

CONFIDENTIALITY POLICY

Identity: -

Date of approval: 27.06.2018

Responsible person: General Director

Reference: **BRC**

Copy: Production and Administrative Division



APPROVED
by the minutes of “ALOJA - STARKELSEN” LTD
Board meeting of June 27, 2018

CONFIDENTIALITY POLICY Version No. 2

CONFIDENTIALITY POLICY

Identity: -

Date of approval: 27.06.2018

Responsible person: General Director

Reference: **BRC**

Copy: Production and Administrative Division



Content

1. Definitions and clarifications.....	3
2. General provisions.....	4
3. Prohibition to disclose Confidential Information.....	4
4. Rules for protection of Confidential Information.....	5
5. Other provisions.....	7
6. Where can I find the updated Confidentiality Policy?.....	7
7. How to get in touch with us?.....	7

CONFIDENTIALITY POLICY

Identity: -

Date of approval: 27.06.2018

Responsible person: General Director

Reference: **BRC**

Copy: Production and Administrative Division



1. Definitions and clarifications

It is important for “ALOJA-STARKELSEN” SIA, hereinafter referred to as **Aloja Starkelsen**, to ensure a continuous confidentiality, integrity and controlled access of information (including trade secrets and personal data).

- 1.1. Confidential information is any information related to Aloja Starkelsen and its operation, methods and nature of its operation, including trade, production, which includes, *inter alia*, personal data and trade secrets, hereinafter collectively referred to as **Confidential Information**.
- 1.2. Aloja Starkelsen's **trade secret** is any information or data relating to Aloja Starkelsen's business (regardless of its form - whether it is oral or written), including its processes, plans, intentions, administration, business status, strategy, recipes, production, its methods, information on products, their composition, design rights, wages, prices of goods or services, cost of production, trade secrets, equipment, software, program codes, specifications, market opportunities, clients or business partners, and documents related to quality management, except for information that is publicly available.

For the avoidance of doubt, we clarify that the information and data to be included in the company statements shall not be deemed confidential, while all other company accounting information shall be considered confidential and shall only be available to Aloja Starkelsen's staff for carrying out their direct duties, for audits, tax administration's verification of accuracy of tax calculation, as well as other institutions in cases provided for in the law.

- 1.3. In order to ensure the protection of Confidential Information (including protection of trade secrets and personal data), Aloja Starkelsen, in this Confidentiality Policy, sets out the requirements for the processing and protection of Confidential Information which must be met by anyone who has, direct or indirect access to such information.
- 1.4. This Confidentiality Policy shall be applicable and binding to anyone who has access to Confidential Information, including employees, trainees, contractors, subcontractors, clients, co-operation partners, or any natural or legal person, hereinafter referred to as the **User of Information**.

The User of the Information shall be responsible for obtaining, processing, and transferring of Confidential Information only in a legal and justified manner, in compliance with the requirements of the applicable regulatory enactments, including regarding the obligation of trade secret confidentiality and processing of personal data.

CONFIDENTIALITY POLICY

Identity: -

Date of approval: 27.06.2018

Responsible person: General Director

Reference: **BRC**

Copy: Production and Administrative Division



2. General provisions.

- 2.1. The purpose and scope of this policy relates to Aloja Starkelsen's Confidential Information and the measures to be taken to ensure that such information is protected.
- 2.2. This Confidentiality Policy prohibits the disclosure of Confidential Information to any person without legal grounds. This policy shall be applied to discourage an unlawful acquisition, use or disclosure of Confidential Information. The aim of this policy shall not be a restriction of rights to freedom of expression and information, private and family life or the right to protection of personal data, but the protection of interests of the company.
- 2.3. The protection of Confidential Information shall not apply to cases in which the disclosure of trade secrets serves the public interest in accordance with applicable regulatory enactments of the Republic of Latvia and within the limits specified therein, however, in any case, Confidential Information shall be considered as restricted access information.
- 2.4. The protection of trade secrets shall not apply to publicly available information, provided that it has become publicly available lawfully.
- 2.5. Anyone who has access to the Confidential Information, i.e., the User of Information, shall be obliged to comply with the terms of this policy, including the use of organizational and technical measures to protect Confidential Information.

3. Prohibition to disclose Confidential Information.

- 3.1. Anyone, who has received Confidential Information, has a duty to ensure the protection, confidentiality (including but not only ensuring that such information is not available to third parties or employees who do not require it for the direct performance of their duties) and shall be prohibited from disclosing it to any person, except in the cases stipulated in the regulatory enactments of the Republic of Latvia.

The said prohibition includes, among other things:

- 3.1.1. *prohibition of disclosure of production technology processes;*
- 3.1.2. *prohibition on disclosure of the cost price of products to third parties;*
- 3.1.3. *prohibition on the disclosure of sales prices of products to third parties with whom there is no contract for the purchase of a product concluded;*
- 3.1.4. *prohibition on disclosure of the conditions for the purchase of a particular client's contract to other clients;*
- 3.1.5. *prohibition on the disclosure of recipes of products to third parties with whom there is no contract for the purchase/development of a particular recipe concluded;*
- 3.1.6. *prohibition on disclosure of information about clients and suppliers;*
- 3.1.7. *prohibition on disclosure of company strategy plans, product sales plans, investment plans to third parties;*
- 3.1.8. *prohibition to disclose to third parties or other employees information on remuneration, bonuses, benefits, gifts, etc. of a company employee.*

CONFIDENTIALITY POLICY

Identity: -

Date of approval: 27.06.2018

Responsible person: General Director

Reference: **BRC**



Copy: Production and Administrative Division

-
- 3.2. The prohibition on disclosure of Confidential Information shall apply to anyone, including employees who may not disclose such information outside the Aloja Starkelsen company unless it is necessary to carry out a direct duties in accordance with the job description and Aloja Starkelsen has a contractual relationship with the recipient of information or applicable regulatory enactments stipulate such disclosure, in any case, subject to the limits specified in the agreement or regulatory enactments. Meanwhile, within Aloja Starkelsen, an employee may disclose information to other employees only to the extent and only to those employees who require such information for the performance of direct duties.
 - 3.3. Confidential Information may only be disclosed with a prior written authorization from Aloja Starkelsen, in so far as there is no valid contractual relationship the nature of which already requires disclosure. In this case, information may only be disclosed to the extent provided for within a valid contractual obligation.
 - 3.4. Any communication of Confidential Information to the media shall be permitted only to the Director General of Aloja Starkelsen or a person designated by him/her.

4. Rules for protection of Confidential Information.

- 4.1. Users of Information shall be required to ensure that the recipient of the Confidential Information obtains such information from the User of Information only in a lawful manner in accordance with the requirements of this policy and is committed to protecting Confidential Information and compliance with the terms and conditions of this policy.
- 4.2. If the User of Information is a co-operation partner who engages subcontractors in the performance of its obligations and this right is contractually agreed upon in the co-operation agreement, he/she shall assume full responsibility for the actions of such a subcontractor in relation to Confidential Information.
- 4.3. If the User of Information is a co-operation partner, in this case he/she must ensure a process that allows tracking and determining who and when has accessed Confidential Information. That applies to both physical access and logical access (through information systems), as well as access to documents in paper form.
- 4.4. The User of Information shall provide compulsory technical protection of Confidential Information implemented by both physical (access control, security, appropriate temperature and humidity for document storage, etc.) and logical (software, passwords, encryption) safeguards.

CONFIDENTIALITY POLICY

Identity: -

Date of approval: 27.06.2018

Responsible person: General Director

Reference: **BRC**



Copy: Production and Administrative Division

4.5. Any User of Information, including employees, shall comply with the following practical rules:

- 4.5.1. *Do not disclose user account passwords, security codes for a dedicated computer, tablet, mobile phone, email;*
- 4.5.2. *Do not disclose user account passwords, security codes for the accounting program and other company databases, programs;*
- 4.5.3. *Do not disclose passwords, security codes for e-environment user accounts (online store for stationery, electronic goods, spare parts, transport orders, etc.);*
- 4.5.4. *Do not disclose access codes to the entrance door;*
- 4.5.5. *Do not divulge information on the company's territorial plan;*
- 4.5.6. *Leave your workplace clean and tidy, your computer turned off, and documents stowed in a safe, locked location.*
- 4.5.7. *Copying of working documents on private media or devices is prohibited;*
- 4.5.8. *Use of personal data carriers in work equipment is prohibited;*
- 4.5.9. *Unauthorized dispatch of work documents by electronic means is prohibited;*
- 4.5.10. *Unjustified reproduction of company documents and transferring them to third parties is prohibited;*
- 4.5.11. *The company electronic equipment shall only be used for work purposes;*
- 4.5.12. *Installing unauthorized software on electronic devices is prohibited.*

4.6. If User of Information is a legal entity, it is obliged to ensure that its employees and contractors comply with this policy, including sub-clause of Clause 4.5 on handling Confidential Information.

4.7. The obligations, requirements and rules set out in this policy must be complied with an unlimited period of time, that is, during employment relationship and after termination thereof, as well as during the cooperation and after the termination thereof.

4.8. The User of Information shall be obliged to immediately delete and/or destroy any Confidential Information in any form after the legal basis for such information to be at the User's disposal has disappeared, for example, after the termination of cooperation, the information received must be destroyed when the legal basis for processing it has disappeared.

4.9. In addition to the foregoing, the User of Information shall be obliged to ensure safe storage of Confidential Information, security measures, frequent change of entrance door access codes to buildings and premises containing Confidential Information, surveillance of company building and site during and outside the specified hours of work.

CONFIDENTIALITY POLICY

Identity: -

Date of approval: 27.06.2018

Responsible person: General Director

Reference: **BRC**

Copy: Production and Administrative Division



5. Other provisions.

5.1. This Confidentiality Policy enters into force on the date of approval thereof.

5.2. Aloja Starkelsen may unilaterally change this policy and notify the Users of Information thereof at least 10 (ten) working days in advance by placing a notice on its website; in limited cases, a shorter period of time for provision of information may be applied in case changes in this policy are related to applicable regulatory enactments or amendments thereto.

6. Where can I find the updated Confidentiality Policy?

The current version of this Confidentiality Policy is available on Aloja Starkelsen website: <https://www.aloja-starkelsen.lv/>

7. How to get in touch with us?

If you have any questions regarding this policy or application thereof, please, contact us at:

„ALOJA-STARKELSEN” LTD
Unified Reg. No. (VAT) 40003022419
Joglas iela 2, Ungurpils,
Alojas pagasts,
Alojas novads
Latvia, LV-4064

<https://www.aloja-starkelsen.lv/>
info.culinar@culinar.lv