

APPROVED  
by the Decision of the Management Board of the LLC "Rīgas ūdens"  
of 22.05.2018 (Minutes No. 2.4.1/2018/33)



## PRIVACY POLICY

**Rīga, 2018**

## I. LLC "Rīgas ūdens" Privacy Policy

The purpose of the LLC "Rīgas ūdens" Privacy Policy (hereinafter referred to as - the Privacy Policy) is to provide the natural person - the data subject - with information on the purpose, legal basis, scope, protection and term of processing of personal data during the processing of the data subject's personal data.

## II. Controller and contact details

1. Controller of the Personal Data processing is the LLC "Rīgas ūdens", unified registration No. 40103023035, registered office: 1 Zigfrīda Annas Meierovica Blvd, Riga, LV-1495 (hereinafter referred to as - LLC "Rīgas ūdens" or the Controller).
2. LLC "Rīgas ūdens" contact information for issues related to the processing of personal data, as well as for submission of data subjects' requests - Mr Raimonds Arājs, Head of the Information Technology Department, phone No. 22007717. Contact details of the LLC "RĪGAS ŪDENS" for information about possible breaches concerning data processing: [office@rigasudens.lv](mailto:office@rigasudens.lv).

## III. General provisions

3. Personal data means any information concerning an identified or identifiable natural person.
4. The Privacy Policy applies to ensure the privacy and personal data protection with regard to all data subjects, including the following groups (hereinafter collectively referred to as - Clients):
  - 4.1. natural persons - clients of LLC "Rīgas ūdens" (including potential, former and existing clients), their representatives, owners of real estate and other related persons;
  - 4.2. natural persons - representatives and contact persons of the Clients of the LLC "Rīgas ūdens" (legal entities);
  - 4.3. visitors to the premises of the LLC "Rīgas ūdens", including those under video surveillance;
  - 4.4. visitors of the websites maintained by the LLC "Rīgas ūdens";
  - 4.5. Persons whose personal data is processed on social networks in relation to activities organised by the LLC "Rīgas ūdens".
5. The LLC "RĪGAS ŪDENS" takes care of the privacy and personal data protection of its Clients, respects the rights of its Clients to the lawfulness of personal data processing in accordance with the applicable laws - the personal data Protection Law, Regulation 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 (hereinafter referred to as - the Regulation) and other applicable laws in the area of privacy and data processing.
6. The Privacy Policy applies to the data processing regardless of the form and/or medium in which the Client provides personal data (in person, on the website of the LLC "Rīgas ūdens", electronically, in paper form or by telephone).
7. The LLC "Rīgas ūdens" complies with the following guiding principles of data processing:
  - 7.1. lawfulness and integrity;
  - 7.2. transparency;
  - 7.3. purpose limitation;
  - 7.4. adequacy (data minimisation);
  - 7.5. accuracy;
  - 7.6. storage restriction;
  - 7.7. integrity and confidentiality;
  - 7.8. accountability.

## IV. Purpose of the processing of personal data

8. LLC "Rīgas ūdens" processes personal data for the following purposes:
  - 8.1. For the provision of services and sale of goods;
    - 8.1.1. for the identification of the client;
    - 8.1.2. for the preparation and conclusion of contract;
    - 8.1.3. for the supply of goods and services (performance of contractual obligations);
    - 8.1.4. for the development of new goods and services
    - 8.1.5. for the promotion and distribution of goods and services, or for commercial purposes;
    - 8.1.6. client service;
    - 8.1.7. for dealing with objections or claims;
    - 8.1.8. for the administration of payments;
    - 8.1.9. for debt recovery and collection;
    - 8.1.10. for maintenance of websites and mobile apps and improvement of operation;
  - 8.2. for business planning and analytics;
  - 8.3. for client safety, protection of company property;
  - 8.4. for other specific purposes.
9. The LLC "RĪGAS ŪDENS" may also process the data for other purposes compatible with the original purpose, provided that the data subject's rights are respected.

#### **V. Legal basis for personal data processing**

10. The LLC "RĪGAS ŪDENS" processes the Client's personal data mainly on the following legal grounds:
  - 10.1. for the conclusion and performance of a contract - to conclude a contract based on the Client's request and to ensure its performance (a contract is also understood as a verbal agreement to purchase a service);
  - 10.2. to comply with laws and regulations - to perform an obligation set out in the binding external laws and regulations of the LLC "RĪGAS ŪDENS";
  - 10.3. in accordance with the data subject's consent;
  - 10.4. lawful (legitimate) interests - to pursue legitimate (lawful) interests arising from the obligations or contract between the LLC "RĪGAS ŪDENS" and the Client or other such interests of the LLC "RĪGAS ŪDENS" and a third party.
11. The lawful (legitimate) interests of the LLC "RĪGAS ŪDENS" are:
  - 11.1. to carry out commercial activities;
  - 11.2. to verify identity of the Client before purchasing certain goods or services;
  - 11.3. to ensure performance of contractual obligations;
  - 11.4. to maintain Client applications and submissions for the purchase of goods and provision of services;
  - 11.5. to design and develop goods and services;
  - 11.6. to advertise their goods and services by sending commercial announcements;
  - 11.7. to send other reports on the progress of performance of the Contract and events relevant to the performance of the Contract, and conduct surveys of Clients about the goods and services and their experience in using them;
  - 11.8. to prevent fraudulent activities against the company;
  - 11.9. to ensure corporate governance, financial and business accounting and analytics;
  - 11.10. to ensure effective business governance processes;
  - 11.11. to ensure and improve the quality of services;
  - 11.12. to administer payments;
  - 11.13. to perform video surveillance for business security;
  - 11.14. to inform the public about the activities;
  - 11.15. other legitimate interests set by the LLC (SIA) "Rīgas ūdens".

#### **VI. Personal data protection**

12. The LLC "RĪGAS ŪDENS" shall protect the Client's data by using modern technological possibilities, taking into account the existing privacy risks and the organisational, financial and technical resources reasonably available to the LLC "RĪGAS ŪDENS", including use of the following security measures:
  - 12.1. Firewalls;
  - 12.2. Intrusion protection and detection software;
  - 12.3. Other protection measures in line with the up to date possibilities of the technical development.
13. Technological and organisational measures for the protection of information (including personal data) are provided for in the internal regulatory enactments governing information security and information systems of the LLC "RĪGAS ŪDENS".

#### **VII. Categories of recipients of personal data**

14. The LLC "RĪGAS ŪDENS" shall not disclose to third parties the Client's personal data or any information obtained during the provision of services and the validity term of the contract, including information about goods and services received, except for:
  - 14.1. subject to the Client's express and unambiguous consent;
  - 14.2. by engaging a data processor to process personal data in accordance with a valid contract;
  - 14.3. in accordance with the legitimate interests of the LLC "RĪGAS ŪDENS" or a third party (to whom the data will be transferred), ensuring a balance with the rights and interests of the data subject, persons provided for in external regulatory enactments upon their reasonable request, in accordance with the procedures and in the scope stipulated in external regulatory enactments;
  - 14.4. in the cases stipulated in external regulatory enactments for the protection of the legitimate interests of the LLC "RĪGAS ŪDENS", for example, by applying to court or other state institutions against a person who has infringed the legitimate interests of the LLC "RĪGAS ŪDENS".

#### **VIII. Transfer of personal data**

15. LLC "Rīgas ūdens" does not transfer personal data to third parties, except to the extent necessary for the conduct of reasonable business, ensuring that the third parties concerned maintain confidentiality of personal data and provide appropriate protection.
16. LLC "RĪGAS ŪDENS" is entitled to transfer personal data to the suppliers, subcontractors, strategic partners of the LLC "RĪGAS ŪDENS" and others who assist the LLC "RĪGAS ŪDENS" and its Clients in the performance of their business activities to implement the relevant cooperation. However, in such cases, LLC "RĪGAS ŪDENS" requires an undertaking from the data recipients to use the information received only for the purposes for which the data was provided and in accordance with the requirements of the applicable laws and regulations.

#### **IX. Transfers to third countries**

17. LLC "RĪGAS ŪDENS" does not transfer personal data to third countries (outside the European Union and the European Economic Area).

#### **X. Duration of storage of personal data**

18. LLC "RĪGAS ŪDENS" determines the periods of storage of personal data in accordance with the

following criteria:

- 18.1. personal data is kept at least as long as they are necessary to achieve the purpose of their processing;
  - 18.2. personal data is kept for at least the statutory period of storage;
  - 18.3. personal data is stored at least until the moment someone may raise legal claims and/or commence legal proceedings against the LLC "Rīgas ūdens" in order to ensure the preservation of evidence.
19. After these circumstances cease to exist, the Client's personal data shall be deleted or anonymised.

#### **XI. Rights of data subjects**

20. The Client has the right to receive the information stipulated by the laws and regulations in relation to the processing of their data.
21. In accordance with the regulatory enactments, the Client has the right to request the LLC "RĪGAS ŪDENS" access to their personal data, to request the LLC "RĪGAS ŪDENS" to supplement, correct, delete or restrict processing thereof in relation to the Client, to object against processing (including processing of personal data based on the legitimate interests of the LLC "RĪGAS ŪDENS"), as well as the right to data portability. These rights shall be exercised subject to the limitations set out in the laws and regulations.
22. The Client may submit a request for the exercise of their rights in the following ways:
  - 22.1. in writing at the registered office of the LLC "Rīgas ūdens": 1 Zigfrīda Annas Meierovica Blvd, Riga, LV-1495 or via postal service;
  - 22.2. by e-mail, signing by means of a secure electronic signature and sending to the following e-mail address: [office@rigasudens.lv](mailto:office@rigasudens.lv).
23. Upon receipt of the Client's request to exercise their rights, the LLC "RĪGAS ŪDENS" shall verify the identity of the Client, assess the request and execute it in accordance with the laws and regulations.
24. LLC "Rīgas ūdens" shall issue answer to the Client in a secure manner, verifying their identity.
25. The amount of information provided to data subjects may be limited to prevent adverse effects on the rights and freedoms of other persons (including employees of the LLC "RĪGAS ŪDENS", other data subjects).
26. LLC "RĪGAS ŪDENS" undertakes to ensure the correctness of personal data and relies on its Clients, suppliers and other third parties who transfer personal data to ensure the completeness and correctness of the personal data transferred.

#### **XII. Client's consent to data processing and right to withdraw it**

27. The Client shall have the right to withdraw the consent to data processing at any time in the same manner as it was given and/or by submitting a separate application. In such a case, no further processing based on the consent previously given for the specific purpose will be carried out.
28. Withdrawal of consent shall not affect the processing of data carried out at the time when the Client's consent was valid.
29. Withdrawal of consent cannot interrupt the processing of data carried out on the basis of other legal grounds.

#### **XIII. Commercial notices**

30. Communication regarding commercial announcements about services provided by the LLC "RĪGAS ŪDENS" and/or third parties services and other announcements not related to the provision of directly contracted services (e.g., client surveys) shall be carried out by the LLC "RĪGAS ŪDENS" in

accordance with the provisions of external laws and regulations or with the Client's consent.

31. Communication, including regarding commercial announcements, may be made by the LLC "RĪGAS ŪDENS" using automatic dialling or electronic communication equipment.
32. The Client gives their consent to receive commercial announcements from the LLC "RĪGAS ŪDENS" and/or its business partners in writing in person at the registered office of the LLC "RĪGAS ŪDENS", on the LLC "RĪGAS ŪDENS" website and mobile applications or elsewhere, where the LLC "RĪGAS ŪDENS" organises marketing activities.
33. The Client's consent to receive commercial announcements is valid until revoked (including after termination of the service contract). The Client may opt-out from receiving further commercial announcements at any time in any of the following ways:
  - 33.1. by sending an e-mail to: [office@rigasudens.lv](mailto:office@rigasudens.lv);
  - 33.2. by calling: 80002122;
  - 33.3. by submitting a written application to the LLC "Rīgas ūdens";
  - 33.4. by using the automated opt-out option provided in the commercial announcement by clicking on the opt-out link at the end of the commercial announcement (e-mail) concerned.
34. LLC "RĪGAS ŪDENS" shall stop sending commercial announcements as soon as the Client's request is processed.
35. By expressing their opinion in the surveys and leaving their contact details (e-mail, telephone), the Client agrees that the LLC "RĪGAS ŪDENS" may contact them using the contact details provided in connection with the assessment provided by the Client.

#### **XIV. Website visits and cookie processing**

36. LLC "Rīgas ūdens" websites may use cookies, whereof a notice shall be posted on the website.
37. Cookies are files that websites place on users' computers to recognise the user and make it easier for them to use the website. Internet browsers can be configured to warn the Client about the use of cookies and allow the Client to choose whether to accept them. Not accepting cookies will not prevent the Client from using the website, but it may limit the Client's use thereof;
38. LLC "RĪGAS ŪDENS" website may contain links to third party websites, which have their own terms of use and personal data protection, for the completeness of which the LLC "RĪGAS ŪDENS" is not responsible.

#### **XV. Final Provisions**

39. This Privacy Policy, as well as the Privacy Notices (Annex 1 and Annex 2) may be revised and amended, whereof the LLC "RĪGAS ŪDENS" will inform the data subjects in the most comprehensible and accessible way.

#### **XVI. Document status**

Date	Version	Page
22.05.2018	1.0	1-4

Annex:

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**LLC "RĪGAS ŪDENS"**  
**PERSONAL DATA PROCESSING NOTICE FOR DATA SUBJECTS FOR THE**  
**PURPOSES OF PROCESSING PERSONNEL DATA**

**1 Information on the controller**

Controller is the LLC "Rīgas ūdens", registration number: 40103023035, registered office: 1 Zigrīda Annas Meierovica Blvd, Riga, LV1495.

We can be contacted by phone: 67088555 or by e-mailing to:  
[office@rigasudens.lv](mailto:office@rigasudens.lv).

**2 Contact details for communication on personal data protection issues**

If you have any questions regarding this notice or the processing of your personal data, you may contact us through the communication channels set out in the preceding paragraph (Paragraph 1) or by contacting our personal data protection officer by writing at the following e-mail address:  
[datuaizsardziba@rigasudens.lv](mailto:datuaizsardziba@rigasudens.lv).

**3 General characterisation of processing of personal data carried out by us**

This notice describes how we process the personal data of our employees, candidates, trainees, employees' family members, contacts and other persons whose data may come into our possession for the purposes of processing personnel data.

When you start the job by submitting your CV, we will give you access to this notice. The purpose of this notice is also to make it possible for persons whose data has been provided to us by employees or candidates (e.g., relatives' data, data of referees, etc.) to get familiarised with our rules on the processing of personal data. This is the updated version of the notice. We reserve the right to amend and update this notice as necessary.

The purpose of this notice is to provide you with a general overview of our personal data processing activities and purposes, however, please note that other documents (such as the Internal Rules of Work, Employment Contract, internal procedures and instructions) may also contain additional information about the processing of your personal data.

We recognise that personal data is your asset and will process it in line with the confidentiality requirements and taking care of the security of the personal data we hold about you.

**4 For what purposes we process your personal data and what are the legal grounds for processing of personal data?**

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

- a) **for the selection process of the employees and the exercise of the rights and obligations arising therefrom:**

Within the framework of this purpose, we collect CVs from candidates, we contact the candidate and the referees identified by the candidates to collect references, we save CVs for other competitions with the candidate's consent, to defend our interests in legal proceedings, we save data to respond to claims and cases brought before the courts.

For this purpose and for the sub-purposes indicated above, we may need at least the following personal data: candidate's name, surname, contact details (e-mail, telephone number), information on the candidate's education and previous work experience, information on persons who can provide references and their contact details, references about the candidate, as well as other information that could be relevant for the performance of the job and identification of the most suitable candidate.

The main legal grounds to be used to achieve these purposes are:

- consent (Article 6(1)(b) of the General Data Protection Regulation<sup>1</sup>) - with regard of the fact of submitting a CV and to the retention of CVs for future competitions;
- conclusion of a contract with the data subject (Article 6(1)(b) of the General Data Protection Regulation) - with regard of the processing of data of the candidates for whom the decision to conclude an employment contract has been taken;
- performance of legal obligations (Article 6(1)(c) of the General Data Protection Regulation) - in individual cases for certain types of data, where the laws and regulations stipulate mandatory requirements for a specific position;
- legitimate interests of the controller (Article 6(1)(f) of the General Data Protection Regulation) - with regard of the provision of evidence in the event of possible claims, as well as with regard of the minimum amount of information to be requested.

**b) for the conclusion and performance of an employment contract:**

Within the framework of this purpose, we collect the information required to be included in the employment contract and annexes thereto, we will identify you, verify your qualification documents, draw up the employment contract, provide you with an e-mail address for work purposes, assign you a user name to access the relevant information systems and keep track of your working hours, the work you have done, in some cases, if necessary for the performance of your professional duties, we will share data on your position and contact details with our business partners and clients, as well as other employees, calculate and pay your wages to the current account indicated by you, check your health status and collect other information necessary for your employment.

For this purpose and the sub-purposes indicated above, we may need at least the following personal data: employee's name, surname, personal identity number, place of residence, telephone number, starting date of employment, place of work, employee's education data, employee's qualifications data, description of job duties to be performed, position, job contact details, amount of wage, evidence of job performance, employee's evaluations, employee's health data.

The main legal grounds to be used to achieve these purposes are:

- conclusion of a contract with the data subject (Article 6(1)(b) of the General Data Protection Regulation);

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<sup>1</sup> 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)



- performance of legal obligations (Article 6(1)(c) of the General Data Protection Regulation) - with regard of the information to be included in the employment contract and the required qualifications;
- performance of the controller's duties and the exercise of rights in the field of employment (Article 9(1)(b) of the General Data Protection Regulation) - with regard of processing of data of special categories (health data, trade union membership).

**c) Compliance with requirements in relation to employment laid down in laws and regulations or with requirements laid down in other laws and regulations:**

Within the framework of this purpose, we would need to comply with the requirements laid down in the Labour Law, the Labour Protection Law, the Accounting Law, the Law On Archives and other laws and regulations. Also, in certain cases, we should provide relevant information about you to public authorities on the basis of the rights of public authorities established by laws and regulations (e.g., the State Revenue Service, the State Labour Inspectorate, sworn bailiffs, investigative institutions, courts, supervisory authorities).

For this purpose, we may need to process the following personal data: any information about you requested by public authorities, health data to ensure health checks required by law and accident investigations, information about your trade union membership in case of termination, information about children (age, name, surname) to ensure additional days of leave, information about your activities as a donor to ensure paid days, etc. information that the laws and regulations require us to collect.

The main legal grounds to be used to achieve these purposes are:

- performance of legal obligations (Article 6(1)(c) of the General Data Protection Regulation);
- performance of the controller's duties and the exercise of rights in the field of employment (Article 9(1)(b) of the General Data Protection Regulation) - with regard of processing of data of special categories (health data, trade union membership).

**d) Ensuring social conditions and an appropriate working environment for staff:**

Within the framework of this purpose, we could provide you with various "social benefits", such as extra days off for various events in your life, health insurance, we could also collect information to tailor the working environment to you, we could inform other colleagues about your anniversaries, your absences, as well as publish pictures of employer-organised events.

For this purpose, we may need at least the following personal data: data of the employee's children (name, surname), information about other important events of your life, information needed for insurance purposes, your anniversaries, photos/videos from events, in some cases also your health condition to ensure an appropriate working environment, etc.

The main legal grounds to be used to achieve these purposes are:

- consent of the data subject (Article 6(1)(a) and Article 9(1)(a) of the General Data Protection Regulation) - e.g., with regard of anniversary publishing, providing insurance;

- the legitimate interests of the controller (Article 6(1)(f) of the General Data Protection Regulation) - e.g., publishing photographs of events, ensuring an appropriate working environment;
- performance of the controller's duties and the exercise of rights in the field of employment (Article 9(1)(b) of the General Data Protection Regulation) - with regard of the processing of special categories of data (health data), for example, to ensure an adequate working environment.

**e) Preventing threat to safety, property interests and ensuring other legitimate interests of ours or third parties:**

Within the framework of this purpose, we would need to carry out video surveillance of our premises, buildings and other property, use personal data processors for various functions, exchange information within the group of companies where necessary, exercise rights conferred by laws and regulations for our legitimate interests, record working time, record employee access to certain premises and information systems, to control protection of our trade secrets and the personal data of clients, for example, by controlling outgoing mail, to check the performance of an employee's duties, in certain cases - to pass on information about you to business partners or clients, or potential clients (within the framework of procurements), if this is necessary for us to provide our services and your work is related to the provision of these services, and we should retain data to protect ourselves in case of claims against us by employees, etc.

For this purpose, we may need to process at least the following personal data: data contained in video recordings, data recorded in access control systems about visits to the premises or connections to information systems, your name, surname, position and contact details, in some cases the content of outgoing e-mails if risks are detected, etc.

The main legal grounds to be used to achieve these purposes are:

- the legitimate interests of the controller (Article 6(1)(f) of the General Data Protection Regulation).

## **5 Who could access your personal data?**

We take appropriate measures to process your personal data according to the applicable laws and regulations and to ensure that your personal data is not accessed by third parties who do not have an adequate legal grounds for processing your personal data.

Your personal data can be accessed as necessary by:

- 1) our employees or directly authorised persons who need to do so to carry out their job, such as accountants, line managers, HR staff or, where the data is public, all employees;
- 2) processors of personal data according to the provided services and only to the extent necessary, such as auditors, financial management and legal consultants, database developer/technical maintainer, other persons related to the provision of the controller's services;
- 3) state and municipal institutions in cases provided for by laws, such as law enforcement authorities, local governments, tax authorities, sworn bailiffs;
- 4) third parties, carefully assessing whether there are appropriate legal grounds for such data transfer, for example, debt collectors, courts, out-of-court dispute resolution bodies, bankruptcy or insolvency administrators, third parties maintaining registers (e.g., population register, debtors' register, etc.), courts.

## 6 What partners do we choose for the processing of personal data or personal data processors?

We take appropriate measures to ensure the processing, protection and transfer of your personal data to data processors in accordance with the applicable laws. We carefully select our personal data processors and, when making data transfers, we assess the need for the transfer and the amount of data to be transferred. The transfer 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 consultants;
- 2) Owner/developer/technical maintainer of IT infrastructure, database;
- 3) Maintainer of fleet management system (GPS data);
- 4) Other persons related to the provision of our services.

Personal data controllers may change from time to time, whereof we will make changes also in this document.

## 7 Is your personal data sent to countries 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.

## 8 How long will we store your personal data for?

Your personal data is stored for as long as it is necessary for the relevant purposes of the personal data processing, as well as in accordance with the requirements of the applicable laws.

When assessing the duration of the storage of personal data, we take into account the applicable requirements of the laws and regulations, aspects related to 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.

Below we list the most common periods of storage of personal data:

- personal data necessary for the performance of an employment contract will be stored by us until the contract is performed and other periods of storage expire (see below);
- we will keep personal data that needs to be kept to comply with the requirements of the laws for the periods specified in the relevant laws and regulations, *e.g., the Accounting Law stipulates that supporting documents must be stored until the date they are needed to establish the start of each economic transaction and trace its progress, but not less than 5 years; whereas, supporting documents for calculated employees' wages - 10 years or, in certain cases, 75 years;*
- We will store the data to prove the fulfilment of our obligations for the general limitation period of the claim in accordance with the statutory limitation periods set for claims - *10 years (Civil Law), 2 or 3 years (Labour Law)* and in accordance with other terms, taking into account also the time limits for raising claims set out in the Civil Procedure Law and the Labour Law.

## 9 What are your rights as a data subject with regard of the processing of your personal data?

**Updating personal data**

If there are changes to the personal data you have provided to us, such as a changes in personal identity number, contact address, telephone number or email address, please contact us and provide us with the updated data so that we can meet the relevant 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 access your personal data that is at our disposal, to request its rectification, erasure, restriction of processing, to object to the processing of your data, as well as the right to data portability in the cases and in accordance with the procedure stipulated in the General Data Protection Regulation.

We respect this right of yours to access and control your personal data, so if we receive your request, we will respond to it within the time limits set out in the laws and regulations (usually no later than within one month, unless there is a special request that requires more time to prepare a response) and, where possible, we will correct or delete your personal data accordingly.

You can obtain information about your personal data held by us or exercise your other rights as a data subject in any of the following ways:

- 1) by filing a respective application in person and identifying yourself at our office, address: 1 Zigfrīda Annas Meierovica Boulevard, Monday - Thursday 8 am - 5 pm, Friday 8 am - 3:45 pm;
- 2) by filing a respective application to us by post to the following address: 1 Zigfrīda Annas Meierovica Boulevard, Riga, LV-1495.
- 3) by filing a respective application to us by e-mailing to: [datuaizsardziba@rigasudens.lv](mailto:datuaizsardziba@rigasudens.lv), preferably signed by means of a secure electronic signature.

Upon receipt of your application, we will assess its content and the possibility of identifying you and, depending on the respective situation, we reserve the right to ask you for additional identification to ensure the security of your data and disclosure thereof to the respective person.

#### **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 and we will no longer process your personal data that we have processed on the basis of your consent for that purpose. However, we inform you that withdrawal of consent may not affect the processing of personal data that is necessary to comply with the requirements of laws and regulations or that is 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 if the processing is based on legitimate interests.

#### **10 Where can you lodge a complaint about issues related to the processing of personal data?**

If you have any questions or objections in relation to our processing of your personal data, we encourage you to contact us in the first instance.

If you believe that we have not been able to resolve the issue mutually and you believe that we violate 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 of the Data State Inspectorate and other related information on the website of the Data State Inspectorate (<http://www.dvi.gov.lv/lv/datu-aizsardziba/privatpersonam/iesniegumu-paraugi/>).

#### **11 Why do you need to provide us with your personal data?**

We collect your information primarily to fulfil our contractual obligations, to comply with our binding legal obligations and to pursue our legitimate interests. In these cases, we need to obtain certain information for the purposes of achievement of relevant purposes, so failure to provide such information may jeopardise commencement of the employment relationship or performance of the contract. If the data is not mandatory, but its provision could help improve the working environment or your employment conditions, we will indicate that provision of the data is voluntary.

#### **12 How do we obtain your personal data?**

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

- 1) from you submitting your application and CV to us for the vacancy;
- 2) in the process of entering into a mutual contract by obtaining data from you;
- 3) if the contract is concluded with a third party who has named you as a family member;
- 4) from you, if you file any submissions with us, send us emails, call us;
- 5) in certain cases, we may obtain data from third parties for this purpose, such as from third party databases, for example, to assess your creditworthiness;
- 6) from CCTV footage and access control systems, where applicable;
- 7) where appropriate, from doctors as a result of medical checks.

#### **13 Is your personal data used for automated decision-making?**

We do not use your data for automated decision-making.

**LLC "RĪGAS ŪDENS"**  
**NOTICE OF PROCESSING OF PERSONAL DATA TO**  
**CLIENTS AND OTHER RELATED PARTIES**

**1 Information on the controller**

Controller is the LLC "Rīgas ūdens", registration number: 40103023035, registered office: 1 Zigrīda Annas Meierovica Blvd, Riga, LV1495.

We can be contacted by phone: 67088555 or by writing to the following e-mail address:

[office@rigasudens.lv](mailto:office@rigasudens.lv)

**2 Contact details for communication on personal data protection issues**

If you have any questions regarding this notice or the processing of your personal data, you may contact us through the communication channels set out in the preceding paragraph (Paragraph 1) or by contacting our personal data protection officer by writing at the following e-mail address:

[datuaizsardziba@rigasudens.lv](mailto:datuaizsardziba@rigasudens.lv).

**3 General characterisation of processing of personal data carried out by us**

This notice describes how we process the personal data of our clients, client representatives/contacts, business partners, website visitors and other persons whose data may come into our possession within the framework of our commercial activity.

We assume that, before using our website or becoming our client, you have read this notice of ours and accepted its terms. This is the updated version of the notice. We reserve the right to amend and update this notice as necessary.

The purpose of this notice is to provide you with a general insight of our data processing activities and purposes, but please note that other documents (such as service agreements, cooperation agreements, terms of use of the website or portal) may also contain additional information about the processing of your personal data.

Please be informed that the provisions of personal data processing contained in this notice only apply to the processing of personal data of natural persons.

We recognise that personal data is your asset and will process it in line with the confidentiality requirements and taking care of the security of the personal data we hold about you.

**4 For what purposes we process your personal data and what are the legal grounds for processing of personal data?**

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

- a) **for the commencement and provision of the Services, and for the performance and securing of the obligations set out in the Agreement (including the Cooperation Agreement):**

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

For this purpose and for the sub-purposes indicated above, we may need at least the following personal data: name, surname, personal identity number, address (facility address, postal address, invoice delivery address), bank account number; telephone number, address (postal address, invoice delivery address), e-mail address of the client, contact person of the client and/or business partner.

The main legal grounds to be used to achieve these purposes are:

- conclusion and performance of a contract with the data subject (Article 6(1)(b) of the General Data Protection Regulation<sup>2</sup>);
- performance of legal obligations (Article 6(1)(c) of the General Data Protection Regulation);
- the legitimate interests of the controller (Article 6(1)(f) of the General Data Protection Regulation).

**b) Compliance with the requirements for the provision of services set out in laws and regulations or with the requirements set out in other regulatory requirements:**

Within the framework of this purpose, we would need to meet the requirements of both the laws and regulations governing water management, as well as the requirements of the Accounting Law, the Law On Archives and other laws and regulations.

For this purpose, we may need to process the following personal data: name, surname, personal identity number, address, facility address of the client, contact person of the client and/or business partner.

The main legal grounds to be used to achieve these purposes are:

- performance of legal obligations (Article 6(1)(c) of the General Data Protection Regulation).

**c) Preventing threat to safety, property interests and ensuring other legitimate interests of ours or third parties:**

Within the framework of this purpose, we would need to carry out video surveillance of our territory, buildings and other properties, record informational telephone calls, use personal data processors for various functions, disclose information to courts and other public institutions, where necessary, and exercise the rights granted by laws and regulations to ensure our legitimate interests.

For this purpose, we may need to process at least the following personal data: name, surname, personal identity number of the client, contact person of the client and/or business partner, address of the object, person's appearance (image), location and time, and other data as necessary.

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<sup>2</sup> 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)

The main legal grounds to be used to achieve these purposes are:

- the legitimate interests of the controller (Article 6(1)(f) of the General Data Protection Regulation), e.g., for the detection of crime, debt recovery.

**d) To ensure proper provision of services:**

Within the framework of this purpose, we would need to carry out maintenance and improvement of technical systems and IT infrastructure, use technical and organisational solutions that may use also your personal data (for example, by using cookies), in order to ensure proper provision of services.

The main legal grounds to be used to achieve these purposes are:

- the legitimate interests of the controller (Article 6(1)(f) of the General Data Protection Regulation).

## **5 Who could access your personal data?**

We take appropriate measures to process your personal data according to the applicable laws and regulations and to ensure that your personal data is not accessed by third parties who do not have an adequate legal grounds for processing your personal data.

Your personal data can be accessed as necessary by:

- 1) our employees or directly authorised persons, where this is necessary for the performance of their duties;
- 2) processors of personal data according to the provided services and only to the extent necessary, such as auditors, financial management and legal consultants, database developer/technical maintainer, other persons related to the provision of the controller's services;
- 3) state and municipal institutions in cases provided for by laws, such as law enforcement authorities, local governments, tax authorities, sworn bailiffs;
- 4) third parties, carefully assessing whether there are appropriate legal grounds for such transfer of data, such as debt collectors, courts, out-of-court dispute resolution bodies, bankruptcy or insolvency administrators, third parties maintaining registers (e.g., population register, debtors' register, and other registers).

## **6 What partners do we choose for the processing of personal data or personal data processors?**

We take appropriate measures to ensure the processing, protection and transfer of your personal data to data processors in accordance with the applicable laws. We carefully select our personal data processors and, when making data transfers, we assess the need for the transfer and the amount of data to be transferred. The transfer 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) Information logistics service providers;
- 2) Auditors, financial management and legal consultants;
- 3) Owner/developer/technical maintainer of IT infrastructure, database;
- 4) Other persons related to the provision of our services;



Personal data controllers may change from time to time, whereof we will make changes also in this document.

#### **7 Is your personal data sent to countries 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.

#### **8 How long will we store your personal data for?**

Your personal data is stored for as long as it is necessary for the relevant purposes of the personal data processing, as well as in accordance with the requirements of the applicable laws.

When assessing duration of the retention of personal data, we take into account requirements of applicable laws and regulations, aspects related to performance of contractual obligations, your instructions, as well as our legitimate interests. If your personal data is no longer necessary for the purposes specified, we will delete or destroy it.

Below we list the most common periods of storage of personal data:

- personal data necessary for the performance of contractual obligations will be stored by us until the contract (contractual obligations) is performed and other storage periods expire (see below);
- we will store personal data that needs to be stored to comply with legal requirements for the periods specified in the relevant laws and regulations, e.g., *the Accounting Law stipulates that supporting documents must be stored until the date they are needed to establish the start of each economic transaction and trace its progress, but not less than 5 years;*
- We will store the data to prove the fulfilment of our obligations for the general limitation period of the claim in accordance with the statutory limitation periods set for claims - *10 years (Civil Law), 3 years (Commercial Law)* and in accordance with other terms, taking into account also the time limits for raising claims set out in the Civil Procedure Law.

#### **9 What are your rights as a data subject with regard of the processing of your personal data?**

##### **Updating personal data**

If there are changes to the personal data you have provided to us, such as a changes in personal identity number, contact address, telephone number or email address, please contact us and provide us with the updated data so that we can meet the relevant 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 access your personal data that is at our disposal, to request its rectification, erasure, restriction of processing, to object to the processing of your data, as well as the right to data portability in the cases and in accordance with the procedure stipulated in the General Data Protection Regulation.

The company respects this right of yours to access and control your personal data, so if we receive your request, we will respond to it within the time limits set out in the laws and regulations (usually no later than within one month, unless there is a special request that requires more time to prepare a response) and, where possible, we will correct or delete your personal data accordingly.

You can obtain information about your personal data held by us or exercise your other rights as a data subject in any of the following ways:

- 1) by filing a respective application in person and identifying yourself at a client service centre: 49/53 Brīvības Street, Riga, every business day from 8 am to 7 pm;
- 2) by filing a respective application to us by post to the following address: 1 Zigfrīda Annas Meierovica Blvd, Riga, LV-1495
- 3) by filing a respective application by e-mailing it to: [datudrosiba@rigasudens.lv](mailto:datudrosiba@rigasudens.lv), preferably signed by means of a secure electronic signature.

Upon receipt of your application, we will assess its content and the possibility of identifying you and, depending on the respective situation, we reserve the right to ask you for additional identification to ensure the security of your data and disclosure thereof to the respective person.

#### **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 and we will no longer process your personal data that we have processed on the basis of your consent for that purpose. However, we inform you that withdrawal of consent may not affect the processing of personal data that is necessary to comply with the requirements of laws and regulations or that is 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 if the processing is based on legitimate interests.

#### **10 Where can you lodge a complaint about issues related to the processing of personal data?**

If you have any questions or objections in relation to our processing of your personal data, we encourage you to contact us in the first instance.

If you believe that we have not been able to resolve the issue mutually and you believe that we violate 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 of the Data State Inspectorate and other related information on the website of the Data State Inspectorate.

#### **11 Why do you need to provide us with your personal data?**

We collect your information primarily to fulfil our contractual obligations, to comply with our binding legal obligations and to pursue our legitimate interests. In these cases, we need to obtain certain information for the purposes of achievement of relevant purposes, so failure to provide such information may jeopardise commencement of the business relationship or performance of the contract. If the data is not mandatory, but its provision could help improve the service or offer you favourable contractual conditions and/or offers, we will indicate upon collection of the data that the provision of the data is voluntary.

In addition, we would like to inform you about the main requirements of the laws and regulations with regard of the processing of personal data:

- 1) Law on Water Management Services and the binding regulations issued on the basis thereof stipulate that notifications of interruptions of water supply are sent by the service provider to the service user's e-mail address;
- 2) The Accounting Law requires the following personal data to be included in the document of an economic transaction (contract), to which a natural person is a party: name, surname, personal identity number (if

the person has been granted one), address indicated by the person or, if none is given, address of the declared place of residence.

### **12 How do we obtain your personal data?**

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

- 1) in the process of entering into a mutual contract by obtaining data from you;
- 2) if the contract is being concluded with a third party and that third party has indicated you as the contact person;
- 3) from you, if you file any submissions with us, send us emails, call us;
- 4) from you, when you log in to [www.rigasudens.lv](http://www.rigasudens.lv)
- 5) in certain cases, we may obtain data from third parties for this purpose, such as from third party databases, for example, to assess your creditworthiness;
- 6) where appropriate, from CCTV footage.

### **13 Is your personal data used for automated decision-making?**

We do not use your data for automated decision-making.