RIGAAPARTMENT.COM Ltd. Reg. no. 40103508736 129 Gertrudes Street, Riga, LV-1009, Latvia

# **Privacy Policy**

Valid from May 25th, 2018.

Out of concern for the protection of your privacy and personal data, including your rights to access the information, RIGAAPARTMENT.COM Ltd. (hereinafter – CLEANING RIGA) has developed this Privacy Policy in accordance with the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of private persons with regard to the processing of personal data and on the free movement of such data (hereinafter – Regulation).

This Privacy Policy goal is to give the CLEANING RIGA customer – the private person – information regarding the types of personal data, purposes of the processing, legal basis, as well as inform about private person rights as a data subject.

Personal data is any information that is directly or indirectly connected with private person (written, audio, video, electronic) which concerns the identified or identifiable private person, for example, name, surname, date of birth, home address, telephone number, e-mail address, photo, one or several economic factors characteristic of the private person, as well as other information that makes it possible to identify the private person (hereinafter – Personal Data).

This Privacy Policy is applied to the processing of Personal Data regardless of the way (form) in which the private person has given their Personal Data: on paper, orally or electronically.

This Privacy Policy concerns the current, former and potential future customers (hereinafter – Customers) of CLEANING RIGA that are using/used/are planning to use CLEANING RIGA services or use the homepage https://cleaningriga.lv/ and CLEANING RIGA business page on social networks, for example, on Facebook, Twitter, Linkedin.

### 1. Basic information about the administrator

Administrator: RIGAAPARTMENT.COM Ltd.

Reg. no. 40103508736

129 Gertrudes Street, Riga, LV-1009, Latvia

Telephone: +371 25298298

<u>Goal of Personal Data processing:</u> providing services connected with the accommodation in the hotel rooms and apartments, as well as providing third party services (taxi services, catering and culture events), administrating the payments, providing customer service, maintaining and improving homepage and business pages on the social networks.

### 2. Types of Personal Data and the purposes of their processing

CLEANING RIGA processes the following Customer Personal Data for the following purposes:

Purpose	Type of Personal Data
To provide services and communication with	Name, surname, address, contact information,
the Customer.	a personal identification document,
	information about the payment method, date of
	arriving and leaving, preferences.
For the purposes of financial accounting, for	History of reservation, details of the payment.
example bookkeeping.	
To develop CLEANING RIGA economic	Name, surname, contact information, gender,
activity and to improve services and product	date of birth, information about habits,
quality, to promote services and marketing	including information about homepage use and
activities, including adapting the homepage	habits, IP address, information about
functionality and commercial correspondence	geolocation, Personal Data processed with the
to the Customer habits.	help of the cookies.
To comply with the requirements of the law,	The Personal Data specified in the laws. For
including but not limited to provide	example, the section 7 of the Law "On
information to public authorities, for example,	Accounting" states that the private person
National Police, Tax office and others.	source document must include the following
	Personal Data – name and surname, personal
	identity number, address.
To store documents in an archive.	All Personal Data needed to fulfill the
	CLEANING RIGA obligations that are stated
	in the laws.

### 3. The Personal Data processing Legal basis

CLEANING RIGA carries out the Personal Data processing if:

- 1) The Customer Personal Data processing is necessary for the contract issue and service completion (upon the purchase of a service provided by CLEANING RIGA by contract is considered to be concluded between CLEANING RIGA and the Customer). For example, data processing is necessary to register the Customer order, to process the payment for the Customer, to draw up and issue a bill for CLEANING RIGA services. If the Customer does not provide to the CLEANING RIGA the Personal Data that are necessary for the contract issue, CLEANING RIGA will not be able to issue the contract and provide the service.
- 2) The Customer Personal Data processing is necessary for the execution of legal obligations that are stated in the laws and CLEANING RIGA concerns, for example, to ensure the information provision about the Customer to the public authorities, as well as to fulfill the obligation of accounting document management.
- 3) The Personal Data processing is necessary to pursue the legitimate interests of CLEANING RIGA or a third party, for example, to investigate cases where there are complaints about the provided service quality, to carry out inspections in order to improve.
- 4) The Customer has given consent to the Personal Data processing to develop CLEANING RIGA economic activity and improve service quality, to promote services and goods, and marketing activities, including adapting the homepage functionality and commercial correspondence to the

Customer habits. For example, the Customer consent is needed to use Personal Data collected with the cookies at the homepage, send special offers e-mails or SMS.

#### 4. The Personal Data recipients

CLEANING RIGA may transfer the Customer Personal Data to the following Personal Data recipients, providing it is not in conflict with the applicable laws:

- ➤ bailiffs, notaries, law enforcement authorities, as well as public municipal authorities, including national safety authorities, prosecutor's office and courts upon their request or in order to bring, implement or defend legal claims and obtain evidence in present cases, as well as to the security staff;
- > to persons connected to the functioning of the CLEANING RIGA company and business development, including but not limited to providers of data storage services, promotion and marketing, and other service providers which are connected to CLEANING RIGA obligation fulfillment or regarding orders of additional services. Information about the Customer may be transferred to the accounting and financial service providers, including but not limited to legal advisers, financial advisers and auditors, the providers of communication, information technology services, credit institutions (to process payments). In the previously mentioned cases CLEANING RIGA transfers or receives Customer Personal Data to and from third parties to the extent that is necessary to provide relevant service or action.

# 5. The extent and period of Personal Data processing

The Customer Personal Data is processed to the reasonable extent that is necessary, in compliance with the existing legislation. CLEANING RIGA will retain Customer Personal Data for the period stated in the law, as well as until the previously mentioned purposes of Personal Data processing have been achieved.

CLEANING RIGA processes Personal Data while at least one of the following criteria is met:

- 1) the contract between CLEANING RIGA and the Customer is in the process;
- 2) CLEANING RIGA or Customer can pursue their legitimate interests in accordance with the procedure prescribed in the existing laws (for example, submit objections or claims, bring or pursue legal proceedings);
- 3) CLEANING RIGA has the legal obligation to retain the Personal Data;
- 4) the Customer give permission and subscribe to the Personal Data processing, if there is no other legitimate reason for the Personal Data processing.

If none of the criteria mentioned in this section are met, the Personal Data is deleted.

### 6. Transfer of the Personal Data outside the European Union

The Personal Data is not transferred outside the European Union.

### 7. The Customer rights regarding the Personal Data processing

- ➤ the right to access their personal data the Customer has the right to receive information regarding the goal, legal basis and type of the processing of Personal Data, rectification, erasure or blocking of Personal Data, source of the Personal Data and other information in accordance with the laws;
- > the right to rectify their personal data the Customer has the right to demand the rectification of their personal data if the data is inappropriate, incomplete or incorrect;
- ➤ the right to object to data processing the Customer has the right to submit objections regarding the processing of their Personal Data if the use of the Personal Data is justified by marketing purposes, for example, to receive marketing offers;
- ➤ the right to withdraw consent the Customer has the right to withdraw their consent to processing of personal data in cases where the Personal Data processing is justified by consent. In addition, the withdrawal does not affect and does not stop the personal data processing which is carried out in accordance with and/or is justified by another legal basis. To withdraw consent the Customer may use the contact information of the Controller that is given in this document. If the Customer withdraws consent, including the consent to the cookie use, CLEANING RIGA has the right to limit the functionality and extent of their services. In this case CLEANING RIGA will be unable to provide relevant services to the Customer if the Personal Data necessary for the provision of services and/or functionality will not be available to CLEANING RIGA due to the withdrawal.
- ➤ the right to be forgotten the Customer has the right to demand the erasure of their personal data unless it is in conflict with legal requirements, for example, if the personal data is being processed on the basis of consent previously given by the Customer and the Customer has withdrawn their consent. This right is not in effect if the the erasure is demanded regarding the personal data that is being processed in compliance with requirements of the law;
- ➤ the right to submit complaints the Customer has the right to submit complaints about the processing of their personal data to CLEANING RIGA and National Data Protection Agency if the Customer believes that their personal data processing is against their rights as stated in the law;
- > other rights that are determined in accordance with the GDP Regulation.

## 8. Personal Data automated processing

The Customer Personal Data may be processed to develop economic activity of the Administrator, to promote services and goods, and marketing activities, including adapting the homepage functionality and commercial correspondence to the Customer buying behavior. CLEANING RIGA can analyze the homepage visitor and use this data for personal Customer offers such as advertisements, services, discounts or opportunities to participate in certain campaigns that are consistent with their habits and interests.

### 9. Information about the Personal Data processing

The Customer may contact CLEANING RIGA in regards to personal data processing (with questions, giving consent of withdrawing it, using their rights and submitting complaints about the use of personal data) by sending their requests to the e-mail address info@cleaningriga.lv or by post to: 129 Gertrudes Street, Riga, LV-1009, Latvia with the subject "Personal Data processing".