



SIA "Rīgas nami" PRIVACY NOTICE

INFORMATION ABOUT PERSONAL DATA CONTROLLER

SIA "Rīgas nami", registration No 40003109638, registered address: Rātslaukums 5, Rīga, LV-1050 Tel: +371 66957267, e-mail: rigasnami@rigasnami.lv

Uldis Sīpols, personal data protection specialist at SIA "Rīgas nami", can be contacted on data protection issues by calling +371 26658265 or writing to rndatuspec@rigasnami.lv. Please be advised that the above-mentioned forms of communication with the personal data protection officer of SIA "Rīgas nami" are not intended for requests for information in the exercise of your rights as a data subject.

The structure of SIA "Rīgas nami" also includes the following event and shopping facilities: Splendid Palace cinema, Blackheads House, Riga Central Market, Vidzeme Market and Latgale Market.

A 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/contacts of customers/business partners, visitors to our buildings/premises, outlets 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 statement and accepted its terms before visiting us and our buildings/facilities, retail outlets and event centres, using our website or becoming a client/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 give you a general overview of our processing activities and purposes, but please note that other documents (e.g. auction rules, bidding and procurement documents, rental/lease agreements, cooperation agreements, event promotional material, posters and newsletters and other documents published on the website) published on www.rigasnami.lv, may 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 recognise that personal data is an asset and will process it in a way that respects your privacy and ensures the security of the personal data we hold about you.

PURPOSES AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

We will only process your personal data in accordance with the legitimate purposes as defined above, including:

a) to ensure your participation in the auction/tender/procurement

For this purpose, we would also need to identify you, register you for participation, ensure the 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: name, surname, personal identification number, address, telephone number, e-mail address, bank account number, information to assess the creditworthiness of the bidder and other data in accordance with the requirements of laws and regulations.

The main legal bases used to achieve these purposes are:

- legal obligations (Article 6(1)(c) of the General Data Protection Regulation¹);

¹REGULATION (EU) 1 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL/ROPARS PARLAMENTA UN PADOMES REGULA (ES) 2016/679 of 2016 April 2016/679 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 27/EC (General Data Protection Regulation);

- the legitimate interests of the controller (Article 6(1)(f) of the GDPR), 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 enforcement of contractual obligations

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

The minimum amount of personal data we need to fulfil these purposes:

- for natural persons renting social housing: name, surname, personal identification number, address, telephone number, e-mail address, language of communication, data of natural persons relevant to the provision of the service (e.g. financial data, data on social status, property data, information on guardianship or trusteeship, other information required by the regulatory enactments);
- for legal persons: name, surname, personal identification number, address, telephone number, e-mail address, bank account number of the client, business partner, contact person of the client and/or business partner.

The main legal bases used to achieve these purposes are:

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

(c) Compliance with the requirements laid down in the regulatory enactments relating to the provision of services or with the requirements laid down in other regulatory enactments

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 necessary for the provision of our services and/or legitimate interests.

The minimum amount of personal data we need for these purposes: name, surname, personal identification 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 would need to comply with the requirements of the Law on the 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 client (event organiser, renter), their representative/contact person, the address of the event venue and the type of event.

Premises rental, management

To this end, we need to meet 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 (tenant)/owner, property information and address.

Building design, procurement of other services

For this purpose, we would need to comply with the requirements of the Construction Law and the Cabinet of Ministers' Regulations issued on its basis, as well as the requirements of the Public Procurement Law and other special regulatory enactments 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 promoter/cooperation partner/client's project promoter/cooperation partner/client's representative/contact person; site address, site ownership/lease documents; details of the cooperation

partner/construction specialist/engineer/architect, etc.c. personal data, position/speciality, details of previous experience and contract prices, certificate/qualification number and expiry date, copies of evidence of qualifications, contact details; name of construction supervisor/author's supervisor, certificate/qualification number, contact details.

The main legal bases to be used to achieve the purposes set out above are:

- compliance with a legal obligation (Article 6(1)(c) GDPR).

d) Providing 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 in order to reflect to the public the activities, events and use of property of the controller in this way.

Most events at our premises are open to the public and you may be photographed and/or filmed for publicity or publication, but in some cases events may be scheduled as closed events - you will be informed of this 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 client, business partner, customer and/or business partner; photo/video image, location and time of visitors to public events.

As part of our marketing activities, we also set up and maintain profiles for the Manager on various social networks, including Facebook, Instagram, LinkedIn, Twitter, Youtube. We use these profiles to create event previews and publish various information about the operator and its event centres, to communicate with our target audience, to organise competitions and other marketing activities. Therefore, if you use social networks and/or follow our profiles on social networks, participate in our competitions, 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, email address.

The main legal bases used to achieve these purposes are:

- the data subject's consent (Article 6(1)(a) GDPR);
- the legitimate interests of the controller (Article 6(1)(f) of the GDPR), e.g. for communication purposes, creation/publication of photos/videos of public events.

e) For the prevention and detection of criminal offences relating to the protection of property and the protection of vital interests of individuals, including the protection of life and health, namely the prevention of threats to property interests and threats 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 carry out video surveillance of our territory, 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 (for example, detection of criminal offences), as well as exercise the rights granted by the regulatory enactments for their legitimate interests.

Please be further informed that video surveillance devices may also be installed in our territory 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 need 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' capture and other data as necessary.

The main legal bases used to achieve these purposes are:

- legal obligations (Article 6(1)(c) GDPR) - because the site is a high-risk site and the laws and regulations impose heightened security requirements for guarding such sites;
- the legitimate interests of the controller or of a third party (Article 6(1)(f) GDPR).

f) Visitor records for the purpose of investigating and detecting threats to property interests, criminal offences, ensuring public safety and other important matters affecting us or third parties (e.g. tenants of the site and premises).

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

The minimum amount of personal data we need to fulfil these purposes: Your name, mobile phone number, date, time the keys were issued and handed over, time you were in the area or on the premises.

The main legal bases used to achieve these purposes are:

- legal obligations (Article 6(1)(c) GDPR) - because the site is a high-risk site and the laws and regulations impose heightened security requirements for guarding such sites;
- the legitimate interests of the controller or of a third party (Article 6(1)(f) GDPR).

g) Access control and maintenance of passes (including vehicle passes)

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

The minimum amount of personal data we need to fulfil these purposes: Your name, mobile phone number, time of arrival and time of departure from the area or premises, address of the facility, company name, pass number.

The main legal bases used to achieve these purposes are:

- the data subject's consent (Article 6(1)(b) GDPR);
- legal obligations (Article 6(1)(c) GDPR) - because the site is a high-risk site and the laws and regulations impose heightened security requirements for guarding such sites;
- the legitimate interests of the controller or of a third party (Article 6(1)(f) GDPR).

h) Providing discounts for our services

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

The minimum amount of personal data we need to fulfil these purposes: Your name, date of birth, visual verification of the identity document proving your entitlement to the discount (pensioner's card, student's card).

The main legal bases used to achieve these purposes are:

- the data subject's consent (Article 6(1)(b) GDPR).

i) To ensure proper provision of service

For this purpose, we need to maintain and improve our technical systems and information technology infrastructure, use technical and organisational solutions that may also use your personal data (for example, by using cookies) to ensure the proper provision of our services.

The main legal bases used to achieve these purposes are:

- the legitimate interests of the controller (Article 6(1)(f) GDPR).

HOW YOUR PERSONAL DATA MAY BE OBTAINED

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

- 1) from you, by applying for an auction, a price inquiry, a procurement, by submitting a quotation, an estimate, a building design;
- 2) from you, if you make any applications/submissions, emails or phone calls to us;
- 3) from you in the process of concluding a reciprocal agreement;
- 4) if the contract is with a third party and that third party has named you as the contact person;
- 5) from you if you show us your ID and/or the document entitling you to the discount when visiting our buildings/premises, event centres;
- 6) from you when logging in on websites www.rigasnami.lv, www.splendidpalace.lv, www.melngalvjunams.lv, www.rct.lv or by using cookies on these websites;

- 7) from you if you attend public events organised by our event centres at which photography or filming is taking place;
- 8) from you if you sign up for our services online or on social networks, enter our social network competitions, comment on or share our publications;
- 9) in certain cases, we may obtain data from third parties for this purpose from third party databases, for example to assess your creditworthiness;
- 10) from third parties/cooperation partners, where applicable, where we need to do so to fulfil a contractual obligation/legal obligation;
- 11) where appropriate, from CCTV footage.

THE NECESSITY AND THE GROUNDS FOR PROVIDING YOUR PERSONAL DATA

Generally we receive your information when you provide it to us on your own initiative or we collect it to fulfil our contractual obligations, to comply with our legal obligations and to pursue our legitimate interests. In these cases, we need to obtain certain information for the purposes for which it is provided, so failure to provide such information may jeopardise the provision of services, the establishment of a business relationship or the performance of a contract.

If the data is not strictly necessary, but the provision of the data could help us to improve our 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 Cabinet of Ministers Regulations issued on its basis;
- Law On Prevention of Squandering of the Financial Resources and Property of a Public Person and the Cabinet of Ministers Regulations issued on its basis;
- Law on the Safety of Public Entertainment and Festivity Events and related regulatory enactments;
- Construction Law and the Cabinet of Ministers Regulations issued on its basis;
- Accounting law;
- Law on Rent of Residential Premises and the Binding Regulations of the Riga City Council issued on the basis thereof, etc.

ACCESS TO YOUR PERSONAL DATA

We take appropriate measures to process your personal data in accordance with the legal enactments and ensure that your personal data is not accessed by third parties who do not have a legal basis for processing your personal data.

Your personal data can be accessed as necessary by:

- our employees or directly authorised persons who need to do so in order to carry out their work;
- processors of personal data in accordance with the services they provide and only to the extent necessary, e.g. security service provider, database owner/technical maintainer;
- state and local authorities and institutions in the cases and according to the procedures set out in the legislation;
- in some cases, tenants of land and premises for their legitimate aims (e.g. prevention, detection of crime);
- in certain cases, the owners/developers/construction supervisors of sites, buildings, projects to achieve their legitimate aims (e.g. access control, crime prevention, detection);
- in certain cases, third parties in respect of photographs and videos from public events or your social media profile data that you have published or posted if you follow our social media, participate in our competitions, comment on or republish our social media posts;
- supervisory authorities, investigative authorities, security authorities and other law enforcement authorities in the cases and according to the procedures established 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 transmission of your personal data to data processors in accordance with applicable legal enactments. We carefully select our personal data processors and, when making transmissions, we assess the need for the transmission and the amount of data to be transmitted. The transmission of data to processors is carried out in compliance with the requirements of confidentiality and secure processing of personal data.

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

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

Personal data processors may change, so changes will 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.

RETENTION PERIODS FOR PERSONAL DATA

The retention 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 the retention of personal data, we take into account the applicable legal requirements, the performance of contractual obligations, your instructions (e.g. in the case of consent), as well as our legitimate interests.

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

Updating personal data

If there have been any changes to the personal data you have provided to us, please contact us and provide us with the updated data so that we can meet the purposes of processing 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 processing, to object to the processing of your data, as well as the right to data portability in the cases and in the manner provided for in the General Data Protection Regulation.

We respect these rights, so if we receive your request, we will respond within the time limits set out in the laws and regulations (no later than one month).

You can 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 1050, Rīga, LV-8.30-16.00, (entrance from Svaru iela), every working day 8.30 - 16.00);
- 2) by sending an application by post to: Rātslaukums 5, Rīga, LV-1050
- 3) by sending an application, signed with a secure electronic signature, to our e-mail address: rigasnami@riga.lv.

Upon receipt of your submission, we will assess its content and the possibility of identifying you and, depending on the situation, reserve the right to ask you to identify yourself further in order 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, we inform you that the withdrawal of consent cannot affect the processing of personal data which are

necessary for compliance with the requirements of laws and regulations or based on a contract, our legitimate interests or other grounds for lawful data processing set out in laws and regulations.

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

THE POSSIBILITIES TO LODGE A COMPLAINT IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA

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

If you believe that we have not been able to resolve the issue and you believe that we have violated your right to the protection of personal data, you have the right to lodge a complaint with the Data State Inspectorate. You can find sample 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.

Updated on 01.03.2023.