

PRIVACY POLICY

WHO ARE WE AND HOW YOU CAN CONTACT US

Contact details of the Data Controller: SIA Syfud, registration number 40203272645, legal address Vienības gatve 87B - 2, Rīga, LV-1004, Latvia, e-mail address info@portlite.eu (hereinafter "We", "Ours", "Company") process the personal data of its' employees, potential employees, contractors (natural persons), employees of its contractors, shareholders and members of the management bodies (hereinafter - you, your) personal data in accordance with the provisions of the legal acts regulating the legal protection of personal data and applying the highest technical and legal standards of protection and taking all necessary measures to prevent possible breaches of personal data protection. This Privacy Policy (hereinafter referred to as the "**Privacy Policy**") sets out the basic rules for the collection, processing and storage of your personal data and other information related to you, the scope, purposes, sources, recipients of your personal data and your rights as a personal data subject and other important aspects of your use of the Company's services. This information is important, so we hope you will read it carefully.

As used in this Privacy Policy, the term "personal data" (the "**Personal Data**") means any information about you relating to you as a natural person, a data subject whose identity is known or can be directly or indirectly identified through the use of certain data (e.g. name, surname, personal identification number, address, telephone number, etc.).

In processing the personal data, we responsibly comply to the regulation No 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 ("**GDPR**"), Personal Data Processing Law of the Republic of Latvia and other directly applicable legal acts regulating the protection of personal data, as well as instructions from competent authorities.

In the event that you provide us with personal information other than your own (for example, identifying another person as a beneficiary), please inform them of this Privacy Policy and its contents.

If the user of the services is a legal entity, this Privacy Policy applies to natural persons whose personal data is transferred to us by a legal entity. The user must duly comply with Art. 14 of the GDPR. to inform data subjects (managers, beneficiaries, representatives, etc.) about the transfer of their personal data to the Company.

If you have any questions regarding this Privacy Policy or requests regarding the processing of your personal data, please contact us by email: info@portlite.eu

By visiting the Company's websites and / or using the information contained therein and / or our services, you acknowledge and confirm that you have read and understood this Privacy Policy.

TO WHOM THE PRIVACY POLICY APPLIES

This Privacy Policy applies to our Website www.portlite.eu (the **Website**) and any service provided by the Company or other activities of the Company where personal data is being process.

The terms and conditions of the Privacy Policy apply to you every time you access the content and/or the service we provide, regardless of which device (computer, cell phone, tablet, TV, etc.) you are using.

This Privacy Policy does not apply to links to other entities websites provided on our websites; therefore, we recommend that you read the personal data processing rules applied on such websites.

WHAT PRINCIPLES DO WE COMPLY TO?

When processing your personal data, we:

- comply with current and applicable legislation, including the GDPR;
- we will process your personal data in a lawful, fair and transparent manner;
- we will collect your personal data for specified, clearly defined and legitimate purposes and will not continue to process it in a way incompatible with those purposes, except to the extent permitted by law;
- take all reasonable steps to ensure that personal data which are inaccurate or incomplete, having regard to the purposes for which they are processed, are rectified, supplemented, suspended or destroyed without delay;
- we will keep them in such a form that your identity can be established for no longer than is necessary for the purposes for which the personal data are processed;
- we will not disclose or disclose personal data to third parties except as provided in the Privacy Policy or applicable law;
- ensure that your personal data is processed in such a way as to ensure the appropriate security of personal data through appropriate technical or organizational measures, including protection against unauthorized or unlawful processing of personal data and against unintentional loss, destruction or damage. Contact details for questions regarding your personal data: info@portlite.eu

WHAT PERSONAL DATA, FOR WHAT PURPOSE AND BASIS DO WE PROCESS

The purpose of the processing of personal data. Why we process personal data?	The categories of processed personal data. What kind of categories of personal data we process?	The legal basis of the processing (the Artical 6 of the GDPR). On what legal basis do we process personal data?
execution of the Company's contracts with legal persons	first name, surname, telephone number, e-mail address of the employees of the Company's contractors	legitimate interest in the execution of the contracts concluded by the Company with legal persons
employee recruitment	CV and/or motivation letter, first name, surname, telephone number, e-mail address, date of birth, education, workplace, information about the candidate from social networks	consent of data subject
execution of employment contracts and contracts with contractors (natural persons)	first name, surname, personal code, telephone number, e-mail address, address, date of birth, a copy of personal identification document, social security number, bank account number, data on health status and capability to perform certain type of work	fulfilment of law and lawful rights and obligations and consent of data subject
protection of Company's confidential information and ensuring business continuity	IP address, browsing history, dates and durations of websites visited, the quantity of data downloaded, the name of the device used for browsing, first name, surname, the content of the electronic mail, the summary of the employee's actions online, the content of the information contained in the electronic devises granted as work equipment	legitimate interest of ensuring the protection of the Company's confidential information and its business continuity
processing personal data of shareholders and members of the management bodies	first name, surname, personal code, address, date of appointment	fulfilment of law and lawful rights and obligations
protection of assets and persons' safety	In order to ensure the security of visitors and employees and to protect the Company assets, the Company performs video surveillance. For these purposes we process: a view that is covered by surveillance cameras, a location and information on the objects' movement through the camera surveillance areas, the assets within the surveillance area, behavior and other relevant information (date, time) captured in the surveillance area	legitimate interest of ensuring the protection of the Company's assets and persons' safety

If you do not provide personal data, the provision of which to the Company is necessary to ensure compliance with the requirements of legal acts and / or the conclusion and / or performance of the contract, we will not be able to provide you with services or conclude another transaction.

DIRECT MARKETING

For direct marketing purpose, we process your personal data in the following cases:

- when we obtain your explicit consent to such processing;

- when you are a customer of us who have not objected to the processing of personal data for the purpose of direct marketing, marketing of similar services or products.

For direct marketing purpose, we process the following of your personal data: email address, phone number.

With you expressed consent to receive direct marketing messages or newsletters you subscribe, you agree to receive our news about new services, products, invitations to events etc.

We inform you that Visitors may at any time refuse our newsletters or other promotional messages by clicking on a link to this in our outgoing newsletters and/or messages.

HOW WE PROCESS YOUR PERSONAL DATA

Our use of your personal data will always have a lawful basis. Most commonly, we use your personal data:

- Where we need to conclude any contract and/or perform any contract we have entered into with you;
- Where we need to comply with a legal obligation;
- Where we have your consent;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interest.

“Legitimate interest” means our interest to enhance our services, products, to manage the processes of businesses and activities. We consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. The legitimate interests that we pursue include:

- legitimate interest in the execution of the contracts;
- legitimate interest of ensuring the protection of the Company's confidential information and its business continuity;
- legitimate interest of ensuring the protection of the Company's assets and persons' safety.

HOW LONG WE WILL RETAIN YOUR PERSONAL DATA

We will retain your personal data for as long as necessary to achieve and fulfil the purposes set out in this Privacy Policy, taking into account the nature of the services provided to you and the contracts you enter into, unless longer storage of personal data and related documents is required by applicable laws and regulations and is necessary (e.g. mandatory time limits for accounting and others, etc.) or is required for the defence of the Data Controller's legitimate interests in judicial, other public institutions etc.

We ensure and take all necessary measures to avoid storing outdated or unnecessary personal data about You and to keep Your personal data up-to-date and accurate.

We will use your personal data for direct marketing purposes for 3 (three) years after you're giving consent or after the end of the contractual relationship (direct marketing of similar services or products).

HOW DO WE PROTECT YOUR DATA?

We responsibly implement appropriate organisational and technical personal data security measures intended for the protection of personal data against accidental or unlawful destruction, alteration and disclosure as well as against any other unlawful processing. **The security measures we implement include the protection of personnel, information, IT infrastructure, internal and public networks as well as office buildings and technical equipment.**

In the event of personal data breach of security that could seriously jeopardise your rights or freedoms and determine the circumstances with which unauthorised access to personal data has been obtained, we will immediately inform you about it.

TO WHOM IS YOUR DATA ARE DISCLOSED

We may share some of your personal data with the following categories of third parties:

- any Avia Solutions Group¹ company (listed at <https://aviasg.com/en/the-group/general-contacts>) for the purposes set out in this Privacy Policy (for example, for the purposes of performance of contracts and the management of relationship with customer);
- representatives acting on our behalf with respect to the promotion of our services in particular territories;

¹ **AVIA SOLUTIONS GROUP PLC**, a private limited liability company, established and acting under the laws of the Republic of Cyprus, registration code HE 380586, registration address 28 Oktovriou, 1, ENGOMI BUSINESS CENTER BLC E, Flat / Office 111 Egkomi, 2414, Nicosia, Cyprus.

- companies providing data centers, hosting, cloud, site administration and related services, software developers, providing, maintaining and developing companies, companies providing information technology infrastructure services, companies providing communication services;
- credit and debit card companies used to facilitate payment transactions related to the provision of our services, banks and other credit and/or payment companies;
- our professional advisors, auditors, lawyers and/or financial advisers;
- our other service providers (data processors) or our subcontractors;
- notaries, if the contract concluded with you requires a notarial form;
- judicial officers, entities providing legal and/or debt recoveries services, subrogator of claim right;
- companies providing advertising and marketing services;
- companies providing archiving, physical and / or electronic security, asset management and / or other business services;
- in accordance with the laws to state institutions, establishments, etc .;
- law enforcement authorities at their request or on our own initiative if there is a suspicion that a criminal offense has been committed, as well as courts and other dispute resolution bodies; tax administrators
- in the event of a company restructuring, transfer / acquisition and / or business transfer / acquisition, to a third party acquiring the business and processing personal data for the same purposes as specified in this Privacy Policy.

DATA TRANSFER OUTSIDE THE EUROPEAN ECONOMIC AREA

As a general rule, your personal data will be processed in the countries of the European Economic Area (hereinafter - EEA). However, in certain cases, your personal data may be transferred to non-EEA countries. Please note that in non-EEA states, personal data may be subject to less protection than within the EEA, but we carefully evaluate the conditions under which such data will be processed and stored after being transferred to the above-mentioned entities.

Please note that if the European Commission has determined that the third country, territory or one or more specified sectors in that third country or international organization concerned provides an adequate level of personal data protection, the transfer must take place in the same manner as in the EEA. Please be informed that you can have access to the information as to the states in respect of which the decision of the European Commission has been taken, here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.

In other cases, we take all necessary measures to ensure that your personal data is transferred to the recipient safely processing the data. The tools we use: a contract with a non-European recipient of personal data includes specific clauses for the secure processing of the data. In certain cases, we ask for your consent to transfer your data outside the Republic of Lithuania or the EEA.

DO WE APPLY AUTOMATED DECISION-MAKING OR PROFILING?

We do not normally use automated decision-making under Article 22 of the GDPR to initiate and execute contractual relationships. Should we apply this procedure in individual cases, we will inform you separately, if required by law.

We process your personal data in a partially automated way in order to assess certain personal aspects (hereinafter - Profiling). We use profiling, for example, when we are required by law to prevent money laundering or manage financial risk.

RIGHTS GUARANTEED TO YOU

We guarantee the implementation of these rights and the provision of any related information at your request or in case of your query:

- know (be informed) about the processing of your personal data;
- to get access to your personal data which are processed by the Data Controller;
- request correction or addition, adjustment of your inaccurate, incomplete personal data;
- require the destruction of personal data when they are no longer necessary for the purposes for which they were collected;
- request the destruction of personal data if they are processed illegally or when you withdraw your consent to the processing of personal data or do not give such consent, when is necessary;
- disagree with the processing of personal data or withdraw the previously agreed consent;
- request to provide, if technically possible, the provision of your personal data in an easily readable format according to your consent or for the purpose of performing the contract, or request the transfer of data to another data controller.

In order to exercise your rights, please send us the request by e-mail info@portlite.eu or directly coming to the Company by address Roņu iela 6, Liepāja.

Upon receipt of your request, we may ask you to provide proof of your identity or other identifying information to ensure that we are exercising your rights as a data subject and to prevent unauthorized disclosure of personal data or information to others who are not entitled to it. If we are unable to identify you, we will not be able to exercise your rights as a data subject.

We provide information about the processing of your personal data free of charge. If your request is unfounded, repetitive or disproportionate, we may charge a fee commensurate with our administrative costs.

Upon receipt of your request, we will respond to you within 30 calendar days of receipt of your claim and the due date for submission of all documents necessary to prepare the answer.

In exceptional circumstances, which may require us to have additional time, the deadline for replying may be extended for a further two months, depending on the complexity of the situation. In this case, it is mandatory to inform the Data Subject in writing about such extension within 1 (one) month from the receipt of the request and indicate the reasons for the delay. If we think we need to, we will stop the processing your personal data, except for storage, until your application is resolved. If you have legally waived your consent, we will immediately terminate the processing of your personal data and within no more than 30 calendar days, except in the cases provided for in this Privacy Policy and in the cases provided for by law when further processing of your personal data is binding on us by the legislation in force, the legal obligations we are facing, court judgements or binding instructions from the authorities. The response will be provided in the same way as your request was received.

By refusing to comply with your requirement, we will clearly indicate the grounds for such refusal.

If you disagree with our actions or the response to your request, you can complain to the competent state authority (the list of supervisory authorities by each EU countries: https://edpb.europa.eu/about-edpb/board/members_en). In all cases, we recommend that you contact us before making a formal complaint so that we can find the right solution.

WHAT HAPPENS IF OUR BUSINESS CHANGES HANDS?

We may, from time to time, expand or reduce the scope of our business operations and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this notice, be permitted to use that data only for the same purposes for which it was originally collected by us.

LINKS TO OTHER WEBSITES

Our Websites may contain links to other websites, which are not operated by us. We have no control over how your data is collected, stored, or used by such other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

SOCIAL NETWORKS

When you visit social networks, your personal data is processed by a specific social network, and we start processing your personal data when you visit [Company Name] on social networks. Through various social media channels, we want to introduce you to our wide range of services / products and exchange ideas and opinions with you on important topics.

Your personal data provided on the social network is processed for the following purposes:

- communicate with our social network visitors;
- respond to visitor inquiries;
- obtaining statistical information;
- conducting customer surveys, marketing campaigns, market analysis, lotteries, competitions or similar actions or events;
- if necessary, defending the legitimate interests of the Company in institutions and in other cases.

Unless explicitly stated otherwise, the legal basis for data processing is Article 6 part 1 point (f) of the GDPR. Our legitimate interests are to be able to answer your messages or questions and analyze our availability on social networks, to present our products and services. To the extent that you wish to enter into a contractual relationship with us with your request, the legal basis for such processing is Article 6 part 1 point (b) of the GDPR.

If we intend to process your personal data for any other purpose not mentioned above, we will notify you prior to such processing.

Our pages on social networks are managed by specific social networks, so when you visit them, the processing of personal data is based on the social network privacy policies. With some social networks, depending on the social network policy, the purposes and scope of the processing, we are considered as joint data controllers.

Name of the social network and its Privacy Policy	Personal Data we process	Personal Data we process as joint data controllers
Facebook You can read their privacy policy by clicking here: https://www.facebook.com/policy.php	- Your username, when you comment, you write us messages; - Your activities on our site, e.g. Your page views, duration statistics, query, comment information, and more.	We use statistical information (visits to our website, range of contributions, visits and average video transmission times, information about the countries and cities from which our visitors come). We receive anonymous statistics from Facebook through their service. The data controllers' agreement for Facebook can be found here: https://www.facebook.com/legal/terms/page_controller_addendum , for LinkedIn: https://www.linkedin.com/legal/l/dpa
LinkedIn You can read their privacy policy by clicking here: https://www.linkedin.com/legal/privacy-policy		
Instagram You can read their privacy policy by clicking here: https://help.instagram.com/519522125107875		

CHANGES TO OUR PRIVACY POLICY

We reserve a right to change this Privacy Policy unilaterally from time to time (for example, if the law changes). Any changes will be immediately posted on our websites. We recommend that you check this page regularly to keep up-to-date.

This Privacy Policy applies from the date it is posted on the Websites. Last review of the Privacy Policy: 24.05.2021. If you continue to use our services (such as the Website) after changing the terms of the Privacy Policy, you will be deemed to have read and understood the changed terms of the Privacy Policy.