of SIA Rīgas nami are not intended for requests for information in order to exercise your rights as a data subject.

The structure of SIA Rīgas nami also includes the following event and sales point centres: Splendid Palace cinema, the House of the Blackheads, Rīga Central Market, Vidzeme Market and Latgale Market.

GENERAL DESCRIPTION OF OUR PROCESSING OF PERSONAL DATA

This notice provides information on how we process the personal data of our customers, business partners, representatives/contact persons of customers/business partners, visitors to our buildings/premises, points of sales and event centres, website visitors and other persons whose data may come into our possession in the course of our business activities.

We assume that you have read this notice and accepted its provisions before visiting us and our buildings/premises, sales points and event centres, using our website or becoming our customer/business partner. This is the current version of the notice. We reserve the right to amend and update this notice as necessary.

The purpose of this notice is to provide you with a general overview of our processing activities and purposes, however, please note that other documents (such as auction rules, bidding and procurement documents, rental/lease contracts, cooperation contracts, event promotional materials, posters and newsletters and other documents published on the www.rigasnami.lv website) may also contain additional information about the processing of your personal data.

Please be informed that the personal data processing rules contained in this notice only apply to the processing of personal data of natural persons.

We understand that the personal data is your asset and we process it in conformity with the confidentiality requirements while caring for the safety of your personal data in our possession.

PURPOSES AND LEGAL BASIS FOR PROCESSING OF PERSONAL DATA

We only process your personal data for the previously defined legitimate purposes, including:

a) For the purpose of your participation in the auction/quote/purchase

For this purpose, we would also need to identify you, register you for participation, ensure appropriate payment calculation and payment process, contact you on auction/quote/purchase related matters.

The minimum amount of personal data we need for these purposes is: name, surname, personal identity number, address, telephone number, e-mail address, bank account number of the customer/business partner, its representative/contact person, information for the assessment of the creditworthiness of the bidder and other data in accordance with the requirements of the laws and regulations.

The main legal basis used to achieve these purposes are:

- legal obligations (Article 6(1)(c) of the ¹General Data Protection Regulation);
- the legitimate interests of the controller (Article 6(1)(f) of the General Data Protection Regulation), such as identifying you as a customer and/or representative, ensuring communication with you.

b) For the provision of services, the conclusion of a contract, and the performance and provision of contractual obligations

For this purpose, we need to identify you, ensure the appropriate calculation of payments and ensure the payment process, contact you on matters related to the provision of the service and/or performance of the contract (including for the purpose of sending invoices) and, in certain cases, ensure the collection of outstanding payments.

The minimum amount of personal data we need for these purposes:

- for natural persons renting social housing: name, surname, personal identity number, address, telephone number, e-mail address, language of communication, data of natural persons relevant to the

¹ 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)

provision of the service (e.g. financial data, information on social status, property data, information on guardianship or trusteeship, other information required by the laws and regulations);

- for legal persons: name, surname, personal identity number, address, telephone number, e-mail address, bank account number of the customer, business partner, contact person of the customer and/or business partner.

The main legal basis used to achieve these purposes are:

- the conclusion and performance of a contract with the data subject (Article 6(1)(b) of the General Data Protection Regulation);
- legal obligations (Article 6(1)(c) of the General Data Protection Regulation);
- the legitimate interests of the controller (Article 6(1)(f) of the General Data Protection Regulation), such as identifying you as a customer, business partner, contact person of a customer and/or business partner, ensuring communication with you.

c) For the fulfilment of requirements laid down in laws and regulations relating to the provision of services or for the fulfilment of requirements laid down in other laws and regulations

For this purpose, we would need to comply with the requirements of the Civil Law, the Accounting Law, the Archives Law and other laws and regulations regarding personal data that is necessary for the provision of our services and/or legitimate interests.

The minimum amount of personal data we need for these purposes is: name, surname, personal identity number, address, contact details, bank account number of the customer, business partner, representative/contact person of the customer and/or business partner.

In addition, we may need to comply with special laws relating to the provision of our services/legitimate interests:

Event centres, security

For this purpose, we may need to comply with the requirements of the Law on Safety of Public Entertainment and Festivity Events and related laws and regulations.

For this purpose, we may also need to additionally process the following personal data: personal data and contact details of the customer (event organiser, renter), their representative/contact person, the address of the event venue and the type of event.

Premise rental, management

For this purpose, we need to comply with the requirements of the Civil Law, the Cabinet Regulations and the legal framework for management.

For this purpose, we may also need to additionally process the following personal data: personal data and contact details of the customer (renter)/owner, details and address of the site.

Construction plans, procurement of other services

For this purpose, we would need to comply with the requirements of the Construction Law and the Cabinet Regulations issued on its basis, as well as the requirements of the Public Procurement Law and other special laws and regulations that apply to the specific subject of the procurement. Therefore, we may also need to additionally process the following personal data: personal data and contact details of the project purchaser/business partner/project purchaser of the customer/business partner/representative of the customer/contact person; address of the site, details of the right of ownership/lease of the site; personal details of the cooperation partner/construction specialist/engineer/architect etc., position/specialty, details of previous

work experience and contract prices, certificate/qualification number and validity period, copies of qualification documents, contact details; name of the construction supervisor/authority supervisor, certificate/qualification number, contact details.

The main legal basis used to achieve the above purposes are:

- legal obligations (Article 6(1)(c) of the General Data Protection Regulation).

d) For the provision of marketing activities

For this purpose, we could send you commercial communications, ensure your participation in events organised by us, issue you with loyalty cards, take photographs during a public event, make a video recording and place it on the internet or in another publicly accessible form to show the public the activities of the controller, the events and the use of the property.

In most cases, events on our premises are open to the public and as a result you may be photographed and/or filmed for the purpose of publicity or publication, however, in some cases events may be planned as closed events – this will be communicated to you in promotional material, posters and tickets for the event.

The minimum amount of personal data we need for these purposes is: name, surname, telephone number, e-mail address of the contact person of the customer, business partner, customer and/or business partner; photo/video image, location and time of attendees of public events.

As part of our marketing activities, we also set up and maintain profiles of the controller on various social networks, including Facebook, Instagram, LinkedIn, X (formerly known as Twitter), Youtube. We use these profiles to create event reviews and publish various information about the controller and its event centres, to communicate with our target audience, to organise contests and other marketing activities. Thus, if you use social networks and/or follow our profiles on social networks, participate in our contests, comment on or share our publications, we may obtain and process the following personal data about you: profile data on the relevant social network, name, surname, e-mail address.

The main legal basis used to achieve these purposes are:

- consent of the data subject (Article 6(1)(a) of the General Data Protection Regulation);
- the legitimate interests of the controller (Article 6(1)(f) of the General Data Protection Regulation), e.g. for communication purposes, creation/publication of photo/video coverage of public events.

e) For the prevention and detection of criminal offences relating to the protection of property and vital interests of persons, including the protection of life and health, i.e. the prevention of threats to property interests and to your life and health, the safeguarding of public security and other legitimate interests of us or third parties (e.g. tenants of the territory and premises) by means of video surveillance.

For this purpose, we would need to perform video surveillance of our grounds, buildings, premises and other property, use personal data processors for various functions, disclose information to investigative authorities, courts and other public authorities, if necessary, assessing the need, also provide information to third parties (such as tenants of premises/territory) for their legitimate purposes (such as detection of criminal offences), as well as exercise the rights granted by the laws and regulations for their legitimate interests.

In addition, please be advised that video surveillance devices may also be placed on our grounds and premises to protect the interests of the tenants as controllers, in which case each tenant is responsible for such video surveillance independently.

The minimum amount of personal data we require for these purposes is: the appearance of the person (image), the location and time of the person (image), the activities performed by the person in the area of the cameras' coverage and other data as necessary.

The main legal basis used to achieve these purposes are:

- legitimate interests of the controller or a third party (Article 6(1)(f) of the General Data Protection Regulation).

f) For the purpose of keeping records of visitors for investigation and detection of threats to property interests, criminal offences, public safety and other important legitimate interests of us or third parties (e.g. tenants of the site and premises).

For this purpose, we collect information about your identity which is required to be included in the visitor logbook or premise key logbook.

The minimum amount of personal data we need for these purposes: your name, surname, mobile phone number, date, time of key issue and handover, time you were in the area or premises.

The main legal basis used to achieve these purposes are:

- legitimate interests of the controller or a third party (Article 6(1)(f) of the General Data Protection Regulation).

g) For access control and maintenance of a pass (including vehicle) regime

For this purpose, we collect information about your identity and the need to obtain a pass, which needs to be included in the pass (including vehicle) logbook.

The minimum amount of personal data we need for these purposes: your name, surname, mobile telephone number, time of arrival and time of leaving the premises, address of the premises, company name, pass number.

The main legal basis used to achieve these purposes are:

- consent of the data subject (Article 6(1)(b) of the General Data Protection Regulation);
- legitimate interests of the controller or a third party (Article 6(1)(f) of the General Data Protection Regulation).

h) For the provision of discounts on our services

For this purpose, we collect information about your identity and eligibility for a discount on our services.

The minimum amount of personal data we need for these purposes: your name, surname, date of birth, visual verification of the identity document proving the right to the discount (pension certificate, student card).

The main legal basis used to achieve these purposes are:

- consent of the data subject (Article 6(1)(a) of the General Data Protection Regulation).

i) **Recording of telephone conversations** by calling the customer service contact numbers 80009917 or 82820.

For this purpose, we collect information about your identity and the information you share with us to address a specific situation.

The minimum amount of personal data we need for these purposes: your name, surname, address, contact details and other information related to addressing a specific situation.

The main legal basis used to achieve these purposes are:

- legitimate interests of the controller or a third party (Article 6(1)(f) of the General Data Protection Regulation).

OBTAINING YOUR PERSONAL DATA

We may obtain your personal data in one of the following ways:

- 1) from you when you apply for an auction, a quotation, a tender, when you submit a quotation, an estimate, a construction project to us;
- 2) from you, if you submit any applications/submissions, send e-mails, call us;
- 3) from you in the process of entering into a mutual contract;
- 4) if the contract is entered into with a third party and the third party has indicated you as the contact person;
- 5) from you if you show us your identity document and/or a document entitling you to a discount when visiting our buildings/premises, event centre premises;
- 6) from you when you visit the websites www.rigasnami.lv, www.splendidpalace.lv, www.melngalvjunams.lv and through the use of cookies;
- 7) from you if you attend public events organised by our event centres during which photography or filming is carried out;
- 8) from you if you subscribe to our services online or on social networks, participate in contests organised by us on social networks, comment on or share our publications;
- 9) in certain cases, we may obtain data from third party databases for this purpose, for example to assess your creditworthiness;
- 10) where applicable, from third parties/business partners where we need to do so to fulfil a contractual obligation/legal duty;
- 11) where applicable, from video surveillance footage.

NECESSITY AND REASON FOR PROVIDING YOUR PERSONAL DATA

Mostly, we receive your information if you provide it to us on your own initiative, or we collect it to fulfil a contractual obligation, to comply with a legal obligation to which we are subject and to pursue our legitimate interests. In these cases, it is necessary for us to obtain certain information to achieve the relevant purposes, so failure to provide such information may jeopardise the provision of services, the establishment of a business relationship or the performance of a contract.

Where the data is not strictly necessary, but its provision could help us to improve the service or offer you favourable contractual terms and/or offers, we will indicate at the time of collection that the provision of the data is voluntary.

The grounds for processing personal data for the provision of our services are also set out in laws and regulations such as:

- Public Procurement Law and the Cabinet Regulations issued on its basis;
- Law on Prevention of Squandering of the Financial Resources and Property of a Public Entity and the Cabinet Regulations issued on its basis;
- Law on the Safety of Public Entertainment and Festivity Events and related laws and regulations;
- Construction Law and the Cabinet Regulations issued on its basis;
- Accounting Law;
- Residential Tenancy Law and the binding regulations of the Riga City Council issued on its basis, etc.

ACCESS TO YOUR PERSONAL DATA

We take appropriate measures to process your personal data in accordance with the law and ensure that your personal data is not accessed by third parties who have no legal basis for processing your personal data.

Your personal data could be accessed, if necessary, by:

- our employees or directly authorised persons who need to do so for the performance of their duties;
- personal data processors in accordance with the services they provide and only to the extent necessary, e.g. security service provider, database owner/technical maintainer;
- national and local authorities and bodies in the cases and according to the procedures established by law;
- in some cases, tenants of the territory and premises to achieve their legitimate purposes (e.g. prevention, detection of crime);
- in certain cases, owners/builders/construction supervisors of territory, buildings, projects for their legitimate purposes (e.g. access control, prevention, detection of crime);
- in certain cases, third parties in respect of photographs and videos of public events or your social networks profile data, if you follow our social networks, participate in our contests, comment on or repost our social networks publications;
- supervisory institutions, investigating authorities, security authorities and other law enforcement authorities in the cases and procedures provided for by law.

OUR BUSINESS PARTNERS IN THE PROCESSING OF PERSONAL DATA OR PERSONAL DATA PROCESSORS

We take appropriate measures to ensure the processing, protection and transfer of your personal data to data processors in accordance with applicable laws. We carefully select our personal data processors and, when making a transfer, assess the necessity and the amount of data to be transferred. Data transfers to processors are performed in compliance with the requirements of confidentiality and secure processing of personal data.

At the moment, we can cooperate with the following categories of data processors:

- 1) auditors, financial management and legal consultants;
- 2) external security service provider;
- 3) information technology infrastructure, database owner/developer/technical maintainer;
- 4) other persons related to the provision of our services.

Personal data processors may change, therefore changes will also be made to this notice.

TRANSFER/USE OF YOUR PERSONAL DATA OUTSIDE THE EUROPEAN UNION (EU) OR THE EUROPEAN ECONOMIC AREA (EEA)

We do not transfer data to countries outside the European Union or the European Economic Area.

PERSONAL DATA STORAGE PERIODS

The storage periods of personal data are determined in accordance with the purposes for which the personal data are processed and in accordance with the requirements of applicable law.

When assessing the duration of storage of personal data, we take into account the applicable laws and regulations, the performance of contractual obligations, your instructions (e.g. in the case of consent) as well as our legitimate interests.

Video surveillance and telephone call recordings are stored for a maximum of 30 (thirty) days after they have been recorded, with deletion after the relevant period (except where storage is requested by law enforcement authorities for the investigation of criminal offences).

If your personal data is no longer necessary for the purposes specified, we will delete or destroy it.

YOUR RIGHTS AS A DATA SUBJECT IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA

Your right to access and rectify your personal data

In accordance with the provisions of the General Data Protection Regulation, you have the right to request access to your personal data held by us, to have it rectified, updated, deleted, to restrict its processing, to object to the processing of your data, as well as the right to data transfer in the cases and in the manner provided for in the General Data Protection Regulation.

We respect these rights, therefore, in case of your request, we will respond within the time limits established by the laws and regulations (no later than within one month).

You may exercise your rights as a data subject in any of the following ways:

- 1) by submitting an application in person and identifying yourself at our office (address: Rātslaukums 5, Riga, LV-1050, (entrance from Svaru iela), every working day from 8.30-16.00);
- 2) by post to: Rātslaukums 5, Riga, LV-1050;
- 3) by using the public administration services portal www.latvija.lv, including the official electronic address or e-address;
- 4) by sending an application signed with a secure electronic signature to our e-mail address: rigasnami@rigasnami.lv.

Upon receipt of your application, we will assess its content and the possibility of identifying you and, depending on the situation, we reserve the right to ask you to identify yourself further to ensure the security of your data.

Withdrawal of consent

If the processing of your personal data is based on your consent, you have the right to withdraw it at any time. However, please be advised that the withdrawal of consent cannot affect the

processing of personal data that is necessary to comply with the requirements of laws and regulations or that is based on a contract, our legitimate interests or other basis for lawful processing set out in laws and regulations.

You may also object to the processing of your personal data if the processing is based on legitimate interests.

COMPLAINT OPTIONS IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA

If you have any questions or objections regarding our processing of your personal data, please first contact us (e-mail: rndatuspec@rigasnami.lv) to mutually agree and resolve the issues.

If you believe that we have not been able to resolve the issue mutually and you believe that we are violating your right to the protection of personal data, you have the right to lodge a complaint with the Data State Inspectorate. You can find templates for applications to the Data State Inspectorate and other related information on the website of the Data State Inspectorate <https://www.dvi.gov.lv/lv/iesniegumu-paraugi>.

USE OF YOUR PERSONAL DATA FOR AUTOMATED DECISION-MAKING

We do not use your data for automated decision-making.