

## LINSTOW PRIVACY POLICY

<i>The principal text of this policy came into force:</i>	<i>25 May 2018</i>
<i>Amendments to the Policy came into force:</i>	<i>3 September 2018</i>
<i>Amendments to the Policy came into force:</i>	<i>12 December 2019</i>

The goal of this Privacy Policy is to provide you with information about the procedure of the Personal data processing conducted by:

- Companies of Linstow Group: SIA “Linstow Center Management” and SIA “Linstow”

(hereinafter referred to as – “Companies”), the principles, purpose, volume, protection of the personal data processing, period of processing, arrangements for deletion, as well as the rights available to you in relation to the processing of personal data performed by us.

This Privacy Policy refers to the personal data we have obtained directly from you, as well as those personal data we have obtained from third parties.

We are entitled to use the personal data for the purposes described in this Privacy Policy as well as other purposes about which we have informed you at the time of obtaining the personal data.

### WHO MAY PROCESS YOUR PERSONAL DATA AND TO WHOM YOUR PERSONAL DATA MAY BE TRANSFERRED?

Your personal data may be processed by any of the Companies indicated in the respective section of the Privacy Policy where specific services provided by us or activities performed by us are described.

In certain cases, we are also entitled to authorise a third party to process your personal data. Please, be aware that we will only transfer your personal data to third parties if:

- We have executed an agreement with the recipient of your personal data and ensured appropriate performance of the security requirements for sending and receiving personal data.
- Relevant legal regulations obligate us to transfer your personal data to the respective recipient.

We can transfer your personal data to the following categories of recipients:

- 1) **personal data processors** providing us with certain services described in more detail in the following sections of the Privacy Policy:
  - a) A processor shall only receive from us the volume of personal data necessary to carry out a specific task or deliver specific service.
  - b) A processor shall only process your personal data according to our instructions and shall use them for no other purposes and will not transfer your personal data to any other persons without our prior consent.
- 2) **Other personal data recipients**, including state and local authorities, and courts to enable us to observe the compulsory legal regulations or protect our legitimate interests.

The personal data shall be only processed within the EU/EEA territory, and they shall not be transferred outside the EU/EEA territory.

For more detailed information about controllers and processors related to specific our services or activities, see the following sections of the Privacy Policy.

## **WHAT WE DO TO PROTECT YOUR PERSONAL DATA?**

We take measures to ensure that your personal data be safe at all times, as well as that the processing thereof be carried out in line with the applicable legal regulations and principles.

In order to ensure that the personal data may only be accessed by duly authorised persons and to prevent unauthorised disclosure or use of the personal data, we use various security technologies and procedures.

## **IN WHAT CASES AND FOR WHAT PURPOSE WE MAY PROCESS YOUR PERSONAL DATA?**

We shall only process your personal data if we have legal basis for that: your consent, our legitimate interests, or if the personal data are required for a contract signing or execution, or to comply with our obligations set forth in the legal regulations.

If the processing of your personal data is based on our legitimate interests, we shall assess the potential impact on your rights and freedoms and ensure that our legitimate interests to process your personal data would not have any adverse effect on your rights or freedoms.

For more detailed information about the legal basis and purpose of the processing your personal data, see the following sections of the Privacy Policy.

## **HOW LONG ARE YOUR PERSONAL DATA RETAINED?**

We shall process your personal data as long as we have legal basis for that or as long as we are bound by other valid conditions. For instance, the period of the personal data processing may be affected by the following conditions:

- The statutory arrangements in line with which we can exercise our legitimate interests (e.g., submit objections or bring a legal action).
- Existence of a legal duty to retain the personal data for a particular period.
- As long as your consent to the processing of your personal data remains valid unless any other legal basis exists to process your personal data.

As the said conditions for processing your personal data become inoperative, your personal data shall be irreversibly removed/destroyed and/or anonymised.

For more detailed information about the retention periods for specific services or activities, see the following sections of the Privacy Policy.

## **WHAT ARE YOUR RIGHTS?**

In order to ensure appropriate processing of your personal data, you have numerous rights you may exercise regarding your personal data. In order to exercise your rights, please, contact us in any of the ways indicated in this Privacy Policy.

### ✓ *Access to your personal data*

You are entitled to request information about the personal data related to you.

### ✓ *Right to correct your personal data*

If you think that the data, we have processed about you, are not accurate, complete or relevant, you have the right to request that your personal data be updated or corrected.

### ✓ *Right to withdraw your consent*

If we process your personal data based on your consent, you are entitled to withdraw your consent at any time.

If you want to withdraw your consent regarding the receiving electronic information about our news, you can perform the activities specified in the received email or contact us.

✓ ***Right to object to or restrict the processing of personal data***

If we process your personal data based on our legitimate interests, you are entitled to object against the personal data processing carried out by us.

Having received your objections against the personal data processing based on our legitimate interests, we shall cease to process your personal data or restrict the processing thereof unless we can substantiate the processing of your personal data with relevant legitimate interests of ours or our rights to protect our legitimate interests.

If you are of the opinion that we are processing inaccurate personal data of yours or our processing of the personal data is not lawful, you may request to restrict the personal data processing carried out by us.

Please, note that in case of your personal data processing being restricted, it is possible that we cannot provide you with all the activities available, including the possibility that you may not receive all the benefits we offer.

✓ ***Right to request removal of your personal data***

If you are of the opinion that our need for your personal data for the purpose they were obtained has expired or you have withdrawn your consent and in other cases, you may request that your personal data be removed.

Please, note that we will only be able to remove your personal data if we have no binding obligation to retain your personal data for specific statutory purposes or if we have no other legal basis to process your personal data.

✓ ***Right to request transfer of your personal data***

You are entitled to receive your personal data you have provided and that are being processed based on consent or agreement performance, in writing or in any of most common electronic formats. If it is technically feasible, based on your request, we may also hand over your personal data to other service provider.

✓ ***Right to submit complaints of the personal data processing we perform***

If you are of the opinion the personal data processing carried out by us violates your rights, you may at any time to submit a complaint to us. We will promptly consider your complaint and provide a response within the statutory deadline.

Furthermore, you are entitled to file a complaint to the Data State Inspectorate:

- By sending your complaint to this email: [info@dvi.gov.lv](mailto:info@dvi.gov.lv)
- Or in person by addressing the Data State Inspectorate at 11/13 Blaumaņa Street, Riga.

## **CONTACT INFORMATION**

If you have any questions regarding the personal data processing carried out by us or you want to exercise your rights, please, contact us through any of these channels:

- Contact us via email: [dpo@linstow.lv](mailto:dpo@linstow.lv),
- Contact us via mail: Stacijas laukums 4, Riga, LV-1050.

## VALIDITY AND ACCESSIBILITY OF THE PRIVACY POLICY

This Privacy Policy is accessible to you:

- ✓ At the Information desk of shopping centre ORIGO we operate,
- ✓ And of our websites: [www.origo.lv](http://www.origo.lv), [www.summerstage.lv](http://www.summerstage.lv).

In order to comply with our obligations related to the personal data processing, we monitor our activities of the personal data processing on regular basis. Therefore, we are entitled to unilaterally amend this Privacy Policy at any time.

## PERSONAL DATA PROCESSING FOR MARKETING PURPOSES OF SHOPPING CENTRES

We carry out the processing of your personal data in order to perform various marketing activities of our shopping centres, to administer your participation in various lotteries or contests run by us or deliver the award related thereto.

### ✓ *Personal data controllers and processors*

The processing of your personal data for our marketing activities is performed by the following companies to be regarded as controllers of your personal data:

#	Our marketing activities	Controllers and their contact information
1.	Marketing activities Subscription to the shopping centre's news Participation in lotteries Participation in contests	<ul style="list-style-type: none"><li>• SIA "Linstow Center Management", reg. No.: 50003702891.</li><li>• SIA Linstow, reg. No.: 50003315411 (SC "Origo")</li></ul> <p><b>Contact information</b> of all specified controllers:</p> <ul style="list-style-type: none"><li>- legal address: Stacijas laukums 4, Riga, LV-1050, Latvia,</li><li>- email: <a href="mailto:dpo@linstow.lv">dpo@linstow.lv</a>.</li></ul>

We may also transfer your personal data to other companies, personal data processors, in order to ensure provision of various services (arrangement of our marketing activities, filming, sending out of news, invitations etc.).

We only engage trustworthy partners, personal data processors, via which the services requested for successful arrangement and progress of our activities are provided.

Your personal data may be handed over to the following categories of data processors:

- Event agencies.
- Photographers or photography agencies.
- Public relations and digital agencies.
- Providers of postal services.
- Providers of mobile and email marketing.
- Authorities (e.g., law-enforcement authorities, tax administration, supervisory authorities, and extra-judicial settlement authorities).
- Auditors, financial and legal advisers.
- Other personal data processors approved by us.

✓ **Types of personal data, legal basis and purpose of the processing**

At any times, we will only process your personal data provided we have legal basis to do it and for the specific purpose only.

For our marketing activities, the following legal grounds exist:

- Your consent – in cases when you have clearly expressed your consent in writing or confirmed such a consent by your actions (e.g., to receive information about our news or activities). In such case, we will only process such personal data of yours the processing of which has been clearly authorised by you.
- Our legitimate interests – it is our interest to provide you with the widest possible and best tailored range of services and experience. In certain cases, we are also entitled to protect our interests, for instance, if you have filed any claim against our activities. In such cases, we will only process your personal data directly required for safeguard of the following legitimate interests of ours:
- Our statutory obligation (legal duty) – sometimes, legal regulations set forth certain obligations we must comply with, e.g., to identify an individual, to report to tax administration authorities etc. In such cases, we only process your personal data directly required to fulfil these obligations of ours.

The **marketing activities** run by us are public events that may be photographed and/or filmed. You should be aware that you may make an appearance if you participate in such events. If you have taken a child (i.e., a person under the age of 18) to our marketing activity, you should be aware that your child may also be photographed and/or filmed while participating in our marketing activities.

We are entitled to use your and your child’s personal data, including but not limited to publishing, posting and distributing through social media, websites, commercials, television, printed media and other publicity materials.

You can subscribe to the receiving of our **news** in the form of an email, by providing your contact information (name, email or only email) or by submitting this contact information in person during the marketing activities.

The **lotteries and/or contests** organised by us are public events. We are entitled to use your personal data, including but not limited to publishing, posting and distributing through social media, websites.

Please, note that within the framework of the lotteries and/or contests neither your personal code, nor phone number, nor email address will be published.

Hereinafter, you can learn the legal basis and purpose of the processing of your personal data:

<b>Our marketing activities</b>		
<b>Personal data</b>	<b>Legal basis</b>	<b>Purposes of processing</b>
The personal data included in photographs or filmed materials: your image, your child’s image etc.	Legitimate interests	Promotion of our shopping centres and products they offer
<b>News of our shopping centres</b>		
<b>Personal data</b>	<b>Legal basis</b>	<b>Purposes of processing</b>
Name, contact information (email)	Your consent	In order to send you the news and current events of our

		shopping centres, and offers of the stores placed in the shopping centres
<b>Lotteries and/or contests organised by us</b>		
<b>Personal data</b>	<b>Legal basis</b>	<b>Purposes of processing</b>
Name, Surname	Legitimate interests	Identification. To enable us to identify you as a participant of a lottery or contest.
	Legal obligation	Identification. To enable us to identify you as a participant of a lottery or contest.  To enable us to comply with our obligations against the tax administration authorities and authorities supervising lotteries.
Personal code	Legitimate interests	Identification. To enable us to identify you as a participant of a lottery or contest.
	Legal obligation	Identification. To enable us to identify you as a participant of a lottery or contest.  To enable us to comply with our obligations against the tax administration authorities and authorities supervising lotteries.
Contact information (phone, email)	Legitimate interests	To enable us to contact you in case of a prize awarded.

✓ ***Terms of personal data processing***

For the marketing activities run by us, we process your personal data according to such terms:

<b>Our activity</b>	<b>Manner of submitting or storing personal data</b>	<b>Term (for removal / destruction)</b>
Marketing activity	Electronic data	3 years following the event
	On paper	3 years following the event
Receiving news	Electronic data	To be stored until you withdraw your consent

	On paper	1 year after submitted
Lotteries or contests	Electronic data	3 years following the lottery or contest
	On paper	8 years following the lottery or contest

## PERSONAL DATA PROCESSING FOR SECURITY PURPOSES OF SHOPPING CENTRES

We perform continuous video surveillance with recording in the shopping centres: in the common areas, along the building perimeter, and in the territory.

We process your personal data in order to prevent or detect criminal offences related to the property protection and the safeguard of vital interests of individuals, including life and health, as well as obtain evidence for the needs of insurance.

### ✓ *Personal data controllers and processors*

The processing of your personal data for our video surveillance activities is performed by the following companies to be regarded as controllers of your personal data:

#	Our activities	Controllers (joint controllers) and their contact information
1.	Video surveillance in shopping centres	<p>ORIGO</p> <ul style="list-style-type: none"> <li>• SIA Linstow, reg. No.: 50003315411</li> <li>• SIA “Linstow Center Management”, reg. No.: 50003702891</li> </ul> <p><b>Contact information</b> of all specified controllers:</p> <ul style="list-style-type: none"> <li>- legal address: Stacijas laukums 4, Riga, LV-1050, Latvia,</li> <li>- email: <a href="mailto:dpo@linstow.lv">dpo@linstow.lv</a></li> </ul>

We may also transfer your personal data to other companies, personal data processors, in order to prevent or detect criminal offences, as well as for the need of insurance.

We only engage trustworthy partners, personal data processors, via which these services are provided.

Your personal data may be handed over to the following categories of data processors:

- Providers of physical security.
- Providers of maintenance services for the security and security systems.
- Providers of insurance services.
- Authorities (e.g., pre-trial investigation authorities, bodies performing operational activities, state security authorities, prosecutor’s office, courts and other law-enforcement authorities, tax administration, supervisory authorities and extra-judicial settlement authorities).
- Other personal data processors approved by us.

### ✓ *Types of personal data, legal basis and purpose of the processing*

At any times, we will only process your personal data provided we have legal basis to do it and for the specific purpose only.

For our video surveillance activities, the following legal grounds exist:

- Our legitimate interests: it is our interest to prevent and detect criminal offences against your, our and our partners' property and the vital interests, including life and health of any persons located in the shopping centre. We also need obtain evidence for the need of insurance regarding the insurance events. In certain cases, we are also entitled to protect our interests, for instance, if you have filed any claim against our activities. In such cases, we will only process your personal data directly required for safeguard of such legitimate interests of ours.

The scope of the video surveillance arranged by us covers surveillance of all the individuals present in the shopping centre, within the zone of visibility of the surveillance cameras, including children (i.e., persons under the age of 18).

No data obtained via the video surveillance run by us will be published. We are only entitled to process your and your children's personal data in order to prevent or detect criminal offences related to the property protection and the safeguard of vital interests of individuals, including life and health, as well as obtain evidence for the needs of insurance.

Hereinafter, you can learn the legal basis and purpose of the processing of your personal data:

<b>Video surveillance run by us</b>		
<b>Personal data</b>	<b>Legal basis</b>	<b>Purposes of processing</b>
Individual's image Location where the individual's image is recorded Time when the individual's image is recorded	Legitimate interests	In order to prevent or detect criminal offences related to the property protection and the safeguard of vital interests of individuals, including life and health, as well as obtain evidence for the needs of insurance.

✓ ***Terms of personal data processing***

In terms of the video surveillance run by us, we process your personal data according to such terms:

<b>Our activity</b>	<b>Manner of submitting or storing personal data</b>	<b>Term (for removal / destruction)</b>
Video surveillance	Electronic data	Up to 30 days after recording
	Electronic data in case of undergoing investigation or an information request is received from law-enforcement authorities	Up to completion of the investigation or submission of the information to the law-enforcement authority