

# INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR REPRESENTATIVES OF BUSINESS PARTNERS AND CUSTOMERS

Version 14.11.2024.



## 1. General information

By this notice, joint stock company RĪGAS PIENA KOMBINĀTS (hereinafter - the "Company") informs its business partners, customers and their representatives and contact persons about the processing of personal data carried out within cooperation with the Company.

Cooperation means the negotiation, conclusion and execution of any transaction of an economic nature or for a business purpose. This notice also covers the handling of personal data after the end of the cooperation, if it is related to the cooperation.

The categories of data subjects (natural persons) to whose processing this notice applies are:

- business partners and customers as individuals;
  - representatives and contact persons (employees and/or authorised persons) of cooperation partners and customers - legal entities;
- hereinafter collectively referred to as "you".

The Company processes personal data on the basis of the requirements of 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 (General Data Protection Regulation) and hereby provides information about the processing of your personal data in accordance with Article 13 (information to be provided where personal data has been collected from the data subject) and Article 14 (information to be provided where personal data has not been collected from the data subject) of the General Data Protection Regulation.

For the purposes of the General Data Protection Regulation, the Company acts as the data controller, being responsible for the processing of personal data processed by it. You are a data subject within the meaning of the General Data Protection Regulation. The contact details of the data controller can be found at the end of this notice.

The terms "controller", "processing", "personal data", "data subject" have the meanings set out in the General Data Protection Regulation.

## 2. Personal data and collection of data

The personal data that the Company obtains in the context of cooperation is information about you, including your name, the organisation where you are employed or on whose behalf you are authorised to act, your contact details (telephone number, e-mail address), information about the cooperation and its progress, correspondence with you, as well as specific information (for example, in the area of delivery cooperation - details provided in the transport documents, details of the right to drive vehicles; in the area of marketing services - the fact of participation and activities within a campaign, etc.).

Your personal data is obtained either directly from you or from the organisation where you are employed or on whose behalf you are authorised to act. Your personal data may be provided in different ways, for example by naming you as a contact person in a cooperation agreement or by providing your contact details in another way, or by forwarding an email message containing your personal data. If your personal data is not obtained directly from you, but is provided by your employer or authorising party or an organisation you represent, then the Company relies on the fact that the person who provides your personal data to the Company has properly informed you about the transfer of your personal data.

## 3. Purpose and legal basis of the processing

Your personal data is collected and used for the following purposes:

- to contact you in the course of our cooperation (e.g. to agree on the conclusion or performance of a contract, to agree on a delivery schedule, to request or provide information, etc.);

- to identify you and verify your representational rights (e.g. if you are the driver delivering the goods, or the person receiving the goods at the warehouse, etc.)
- for other purposes necessary for the implementation of cooperation.

In certain cases, your personal data may be used for evidentiary purposes where the Company needs to defend its legitimate interests before an authority or a court.

Your personal data is processed on the basis of the following legal grounds set out in Article 6(1) of the General Data Protection Regulation:

- sub-clause f) (legitimate interests of the controller or a third party): this legal basis is mostly used, which means that the Company and the organisation you represent have a legitimate interest in cooperating with each other within the scope of their business activities, and in order to ensure this cooperation, it is necessary to designate employees-in-charge or authorised representatives who will actually implement the communication, fulfilment of the obligations, and organise and control the performance of the contractual obligations;
- sub-clause b) (performance of a contract to which the data subject is party or in order to take steps prior to entering into a contract): where the cooperation is planned or initiated with you as an individual, not a representative of a legal entity;
- sub-clause a) (data subject consent): where you provide consent to the processing of certain personal data (for example, where you voluntarily provide an additional telephone number or private email address for the purpose of communicating using these communication channels).

#### **4. Recipients of personal data**

Your personal data may be made available to the Company's independent service providers who provide, for example, information technology (IT), email delivery, legal representation and other services. Personal data will only be transferred or made available to these third parties for the purpose of providing the services to the Company.

In certain cases, your personal data may be accessible to public authorities, courts or other bodies where the Company needs to defend and/or represent its legitimate interests in case of disputes and claims.

The Company does not transfer your personal data outside the European Union and the European Economic Area.

#### **5. Duration of processing of personal data**

Your personal data is used for the duration of the cooperation or the resolution of issues arising from it (even after the cooperation has ended). If your personal data is included in a document, it will be retained for as long as the document is stored. The storage of documents shall be based on the requirements of laws and regulations and in accordance with the Company's internal regulatory enactments (including the file nomenclature).

Correspondence with you may be kept for longer than is necessary to secure or terminate cooperation, if this is necessary for the purpose of providing evidence for the protection and/or representation of the Company's legitimate interests in court and/or before public authorities.

If your personal data is stored for evidentiary purposes in the event of claims or legal proceedings, the Company shall ensure compliance with the principles of data minimisation and purpose limitation in accordance with Article 5 of the General Data Protection Regulation.

#### **6. Additional information**

If you are on the Company's territory or premises, such as during a shareholders' meeting, please be aware that you may be subject to video surveillance. Information on video surveillance can be found on the website provided below, as well as on [www.foodunion.lv](http://www.foodunion.lv) in the "Privacy Policy" section (under the "Video Surveillance" subsection).

## **7. Your rights**

The General Data Protection Regulation gives you as a data subject the right to access your personal data, receive information about the processing, withdraw consent (if the processing of personal data is based on consent), request correction of incorrect, inaccurate or incomplete data, request restriction of processing, request erasure of data, request data portability, as well as in case of unjustified processing of personal data file a complaint with the data protection authority - Data State Inspectorate (Latvia).

To exercise your rights as a data subject or to ask questions about the processing of personal data, you can submit your request to the company using the contact details below.

## **8. Information about the data controller**

Name: Joint stock company "RĪGAS PIENA KOMBINĀTS"

Registration number: 40003017441

Address: Riga, 180 Bauskas Street, LV-1004

Phone +371 67066887

E-mail: [foodunion@foodunion.com](mailto:foodunion@foodunion.com)

Contact details of the Data Protection Officer: [dati@foodunion.com](mailto:dati@foodunion.com)