

PRIVACY STATEMENT

(translation from official Latvian version)

Effective May 25, 2018

Last revised September 28, 2023

1. Definitions

1.1. **Data subject** - an identified or identifiable natural person, including a client, a potential client, representatives of legal persons.

1.2. **Personal data**: any information directly or indirectly related to the data subject that we have acquired during the cooperation.

1.3. **Processing** - any activity performed on personal data, including collection, recording, storage, alteration, provision of access, transfer.

2. Data Controller and contact details

2.1. The controller of the processing of personal data is LLC "Latvia tours", unified registration number: 40103042144, registered office: Aspazijas Boulevard 24-10, Riga, LV-1050 (hereinafter – Latvia tours).

2.2. Latvia tours' contact information on matters related to the processing of personal data is dati@latviatours.lv.

3. Purpose of the document

3.1. Latvia tours Privacy Policy (hereinafter – Policy) is designed to ensure and inform data subjects regarding the processing of personal data sold by Latvia tours in accordance with 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 – Regulation) and other applicable legislation.

3.2. The policy provides information on how Latvia tours processes personal data of data subjects. The policy applies to all data subjects whose personal data are processed by Latvia tours, including relations with data subjects that were established before the coming into force of this policy.

3.3. The policy describes general principles for the processing of personal data by Latvia tours. More detailed information on the processing of personal data carried out in the context of the provision of a particular service may be described in a specific service contract or on a website in the description of the service concerned.

3.4. Links to third-party websites that have their own terms of use, for which Latvia tours does not assume responsibility, may be posted on the Latvian tours website.

4. Categories of personal data

4.1. During co-operation, Latvia tours processes the following categories of data subjects:

4.1.1. **Identification data**: e.g. given name, surname, personal identity number, date of birth, telephone number, electronic mail;

4.1.2. **Contact details**: e.g. address of residence, address of declared place of residence, contact telephone, electronic mail;

4.1.3. **Service data**: e.g. contract number, service name, service price, discount,

4.1.4. **Consent data**: subject-by-subject acknowledgement of consent expressed by the data subject, date, time and source of consent;

4.1.5. **Communication data**: e.g. type, number, date, content of incoming/outgoing communication;

4.1.6. **Family and related data:** e.g. details of the family of the data subject with whom the leisure trip is planned;

4.1.7. **Cookies:** For more details, please read the section of the Latvia tours website: https://www.latviatours.lv/upload/privatuma_politika/privatums_un_sikdatnes.pdf.

5. Legal basis and purpose for the processing of personal data

5.1. **For the purpose of making commercial offers:** Latvia tours sends commercial offers to the data subject if the data subject has given him or her free and unambiguous consent (Article 6(1)(a) of the Regulation).

5.2. **For the purposes of the conclusion and performance of the contract:** Latvia tours processes personal data of the data subject in order to conclude and execute contracts, to ensure the up-to-date and accuracy of personal data of the data subject, to ensure communication related to the performance of the contract, to inform the data subject of changes in contracts or in the course of the provision of the service, to draw up and deliver invoices for services, as well as to take pre-contractual measures at the request of the data subject (Article 6(1)(b) of the Regulation).

5.3. **Fulfilment of legal obligation:** Latvia tours may process your personal data in order to fulfil the legal obligation imposed by any of the laws applicable to Latvia tours (Article 6(1)(c) of the Regulation)

5.4. **In the interest of exercising the right of claim:** Latvia tours may exercise the right of claim against the data subject in relation to outstanding liabilities. Latvia tours may assign claims rights against providers of out-of-court debt recovery services licensed by data subjects (Article 6(1)(f) of the Regulation).

6. Recipients of personal data

6.1. Latvia tours may use service providers to process personal data of the data subject for the purposes of the performance of the contract. Latvia tours co-operates, for example, with cooperation partners related to the provision of tourism services, including air carriers, hotel consolidators, insurance companies, tour operators.

6.2. Personal data are processed in the European Union/European Economic area (EU/EEA), however, they may be transferred and processed in non-EU/EEA countries according to the services chosen by customers.

6.3. Transfers and processing of personal data outside the EU/EEA may take place on legal grounds, for example in order to fulfil a legal obligation, enter into or perform a contract, or with the consent of the Customer, and appropriate safeguards have been taken. Appropriate safeguards include:

6.3.1. an agreement has been entered into, including standard clauses of the EU Treaty, or other approved provisions, code of conduct, certifications, etc., which have been approved in accordance with the General data Protection Regulation;

6.3.2. A sufficient level of data protection is ensured in the non-EU/EEA country where the beneficiary is located, as decided by the EU Commission;

6.3.3 recipient certified under Privacy Shield (refers to recipients located in the United States).

6.4. Upon request, customers may receive further information on the transfer of personal data to countries outside the EU/EEA.

7. Data storage and technical security

7.1. Latvia tours shall ensure the confidentiality of personal data and implement appropriate technical and organisational measures to protect personal data from unauthorised access, unlawful processing, disclosure, accidental loss, alteration or destruction.

7.2. Latvia tours stores personal data of data subjects while one of the following grounds for processing personal data exists:

- 7.2.1. The service contract concluded by the data subject is in force;
- 7.2.2. The time period laid down in the laws and regulations for the exercise of mutual claim rights after the end of the term of the contract has not expired;
- 7.2.3. The time period specified in Latvia tours for the fulfilment of mandatory duties provided for in regulatory enactments has not expired;
- 7.2.4. The consent of the data subject to the processing of the personal data concerned shall be valid if there is no other legal basis for the processing of the personal data.
- 7.3. Upon termination of the legal bases for processing personal data specified in Section 7.2 of the Policy, personal data held by Latvia tours shall be deleted.

8. Commercial offers

- 8.1. Subject to the requirements of regulatory enactments, Latvia tours shall send data subjects information regarding its individual and advantageous offers, writing electronically to the e-mail that Latvia tours has obtained by entering into a service contract with you, provided that at the time of entering into the contract you have given consent for receipt of such offers and news.
- 8.2. You may revoke your consent to the processing of personal data at any time and refuse further commercial offers through one of the following communication channels:
 - 8.2.1. By sending a written notification to an electronic mail: dati@latviatours.lv, signing it with a secure electronic signature;
 - 8.2.2. Upon arriving in person to Latvia tours Customer Service Centre, taking a personal identification document with him or her;
 - 8.2.3. Using the automated option provided for in the commercial offer to refuse further notifications by clicking the opt-out note at the end of the commercial offer concerned.

9. Rights of the data subject

- 9.1. Latvia tours shall provide data subjects with the following rights in relation to the processing of personal data:
 - 9.1.1. Request the rectification of their personal data if they are inappropriate, incomplete or incorrect;
 - 9.1.2. Oppose the processing of personal data where the use of personal data is justified by legitimate interests;
 - 9.1.3. Request the deletion of personal data thereof, but only in cases if personal data are processed on the basis of the consent of the data subject, as well as in cases when Latvia tours no longer exists the legal basis for the processing of personal data specified in regulatory enactments;
 - 9.1.4. To request the restriction of processing of personal data thereof in accordance with the applicable regulatory enactments, for example, at the time when Latvia tours evaluates whether the data subject has the right to request the deletion of his or her data;
 - 9.1.5. Receive information whether Latvia tours processes personal data of the data subject, as well as access thereto;
 - 9.1.6. Receive personal data which it has provided and which are processed on the basis of consent or for the purpose of concluding and enforcing the contract, in writing or in one of the most commonly used electronic formats and, where possible, transfer such data to another service provider. Latvia tours in such case has the right to apply a reasonable fee for the transfer of data in accordance with the costs caused by such transfer of data;
 - 9.1.7. Withdraw prior consent to the processing of personal data;
 - 9.1.8. Not to be subject to fully automated decision-making, including profiling, where such decision-making produces legal effects for the data subject or has a similar significant impact on the data subject. This right shall not be valid if the taking of a decision is necessary for the conclusion or performance of a

contract, if the taking of a decision is permitted in accordance with the applicable laws and regulations, or if the data subject has given his or her explicit consent. In any event, if Latvia tours bases its decision on automated processing or profiling of data subject, the Customer will be informed thereof and will be granted the right to object;

9.1.9. Submit a complaint to the data State Inspectorate regarding the procedures by which Latvia tours processes personal data of the data subject. Contacts of the data State Inspectorate are available at: <https://www.dvi.gov.lv/lv/iestades-kontakti>.

9.2. The data subject shall be entitled to submit requests for the exercise of his rights in writing in one of the following ways:

9.2.1. by sending a signed submission to the legal address of Latvia tours,

9.2.2. by submitting a signed submission to Latvia tours Customer Service Centre, presenting a personal identification document;

9.2.3. When sending an application signed with a secure electronic signature to Latvia tours e-mail: dati@latviatours.lv

9.3. The request of the data subject shall be examined without undue delay and a response to the execution or non-execution of the request shall be given not later than one month from the date of receipt thereof. If the execution of the request takes longer, Latvia tours is entitled to extend the execution thereof for another two months, informing the data subject thereof.

9.4. Latvia tours is entitled not to execute the request of the data subject if:

9.4.1. It is not worded intelligibly;

9.4.2. Cannot identify the data subject;

9.4.3. Such a request has already been answered;

9.4.4. The amount of information requested is disproportionate;

9.4.5. The request is unfounded (not applicable to Latvia tours, no explanations have been provided as to why the request should be executed);

9.4.6. Laws and regulations stipulate that Latvia tours is not entitled to provide such information to you or has an obligation to store specific personal data of the data subject.

10. Other provisions

10.1. This policy is available to data subjects on Latvia tours website, as well as at Latvia tours Customer Service Centre.

10.2. Latvia tours may make additions and changes to this policy by informing data subjects of such changes on the website of Latvia tours and ensuring the insertion of the updated policy on the website of Latvia tours.