

PRIVACY POLICY REGULATIONS ON YOUR PERSONAL DATA PROCESSING

- SIA "KUNDZIŅU SALAS", Reg. No.40103846054, "Kundziņsala", Vidrižu pagasts, Limbažu novads, (hereinafter referred to as "Processor", "we", "our") shall process your personal data collected on the website www.kundzinusalas.lv, as well as submitted in another electronic or paper format.
- In conformity with the purposes laid down in the Regulations and in a required amount we process the following Personal data sets (categories):

Personal data sets (categories)	Description
Your contact information	Information for contacting you, telephone number, electronic mail address.
Your identification data	Name, surname, personal identity number, residence address
Information obtained as a result of CCTV monitoring	Information about you obtained as a result of the CCTV monitoring in the territory of the guest house "Kundziņu salas" - your video image, time and place when you were located in the CCTV monitoring area.
Your financial information	Your bank account number

- We acknowledge that your Personal data shall not be used for the purposes other than described herein. By handing over the Personal data for processing you acknowledge doing it of your own free will.
- Purposes of your Personal data processing:
Prior to beginning of your Personal data processing, we always assess the purposes of your Personal data processing in advance. Your Personal data processing is lawful if we perform it based on at least one of the following bases, i.e. we perform your Personal data processing:
- Your contact information: to send you information to your e-mail in relation to SIA "KUNDZIŅU SALAS" services; to contact you by phone or send information to your phone in relation to SIA "KUNDZIŅU SALAS" services;
- Your identification data: for drawing up, entering into and performance of the rent, accommodation and other services agreements;
- Your personal data shall be used for provision of quality SIA "KUNDZIŅU SALAS" services to you;
- Your financial information: Your account number may be used to draw up and enter into an agreement on any of the services offered by SIA "KUNDZIŅU SALAS";
Personal data may be used to analyse our service quality, market situation, consumers and the product; however, as a result of the analysis your data shall not be delivered to third parties.
- **Legal basis for personal data processing:**
Your personal data shall be processed based on:
 - subclause a) of clause 1 of Article 6 of the General Data Protection Regulation (GDPR) (your consent);
 - subclause b) of clause 1 of Article 6 of GDPR (for contract performance);
 - subclause f) of clause 1 of Article 6 of GDPR (for our legitimate interest);
 - subclause d) of clause 1 of Article 6 of GDPR (for protection of vital interests of the data subject or of another natural person).
- **Legitimate interest**
Our legitimate interest is development, popularization and selling of services provided by SIA "KUNDZIŅU SALAS".
- **Personal data recipients**
Within processing your personal data shall be handed over to service providers providing services to us: security services, information technology services, e-mail delivery services, legal advice and similar services. We acknowledge that these service providers shall process data only within provision of services to us in order to ensure communication with you about services provided by SIA "KUNDZIŅU SALAS", as well as to draw up legal documents that may be required in the process of drawing up agreements or other legal documents, as well as to ensure protection of vital interests of the data subjects or other natural persons (for example, security services). In cases provided by the legal acts data may be handed over to public/law enforcement institutions, for example, to investigation authorities, courts, sworn bailiffs, etc.
- **Personal data storage**
Your personal data shall be stored as long as required for the above purposes related to the services provided by SIA "KUNDZIŅU SALAS". Personal data may be stored until the end of the abovementioned activities, including possible appeal terms and then they shall be deleted and shall be stored no longer. Should any mandatory data storage be laid down by the regulatory enactments of the Republic of Latvia, respective regulations shall be complied with. We secure storage of your personal data on the territory of the European Union and European Economic area.

- **Ensuring security of personal data processing**

We guarantee non-disclosure and security of your Personal data upon carrying out adequate technical and organizational measures, securing physical and environmental security of your Personal data, restricting access rights to your Personal data, implementing data minimization, sending your Personal data in an encrypted mode, we secure protection of computer network, personal devices, data backup and other protection measures, hence ensuring also your Personal data protection against illegal access, use or disclosure.

Within the Personal data processing performed by us, only our authorised employees and authorised employees of our cooperation partners shall have access to them, who need it for fulfilment of their job responsibilities and who process your Personal data in compliance with the technical and organizational requirements of the Personal data processing laid down in the legal acts.

- **Marketing and advertising campaigns**

Your personal data may be used for preparation or publication on the Internet of printed marketing and advertising materials. Such Personal data processing shall take place only in case you provide your written consent to it.

- **CCTV monitoring**

We carry out CCTV monitoring in order to protect your and our security within realization of our legitimate interest, as well as to eliminate and identify criminal offences in relation to property protection therefore we ensure CCTV monitoring in the open space of the guest house "Kundziņu salas" territory.

For the purpose of provision of information about the CCTV monitoring, before you enter the CCTV area, we have placed respective CCTV monitoring signs (see below) that provide you information about your Personal data processing within the scope of the CCTV monitoring performed by us.

CCTV monitoring sign

SIA "KUNDZIŅU SALAS" as your Personal data controller, based on its legitimate interest for the purpose of personal security and property protection shall process the following Personal data sets obtained as a result of the CCTV monitoring: Your video image, time and place when you were located in the CCTV monitoring area.

We shall transfer your Personal data:

- in cases provided by the legal acts for execution of requests to competent public authorities, for example, court, investigation authorities, prosecutor's office, bodies performing investigatory operations and other persons set forth by the legal acts, who are entitled to request and receive such information;
- in cases provided by the legal acts for the protection of our legitimate interest to public/law enforcement institutions, investigation authorities, courts.

We shall store your Personal data obtained as a result of the CCTV monitoring for one month.

Your personal data controller for the purpose of personal security and property protection is SIA "KUNDZIŅU SALAS", Reg. No.40103846054, "Kundziņšala", Vidrižu pagasts, Limbažu novads. In case of questions related to your Personal data processing you may contact us by writing to the e-mail address kundzinusalas@gmail.com where all required information in relation to your Personal data processing, [incl.](mailto:kundzinusalas@gmail.com) answers to your questions, will be provided to you. All information shall be handed over to a responsible employee who will provide a reply to your request.

In conformity with the legal acts requirements we secure for you the right, upon submission a written request to SIA "KUNDZIŅU SALAS", to access your personal data, rectify or delete them, to restrict their processing, to object to their processing, as well as to re-locate them.

- **Your rights in relation to Personal data processing**

If you are a data subject for the purpose of [EU GDPR](#) (for example, you are an EU citizen and provide your private data to us), you have the following rights in relation to your personal information:

- **Right to access information.** You are entitled to receive information about why and how your personal data are processed. You are entitled to receive free of charge a copy of your stored personal data in a widely used electronic format.
- In individual cases we may request you to specify the volume of your request, indicating more precisely, to what information and what processing activities your request refers to, as well as to request to explain the justification of your request. For example, in case of a CCTV monitoring record request, we are entitled to specify the volume of your requested information, a specific date and time when you were in the CCTV monitoring area, description of your looks, clothes, as well as other information that could be useful for execution of your request. You should take into account that in the respective case you will receive an edited CCTV monitoring record, which shall refer only to your Personal data processing and no other persons shall be seen in the record unless consent of these persons is received.
- In cases when it is not permitted by the legal acts, we shall not be able to provide you information about your Personal data processing, for example, if information is provided to law enforcement institutions, prosecutor's office, court.
- **Right to rectify.** You are entitled to obtain rectification of inaccurate personal data without undue delay, as well as supplement of incomplete personal data. Should changes occur to your Personal data, as well as if

you have identified that we process your inaccurate or incomplete Personal data, please inform of a necessity to rectify them. SIA "KUNDZIŅU SALAS" in such case is entitled to request you to present documents supporting the rectification.

- **Right "to be forgotten"**. You are entitled to withdraw your consent to personal data processing and obtain deletion of your personal data without undue delay, as soon as the data are no longer needed (a) for performance of a contract, (b) realization of our legitimate interests © in order to comply with any applicable law, regulation, legal process or implemented governmental request. When withdrawing given Consent to Personal data processing for a specific purpose we shall no longer carry out processing of your Personal data. However, you should take into account that such consent withdrawal shall not affect your Personal data processing lawfulness before the consent withdrawal.
- **Right to restriction of processing**. You are entitled to obtain restriction of your personal data processing where you object to it and there are no legitimate grounds to continue processing. When using the mentioned rights, we, however, shall be entitled to process your Personal data, for example, to exercise or protect legitimate right and interest, to bring an action, rights of another natural or legal person. We shall secure restriction of your Personal data at our disposal and at the disposal of our cooperation partners unless it would involve disproportionate effort.
- **Right to object**. You are entitled at any time to object to data processing unless the processing is necessary for the performance of a task carried out for reasons of public interest or compelling legitimate grounds exists for processing. SIA "KUNDZIŅU SALAS" shall be entitled to carry out Personal data processing if it shall be required for exercising or protection of legitimate right and interest, to bring an action (for example, for the purpose of legal proceedings).
- **Other rights in accordance with GDPR** More information is available at [GDPR website](#). SIA "KUNDZIŅU SALAS" shall be responsible for your personal data processing pursuant to the requirements of the legal acts. You may request information about availability of your personal data, as well as rectifications or deletion or apply data processing restrictions and express objections by writing to e-mail kundzinusalas@gmail.com or by phone 29339977. In case of infringement of your privacy you are entitled, for the protection of interests laid down in the legal acts, to lodge a complaint for review to SIA "KUNDZIŅU SALAS", the Data State Inspectorate, or bring an action in court.