## **Privacy Policy of SIA "Latvia Tours"**

## Valid as of 25 May 2018

This Privacy Policy, hereinafter – the Policy, describes the most important natural persons data processing principles and procedure how Latvia Tours processes personal data and ensures the privacy culture in the company.

The Policy is applied if Clients who are natural persons, and if the representative, employees of Clients – legal entities – or related third parties use, have used or are expressed the wish to receive the services of Latvia Tours. The Policy refers also to the Cooperation partners and cooperation relations with Clients that are established before this Principles become effective to improve the existing cooperation and provision of privacy within its framework.

## 1. General conditions

1.1 This Policy describes how Latvia Tours performs the processing of personal data. further information about processing of personal data can be described also in contracts and other documents related with the services, and in internal provisions of Latvia Tours.

1.2. Latvia Tours, in accordance with applicable normative acts, is responsible for and ensures the confidentiality of personal data, the required technical and organizational information security measures, e.g. inspections of systems safety, and manager or processer of personal data depending on the status and aim of processing of personal data to be performed.

1.3. Employees of Latvia Tours who are involved in processing of personal data are trained accordingly and have received instructions about confidentiality regarding the personal data available when performing the work duties.

1.4. If this is required for provision of services, Latvia Tours can use approved processers of personal data. In such cases the required measures are taken to ensure that the processers of personal data implement the processing of personal data and the safety measures according to the instructions of Latvia Tours and according to the applicable normative acts.

1.5 Latvia Tours cookies policy is available at the website of Latvia Tours: <u>http://www.latviatours.lv/lv/privatums-un-sikdatnes/index.html</u>.

1.6. This Policy is available for Clients: <u>http://www.latviatours.lv/lv/privatums-un-sikdatnes/index.html</u>, and in Customer centres.

1.7. In accordance with applicable normative acts, Latvia Tours is entitled to amend unilaterally this Policy at any time by informing the Client about the relevant amendments in Latvia Tours customer centres, website of Latvia Tours, by e-mail at latest one month before enforcing of amendments.

2. Forms and categories of personal data

Personal data are obtained primarily from the Client and in specific cases from persons representing the Clients. Categories of personal data which are mainly processed by Latvia Tours are:

- identification data, e.g. name, surname, personal number, date of birth, information of identification documents when it is reasonably required to provide the tourism service;
- contact information, e.g., address, phone number, e-mail address;
- data about the family and related persons, e.g. information about Client's family with whom the leisure trip is planned;
- data that are obtained and/or created by performing the duties anticipated in normative acts, e.g. data resulting from information requests received from investigation authorities;
- communication data that are processed when the Client visit Latvia Tours customer centres, contact Latvia Tours, e.g. by e-mail;
- data related with the services, e.g. performance of contracts, submitted applications, requests and complaints, interests, services costs, insurance experience;
- 3. Aim and grounds of processing personal data

Latvia Tours performs the processing of personal data:

3.1 to provide services;

To provide the Clients with qualitative services, to conclude and perform contracts.

3.2. to protect the interests of the Clients and/or Latvia Tours:

To protect the interests of the Clients and/or Latvia Tours and supervise the quality of the provided services. To provide evidence for transactions on the grounds of performance of contracts. To take measures upon the request of the Client before the conclusion of contract or perform a legal obligation, or Clients consent, or in the legitimate interests of Latvia Tours to prevent, restrict and investigate dishonest or illegal use of services and products or cause disturbances in them; to provide the quality of services. To ensure the protection of right to request.

3.3. To provide and offer additional services, perform clients inquiries, market analysis, statistics:

To offer Latvia Tours services to clients, improve the satisfaction of Clients and quality of services.

3.4. To perform legal obligations;

To implement the applicable normative acts or to perform a legal obligation or to ensure the risk management and company' management by observing the legitimate interests of Latvia Tours.

## 4. Receivers of personal data

Personal data are transferred to other receivers, e.g.:

4.1. cooperation partners related with provision of tourism services, e.g. airlines, hotel consolidators, insurance companies, tour operators;

4.2. institution, e.g., law enforcement bodies;

4.3. auditors, legal advisers, financial advisers or other processers of personal data confirmed Latvia Tours;

4.4. other persons related with provision of services Latvia Tours and provision of company's daily operation, incl. archiving, providers of postal services.

5. Geographical territory of processing

5.1. Personal data are processed in European Union/European Economic Area (EU/EEA), however, according to the services chosen by the Client they can be transferred and processed in countries outside EEA.

5.2 Transfer and processing of personal data outside EU/EEA can take place if this has a legal ground, e.g. to perform a legal obligation, to conclude or perform a contract, or in accordance with Client's consent and adequate safety measures are taken. Adequate safety measures are, for example:

- a concluded agreement, including ES standard contractual clauses, or other confirmed provisions, code of action, certifications, etc. that are confirmed in accordance with the General data protection regulation;

- in a country outside EU/EEA where the receiver is located, is ensured sufficient level of data protection in accordance with the decision of EU Commission;

- the receiver is certified according to the Privacy Shield (applies to receivers in the United States of Amerika).

5.3 Upon the request, Clients can receive further information about the transfer of personal data to countries outside EU/EEA.

6. Storage period of personal data

6.1. Personal data shall be processed only for how long it is required to reach the specific processing aim.

6.2. Storage periods can be justified with a contract with the Client, legitimate interests of Latvia Tours or applicable normative acts (e.g., laws on accounting, civil right, etc.).

7. Rights of data subject

Data subject – Clients, their representatives, employees and natural person related with the receipt of services have the following rights as to processing of their personal data:

7.1 request the correction of their personal data if they are improper, incomplete or incorrect;

7.2 object the processing of their personal data if use of personal data is justified with legitimate interests, including the profiling for the purpose of direct marketing, e.g. to receive marketing offers or participate in inquiries;

7.3 request the deletion of their personal data, e.g. if personal data are processed on the grounds of consent and the Client has withdrawn his/her consent. These rights are not valid if personal data the deletion of which is requested are processed also on the base of other legal grounds, e.g. contract or other obligations resulting from relevant normative acts;

7.4 limit the processing of their personal data in accordance with applicable normative acts, e.g. when Latvia Tours assesses whether the Client has the right to deletion of his/her personal data;

7.5 receive information whether Latvia Tours processes his/her personal data, and if processes – to access them;

7.6 receive his/her personal data he/she has provided and that are processed on the base of performance of consent and performance of a contract in writing or in any of most frequently used electronic formats and, if possible, transfer such data to another service provider (data portability);

7.7 withdraw his/her consent to processing of personal data;

7.8 not to be subject to completely automated decision-making, including profiling, is such decision making has legal consequences or similarly affect the Client. These rights are not effective if the decision making is required to conclude or perform a contract with a Client, if the decision making is allowed according to applicable normative acts or if the Client has given a clear his/her consent;

7.9 submit claims about use of personal data to Data State Inspectorate (<u>www.dvi.gov.lv</u>) if the Client deems that the processing of personal data violates his/her rights and interests in accordance with applicable normative acts.

8. Contact information

8.1. In relations to questions, withdrawal of consent, requests, application of data subjects' rights and complaints about use of personal data, the clients can contact Latvia Tours by e-mail <u>dati@latviatours.lv</u>