

Privacy Policy of the S/c Galerija Centrs

Principal wording of the Policy came into force on:

25 May 2018

Changes made in the Policy came into force on:

1 September 2019

The purpose of this privacy policy is to provide information to you about personal data are processed by s/c Galerija Centrs SIA BH Galerija Centrs (hereinafter referred to as - "the Companies"), processing principles of such personal data, purpose, volume, protection, processing terms, procedure for erasure, as well as the rights available to you in relation to personal data processing performed by us.

This privacy policy shall refer to both, personal data we have obtained right from you, as well as the personal data we have obtained from third parties.

We have the right to use personal data for the purposes described in this privacy policy, as well as other purposes regarding which have informed you at the time of acquisition of personal data.

WHO ARE ENTITLED TO PROCESS YOUR PERSONAL DATA AND TO WHOM YOUR PERSONAL DATA MAY BE TRANSFERRED?

Any of the Companies, specified in the relevant section of the privacy policy, specifically describing services provided by us or activities performed, may be entitled to process your personal data.

At the same time in certain cases, we are entitled to authorise a third party to process your personal data. Please, take into account that we will transfer your personal data to third parties only:

- If we have concluded a contract with the receiver of your personal data and have ensured the relevant execution of safety requirements of sending and receipt of personal data,
- If an obligation has been determined for us in legal norms to transfer your personal data to the relevant receiver.

We may transfer your personal data to the following categories of receivers:

1) **personal data processors**, who provide certain services to us, described in details in further sections of the privacy policy;

a) the processor shall receive from us only the scope of personal data, necessary for fulfilment of the particular task or provision of certain services;

b) the processor shall process your personal data only on the basis of our instructions and shall not use them for other purposes, as well as shall not transfer your personal data to other persons without our prior consent;

2) **other receivers of personal data**, including state and municipal authorities, as well as courts, in order we could ensure the fulfilment of requirements of legal acts binding to use or protect our legal interests.

Personal data are processed only in the territory of EU/EEA and are not transferred outside of the territory of EU/EEA.

Read more details about controllers and processors for our specific services or activities in further sections of the privacy policy.

WHAT DO WE DO IN ORDER TO PROTECT YOUR PERSONAL DATA?

We take care in order to ensure that your personal data are always safe, as well as their processing is performed in accordance with the applicable legal acts and principles.

In order to ensure that only persons authorised for that may have access to personal data, as well as ensure unauthorised disclosure or use of personal data, we use different technologies and procedures providing safety.

IN WHAT EVENTS AND FOR WHAT PURPOSES CAN WE PROCESS YOUR PERSONAL DATA?

We process your personal data only if we have a legal ground to do so - your consent, our legal interests or personal data are required for conclusion or fulfilment of a contract, or for performance of our duties provided for in legal norms.

If your personal data processing is based on your legal interests, we assess the possible impact on your rights and freedoms and ensure that our legal interests to process your personal data do not adversely affect your rights and freedoms.

Read more details about the legal basis and purposes of your personal data processing in further sections of our privacy policy.

FOR HOW LONG DO WE STORE YOUR PERSONAL DATA?

We process your personal data only as long as we have a legal basis to do so or as long other provisions binding to us are in force. For example, the period of storage of your personal data may be affected by the following circumstances:

- procedure determined by legal acts, according to which we can implement our lawful interests (for example, submit objections or raise a claim to the court);
- a legal obligation exists to store personal data for a certain period of time;
- as long as your consent for the relevant personal data processing is in force, unless any other legal grounds for processing of your personal data is existing.

When the above-mentioned conditions for your personal data processing cease to exist, your personal are irrevocably erased/destroyed and/or anonymized.

Read more details about the period of storage of your personal data for specific services or activities in further sections of our privacy policy.

WHAT ARE YOUR RIGHTS?

In order to ensure the relevant personal data processing, you have several rights available that you may utilise with regard to your personal data. In order to implement your rights, please, contact with use in the forms specified further on in this privacy policy.

- ***Access to your personal data***

You have the right to request information about the personal data processed by us in relation to you.

- ***Right to rectify your personal data***

If you consider that the personal data processed by us about you are not correct, complete or relevant, you have the right to request to update or rectify your personal data.

- ***Right to revoke your consent***

If we process your personal data on the basis of your consent, you have the right at any time to revoke your consent.

If you wish to revoke your consent with regard to receipt of electronic data about our news, you may perform the activities specified in the received e-mail or contact us.

- ***Right to object or limit processing of personal data***

If we process your personal data, on the basis of our legal interests, you have the right to object to the personal data processing performed by us.

When receiving your objections against the personal data processing performed by us, on the basis of our legal interests, we will not process your personal data anymore or will limit their processing, unless we can substantiate your personal data processing with relevant legal interests of ours or our right to protect our legal requirements.

If you consider that we process inaccurate your personal data or the personal data processing performed by us is not legal, you may request to limit the personal data processing performed by us.

Please, take into account that if processing of your personal data is restricted, there is a possibility that we cannot provide all activities available to you, including, you may not receive all benefits we offer.

- ***Right to request to delete your personal data***

If you consider that we do not need your personal data anymore for the purposes they were obtained, or you have revoked your consent and in other circumstances you may request to delete your personal data.

Please, take into account that we will be able to delete your personal data only in the events, when we do not have a binding obligation to save your personal data for certain purposes provided by legal acts, as well as if no other legal basis exists to process your personal data.

- ***Right request to transmit your personal data***

You have the right to receive your personal data that you have provided and that are processed on the basis of the consent and fulfilment of the contract in the written form or any other most often used electronic formats. If it is technically possible, on the basis of your request, we can transfer your personal data to any other service provider.

- ***Right to submit complaints about the personal data processing performed by us***

If you consider that the personal data processing performed by us violates your rights, you may submit a complaint to us at any time. We will review your complaint without delay and provide a reply within the time periods provided for in legal acts.

You have the right to submit a complaint also to the State Data Inspectorate:

- by sending your complaint to the following e-mail: info@dvi.gov.lv
- or turning in person to the State Data Inspectorate, at Blaumaņa iela 11/13, Riga.

CONTACT INFORMATION

If you have any questions about the personal data processing performed by us or you wish to implement your rights, please, contact us in the following forms:

- with regard to activities performed by us:
 - via e-mail: info@galerijacentrs.lv,
 - via mail: Audēju iela 16, Riga, LV-1050.

VALIDITY AND AVAILABILITY OF THE PRIVACY POLICY

This privacy policy is available to you:

- in the information centre of GALERIJA CENTRS,
- and on our website – www.galerijacentrs.lv

In order to ensure our obligations with regards to personal data processing, we regularly monitor our activities in the area of personal data processing. Therefore, we have the right to unilaterally amend this privacy policy at any time.

PERSONAL DATA PROCESSING FOR MARKETING PURPOSES OF THE SHOPPING CENTRES

We perform your personal data processing, in order to perform different marketing activities of our shopping centres, to administer your participation and awarding of prizes for various lotteries and contests organized by us.

- **Personal data controllers and processors**

The following companies, considered as your personal data controllers, perform your personal data processing within the framework of our marketing activities:

#	Our marketing activities	Contact information of the controller
1.	Marketing activities Subscription to news of the shopping centre Participation in lotteries Participation in contests	SIA BH Galerija Centrs, reg. No.: 40003311422 (s/c "Galerija Centrs"); Contact information: – legal address: Audēju iela 16, Rīga, LV-1050, Latvia, – e-mail: info@galerijacentrs.lv.

We may transfer your personal data also to other companies - personal data processors, in order to ensure fulfilment of different services (organization, video recording of our marketing activities, sending of invitations etc.).

We use only trusted partners - personal data processors, with the help of whom the services required for successful organization and course of our activities are provided.

Your personal data may be transferred to the processors of such categories of data:

- Event organization agencies;
- Photographs or photograph agencies;
- Public relations and digital service agencies;
- Mailing service providers;
- Mobile and e-mail marketing service providers;
- Authorities (such as law enforcement authorities, tax administration, supervisory authority and extra-judicial dispute settlement authorities);
- Auditors, financial and legal advisers;
- Other personal data processors approved by us.

- **Types of personal data, legal basis and purpose of processing**

We always process your personal data only if have a legal basis to do so and only for the certain purpose.

The following legal basis exist for the needs of our marketing activities:

- our legal interests - we are interested to provide as much as possible broad and adjusted range of services and experience to you. In certain cases, we have the right to also protect our interests, for example, if you have submitted a complaint against our activities. In such cases we process only such personal data of you, which are directly necessary for provision of such our legal interests;
- our obligation provided under legal acts (legal obligation) - in some cases legal acts provide certain obligations to us, for example, to identify a person, to send a report to tax administration authorities etc. In such cases we process only such personal data of you, directly required for fulfilment of these our obligations.

Marketing activities organized by us are public events, which may be photographed and/or video recorded. You have to aware of that you may be visible if you participate in these events. If you have attended the marketing activity organized by us together with a child (that is, a person under the age of 18), you have to be aware of the fact that also your child may be photographed and/or video recorded within the framework of marketing activities organized by us.

We have the right to your the personal data of you and your child for different purposes, including, but not limited to, publishing, posting and distribution on social networks, internet sites, advertising clips, on television, in printed media and other publicity materials.

Lotteries and/or contests organized by us are public events. We have the right to use your personal data for different purposes, including, but not limited to, publishing, posting and distribution in social networks, internet sites.

Please, take into account that neither your personal identity number, nor phone number or e-mail address will be published within the framework of lotteries and/or contests organized by us.

Further on you may become acquainted with the legal basis and purpose of your personal data processing:

Our marketing activities

Personal data	Legal basis	Purpose of processing
Personal data included in photographs or filming materials - your appearance, appearance of your child etc.	Lawful interests	Popularization of the shopping centre and products offered by it.

Lotteries and/or contests organized by us

Personal data	Legal basis	Purpose of processing
Given name, surname	Lawful interests	Identification In order we would be able to identify you as a participant of the lottery or contest.
Lawful obligation	<p>Identification In order we would be able to identify you as a participant of the lottery or contest.</p> <p>In order we would be able to fulfil our obligations towards tax administration authorities and supervisory authorities of lotteries.</p>	
Personal identity number	Lawful interests	Identification In order we would be able to identify you as a participant of the lottery or contest.
Lawful obligation	<p>Identification In order we would be able to identify you as a participant of the lottery or contest.</p> <p>In order we would be able to fulfil our obligations towards tax administration authorities and supervisory authorities of lotteries.</p>	
Contact information (telephone, e-mail)	Lawful interests	In order we could contact we in case of receipt of a prize.

- **Personal data processing terms**

In order to provide marketing activities organized by us, we process your personal data within the following time periods:

Our activity	Type of submission or storage of personal data	Term (for erasure/ destruction)
Marketing activity	Electronic data	3 years after the course of event
Paper format	3 years after the course of event	
Lotteries or contests	Electronic data	3 years after the course of the lottery or contest
Paper format	8 years after the course of the lottery or contest	

PERSONAL DATA PROCESSING FOR SECURITY PURPOSES OF THE SHOPPING CENTRE

We perform constant video surveillance with recording in the public use premises of the shopping centre, across the perimeter of the building and in the territory.

We perform processing of your personal data, in order to prevent or disclose criminal offences related to protection of the property and protection of interests vitally important for persons, including life and health, as well as obtaining proof for the needs of insurance.

Our activities	Controllers (joint controllers) and their contact information
Performance of video surveillance in shopping centres	GALERIJA CENTRS • SIA BH Galerija Centrs, reg. No.: 40003311422

Contact information of the controllers:

- legal address: Audēju iela 16, Rīga, LV-1050, Latvia,
 - e-mail: info@galerijacentrs.lv
-

- **Personal data controllers and processors**

The following companies, considered as your personal data controllers, perform your personal data processing within the framework of video surveillance performed by us:

- We may transfer your personal data also to other companies - personal data processors, in order to prevent or disclose criminal offences as well as for the needs of insurance.

We use only trusted partners - personal data processors, through which these services are provided.

Your personal data may be transferred to the processors of such categories of data:

- Providers of physical security service;
- Providers of security guard and security system maintenance services;
- Insurance service providers;
- Authorities (such as pre-trial investigation authorities, subjects of investigatory operations, state security authorities, prosecutor's office, courts and other law enforcement authorities, tax administration, supervisory authorities and extra-judicial dispute settlement authorities);
- Other personal data processors approved by us.

- **Types of personal data, legal basis and purpose of processing**

We always process your personal data only if have a legal basis to do so and only for the certain purpose.

The following legal basis exist for the needs of video surveillance:

- our lawful interests - we are interested to prevent and disclose criminal offences with regard to your, our property and property of our partners and any persons, being in the shopping centre, vitally important interests, including life and health. We need to obtain proof also for the needs of insurance about insured events. In certain cases, we have the right to also protect our interests, for example, if you have submitted a complaint against our activities. In such cases we process only such your personal data that are necessary for provision of our lawful interests.

All persons located in the shopping centre, being the area of visibility of the surveillance cameras, including children (that is, persons under the age of 18 years), are observed within the framework of video surveillance organized by us.

Data of video surveillance organized by us are not published. We have the right to use your personal data and personal data of your children only for the purpose of prevention or detection of criminal offences related to protection of the property and protection of interests vitally important for persons, including life and health, as well as acquisition of proof for the needs of insurance.

Further on you may become acquainted with the legal basis and purpose of your personal data processing:

Personal data	Legal basis	Purpose of processing
Image of a person Place of recording of the image of a person Time of recording of the image of a person	Lawful interests	In order to prevent or detect criminal offences in relation to protection of property and vitally important interests of persons, including life and health, as well as obtain proof for the needs of insurance.

- **Personal data processing terms**

Within the framework of video surveillance organized by us, we process your personal data within the following time periods:

Our activity	Type of submission or storage of personal data	Term (for erasure/ destruction)
Video Surveillance	Electronic data	No longer than 30 days after recording
Electronic data, if the investigation is performed or a request for information is received from law enforcement authorities	Until completion of investigation or until submission of information to the law enforcement authority	