

Processing of personal data

Riga

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General rules

Personal data means any information relating to an identified or identifiable natural person (hereinafter referred to as - Personal data).

Limited liability company "Perks", reg. No. 40203343134 (hereinafter - "Perks" and/or "We") as an insurance brokerage company processes personal data on a daily basis. Recognising that personal data is an asset to you, we take appropriate measures to ensure that your personal data is always safe with us.

These Principles on Processing of Personal Data apply to any data subject whose personal data handled by Perks.

The purpose of these principles is to inform and explain to you how and for what purposes personal data are processed, and to make you aware of the rights of data subjects. However, please note that other documents (such as service agreements, cooperation agreements, terms of use of the website or portal) may also provide additional information about the processing of your personal data.

What Personal Data does Perks process?

The processing of your personal data is related to the provision and use of Perks insurance services. The information we obtain about an individual depends on the specific insurance product. For example:

- a) Identification data (name, surname, personal identification number and other information);
- b) Contact details (home address, email, phone number and other information);
- c) Vehicle information (registration number, make and model, equipment details, photos of the vehicle and other information);
- d) Information about the property (location, property details, occupancy and facilities, security and other information);
- e) Travel information (information on the destination and travellers, planned activities for the trip, and other information).

How does Perks obtain Personal Data?

We may receive personal data in a number of ways, including:

- a) The data subject has provided his or her own Personal Data, i.e., when making an insurance offer to the data subject, signing up for a newsletter, applying for a job at Perks, requesting information, contacting Us, and in other cases;
- b) Perks may receive your personal data from a person who intends to conclude an insurance contract for your benefit. For example, if you are named as a beneficiary in an accident insurance contract or you are named as an insured person in a travel insurance policy.

- c) Perks receives personal data from insurance companies if you have used our insurance intermediary services.
- d) Cookies may be used when you visit the Perks website.

How does Perks use Personal Data?

Perks processes Personal Data in order to provide insurance services, to provide efficient service, to ensure cooperation, and to carry out economic and administrative activities.

Perks processes Personal Data only for specific and necessary purposes, such as:

- a) For the provision of insurance mediation services;
- b) To advise clients on insurance matters;
- c) For personnel management purposes (e.g. recruitment);
- d) To examine and process applications;
- e) To work with partners;
- f) For compliance with binding laws and regulations;
- g) For other specific purposes, of which the Data Subject is informed at the time of providing the relevant data to Perks.

Perks processes Personal Data only on the basis of certain legal grounds, such as:

- a) The processing is necessary for the performance of a contract to which the Data Subject is a party or for the performance of measures requested by the Customer prior to the conclusion of the contract;
- b) You, as the data subject, have given your consent to the processing of your personal data;
- c) The processing of personal data is necessary for the protection of you or another natural person interests;
- d) The processing of personal data is necessary for compliance with a legal obligation to which we are subject as controller;
- e) The processing of personal data is necessary for the performance of a task carried out in the public interest.
- f) The processing of personal data is necessary for the pursuit of our or a third party's legitimate interests. When processing personal data on this basis, we specifically assess proportionality and whether your right to privacy is overridden in a particular situation compared to our or a third party's legitimate (legitimate) interest.

Perks legitimate interests are:

- a) to carry out commercial activities
- b) provide insurance mediation services
- c) verify the identity of the Data Subject before the conclusion of the contract or during the provision of services to the Data Subject - by telephone, electronically, in person;
- d) to remind you of the end of the insurance contract, while protecting your interests;
- e) advertise their services by sending commercial communications;
- f) to prevent crime, such as fraud;
- g) to prove compliance with the obligation;
- h) ensure and improve the quality of services
- i) administer payments

- j) apply to public administration and law enforcement bodies and courts to protect your legal interests, and more.

Who may Perks provide Personal Data to?

Perks shall ensure confidentiality and shall not disclose to third parties your personal data or information obtained during the provision of services and the performance of the contract, except where the exchange of personal data may be necessary in individual cases for a specific purpose, such as:

- a) Insurance companies to whom the Client's data must be passed for the purpose of obtaining an insurance quote, concluding an insurance contract and servicing the insurance contract, representing the Client's interests. We transfer data to insurance companies on the basis of a cooperation agreement.
- b) We are obliged to provide information to public authorities and other public or third parties where required to do so by law or regulation;
- c) Institutions/companies involved in debt collection. Including debt collection companies, bailiffs, administrators and others involved in the debt recovery process.

Within Perks, access to your personal data is limited to those employees who need it to perform their job.

How long does Perks keep data?

We keep Personal Data only for as long as necessary to achieve the purposes set out in these Principles for Processing Personal Data, unless longer retention is required or permitted by applicable laws and regulations.

- a) the statutory limitation periods for certain types of claim;
- b) The law defines the terms for keeping various documents, for example the Law on Accounting or the Law on Archives.

How does Perks process Personal Data?

When processing personal data, Perks complies 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 (the Regulation) and other applicable data processing legislation.

Perks organises data processing using appropriate technical and organisational measures that are necessary in accordance with the laws of the Republic of Latvia and the applicable laws of the European Union.

What are the data subject's rights?

Data protection law gives you a number of rights in relation to the processing of your personal data:

- a) Access to personal data. You have the right to request confirmation from us as to whether we are processing personal data relating to you and, in such cases, to receive information about the processing of your personal data and to request access to your personal data. (Article 15 of the Regulation).
- b) Rectification of personal data. If you believe that information about you is incorrect or incomplete, you have the right to ask Perks to complete or rectify it (Article 16 of the Regulation).
- c) Erasure of personal data. You have the right to ask us to erase your personal data in certain circumstances, but this does not apply where we are required by law or regulation to retain the data (Article 17 of the Regulation).
- d) Treatment restriction. You have the right to restrict the processing of your personal data in certain circumstances (Article 18 of the Regulation).
- e) Data portability. You have the right to receive or transfer your personal data to another data controller ("data portability"). This right only covers data that you have provided to us on the basis of your consent or a contract and where the processing is carried out by automated means (Article 20 of the Regulation).
- f) Objection to processing. You have the right to object to the processing of your Personal Data where the use of your Personal Data is based on legitimate interests, including profiling for direct marketing purposes such as receiving marketing offers or participating in surveys (Article 21 of the Regulation).

The right not to be subject to fully automated decision-making, including profiling, where such decision-making has legal effects or similarly significantly affects you. This right does not apply if the decision-making is necessary for entering into or performance of a contract with the data subject, if the decision-making is permitted under applicable law or regulation, or if the data subject has given his or her explicit consent (Article 22 of the Regulation).

The data subject may submit a reasoned request for the exercise of his or her rights:

- a) in writing in person at Perks' registered office at 60 Dārziema Street, Riga, upon presentation of an identity document;
- b) by electronic mail, signed with a secure electronic signature and sent to info@perks.lv.

Upon receipt of a request from a Data Subject to exercise its rights, Perks shall verify the identity of the Data Subject, assess the request and comply with it in accordance with the laws and regulations.

Perks shall send a reply to the Data Subject by post to the contact address provided by the Data Subject by registered letter or by electronically signed e-mail at the request of the Data Subject.

Perks' supervisory authority for personal data protection is the State Data Inspectorate. Before you lodge a complaint with the Data Inspectorate, we encourage you to first address your request to us.

Right of the data subject to withdraw consent

The data subject has the right to withdraw the consent to data processing at any time in the same way as it was given, i.e. by calling 26668558, writing to info@perks.lv or in person at the registered office of Perks at Dārziema iela 60, Riga, in which case no further data processing based on the previously given consent for the specific purpose will be carried out. However

take into account that, if we withdraw consent, we will not be able to fulfil the purpose for which such consent was obtained. In some cases, we may not be able to continue to provide our services.

Withdrawal of consent shall not affect the processing of data carried out at the time when the Data Subject's consent was valid.

Withdrawal of consent may not interrupt the processing of data carried out on the basis of other legal bases

Access to personal data by third-country subjects

We process your personal data within the territory of the European Union and the European Economic Area. However, if we need to transfer your data to persons located in other countries, in such cases Perks will ensure the procedures established by the laws and regulations for the processing of personal data and a level of protection equivalent to that established by the Regulation.

How can I find out about changes to our personal data processing principles?

We will regularly review our data processing principles. We therefore encourage you to consult the current version regularly. It is available at Perks' registered office at 60 Dārzciema Street, Riga and on Perks' website www.perks.lv. When we make changes, we will inform you by a notice on our website.

How to contact Perks?

If you have any questions or concerns, please contact Perks by e-mail: info@perks.lv or call 26668558

Riga, 14 September 2021

Guntis Zoldners, Member of the Board of Perks SIA