

30 April 2019

Client Data Processing Policy

I. Objectives and content of this policy

The policy adopted by SIA 'Vika Wood' (hereinafter referred to as “**the Company**”) aims to provide customers of the Company with information on the processing of its clients' personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and the Council of European Union of 27 April 2016 on the protection of individuals data with regard to the free movement of such data and with regard to whom Articles 13 and 14 of Directive 95/46/EC (hereinafter referred to as “**the Regulation**”) are repealed.

This policy contains the following information on the processing of personal data by the Company:

- The principles of processing personal data;
- Purposes and legal basis for the processing of personal data;
- Categories of processed personal data and Data Subjects;
- Where your personal data is passed and who are their recipients;
- Duration of processing and storage of personal data;
- Rights of the Data Subject.

II. Abbreviations used

Processing	any operation or set of operations which is performed on sets of personal data (such as collection, structuring, organisation, storage, adaptation or alteration, retrieval, use, disclosure by transmission, erasure or destruction).
Processor	a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Company.
Data Subject	a natural person (client, client's official, representative, employee, contact person) who can be identified directly or indirectly and is subject to personal data.
EEA	European Economic Area.
EU	European Union.
LV	Latvia, Republic of Latvia.
Profiling	any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
Personal data	any information relating to an identified or identifiable natural person - Data Subject.
Controller	the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Regulation	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 Company	SIA "Vika Wood", registration number: 40003241801, address: "Punti", Laucienes pag., Talsu nov., LV-3285, website address: http://vikawood.lv/ .

III. The policy's scope and basic principles for processing

1. The Company is a Controller for the purposes of this policy and for the processing it covers.
2. This policy provides information on such processing by the Company:
 - 2.1. Processing of Personal Data of former, existing and potential customers;
 - 2.2. Processing of Personal Data of former, current and potential clients, employees, contacts and representatives of the Company.
3. The Company processes personal data in compliance with the requirements of the Regulation. The Company performs Processing for the purposes of establishing and enforcing contractual obligations within the framework of the implementation of commercial activities and for other legitimate purposes described in this policy.
4. The Company mainly receives Personal Data from the former, existing and potential customers of the Company and transfers it to other persons in accordance with the requirements of the Regulation.
5. The legal basis of the Company's processing is mostly the need to conclude and execute a contract, the need to fulfil a legal obligation arising from law or the legitimate interests of the Company.
6. The Data Subject whose Personal Data is processed by the Company by submitting a written application to the Company shall have the right to acquaint himself with its data, request its rectification, restriction of processing, the right to withdraw its consent and object to the processing of data by the Company, as well as the right to data portability. In certain cases specified in the Regulation, some of these rights may be limited where the Company have an overriding interest or legal obligation to continue to process the data.
7. The Company shall ensure the security and storage of Personal Data to the extent and in the manner specified in the Regulation, including the implementation of technical and organizational measures for the protection of personal data. For example, information systems use individual user accounts, secure passwords, firewall, and workstation antivirus software to protect the system from unauthorized third-party access to information resources.

IV. Purposes for processing information and legal basis for such activity

8. The Company's Personal data Processing is carried out for the following purposes and in accordance with the following legal grounds

Purpose for which we will process the information	Legal basis for the processing
To perform contractual engagements such as entering into, executing a contract, including identification of clients and their representatives	To enter into a contractual relationship For the performance of any contractual engagement To comply with legal and regulatory obligations The legitimate interests of the Company
Manufacturing, sale and supply of products (Product manufacturing, sale and supply.) Billing administration and debt recovery	To enter into a contractual relationship To comply with legal and regulatory obligations The legitimate interests of the Company To enter into a contractual relationship To comply with legal and regulatory obligations The legitimate interests of the Company
Management of the relationship between the Company's customers, creditors, debtors, partners and other related parties, including consideration of any queries or objections	To enter into a contractual relationship For the performance of any contractual engagement To comply with legal and regulatory obligations
Enforcement of regulatory requirements, including accounting and legal compliance regarding personal data protection	To enter into a contractual relationship For the performance of any contractual engagement To comply with legal and regulatory obligations The legitimate interests of the Company
For the analysis of the company's commercial activities, assessing its efficiency and future development planning	The legitimate interests of the Company
Ensuring the security of physical information and data	To comply with legal and regulatory obligations The legitimate interests of the Company
Protection of clients' and the Company's interests, including risk management	To comply with legal and regulatory obligations The legitimate interests of the Company
The Company's rules and for directly approved purposes by the Data Subject	Consent of the Data Subject

9. The legitimate interests of the Company for which the Company may process data are as follows:

- 9.1. to carry out commercial activities;
 - 9.2. to offer qualitative and verified products;
 - 9.3. to verify client identity before entering into a contract;
 - 9.4. to ensure compliance with the obligations of the contract;
 - 9.5. to prevent unjustified financial risks to the Company's commercial activities (including carrying out a credit risk assessment prior to the sale of products and during the performance of the contract);
 - 9.6. maintain submissions for purchase of products, also other applications and submissions, comments on them, including those made orally, by calling or left on the website;
 - 9.7. segment customer database for production efficiency and sales;
 - 9.8. send reports on the performance of the contract execution and on the relevant terms for the performance of the contract;
 - 9.9. as well as conducting customer surveys regarding output and their experience of using such products;
 - 9.10. to prevent fraud;
 - 9.11. to ensure corporate governance, business and financial accounting and analytics;
 - 9.12. to ensure efficient business management process;
 - 9.13. to ensure and improve product quality;
 - 9.14. to administer payments, administer non-payments;
 - 9.15. turn to the public administration and operational authorities and also to the court for the protection of the Company's legal interests;
 - 9.16. to invite an external auditor to review the Company's activities as well as professional advisers to resolve or prevent problematic situations;
 - 9.17. to ensure the protection of the Company's property and its employees;
 - 9.18. to inform the Company about its activities.
10. If processing is based on the consent of the Data Subject, the Company shall ensure that the consent is freely given, obtained as a specific, deliberate and unambiguous indication of the Data Subject's desires for its specific Processing of Personal Data for a particular purpose. The data Subject has the right to withdraw its consent at any time by sending a request to the Company at its postal address: "Punti", Laucienes pag., Talsu nov., LV-3285. The withdrawal of consent shall not affect the legality of the Processing based on consent prior to the revocation.
 11. Where personal data is submitted to the Company by another person, and not by the Data Subject itself, and this person is not the Company's Processor or a member of the

Company's management board nor an employee, representative or authorised person who performs the submission of Personal Data on the basis of the instructions of the Company, the person who submits Personal Data shall be fully responsible for the fulfilment of the legal basis for the transfer of the Personal Data and other obligations of the Controller concerning this Processing.

V. Categories of Data Subjects and its personal data

12. Data Subject categories

- 12.1. Customers of the company (existing, former, potential), creditors, debtors and related persons (representatives, officials, contact persons, trustees, beneficiaries, employees, etc.);
- 12.2. Partners, agents, suppliers, service providers, consultants and related persons of the Company (representatives, officials, contact persons, trustees, beneficiaries, employees, etc.);

13. Data categories

- 13.1. Such categories of Personal Data may be provided to the Company by the Data Subjects themselves or the Company's customers. Moreover, the Company may obtain such data by means of the clients using the Company's services such as sending an email or by calling, as well as the Company may obtain data from third parties (e.g. public registers, public authorities, company's partners):
 - 13.1.1. personal identification details (e.g. name, surname, personal identity number, date and place of birth, identification document details);
 - 13.1.2. contact information (e.g. postal address, phone number, email address, Skype address, IP address, etc.);
 - 13.1.3. professional or commercial activity (e.g. information about the Data Subject's position at its workplace, relationship with a particular company, institution);
 - 13.1.4. financial information (e.g. account number, financial status information);
 - 13.1.5. correspondence data (e.g. the Data Subject's sent an email to the Company, the Company's response to the Data Subject, the proffered information through a telephone conversation or in person, if it is recorded).

VI. Transfers and recipients of personal data

- 14. In order to serve the applicable legitimate purposes and achieve individual processing objectives, the company shall transfer Personal Data and make such data available to processors – persons who perform the processing of Personal Data on behalf of the Company, on the basis of given instructions and a written agreement with the Company and for the purpose of processing specified in such agreement. The Company entrusts Processors, for example, in the following cases:
 - 14.1. The Company's information system, server and program maintenance, as well as ensuring the protection of Personal Data storage;

- 14.2. Sending invoices to clients;
 - 14.3. Sending other types of information to clients.
15. The company may disclose Personal Data to such data recipients:
- 15.1. Board members, employees, representatives and authorised persons of the Company who carry out the processing on the basis of instructions given by the Company. These persons are considered to be the Company within the scope of this policy;
 - 15.2. National institutions, public officials, investigating authorities, including courts, prosecutors' office, operational bodies, orphaned courts, notaries, bailiffs, other courts and investigating authorities of a Member State and of a foreign state, tax authorities, arbitration, non-court disputes, company or client counterparties, etc. Such transfer is made based on the law or the Company's legitimate interests in accordance with the Regulation and the recipient of personal data becomes the controller of that Personal Data upon receipt of the Personal Data and is responsible for their lawful processing following the Regulation.
 - 15.3. Partners, suppliers, service providers, auditors, consultants and insurers. Such a transfer is made based on the Company's contractual obligations or legitimate interest in ensuring efficient commercial activity, risk management and risk prevention, following the Regulation. Furthermore, the Personal Data recipient, upon receipt of such data, becomes the Personal Data controller and is responsible for their lawful processing following the Regulation.
16. The Company may also transfer Personal Data outside the EU and EEA within the framework of commercial activities. Such transfers may include, but are not limited to, the following:
- 16.1. To order processing to be carried out by the Processor of the company;
 - 16.2. Personal data are transferred to the Company's service providers and cooperation partners to ensure the performance of the Company's contractual obligations with a client or a partner of a company located outside the EU and EEA. For example, the personal data of the Company's client is transferred to a transport or supply service provider located outside the EU, EEA, to ensure the delivery of products outside the EU and EEA, to an existing client of the Company.
17. The Company transfer Personal Data outside the EU and EEA, subject to one of the following prerequisites under the Regulation:
- 17.1. a decision has been made that a non-EU or non-EEA country, national territory or one or more specific sectors, or an international organisation concerned, provides an adequate level of protection in accordance with the Regulation;
 - 17.2. based on binding corporate rules or standard data protection clauses;
 - 17.3. the Data Subject has agreed to the proposed transmission after being informed of the potential risks that such transmission may pose to the Data Subject due to a decision on the adequacy of the level of protection and a lack of adequate guarantees;

- 17.4. the transfer is necessary for the performance of a contract between the Data Subject and the Controller, for managing a contract with the Data Subject or to take necessary steps at the request of the Data Subject prior to entering into a contract;
- 17.5. the transfer is necessary for the conclusion or performance of a contract concluded in the interests of the Data Subject between another natural or legal person.

VII. Duration of the processing and storing personal data

- 18. The Company shall store Personal Data following the Regulation and applicable national law. In principle, Personal Data is stored in a form that permits the identification of the Data Subjects, but for no longer than is necessary for the Processing. The processing of personal data, including the storage time, shall be determined by the applicable legislation or by the Company following the applicable law and shall depend on the type of document or contract in question and on the basis of the processing of personal data. The processing, based on the consent of the Data Subject, shall be carried out as long as the agreement of the Data Subject in question is valid unless another legal basis for the processing exists.
- 19. The applicable law lays down an obligation to keep certain documents containing Personal Data for a specified period. For example, storage time is a matter of legislation in the field of taxation, accounting and employment. The storage of certain Personal Data may be permitted based on the Company's legitimate interests, except where the Data Subject's interests or fundamental rights and values that require the protection of Personal Data outweigh such legitimate interests.
 - 19.1. An example of personal data retention based on the Company's legitimate interests is the need to protect our rights in litigation. For this purpose, the Company will retain certain documents containing Personal Data until the expiration date associated with such documents. The Company is entitled to keep the contracts and the documents related to their performance for 10 years after the performance of the contract according to the general limitation period for the rights of liability.
 - 19.2. An example of the storage of personal data based on the law - according to the accounting legislation, invoices issued by the Company should be kept for 5 years.
- 20. The Company has set the following periods of retention of Personal Data:

Nr.	The name of the document type	The period of the document storage
1.	Any documents containing Personal Data, Personal Data obtained during pre-contractual relationships, including communication with a client, as well as pre-contractual cooperation partners, including collaborative offers	
1.1.	If a contractual relationship is established	10 years after the expiry of the contract

1.2.	If a contractual relationship is not established	2 years after communication
2.	Any documents containing personal data, which have been obtained during a contractual relationship, including communication with the client and the Company's partners	10 years after the expiry of the contract
3.	Accounting documents (including transaction supporting documents)	
3.1.	Documents for purchase of goods (including waybills)	5 years
3.2.	Transport documents for goods	
3.3.	Payment of advances	
3.4.	Waybills, invoices	
3.5.	All other tax-related documents, including documents relating to transactions and payments	

21. Additional information regarding the retention periods of other Personal Data may be obtained by sending a request to the Company at its postal address: "Punti", Laucienes pag., Talsu nov., LV-3285.
22. Upon expiration, the Company will ensure the deletion or anonymisation of the Personal Data - making the Personal Data non-identifiable so that it can no longer be associated with the Data Subject.

VIII. Rights of the Data Subject

23. Following data protection legislation, including Articles 12 to 22 of the Regulation, the Data Subject - who is a natural person, shall have the following rights regarding the processing of personal data, which is carried out by the Company:
- 23.1. Obtain additional information on the processing of personal data by the Company, request a copy of the personal data of the Data subject held by the Company, and obtain information on the receipt of a copy of the Personal Data, or where it has been made available in respect of Personal Data transferred outside the EU and the EEA;
- 23.2. Request rectification of the Data Subject's Personal Data (if you find that the information held by the Company regarding the Data Subject is incorrect or incomplete, then the Data Subject is entitled to request to have it rectified);
- 23.3. Withdraw consent to Personal Data processing;
- 23.4. Request erasure of the Data Subject's Personal Data;
- 23.5. Request restrictions on the processing of personal data of the Data Subject (earmarking of personal data held by the Company to limit their future Processing);

- 23.6. Request the portability of personal data (possibility of obtaining Data Subject's Personal data information in a machine-readable format);
- 23.7. Object to the Processing of Personal Data based on the legitimate interests of the Company.
24. These rights of the Data Subject are not absolute, and their enforcement may be limited. For example, the Company has the right to refuse to discontinue the processing of personal data where the Company refers to compelling legitimate reasons for processing that outweigh the interests, rights and freedoms of the Data Subject, or to raise, implement or defend legitimate claims.
25. In order to exercise the rights of the Data Subject or to obtain additional information on this policy and on the processing by the Company, the Data Subject or other persons must contact the Company by sending a request to the Company's email address: zinojumi@vikawood.lv or postal address: "Punti", Laucienes pag., Talsu nov., LV-3285, addressed to SIA "Vika Wood".
26. The activities of the Company regarding the protection of Personal Data are supervised by the Data State Inspectorate. In order to resolve any disagreement or misunderstanding as soon as possible, we ask the Data Subjects to contact the Company first. If the Data Subject is not satisfied with the response received, the Data Subject has the right to complain to the Data State Inspectorate (address: Blaumana iela 11/13-15, Riga, LV-1011; email address: info@dvi.gov.lv; contact number: 67223131).

IX. Availability, validity and any amendments of this policy

27. This policy is available on the Company's website: www.vikawood.lv, under Privacy Policy section.
28. This policy is effective since April 30, 2019.
29. To ensure that Data Subjects and others have up-to-date information on the Personal Data Processing carried out by the Company, we will ensure that this policy is reviewed and updated following the requirements of the legislation. Therefore, we encourage you to periodically review the current version of this policy on the Company's website. Further, any changes to the policy will be announced in advance on the Company's website.