

## GENERAL PRIVACY POLICY

Identity: -

Date of approval: 27.06.2018

Responsible person: General Director

Reference: **BRC**



Copy: Production and Administrative Division

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

# GENERAL PRIVACY POLICY

## Version No. 1

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### 1. General provisions.

- 1.1. It is important for us, ALOJA-STARKELSEN, Limited Liability Company, hereinafter referred to as the “**Manufacturer**” and/or “**We/Us**”, to ensure and respect the protection of privacy of natural persons in accordance with the applicable legal framework, in particular, the General Data Protection Regulation No. 2016/679 (hereinafter referred to as the **Data Regulation**).
- 1.2. The purpose of this General Privacy Policy (hereinafter referred to as the **Privacy Policy**) is to inform and provide clarification on how the Manufacturer takes care of and protects the personal data of natural persons, including seminar participants, clients, natural persons associated with a co-operation partner and visitors, and we want to help you understand how and for what purposes the personal data shall be processed. In this policy, you will also be able to learn about the rights of data subjects, which includes You, in the field of personal data protection.
- 1.3. We have tried to write this Privacy Policy as simple as possible to make it easier to understand the terms used in this policy, and we invite you to first read the following clarification:
  - 1.3.1. **anonymization** – a method of transformation of information after application of which the information can no longer be attributed to a natural person, since all identifying elements of the person are excluded from the personal data set;
  - 1.3.2. **data subject** – any directly or indirectly identified or identifiable natural person;
  - 1.3.3. **Agreement** – an agreement concluded between the Manufacturer and the data subject, or an agreement concluded with a co-operation partner or client, serving as grounds for processing of data relating to natural persons associated with the said partner or client;
  - 1.3.4. **You** – a natural person whose personal data we have obtained, for example, participants of seminars we have organized, clients, natural persons associated with co-operation partners, visitors;
  - 1.3.5. **personal data** – any information that can be attributed to data subject either directly or indirectly;
  - 1.3.6. **pseudonymisation** – the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

### 2. How does the Manufacturer obtain personal data?

Generally, we process personal data for the purposes of ensuring our operation, compliance with the regulatory enactments, contractual obligations, to ensure the health and safety of our clients, employees, and visitors, as well as protection of our infrastructure.

- 2.1. **Data obtained from the data subject, i.e., You.** Mainly we obtain your personal data when You provide them to Us, for example, by signing up for a seminar organized by Us or by entering into an Agreement with Us.
- 2.2. **Data generated in the process.** Data are being generated during visits to Manufacturer's infrastructure, by video surveillance, during seminars or events organized by Us, for example, when taking photographs of seminars or events, and We will notify You on that in each particular occasion. Photographs may be taken during events for the purposes of fixing a historic moment or ensuring continuity.
- 2.3. **Data obtained from other persons.** On separate occasions personal data may be obtained from other third parties, for example, personal data may be obtained from a co-operation partner providing information on the person who will perform the obligations arising from the Agreement. In the event that in the course of performance of the Agreement the Manufacturer also provides the

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organization of means of travel and transport, for the purpose of achieving the said objective, the data of natural persons provided by the co-operation partners or clients may be transferred solely in the required amount to other merchants (including travel agents) providing and organizing tourism, travel, accommodation or transport services. Likewise, a company representative may provide information on the seminar participants.

### 3. What kind of personal data are being processed by the Manufacturer?

The categories of personal data processed by Us include:

- 3.1. **Personally identifiable data and contact details** (such as client's name, surname, personal identity number, address, telephone numbers to be used for communication, data of the seminar participants) to ensure, among other things, that we verify the identity of the person, to ensure the Manufacturer's operational management, safety, while, the contact details are necessary to be able to contact the person in question; certain Personally identifiable data can be processed to fulfil the obligations arising from the Agreement;
- 3.2. **Attendance data**, e.g., information about the attendance of seminars organized by the Manufacturer, personal data of the visitors to the Manufacturer's infrastructure, such as name, surname, time of arrival, and grounds;
- 3.3. **Settlement data information**, e.g., such as client's name, surname, bank account number, and payment behaviour aimed at ensuring the billing administration process;
- 3.4. **Video recordings**, such as video recordings stored as a result of the surveillance of infrastructure objects where data subjects are visible, in order to ensure visitor and infrastructure safety and protection, as well as safety and quality management of the manufacturing process;
- 3.5. **Data of events organized** (for example lists of event or seminar participants, photographs made during events).

We process your personal data only to the extent permitted by the set purposes of personal data processing.

### 4. Purposes and legal grounds for personal data processing.

We process your personal data for the following purposes and based on the following legal grounds:

#### 4.1. For securing contractual relationships.

We process personal data in order to secure the conclusion of the Agreement and fulfilment of the obligations arising thereof. For example, we may ask the client to produce a personal identification document to verify the identity of the person in question or to state their address in order to ensure the delivery of goods.

In certain cases, as a part of performance of the Agreement, we can process the data of natural persons indicated by the co-operation partners, however, in any case such processing will be carried out only to the extent necessary for the cooperation concerned, as well as to fulfil the obligations arising from the Agreement. For example, personal data may be processed to ensure arrival (e.g., travel, transport) of natural persons and their stay in the Republic of Latvia (which may include hotel reservations) in order to fulfil the obligations under the Agreement. In this context, data may be transferred to partners who provide tourism, travel/transportation services, which may include the purchase and organization of airline tickets, as well as hotel reservation services.

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In this case, the co-operation partner who transferred the data of natural persons to the Manufacturer is obliged to notify individuals about the type of personal data and for what purpose will these be transferred to the Manufacturer, as well as to introduce the said data subjects with this Privacy Policy.

We process personal data related to ensuring the billing (for example, an account number) in order to secure payment procedures in accordance with the Agreement.

These personal data are processed on the basis of the Agreement and applicable legal acts, for example, the Civil Law.

### **4.2. Securing the Manufacturer's operation, organizational and resource management, and its continuity.**

4.2.1. Within the scope of this purpose, personal data may be processed to ensure the operation of the Manufacturer, including the ensuring record keeping, the process, incl. manufacturing processes, accounting for employees, building infrastructure visitors, information systems, as well as resource planning.

4.2.2. Likewise, personal data can be processed to ensure the continuity of the Manufacturer (for example, by capturing various events, including corporate events, in photographs), for the purposes of public relations, communications (including internal communication, unified electronic mail usage) and marketing (for example, organization of corporate events, loyalty events, participant lists, etc.) and the realization of social responsibility (for example, provision of donations or other types of support activities).

4.2.3. For this purpose personal data can be processed in order to ensure internal processes, resources, their traceability and control, as well as planning and development, and provision, planning, development and growth of personnel resources, and ensuring efficiency. Data can also be processed for the development and provision of services, products and production processes, trend analysis in order to ensure, plan, and improve services, goods, their composition, production process or their operation.

4.2.4. This purpose includes, among other things, the processing of personal data in the event of reorganization, for purposes of audits, thematic inspections, such as quality audits, internal audits or due diligence.

4.2.5. Personal data shall be processed for these activities on the basis of legitimate interest. In case you have any objections to the processing of personal data based on a legitimate interest in a particular situation, We kindly ask You to inform Us accordingly. We will carefully assess the situation occurred and, in the case of a substantiated request, we will discontinue the practice to which You have objected.

### **4.3. Quality management, ensuring and assessing the operation and processes (including production) of the Manufacturer.**

4.3.1. It is important for Us to produce safe goods of high quality. In this context, it is essential to ensure a high quality and safe manufacturing and production process, through assessment and development thereof, and the application of measures to ensure efficient production. In this regard, personal data may be processed to achieve the said objective. This objective is mainly based on our legitimate interest, as well as individual cases of processing are based on applicable

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regulatory enactments, including the Law On the Supervision of the Handling of Food and the Law On the Safety of Goods and Services.

4.3.2. When processing personal data for this purpose, We will, to the extent possible, avoid processing personal data and, where possible, apply anonymization methods, however, there may be cases where certain personal data are processed to achieve the purpose. In any case, We would prefer to handle information that minimizes the processing of personal data.

In case you have any objections to the processing of personal data based on a legitimate interest in a particular situation, We kindly ask You to inform Us accordingly. We will carefully assess the situation occurred and, in the case of a substantiated request, we will discontinue the practice to which You have objected.

#### **4.4. Ensuring the security of persons, production processes, goods and services, information and infrastructure (including premises and buildings), elimination of unlawful or other threats (including preventive), as well as facilitation of detection of criminal offences in the facilities and adjoining territory.**

Personal data may be processed for this purpose, based on regulatory enactments and legitimate interest. The legislation regulating food production imposes an obligation on the Manufacturer to ensure the safety of goods and production. Within these requirements, the Manufacturer applies security measures.

Within this framework of this objective, among others, the following security measures are provided:

- 4.4.1. **Premises** –the fire safety measures in accordance with applicable regulatory enactments, access control to the premises of the Manufacturer; in this regard we provide the registration of visitors to the premises in an appropriate journal; the video surveillance of the territory is being carried out, and data subjects are notified on this both in this Privacy Policy and on the information signs;
- 4.4.2. **Computers and information systems:** Computers have anti-virus programs installed verifying files on the computer and various types of data carriers available to the computer, likewise, software updates are installed on the computer, however, the anti-virus programs do not scan the file contents. Information systems provide audit trails or log files for all user actions in order to ensure their integrity, confidentiality, and accessibility. These activities are analysed in cases where it is necessary to verify or investigate a possible breach of personal data protection; for additional security, access control and regular change of passwords are carried out.

As mentioned above, to this end, video surveillance is conducted on the basis of legitimate interest. The Manufacturer carefully assesses the required facilities and conditions in which video-surveillance shall be implemented for the purposes of efficient achievement of aim, as well as assesses the impact of video surveillance on privacy protection. Video surveillance is carried out and the relevant information is placed on warning signs in the objects. In case you have any objections to the processing of personal data based on a legitimate interest in a particular situation, We kindly ask You to inform Us accordingly. We will carefully assess the situation occurred and, in the case of a substantiated request, we will discontinue the practice to which You have objected.

#### **4.5. Protection of legitimate interests and enforcement of applicable laws and regulations.**

For this purpose, personal data may be processed on the basis of legitimate interest, for example, in order to ensure the protection of our legitimate interests in the event of violations of our legitimate interests. To this end, We can, for example, submit in court a claim for payment of a debt.



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We may also process personal data in cases where the applicable laws and regulations have imposed such an obligation on Us.

The Manufacturer shall ensure that processing of personal data will only be carried out for certain purposes and only to the extent necessary for the achievement of the objective and for the time period until the said objective is achieved.

### 5. Security of personal data.

- 5.1. It is important for the Manufacturer to ensure not only the quality and reliability of the production process, but also the security of personal data. We take organizational and technical measures in accordance with the nature of the processing of personal data to ensure the protection of personal data and prevent unauthorized access to personal data.
- 5.2. When necessary and where possible, We use personal data anonymization and pseudonymization methods to minimize the processing of personal data.
- 5.3. The Manufacturer shall ensure that personal data are only accessible to persons who need it for the purpose of carrying out their direct duties.
- 5.4. In addition, controlled access to the premises of the Manufacturer, as well as other protective measures are in place, including the provision of appropriate software protection mechanisms, whereas personal information shall be stored in closed shelves on paper.

### 6. Whom may Manufacturer transfer your personal data to?

The Manufacturer shall ensure the confidentiality of personal data, so We shall transfer personal data only in justified cases for a specific purpose, for example, personal data can be transferred on to the following data recipients:

- 6.1. To our co-operation partners to secure contractual relationships, for example, by organizing our foreign partners' stay in the Republic of Latvia during the performance of their contractual obligations (by booking a hotel, flight ticket or transferring data to the partner who arranges for this, etc.);
- 6.2. To our co-operation partners for the purposes of ensuring management and securing organizational, quality, financial management, accounting and personnel management processes, as well as other processes, including auditors, quality auditors, experts, controllers, banks, insurers, safety advisers, program and information system maintenance personnel, and event organizers. If necessary – also to our debt collection partners. A list of regular partners – data recipients is available in Annex No. 1 to this Privacy Policy which forms an integral part of this Privacy Policy;
- 6.3. In the cases specified in the applicable regulatory enactments and only to the extent specified in such regulatory enactments;
- 6.4. In the cases specified in the applicable regulatory enactments in order to protect the legitimate interests of the Manufacturer, for example by turning to a court or other institution against a person who has violated our legitimate interests.

Processing and access to personal data takes place only within the territory of the European Union: should this practice change, We will always comply with the applicable laws and regulations, as well as notify You on that.

In addition to the above, there may be individual cases when we transfer personal data to another person in connection with the transfer of an enterprise, any merger, acquisition, sale of assets to another merchant.

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### 7. For how long shall we retain your personal data?

The Manufacturer shall only ensure the processing of personal data for such a period of time as is necessary to achieve a specific objective.

We use the following criteria to determine the retention period:

- 7.1. The term specified in the regulatory enactments – when the applicable laws and regulations impose an obligation to retain certain information for a certain period of time (for example, the Law on Accounting imposes an obligation to retain invoices for a period of 5 (five) years);
- 7.2. The time period necessary for the achievement of the objectives and the protection of legitimate interests, including taking into account the period for processing claims, protection of rights, resolving issues, and taking into account the statute of limitations for claims;
- 7.3. The period during which individuals can exercise their rights of claim, for example, by setting a data retention period during which claims related to legal relationships may be filed, should they arise.

Direct restrictions to retention of anonymized data are not applicable, however, We in any case store them only to the required extent and for the required duration.

### 8. What are your rights?

The Manufacturer shall ensure the protection of privacy as well as the exercising Your rights in the field of personal data processing. We want You to know that You have the following rights to be exercised in good faith, as specified in the Data Regulation, by contacting Us in writing:

**8.1. You have the right to be informed** on processing of your personal data. In this context, We invite You to read this Privacy Policy carefully. In case You have any additional question, please do not hesitate to turn to Manufacturer's HR specialist and write Us to the contact e-mail address stated in this Privacy Policy.

**8.2. You have the rights to access your personal data.** Data Regulation grants the rights to everyone, including You, to access their personal data. You may obtain majority of information in this Privacy Policy, however, in any case, You have the right to obtain information specific to You. The Manufacturer shall ensure the access rights stipulated in the Data Regulation after receiving application from the person in question.

**8.3. You have the right to obtain rectification, deletion (right “to be forgotten”) of your personal data, as well as right to request restriction of processing of your personal data.** The Manufacturer shall ensure rectification and/or deletion of personal data upon request, as well as, in the event of justified request - restriction of processing of personal data for a certain period of time in compliance with the provisions of the Data Regulation. We shall ensure by default deletion of personal data after achievement of the aim for which the said personal data have been processed.

If You find an error in your personal data, by all means notify Us accordingly, as We are interested in processing true information about You in order to achieve the objectives of this Privacy Policy.

**8.4. You have the right to portability of your personal data.** The Data Regulation determines Your right of personal data portability in relation to the personal data You have provided, which the Manufacturer upon assessment of the technical capabilities and the specifics of the particular information shall ensure by providing information in a commonly used and machine-readable form.



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### 8.5. You have the right to object to the processing of personal data when it is based on a legitimate interest and the right not to be subject to automated individual decision making (including profiling) in a way that produces legal effects or a similarly affects the data subject.

You have the right to object to the processing of your personal data at any time in the cases specified in the Data Regulation, including cases where the processing of data is based on legitimate interests.

At present, the Manufacturer does not make automated individual decisions with significantly affect the data subject, however, should We change the practice, We will always inform you accordingly in accordance with the requirements of the Data Regulation.

### 8.6. You have the right to contact Us and file a complaint with the supervisory authority

In case of any questions or objections, complaints regarding the processing of personal data by the Manufacturer, We encourage you to contact the Manufacturer's HR specialist in order to resolve the situation as quickly and as efficiently as possible. In any case, a natural person shall always be entitled to file a complaint with the Data State Inspectorate (data protection supervisory authority in Latvia).

## 9. Where can I find the updated General Privacy Policy?

It is important for us to improve and develop our business, so We may periodically unilaterally modify and supplement this Privacy Policy.

The current Privacy Policy is available here: <https://www.aloja-starkelsen.lv/>.

We will always notify You when changes are made to this Privacy Policy.

## 10. How to get in touch with us?

If you have any questions or doubts in relation to this Privacy Policy or processing of personal data, we kindly ask You to contact the Manufacturer by using the contact details provided here:

„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](mailto:info.culinar@culinar.lv)

### *History of document*

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*Annex No. 1  
“ALOJA STARKELSEN” LTD  
to the General Privacy Policy  
(approved by the Minutes of Board meeting of  
June 27, 2018)*

It is important for, ALOJA-STARKELSEN, Limited Liability Company, hereinafter referred to as the “**Manufacturer**” and/or “**We/Us**”, to ensure and respect the protection of privacy in accordance with the applicable legal framework, in particular, the General Data Protection Regulation No. 2016/679. To this end, we have prepared our General Privacy Policy.

Pursuant to Clause 6.2 of our General Privacy Policy, the following co-operation partners carry out the processing of personal data of regular nature on our behalf:

- 1) *Sveriges Starkelseproducenter, forening upa*, established in Sweden, registration No.736200-2102, legal address: *Degebergavagen 60-20, SE-291-91, Kristianstad, Sweden*;
- 2) *Andrejs Caps IU*, established in Latvia, registration No. 01047811383, legal address: *"Jaunpūpoli", Vaidavas pagasts, Kocēnu novads, LV-4227*;
- 3) *Vivio SIA*, established in Latvia, registration No. 54103052121, legal address: *Straupes iela 17a, Valmiera, LV-4201*.

We carefully select our co-operation partners, as well as comply with the requirements of the Data Regulation, and We have entered into an appropriate co-operation agreement that includes a commitment from the partner to protect your personal data.