



**Blockvis SIA**

**Registered office: 17-5 Elijas Street, Riga, LV-1050**

**Reg. No. 40203070356**

## BLOCKVIS SIA

### Privacy Policy

*Riga*

#### **PERSONAL DATA PROTECTION**

Privacy Policy relating to personal data protection is based on the Regulation (EU) No. 2016/679 of the European Parliament and of the Council dated April 27, 2016 (hereinafter referred to as the “Regulation”).

#### **PRIVACY OBLIGATIONS**

In processing personal data, SIA BLOCKVIS (hereinafter – the “manager”) undertakes to protect personal data privacy. Personal data processing scheme is subject to the EU General Data Protection Regulation (GDPR) and the relevant national regulatory enactments. This Privacy Policy sets out general principles for the manager to compile, publicly use and protect personal data.

#### **MANAGER AND CONTACT DATA**

- Personal Data Processing Manager: *SIA „BLOCKVIS” unified registration No. 40203070356, registered office: 17-5 Elijas Street, Riga, LV-1050.*
- The manager’s contact details on the matters of processing of personal data: phone +37126124729, e-mail: [anatoly@blockvis.com](mailto:anatoly@blockvis.com). Using these contact details or visiting the manager’s registered office, you may ask questions on processing of personal data.

#### **DEFINITIONS**

For the purpose of this Privacy Policy, the following definitions are used:

**processor** – a natural person or a legal person, processing personal data on behalf of the manager.

**processing** – any activity related to personal data (inter alia, their collection, recording, retention, amendment, ensuring access, request, transmission, etc.).

**data subject** – a natural person

**service** – any service provided by the manager

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**manager** – a natural person or a legal person, to whom a data subject has provided their personal data

**personal data** – any information referring to identified or identifiable natural person

**cookies** – small text files, which are saved by a web browser (e.g., Internet Explorer, Mozilla Firefox, Safari, etc.) on a user's terminal (computer, mobile phone, data tablet) at the time when the user visits a website to identify the browser or information or settings saved on the browser.

**GDPR** - 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, and repealing Directive 95/46/EC (General Data Protection Regulation).

## COLLECTION OF INFORMATION

The manager may collect and process the following personal data:

- Personal data, which data subjects provide absolutely voluntarily through:
  - communication channels with the manager by phone, e-mail or otherwise.
  - entering into and signing of the rental agreement.
  - signing of other documents.
- Personal data acquired from other sources, which mostly comprise:
  - Credit information offices (e.g., AS “Kredītinformācijas Birojs”);
  - Databases maintained by debt recovery service providers (e.g., databases maintained by SIA “Ceditreform Latvija”);
  - Systems created by anti fraud, anti money laundering and terrorism financing service providers;
  - State Information System/state authorities (e.g., databases maintained by the State Revenue Service, State Social Insurance Agency, Maintenance Guarantee Fund Administration, Office of Citizenship and Migration Affairs, Anti Money Laundering Service, Population Register, Credit Register, Lursoft, Register of Enterprises)
  - Credit institution (bank), from which a data subject (or any other person on behalf of the data subject) makes payment;
  - Cookies;
  - Other processors/managers/information sources, if there exists the relevant legal basis for processing of data.

## THIRD PARTY RECIPIENTS

The manager may send personal data to a processor (insofar as required for the fulfillment of his duties).

Personal data of a data subject may be disclosed also to:

- all third parties, to whom the manager assigns any of his rights or duties in accordance with the relevant contract;
- all state and/or international regulatory, execution or exchange structures or courts, if this duty is imposed on the manager by the applicable law or rules or requirements of such institutions;
- all state or local government structural units and other state or public institutions or enterprises set out in law.

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## **HOW DOES MANAGER PROTECT PERSONAL DATA OF DATA SUBJECTS?**

To ensure protection of personal data of a data subject, the manager and the manager's cooperation partners take a number of organizational and safety measures. The manager performs efficient work to observe the EU General Data Protection Regulation (GDPR). The manager has access to a large number of information technology systems and functions, which help protect personal data of data subjects against unauthorized access. Furthermore, the manager uses internal mechanisms, ensuring access to the data subject's data for a limited number of persons as required.

## **SHOULD DATA SUBJECT DISCLOSE THEIR PERSONAL DATA TO MANAGER AND WHAT HAPPENS IF DATA SUBJECT FAILS TO DO SO?**

For a data subject to receive certain services from the manager and to enter into a contract with the manager, the data subject shall inform the manager of specific personal data. For example, if the manager has no access to personal data required to fulfill the contract signed with the data subject, the manager will not be able to provide services to the data subject. If the data subject fails to provide information to the manager, which should be processed, the manager will not be able to process personal data of the data subject for this purpose. The data subject's consent is required, e.g., to receive notices, bills or other documents by e-mail, SMS or mail also further on.

## **WEBSITE VISITS AND COOKIE PROCESSING POLICY**

The manager's websites may use cookies and set links to the websites of third parties, which have their own rules of use and personal data protection, for which the manager is not responsible.

## **FOR WHICH PURPOSES DOES MANAGER USE COOKIES?**

The manager uses cookies in order to improve the user experience of websites:

- to ensure website functionality;
- to adapt website functionality to the habits of users;  
-including language, search inquiries, viewed contents;
- to acquire statistical data on website visitor flows – number of visitors, time spent on a website, etc.;
- user authentication;
- if a user is the manager's client, to show services adapted to the client's needs and to offer any other contents and projects created or distributed by the manager, visiting the manager's websites.

## **PERSONAL DATA RETENTION PERIOD**

The manager retains and processes personal data of a data subject while at least one of the below criteria exists:

- while the contract signed with the data subject is valid;
- data are required for the purposes they were acquired;
- while in accordance with the procedure set out in the external regulatory enactments the manager or the data subject may exercise their legitimate interests (e.g., file objections, or raise or conduct claims in court);
- while the manager is legally bound to retain data (e.g., pursuant to the Accounting Law, bills issued to a company shall be stored for 5 years, etc.);

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- while the data subject's consent to processing of personal data is valid, unless there is any other lawful basis for processing of data.

#### **WHERE TO APPLY IN CASE OF QUESTIONS OR COMPLAINTS?**

If a data subject intends to access, delete (in separate cases) or correct their personal information, or in case of complaints or conflicts, the manager asks to contact by e-mail: [info@blockvis.com](mailto:info@blockvis.com).

If a data subject files a privacy related complaint, the manager registers the data subject's name and/or corporate name, name, e-mail and location of the person involved in the complaint and information served as a basis for the complaint. The manager uses information provided by the data subject in order to examine the data subject's complaint and send a reply to the data subject, as soon as the data subject's complaint is examined.

#### **CHANGES IN THE PRIVACY POLICY**

The manager has the right to unilaterally change this Privacy Policy. Changes take effect on the date when the updated Privacy Policy has been sent to a data subject by e-mail, unless the Privacy Policy determines later effective date.