

Principles of OM31 clients' (data subjects) data processing. Developed in accordance with 2016/679 Regula of the European Parliament and the Council on the protection of individuals with regard to the processing and free movement of personal data.

Riga, July 1, 2019

1. Data Controller

SIA OM 31, reg. number 40203082590, legal address: 1-12 Vīlandes street, Riga, LV1010, is responsible for processing personal data on the legal basis and for the purposes set out in this policy, such as marketing and sales; use of services; financial, administrative and business management; customer and supplier relationship management; goods, services, customer and supplier relationships business analysis and development.

The Data Controller is responsible for processing of personal data for the defined purposes on the basis of the legal data processing principles, namely: fulfillment of contractual obligations.

2. Contact information

For data processing related issues, the Data subject may contact SIA OM 31 by sending a notification to info@edinburgh.lv.

3. Purpose and legal basis for the processing of personal data

The legal basis for the processing of personal data of data subjects is

1. Execution of pre-contractual requests by the data subject, such as requests for information or offers, requests for subscriptions to information material.
2. The contractual relationship between the data subject and the Data Controller.
3. Maintaining Customer Relationships as a legitimate interest of Data Controller.
4. Legitimate interest in direct marketing.
5. The consent of the data subject, when necessary to:
 - send digital content for direct marketing purposes;
 - find a data subject;
 - collect data about the use of Data Controller's internet or mobile services measured with the help of cookies, advertising identifiers, or other similar tracking technologies for the purposes set out in this Privacy Policy;
 - for other statutory purposes.

Personal data are processed for the following purposes:

- establishment, management and development relationships between data subject and Data Controller;
- marketing, offering, brokering, providing and developing various housing services;
- credibility assessment and billing, payment monitoring and collection, data transfer to debt collection agencies;
- communication with the data subject, including feedback and satisfaction surveys of data subjects and suppliers;
- defining and reaching the target audience via email, by phone or by digital advertising (internet and mobile);
- opinion polls, surveys and marketing research;
- advertising lotteries and contests;
- for development of goods, services and entrepreneurship;
- detection, prevention and investigation of fraud and other criminal offenses;
- performing analysis, segmentation and statistics to achieve the above objectives.

4. Data subjects and personal data categories

The Data Controller processes the data of prospective, current and former clients in the following categories:

- basic information about the data subject: name, surname, personal identification number, year of birth, native language, postal address, e-mail address, telephone number, preferred means of communication, resident or non-resident status;
- marketing data: activities; choices and interests related, for example, to types of housing and their characteristics, living areas and locations; size of household, type of dwelling; the number of apartments owned by the data subject; other interests and information provided by the data subject; permissions, consents, restrictions and prohibitions;
- information about the data subject's account: conditions of the relationship with the client, development and termination of the relationship; details of contracts, including termination, modification and transfer; data subject feedback and complaints, recorded data subject's calls to support service; marketing research; other communication including billing, payment, debt collection and credibility check;
- digital service user data, such as registration information for the digital account, including username, nickname, password and other identifiers; information about the use of the service; browsing information and user's digital account; information collected through cookies and similar technologies, such as user-browsed websites, devices' models, device and/or cookie identifier, channels for accessing the service (web browser, mobile browser, application), browsers' versions, IP addresses, session identifier, session time and duration, screen resolution, and operating system; location data, such as coordinates calculated using GPS, WLAN hotspots, or cellular network base stations – only if the with user has given a clear approval for such actions;
- social media usage data; for example, the Data Controller's website may include social media features such as the *Facebook* Like and Share buttons. The Data Controller may receive a copy of a comment or a link shared by the user from the Data Controller's website on *Facebook*. The Data Controller may also receive the user's public profile data on the *Facebook* or any other information that the *Facebook* user shares through the Data Controller's services.
- data subject's/user/s analytical data, such as marketing segments and profiles derived from the data described above or from regular source data using analysis and templates, such as calculating the potential interest of the user/data subject or otherwise placing the user/customer into a certain segment.

Data subjects' personal code shall only be processed for purposes permitted by the law – when it is important to identify the data subject, for example in case of sale or rental of apartments or in case of granting credit or debt recovery.

Only basic information and marketing data can be used for direct marketing activities defined above.

5. Regular sources of information

Personal data are collected directly from the data subject when the data subject registers or uses the service – sends a request for contact or other information or fills out a form; buys, orders, contracts, participates in events, or otherwise communicates with the Data Controller (SIA OM 31) in person, by telephone or in digital form. Personal data may also be collected and updated through the company's websites, open or public and business registers, government agencies, postal operators, public telephone directories, direct marketing and other data tools, including other similar public and private registers.

6. Disclosure and transfer of data

The Data Controller (SIA OM 31) may disclose personal data to other affiliated companies whose real estate or services are sold by the Controller to clients.

Data will not be disclosed to anyone except as a result of legal or contractual obligations of the Data Controller.

The Data Controller (SIA OM 31) may outsource data marketing, communication and other functions. In such a case, the Data Controller (SIA OM 31) may transfer personal data to the external service providers to the extent necessary for the provision of their services. These outsourced providers process personal data on behalf of the Data Controller (SIA OM 31) and must comply with the rules of the Data Controller (SIA OM 31) and its data processing principles. The Data Controller (SIA OM 31), by entering into contracts with appropriate rules and conditions, ensures that personal data are processed in accordance with the requirements of the law.

Personal data cannot be transferred outside the European Union (EU) or the European Economic Area (EEA).

7. Data protection and safekeeping

Access to personal data shall be allowed only to persons with a need to process data as a part of their job or other duties. Digital data is protected by firewalls, passwords and other technical means. All data is stored in locked cabinets and rooms that are protected by physical access control tools.

After the end of the relationship with a customer, the personal data is retained for the duration of the contractual and legal rights and obligations, and until the end of the safekeeping and liability periods, in accordance with, for example, the Consumer Protection Act and the Accounting Act.

After the end of the relationship with a customer, the Data Manager (SIA OM 31) may keep anonymised data as well as the above-mentioned basic information (except personal identification number) and the data subject's marketing information for direct marketing purposes.

8. Subjects' right to access and update data and other rights

Data subjects have the right to know what type of personal data has been collected and processed by the Data Controller. At the request of the data subject, the data shall be corrected, deleted or supplemented if it contains any incorrect, unnecessary, incomplete or outdated personal information.

Data subjects have the right to prohibit the use of data for direct advertising, telephone marketing and other forms of direct marketing, as well as to prohibit the use of data in questionnaires and market research.

Data subjects may also withdraw the consent they have given, object to or restrict the processing of the data in cases laid down by law, and have the right to complain to the supervisory authority.

Requests may be submitted by sending an e-mail to the address mentioned in paragraph 2. Please note that the Data Controller (SIA OM 31) may need to request additional information to determine the identity of the data subject.