

# SIA Color Expert Storch LV

## Privacy Policy (Statement)

Our personal data protection is important to us, therefore we have developed this Privacy Policy in order to ensure honest and lawful processing of your personal data in a transparent way and to inform you regarding rights and duties in relation to the processing of your personal data.

The purpose of the Privacy Policy is to provide the natural person - Data Subject (in this policy - **Data Subject or you**) - information regarding the purpose, legal basis of the processing, the scope of processing and the period of processing performed by us as the Controller ensuring data processing in such a way that is transparent to the Data Subject.

The Privacy Policy has been developed by taking into account the 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 (hereinafter – the Regulation), Personal Data Processing Law and other applicable laws and regulations in the area of privacy and data processing.

Policy is applicable to the processing of the data of natural persons regardless of the form and/or environment the personal data is submitted (when entering the territory and/or premises, by tele-phone, orally, etc.), and what is the acquisition source of the personal data, as well as regardless in what systems of the Controller (video, audio, web, etc.) it is processed.

Taking into account that we constantly develop our activity and are improving; we may change and supplement this Privacy Policy time by time.

The Controller saves the previous versions of the Privacy Policy, and these are made available when contacting us.

### **1. INFORMATION CONCERNING THE CONTROLLER**

The controller of the personal data processing set out in this Privacy Policy is SIA “**Color Expert Storch LV**” (elsewhere also referred to as the **Controller** or **we**), unified registration No. .40103263769, registered office: 9 Zemitanu Street, building 3, Office 3.1, LV-1012, Latvia. In separate cases, there may be situations when the respective data processing has several personal data controllers that are other companies of Storch Ciret Holding GmbH group. The list of the companies of this group of companies (possible joint controllers) can be found here: <https://www.storch-ciret.com/en/contact.html>

As the Controller, we undertake to work in compliance with the standards set out in this Policy and we undertake to supervise that our cooperation partners comply with the standards set out in the Policy as well.

We invite you to contact us by using the contact information provided below if you wish to clarify the actual aspects of the personal data processing and/or whether any other Controllers are actually involved in processing of your personal data.

### **2. CONTACT INFORMATION FOR MATTERS RELATED TO PERSONAL DATA PROCESSING**

Address for correspondence: 9 Zemitanu Street, building 3, Office 3.1, LV-1012, Latvia

E-mail: [info@color-expert.com](mailto:info@color-expert.com)

Telephone No.+371 67 281 242

### **3. HOW WILL YOU BE INFORMED CONCERNING THE PROCESSING OF YOUR DATA**

In order to promote transparent data processing, the Controller in its activity informs and explains what personal data are processed when conducting the economic activity of the controller and how it will be used.

The mentioned information is provided in this Privacy Policy. When processing the personal data for purposes that are not specified in this Privacy Policy, as well as to clarify information regarding individual conditions of the data processing, the Controller may inform the data subject individually (for example, when the Controller places notifications in the e-mail messages or organizes competitions in the social network platforms). The information may also be provided to you by the Controller’s personnel explaining it orally or requesting to familiarize yourself with the information specified in particular documents.

## **4. PURPOSES (AIMS) OF THE PERSONAL DATA PROCESSING**

### ***4.1. Personal data processing in order to ensure personnel selection***

The processed personal data

All information that you will have included in the submitted CV (for example, your name, surname, personal identity number, address of residence, work and study/learning experience, language skills and application, additional knowledge/skills, telephone number, e-mail address);

All information that you will have included in the application letter (or similar document, for example, information on your motivation why you apply for the relevant vacancy) submitted by you or annexes thereto appended by you.

Information from the persons which have provided references on you (if you have explicitly permitted to contact the relevant persons in order to receive references);

If you will be invited for the job interview, information provided by you during the job interview, completed tests and other examination works.

The aim (purpose) and legitimate (legal) basis for the personal data processing

Personal data will be processed for the selection of the Controller's personnel and ensuring of legitimate interests, insofar as these are related to the personnel selection.

When receiving your application for a specific vacancy, the Controller has a legitimate interest to process the application received from you by evaluating the information provided therein, organizing the negotiated procedure, conducting the negotiations and providing evidence for the support of the legitimate process of the relevant procedure. In the case of dispute, the information obtained during the selection process may be used to reflect the legitimate process of the respective procedure.

Legitimate (legal) basis for such data processing in Article 6(1)(f) of the Regulation.

If you have expressed your wish to be a candidate for future vacancies (for example, if another candidate has been selected for a particular office; however, the Controller considers your candidature as valuable and offers to save your information for other vacancies in case such will arise, or if you have sent your CV to the Controller not for a particular vacancy but for a possible future vacancy, and the Controller considers your candidature as valuable for possible future vacancies), the Controller shall continue processing of your personal data for the above-mentioned purpose on the basis of your consent.

The legitimate (legal) basis for such data processing is Article 6(1)(a) of the Regulation (until such moment when you decided to apply for a particular vacancy. When you apply for a particular vacancy, the above-mentioned legitimate basis is applied).

The possible recipients of the personal data

Authorized employees of the Controller in accordance with the scope specified in their job descriptions in compliance with the requirements set out in the data protection and other laws and regulations.

If a complaint is received regarding the relevant selection process, the information received and processed during the relevant selection process may be transferred to the law enforcement and supervisory authorities, as well as the court.

Transfer of the personal data to the recipients outside the countries of the European Union and the European Economic Area is not intended.

Criteria that are used to determine the data retention period

The Controller shall store and process the personal data while any of the following circumstances exists:

- information obtained when the candidate applies for a vacancy will be retained in full or in part no longer than for six months as of the moment when the relevant selection process has ended. The period is determined on the basis of the condition that the Controller would be able to retain evidence on legitimacy of the selection process if it believes that this evidence might be necessary in case of a dispute.
- the intended personal data retention period if the Data Subject has agreed to be a candidate in future vacancies - for a period not exceeding one year since the moment of receipt of the relevant consent, or until the moment when the Data Subject withdraws their consent to the relevant data processing.
- if the complaint is received regarding the particular selection process, the information processed during the whole selection process will be retained until the moment when the complaint has been reviewed and until the final settlement becomes effective for example, the effective date of the court judgement).

## ***4.2. Personal data processing for provision of the economic activity and performance of contractual obligations***

The processed personal data

Categories of data which are processed by the Controller depend on the specific situation in which the data processing is performed and on economic activities that are related to this situation, for example, the planned or performed deliveries, requirements of the laws and regulations in the particular situation, and the legitimate interests of the Controller.. The Controller has a duty and the right to process the identifying information of the data subject and information establishing the identity and representation right of the person (if the person represents another person). The Controller may process the scope of the personal data including both name, surname, and personal identity number, as well as contact information, information on received materials, etc. The relevant information is recorded in documentation and saved to the Controller's data processing system. When entering into the supply contract, the information necessary to enter into the contract and the information arising from the contract is retained, as well as payment information arising from the transaction, including the account No. and information regarding the credit institution, etc.

The aim (purpose) and legitimate (legal) basis for the personal data processing

The purpose of the data processing is provision of the Controller's economic activity, including establishment and performance of the contractual relations, administration of the payment for the purchased materials, provision and protection of the legitimate interests of the Controller and the third parties arising from the economic activity (for example, communication with the cooperation partners, compensation for damages, debt recovery).

Data processing with the purpose to ensure the Controller's economic activity is performed on the basis of Article 6(1)(b), (c), (f) of the Regulation, i.e. the processing is necessary in order to perform the contract the party of which is the data subject or for performance of duties upon the request of the data subject prior to conclusion of the contract (if the contract is entered into with a natural person); the processing is necessary in order to perform a legal duty applicable to the Controller, as well as (in separate cases) to ensure the legitimate interests of the Controller and the third parties (for example, in order to organize the Controller's economic activity, to examine the cases when complaints concerning the received payment have been received, to conduct the after-control, as well as to secure evidence in case of complaints or claims).

The possible recipients of the personal data

Authorized employees of the Controller in accordance with the scope specified in their job descriptions in compliance with the requirements set out in the data protection and other laws and regulations. As well as the employees of the Controller's cooperation partners, for example, providers of transport services, service providers which provide services to our customers (providers of accounting services, etc.).

The personal data may be transferred to the providers of accounting or legal services (the Controller's processors) or providers of auditing services in accordance with the provisions of a contract entered into by the parties, as well as to the providers of the debt recovery services in separate cases.

Personal data may be transferred to the law enforcement authorities, court or other state and municipal institutions if it arises from the laws and regulations, and the relevant authorities are entitled to receive the requested information (for example, the State Revenue Service concerning you as a business partner).

For protection of the legitimate interests, for example, when submitting an application to the court or other state authorities against a person that has infringed upon the legitimate interests of the Controller, to the debt recovery companies.

Transfer of the personal data to the recipients outside the countries of the European Union and the European Economic Area is not intended.

Criteria that are used to determine the data retention period

The Controller complies with all the special laws and regulations determining its duty to retain separate data, for example, the Law on Accounting sets the duty to retain information on transactions for at least five years. The Commercial Law sets a time limit of three years.

If you would like to find out a more detailed information, please contact the Controller by using the above-mentioned contact information. If for the purposes of ensuring the economic activity and perform the contractual obligations the Controller will need to protect the interests that have been violated, to submit

an application to the court, etc. , all information related to the particular trans-action will be retained until the moment of execution of the final settlement.

### ***4.3. Records of correspondence and record-keeping***

The processed personal data

By using the various options to contact the Controller in writing (by e-mail, mail letter, by using social networks (facebook.com, WhatsApp), information regarding the particular letter, request, application will be saved.

The aim (purpose) and legitimate (legal) basis for the personal data processing

Retention of information regarding the fact and content of communication is conducted on the basis of Article 6(1)(c) and (f) of the Regulation, i.e., in cases when you have submitted a statement of claim or request obliging the Controller to review your request (for example), a complaint arising from the Consumer rights), the legal basis for data processing is this duty (performance of the requirements to protect the Consumer rights), and for assurance of the legitimate interests of the Controller and the third parties (for example, in order to examine cases when complaints have been received, as well as to secure evidence against the possible claims) the legal basis for the data processing is the Controller's legitimate interests. In other cases, as well the records of correspondence are kept in order to make the Controller's commercial activity systematic and to achieve the purposes of the commercial activity - to inform regarding the range of goods and services, provisions for purchase, delivery.

The possible recipients of the personal data

The Controller's authorized employees in accordance with the scope set out in their work duties.

Criteria that are used to determine the data retention period

The Controller shall store and process the personal data while at least one of the following criteria exists:

- until the respective matter has been fully settled, and the appellation period has expired;
- If correction to the accounting system had to be made in relation to the received correspondence, the relevant information will be retained in accordance with the laws and regulations governing the accounting and in compliance with the time limit set out in the Commercial Law, being 3 years.

### ***4.4. With a purpose to publicize and promote recognition of brands which are represented by Color Expert Storch LV the Controller establishes good relations with the customers and cooperation partners, including, participation in reflection of events in mass media and social networks.***

#### **Which personal data is processed by the Controller?**

In the events organized by the Controller and the cooperation partners and in locations, where photo and video records of the event are made, photo and video images of the participants, visitors may be processed by retaining these images in the Controller's archives, by placing them on the website, social networks administered by the Controller and in other informative materials of the Controller. In order to promote recognition of the represented brands, the Controller may also use the e-mail address obtained during performance of the commercial activity in order to provide information on news and updates in terms of range of goods, to invite you to the organized events and demonstrations, as well as to inform you regarding announced campaigns or competitions. In separate cases, within the framework of public relations the Controller may use information at its disposal or which is publicly available (for example, lursoft.lv) in order to congratulate the representatives of the cooperation partners in common national holidays or individual celebrations, for example, on name days or birthdays.

#### **What is the legal basis for the personal data processing?**

With a purpose to reflect the events organized by the Controller in mass media and social networks, in order to ensure the recognition of products represented by the Controller, as well as in order to communicate by using an e-mail address, the processing of personal data is performed on the basis of Article 6(1)(f) of the Regulation, i.e.,

the Controller has a legitimate interest to reflect its organized events or events it participates in, or to provide information regarding the properties of the products it represents and the campaigns in mass media and social networks, thus ensuring the recognition of the represented brands. When selecting the information to be published, the Controller always applies the highest standards of ethics, thus attempting to ensure that the publications will not infringe upon the rights and freedoms of the data subjects. At the same time, the Controller is aware that it might possibly not be aware of all facts and circumstances; therefore, in order to ensure honest data processing it does not prohibit any data subject to contact the

Controller at any time by using the provided information, so that the data subject might object against the data processing. At the same time, the Controller explains that if you cooperate in various public events, for example, by providing interviews, deliberately being photographed and filmed, it is assumed prima facie that you do not object to the publishing of the relevant information.

In separate cases, the Controller may use information at its disposal or publicly available information within the framework of the public relations to congratulate the representatives of the cooperation partners in common or individual celebrations both personally by using the e-mail address or tele-phone No obtained during commercial activity, when the processing of personal data is performed on the basis of Article 6(1)(f) of the Regulation, i.e., legitimate interest of the Controller. At the same time, the Controller is aware that it might possibly not be aware of all facts and circumstances; therefore, in order to ensure honest data processing it does not prohibit any data subject to contact the Controller or the contact person of the Controller at any time by using the provided information, so that the data subject might object against the data processing.

**What is the period of the personal data processing?** The Controller is planning to retain the obtained information continuously, for example, in its archive, in order to save information on historic events in which it has participated. In order to fulfil the principle of honest data processing, the Controller explains that taking into account the circumstance that the purpose of reflection of the events is to publish information about the Controller and the brands it represents, the obtained materials will be publicly available and accessible to any third party.

In the cases when the Controller processes the personal data to congratulate the data subject in their individual celebrations, the Controller will retain this information for the whole time as long as you are a representative of our customer or cooperation partner, and not exceeding one year (the Controller ensures that at least once a year information on contact persons and representatives of the cooperation partners is renewed in the data processing systems).

**Who can access the information and to whom is it disclosed?**

The recipients of the personal data may be the Controller's authorized employees, processors, law enforcement and supervisory authorities. If the personal data must be transferred to the relevant third party within the framework of the concluded contract to perform a function necessary for performance of the contract (for example, in case of an insurance contract for implementation of the Controller's legitimate interests; to the service provider for video editing works), or if it is necessary to improve the services and provision of high-quality services to the visitors of the event);

The Controller hereby informs that its selected Processors (google.com (google analytics), face-book.com, etc.) should be recognized as companies operating outside the Member States of the European Union and the European Economic Area; therefore, the Controller invites you to familiarize yourself with the privacy policies of these companies or to address the Controller separately with a request to provide additional information on conditions of cooperation.

#### ***4.5. Competitions and campaigns organized by the Controller***

**Which personal data is processed by the Controller?**

Personal data relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier, for example, name, surname, identification number of the mentioned person, location data, online identifier, or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity.

In order to participate in a Competition, you have to be the follower of the facebook.com pages administered by the Controller and the companies of its group and/or meet other requirements set out in the Competition; that way you register for participation in the Competition and/or register your friend for a competition. If in accordance with the rules of a Competition you have to "tag" a friend, for example, before this action you are obligated to have it approved by the relevant friend and you have to familiarize him/her with the rules of the Competition (which can be found in the notification on competition) and information included in this notification.

**What is the legal basis for the personal data processing?**

With a purpose to reflect the events organized by the Controller in mass media and social networks, in order to ensure the recognition of the Controller, the processing of personal data is performed on the basis of Article 6(1)(f) of the Regulation, i.e.,

the Controller has a legitimate interest to ensure recognition of the brands it represents by organizing competitions and campaigns. When selecting, which participation conditions should be determined for the participants of the competition or campaign, the Controller always applies the highest standards of ethics, thus attempting to ensure that participation in the relevant competition will not infringe upon the rights and freedoms of the data subjects; moreover, participation in competitions and campaigns is voluntary, and the Data Subject may choose whether or not to participate in it. If the participant of the Competition involves another person in the competition in accordance with the rules of the competition, then in accordance with the rules for participation he/she assumes liability for such an action, while in compliance with the principles of honest data processing upon receiving objections against the data processing the Controller will take any action that will be necessary and reasonable in the relevant situation to exercise the rights and freedoms of the data subject in accordance with the provision of the Regulation.

**What is the period of the personal data processing?** The whole period while the Competition takes place and after its completion. The Competition will be considered completed when the prize is issued to the winner/winners. Information concerning the winners will be published for the period when the winner can contact us and receive the award. We can retain the proof of the competition process and the winner for a longer period as well, until claims that may arise or have arisen during the competition expire, as well as if it is necessary for us to protect our legitimate interests against the claims, objections or requests raised against us, but in any case information concerning the winners will not be retained longer than stipulated by the Law on Accounting.

**Who can access the information and to whom is it disclosed?**

The recipients of the personal data may be the Controller's authorized employees, processors, law enforcement and supervisory authorities. If the personal data must be transferred to the relevant third party within the framework of the concluded contract to perform a function necessary for performance of the contract (for example, in case of an insurance contract for implementation of the Controller's legitimate interests; to the service provider for video editing works), or if it is necessary to improve the services and provision of high-quality services to the visitors of the event);

The Controller hereby informs that its selected Processors (google.com (google analytics), face-book.com, etc.) should be recognized as companies operating outside the Member States of the European Union and the European Economic Area; therefore, the Controller invites you to familiarize yourself with the privacy policies of these companies or to address the Controller separately with a request to provide additional information on conditions of cooperation.

## **7. YOUR RIGHTS**

7.1. Data Subject is entitled to request from the Controller access to his/her personal data and to receive clarifying information on what personal data about him/her is at the disposal of the Controller, for what purposes the Controller processes the personal data, the categories of the recipients of the personal data (persons to whom the personal data has been disclosed or to whom it intended to be disclosed, if the laws and regulations in the particular case permit the Controller to provide such information (for example, the Controller may not provide to the Data Subject information regarding relevant state authorities which direct the criminal proceedings, are subjects of operative activity or other institutions of which the laws and regulations prohibit to disclose the information), information concerning the period of personal data retention, or criteria used to determine the mentioned period.

7.2. If the Data Subject believes that the information at the disposal of the Controller is outdated, inaccurate or incorrect, the Data Subject is entitled to request the correction of his/her personal data.

7.3. Data Subject is entitled to request deletion of his/her personal data or to object against the processing if the person believes that the personal data is processed illegally or is no longer necessary in relation to the purposes for which it was collected and/or processed (by using the principle - the right "to be forgotten").

7.4. The personal data of the Data Subject may not be deleted if personal data processing is necessary:

7.4.1. for the Controller to protect vitally essential interests of the Data Subject or another natural person, including life and health;

7.4.2. for the Controller or the third party to raise, implement or protect their legitimate (legal) interests;

7.4.3. data processing is necessary in accordance with the laws and regulations binding to the Controller.

7.5. Data Subject is entitled to request the Controller to limit the processing of the Data Subject's personal data if one of the following circumstances exists:

- 7.5.1. Data Subject contests the accuracy of the personal data – for the period while the Controller can verify the accuracy of the personal data;
- 7.5.2. processing is illegal, and the Data Subject objects against deletion of the personal data and instead requests restriction on use of data;
- 7.5.3. The Controller no longer needs the data for processing; however, it is necessary to the Data Subject to raise, implement or protect legal claims;
- 7.5.4. Data Subject has objected against the processing while it has not been verified whether the legitimate reasons of the Controller are more important than the legitimate interests of the Data Subject.
- 7.6. The Controller informs the Data Subject before cancellation of the restriction on processing of the personal data of the Data Subject.
- 7.7. You are entitled to withdraw the consent given for the data processing at any time the same way that you provided it. In that case further data processing on the basis of the previous consent for the particular purpose will no longer be performed. Withdrawal of the consent does not affect data processing performed at the time when your consent was valid. Data processing performed on the grounds of other legal bases (for example, in accordance with the external laws and regulations or contract) cannot be terminated by withdrawing the consent.
- 7.8. You can submit a request concerning exercise of your rights:
- 7.8.1. in a written form in person by presenting an identification document;
- 7.8.2. by electronic mail, signing the letter by a secure electronic signature and sending it to the e-mail address: [info@color-expert.com](mailto:info@color-expert.com);
- 7.8.3. by sending mail to the registered office of the Controller.
- 7.9. Data Subject is obligated as much as possible to clarify in their request the date, time, location and other circumstances that might aid in fulfilment of their request.
- 7.10. After receipt of a written request of the Data Subject concerning exercise of their rights, the Controller shall:
- 7.10.1. verify the person's identity;
- 7.10.2. evaluate the request and act in the following way:
- if it can ensure the request, perform it as soon as possible;
  - if additional information is necessary to identify the Data Subject or to perform the request, the Controller may request additional information from the Data Subject in order to be able to perform the request correctly;
  - if information has been deleted or the person requesting the information is not the Data Subject or the person cannot be identified, the Controller may reject the request.
- 7.11. Data Subject is entitled to submit a complaint to the Data State Inspectorate if he/she believes that the Controller has processed their personal data illegally.