SIA "GOLLNER SPEDITION" PRIVACY POLICY

Valid as of: 25 May 2018

Privacy policy, hereinafter - Policy, describes how SIA "Gollner Spedition" processes personal data.

The Policy is applicable if the Client uses, has used or has expressed their will to use SIA "Gollner Spedition" services, including customer relationships established before the Policy came into effect.

1. Definitions

Client - any physical person that uses or has expressed their will to use any SIA "Gollner Spedition" services.

Personal data - any data directly or indirectly related to the Client.

Processing - any actions performed on the Personal data.

2. Controller of personal data processing

2.1. SIA "Gollner Spedition", registration No. 40003296369, legal address 20 Braslas Street, Riga, Latvia, LV-1084, telephone 67514722 (hereinafter - GOLLNER SPEDITION and/or Service provider) http://goellner-spedition.eu/?lang=lv, is the controller of Personal data processing.

3. Applicable laws and regulations

- 3.1. Regulation of the European Parliament and of the Council (EU) 2016/679 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 Protection Law.
- 3.3. Other regulations laying down the obligations of the Controller to perform specific actions on the personal data.

4. GOLLNER SPEDITION Privacy Policy

- 4.1. Privacy policy (hereinafter Policy) provides information on how GOLLNER SPEDITION collects, processes, stores, shares, deletes and protects personal data of the Client, thus ensuring that the personal data of the Client are processed legally, fairly and in a way transparent for the Client. The Policy applies to any processing of personal data of a physical person.
- 4.2. In order to provide better and more suitable services for the Client, and also in order to ensure, maintain, protect and improve present services, GOLLNER SPEDITION processes data collected from the provision of services.

5. Categories of personal data

Personal data may be collected from the Client and external sources, e.g. public and private registers or third parties. The categories of personal data mainly, but not limited to, collected and processed by SIA "Gollner Spedition" are:

<u>identification data</u>, for example, name, surname, personal identity number, address, identity document data;

contact information, for example, address, telephone number, e-mail address.

6. The purpose of processing the personal data of customers and legal basis for processing

- 6.1. In accordance with the General Data Protection Regulation Article 6(1)(a), the data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- 6.2. In accordance with the General Data Protection Regulation Article 6(1)(b), the processing of personal data is necessary for the performance of a contract so that the Service provider may provide services.
- 6.3. In accordance with the General Data Protection Regulation Article 6(1)(c), the processing of personal data is necessary for compliance with a legal obligation to which the controller is subject the Service provider may process personal data to comply with laws and regulations, as well as to respond to legal requests by state and municipal authorities.
- 6.4. In accordance with the General Data Protection Regulation Article 6(1)(f), the processing of personal data is necessary for the purposes of the legitimate interests of the controller pursuing the interests of the Service provider based on the provision of a quality service and timely support to the Client. The Service provider may process personal data of the Client in the amount objectively needed to ensure the provision of a quality and timely service.

7. Possible data recipients

- 7.1. GOLLNER SPEDITION does not disclose the personal data of the Client or any information collected in the provision of the service or duration of the contract to third parties, except for:
- if the data must be disclosed to the respective third party within the framework of the concluded agreement to perform some action necessary for the performance of the contract or legally delegated function (for example, to the bank for payment;
- in accordance with clear and explicit consent;
- to persons provided in external regulations at their founded request in the amount and in accordance with the procedures specified therein;
- in accordance with external laws and regulations for the protection of legitimate interests of GOLLNER SPEDITION, such as going to court or other state authorities against a person that has undermined the legitimate interests of GOLLNER SPEDITION.

8. Rights of the Client as a data subject

- 8.1. Request the rectification of their personal data, if the data is inaccurate, incomplete or incorrect.
- 8.2. Request the deletion of their personal data if, for example, the personal data are processed based on the consent of the Client, which has been withdrawn. This right does not apply if the Personal data requested for deletion is being processed on another legal basis, such as a contract or obligations of relevant laws and regulations, or their preservation is required by existing legal requirements.
- 8.3. To limit the processing of their personal data in accordance with applicable laws and regulations when, for example, the Service provider is evaluating whether the Client has the rights to the deletion of their Personal data.
- 8.4. To receive information or whether the Service provider processes the personal data of the Client, and, if they do, receive information about their personal data being processed.
- 8.5. Request information from the Service provider on third parties which have received information on the physical person, unless the laws and regulations provide otherwise.

- 8.6. Receive their personal data that the Client has provided to the Service provider and which are processed on the basis of consent and the contract in writing, or in one of the frequently used electronic formats.
- 8.7. To withdraw consent regarding the Processing of their Personal data.
- 8.8. File complaints about the use of personal data to the Data State Inspectorate (www.dvi.gov.lv) if the Client believes that the processing of their personal data infringes their rights and interests in accordance with the applicable laws and regulations.

9. Obligations of the Client as a data subject

- 9.1. The Data subject shall be responsible for the provision of true, valid and complete data, both entering into a contract (commissioning of services) and during the performance of the contract (during the provision of the service).
- 9.2. The Data subject, in the case of changes to personal data, must immediately inform the Service provider in writing, sending the information to the e-mail address provided in Paragraph 12 of the Policy, or to the Service provider's legal address.

10. Geographical area of data processing.

Personal data will be processed in the European Union / European Economic Area.

11. Personal data storage period

Personal data is only processed for as long as necessary for achieving the purpose of processing. The storage period can be justified by a contract with the Client, the Service provider's legitimate interests or applicable laws and regulations (e.g., laws on accounting, prevention of money laundering, limitation, civil law, etc.).

12. Contact information

The Client may contact the Service provider with questions, to withdraw their consent, make requests, use data subject rights and submit complaints on the use of personal data. The contact information of the person responsible for questions related to personal data protection: telephone 67514722, e-mail - I.kalnina@goellner-spedition.eu, 20 Braslas Street, Riga, LV-1084.