

# Privacy Policy

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## 1. General Provisions

We, **TSC Authorised Service Centre**, phone +371 67 808 808, [info@tsc.lv](mailto:info@tsc.lv), [www.tsc.lv](http://www.tsc.lv) (hereinafter — **We**) provide to our Customers constantly new Services in line with modern standards. We believe that convenience and possibilities provided to the Customers by our Services are as important as protection of Privacy of our Customers. We invest resources to ensure that Our Customers feel safe, and in Our daily operations we care for protection of Customers' data.

This Privacy Policy is aimed at informing about Customers' privacy protection that We provide, explaining the way how We protect Customers' personal data, and helping Customers to understand how Customers' personal data are processed and what are the rights and responsibility of Us and Customers.

We do processing of personal data in line with the valid national legislation and binding guidance and regulations issued by the responsible institutions, as well as legislation of the European Union, including, but no limited to the requirements set in the fields of data processing, fair commercial practice and consumer protection.

This Privacy Policy is applicable to Our mutual relationship with the Customer, including each existing Customer, buyer or any other person who uses or has expressed willingness to use any of Our services, or who addresses Us with any request or claim, submits any document, visits Our homepage or Customer service centres and trading venues, or any other of Our objects or events, or contacts Us by means of distance communication, including mail, e-mail or phone (hereinafter — **the Customer**).

This Privacy Policy does not apply to the data processing measures taken by other undertakings, *inter alia* if the Customer visits the homepage of another undertaking or uses the services of another undertaking and gets access to such homepage or service through Our communication channels, including the homepage. In such cases We suggest getting acquainted with the data processing safety guarantees provided by the respective undertaking.

We have made this Privacy Policy as simple as possible, however if you are not aware of such notions as "anonymised data", "personal data" etc., please get acquainted with the following notions which have been used in this Privacy Policy.

- **Personal Data** — any information associated with an identified or to be identified individual (data subject), for example, name, surname etc.
- **Anonymised data** — information which is not Personal Data and not associated with the individual anymore since all identifying elements have been excluded from the set of information.
- **Services** — any kind of services provided by Us on site or remotely.

## 2. How do we obtain Personal Data and what is the basis for data processing

We provide a broad scope of Services to our Customers. The information that We obtain about the person depends on the Service which is used or applied for by the Customer. We also obtain the information that is provided by the Customer to Us within the framework of cooperation of any form.

We can receive data in different ways, including the following.

- **The Customer submits his/her Personal Data to Us, i.e.** if the Customer or Customer's authorised person, including the person indicated by the Customer which should be contacted in the matters related to the repair deal, which contacts Us or cooperates with Us or Our authorised persons, for example, uses Our Services or requests any information, or submits an application for consideration of a certain issue or request, visits Our Customer service centres or contacts Us through the information channels that We have indicated.
- **Data is created using Our Services**, for example, by making calls or visiting or using Our homepage.
- **We can receive data from other sources**, for example, if the Customer applies for communication with Us at other service providers or cooperation partners, for example, in order to buy equipment or accessories, deliver parcels or solve equipment repair issues. In order to comply with legislative requirements and ensure long-term cooperation it might be necessary to request data also from public registers in line with laws and regulations.

The Customer has the right to not provide his/her Personal Data to Us, however in such a case it is possible that We will not be able to provide the Services requested by the Customer and the deal will be rejected.

We do data processing in compliance with certain basis for data processing, *inter alia* based on execution of Customer's requests and respective deals, within the framework of Customer's consent, meeting of legislative requirements, as well as protection of Our and third parties' legitimate interests, and it is done in balance with the rights and interests of Customers.

### 3. What Personal Data do we obtain

Kinds of Personal Data may differ depending on the Service used or cooperation. In general, Personal Data may be grouped into the following categories.

- **Basic Data**, including name, surname, contact phone number, e-mail address.
- **Data referring to the relationship with the Customer**, for example, information about the Service provided to the Customer and the data resulting from the provision of the Service, for example, purchase of equipment or accessories and related supporting documents; data of the parcel delivery service, data of equipment repairs and related equipment data, incl. producer of the equipment, model of the equipment, IMEI code, settings, defect description, visual picture — assessment, security code, if any; or data within the framework of the equipment data saving service; payment-related documents and their data, Customer's communication data that We receive during the on-site or remote communication with the Customer, for example e-mails addressed to Us, applications or information provided during a phone conversation and agreements made with the Customer; Customer's requests or prohibitions to process particular data for a particular goal.
- **Data obtained on the basis of Customer's consent** and defined at the moment when such consent is given. The Customer has the right to recall consent given to Us as simply as it was given, including through Our communication channels. Consent is valid until it is executed or recalled, whichever happens sooner. A recall does not influence validity of the processing, which is based on respective consent before the recall.

We deliberately do not collect and process individually identifiable information from the persons who have not reached the age limit which is set in the legislation and which gives the right to act independently. We respect the rights of such persons and in case a Service is needed, we invite parents or guardians of such persons to contact Us.

### 4. How do We use Personal Data

We process Personal Data in order to provide Services, ensure effective Customer service, cooperation and other Our operations and activities that are important to Our Customers.

In order to protect Personal Data of Our Customers, We prefer Anonymised Data processing, preventing identification of the person. Often, however, We have to process identifiable Personal Data in compliance with the nature of the Service provided and cooperation, as well as binding legislative requirements. In such a case We process data in accordance with the applicable basic principles of data processing, in particular the principle of minimised data processing and other legislative requirements.

We process Personal Data only for the needs of particular goals based on the established legal basis, including Our legitimate interests, for example:

- **Quality control of provided services.** For Us it is important to ensure quality of provided services and execution of Customers' rights to receive Services in line with the deal, thus in certain cases Personal Data may be processed for quality control purposes. We perform processing on the basis of the legislation (law) and contract (deal).
- **Resolution of notified issues**, including consideration and resolution of different notified issues or complaints. We perform processing on the basis of the legislation (law) and contract (deal), including on the basis of the notified issue.
- **Provision of Services and ensuring execution of the deal.** We process data to provide Services and ensure execution of the concluded contracts (deals). For example, We process data to be able to perform ordered repair of the equipment or delivery of the order. We process Personal Data in communication with Customers, for example, We send Service-related service announcements in order to inform about the Service performance results or to provide other important information to the Customer. We might also need to contact the Customer in relation to provision of the Service, to clarify for instance the information in the order, description of the ordered repair or to find out other information which facilitates the execution of the deal. To ensure traceable execution of the deal, Our agreements and negotiations with the Customer about resolution of a particular issue may be recorded. Within the framework of the deal in order to fulfil accounting conditions We need to administer settlements and to account the provided Services. In cases when the Customer has not paid in full for the provided Services, We need to implement the process of recovery of the remaining payments in line with the arrangements stipulated by laws and regulations. We perform processing on the basis of the legislation (law) and contract (deal).

- **Conclusion/modification of the contract (deal).** The goal refers to the new application for the existing or new deal, including the Services in any form of the application. We perform processing on the basis of the legislation (law) and contract (deal).
- **Communication with the Customer.** We respect the rights of each Customer to recall or change the possibility to receive information. In cases when the Customer has expressed a wish to receive information or to provide an opinion on particular products or Services, Personal Data may be processed to ensure that necessary information is submitted to the Customer. In such cases consent of the Customer is always important. If Customer's consent refers to the receipt of information from the cooperation partner, for example, to ensure that the producer can contact the Customer and to find out if the Customer is satisfied with the products of the particular brand of the producer and to be able to assess equipment repair quality in case of repairs, Customer's data, such as name, surname, contact phone number and e-mail address may be submitted to the particular producer in the context of Customer's consent. We do processing on the basis of legitimate interest and Customer's consent.
- **Implementation of binding laws and regulations.** We process Personal Data in order to fulfil the obligations stipulated in laws and regulations, for example, to ensure data availability to competent authorities, *inter alia* to answer requests received from institutions and courts in compliance with laws and regulations, as well as to execute Customers' rights provided for in laws and regulations, and liabilities which have been imposed upon Us as an undertaking, including in the fields of accounting, taxes, fees etc.
- **Accounting/finance and tax management.** The goal refers to accounting records, tax payments, settlements etc. We perform processing on the basis of the legislation (law) and contract (deal).
- **Settlement administration.** The goal refers to the activities done within the framework of settlements with an individual. We perform processing on the basis of the legislation (law) and contract (deal).
- **Fraud prevention and/or credit risk assessment.** The goal refers to the protection of legitimate interests and performance of legal and contractual liabilities. The goal comprises data processing, *inter alia* before the conclusion of the deal and during the execution of the deal, including operations relates to the data processing to prevent fraud and credit risks. We perform processing on the basis of the legislation (law), contract (deal), legitimate interest and Customer's consent.
- **Debt recovery.** The goal refers to the operations related to debt recovery, including to receive, save and process the data which is necessary for debt recovery, as well as to provide and enter the information about the debt and the person, including personal data, in duly registered databases of debtors and credit information (credit history), and to save and transfer to third persons the information which has been submitted and sent to the undertaking, including personal data and deal-related information, to ensure execution of the deal, as well as in cases when the person has not duly performed contractual provisions. We perform processing on the basis of the legislation (law), contract (deal) and legitimate interest.
- **Security of persons and objects.** We can process Personal Data to ensure safety of Our employees, infrastructure, services, information, Customers, including safety of the visitors of Our objects and events, prevention of illegal or other threats, facilitation of exposure of crimes in Our objects and surrounding territory, including in the information systems. The goal refers to the measures that have been performed by physical and logical means of protection, including video surveillance, pass regime and other technical and organisational measures, to ensure protection against the threats caused by physical impact and protection with physical means of protection. We perform processing on the basis of the legislation (law), contract (deal) and legitimate interest.
- **Statistics and analysis of services, processes, information systems** in order to develop and improve them. The goal refers to the processing of the personal data, which is available to Us, to evaluate results of Service provision in order to develop and improve Our Services, processes, systems and determine goals and directions of development of Our company. We can process data for statistical purposes and to summarise business information and analysis, so We could take informed decisions about the improvements and protection of Our operations, as well as to perform statements on Our commercial results. We perform processing on the basis of legitimate interest.
- **Processing of Personal Data for administrative purposes within the framework of Our group.** The goal refers to the processing of personal data for internal administrative purposes of Group's companies, for example, to prevent a conflict of interests or illegal transactions. We perform processing on the basis of legitimate interest.
- **Organisational management** (incl. bookkeeping, accounting of processes, services, information systems, persons). The goal refers to the measures aimed at integrated management of the company, including in line with national and international corporate management principles, thus ensuring traceability, control and improvement of internal processes. We perform processing on the basis of the legislation (law) and legitimate interest.

In all cases We process Personal Data only in the amount which is necessary to achieve the goal respecting Privacy of each person.

## 5. How do We protect Personal Data

We ensure confidentiality of Personal Data by appropriate security measures and in line with legislative requirements and respective duties.

In order to protect Customer's interests We develop our security process and measures on an ongoing basis. Such security measures include protection of the staff, information and technical resources, IT infrastructure, as well as the buildings where we operate. Within the framework of such measures We ensure appropriate level of information protection to avoid unauthorised access of third parties.

## 6. Whom can We submit Personal Data to

Exchange of Personal Data may be necessary in individual cases with a particular purpose, for example, We might need to submit Personal Data to the following categories of data receivers.

- **Companies of Our Group** to process information in line with the legislation, *inter alia* to ensure proper management of Group's companies.
- **Cooperation partners**, including cooperation partners for the provision of Services, quality control and development, as well as partners who provide certain delivery services, personal, object and information protection and security services and other Services. For example, We cooperate with producers who process Personal Data in order to execute the repair guarantees provided to the Customer in the equipment usage instructions in line with the legislation. In such cases Customer's personal data (name, surname, contact phone number and e-mail address, if indicated), which are necessary to execute the repair deal, equipment data and copies of equipment purchase (deal) supporting documents, which are necessary to ensure the repair, may be submitted to the producer of Customer's equipment or its authorised person as the manager to achieve the goal of processing — execution of the repair deal. If necessary, We cooperate with Our partners that ensure parcel delivery to Customers. Such data processing is based on Customer's applications — execution of the deal and compliance with the legislation. Such cooperation partners are allowed to use Personal Data only for the purposes agreed between Us and the cooperation partners. We take due care to ensure that such cooperation partners act in line with this Privacy Policy and security requirements provided for in the legislation in respect to Customers.
- **Supervising institutions.** In order to meet legislative requirements, We might need to submit Personal Data to market supervising institutions, law enforcement institutions, as stipulated by laws and regulations.
- **Other persons.** Data may be processed in accordance with Customer's consent or request, including in cases when the Customer has agreed with data transfer to third parties for a defined purpose. For example, if the Customer uses equipment of a certain producer and the Customer has agreed that the producer will contact the Customer to find out if the Customer is satisfied with the products of producer's brand and to assess the quality of performed repairs. In such cases Customer's data are received and processed by the particular producer in order to be able to contact the Customer.

In addition to the above mentioned, there may be cases when We can transfer Personal Data to other persons in relation to business transfer, any merger, acquisition, sale of Our assets or transfer of Service delivery to another undertaking.

We ensure confidentiality of Personal Data by security measures performed in line with legislative requirements.

We can also process Anonymised Data. Such data that give no possibility to identify the person may be used for other purposes and transferred to other persons.

## 7. How long do we store data

We store Personal Data only for a period of time which is necessary to achieve the goals set in this Privacy Policy, unless a longer storage is not determined or allowed by applicable laws and regulations. To determine the time period for data storage We use the criteria that comply with the legislative liabilities, *inter alia* We respect Customer's rights, for example, by determining data storage for a period of time when claims related to the deal, if any, may be submitted.

If the Customer has requested to make data copy of information in the device during the time period of repairs, the data copy is saved for 2 (two) months from the date when the Customer has picked up their device from service centre, so that in case of necessity, per customers request it would be possible to restore Customer's data repeatedly and/or if it is necessary to review client submitted questions regarding the provided service. However, in accordance with data minimisation principle the saved data copy is stored for no longer than 6 (six) months from the moment, when the Customer has been informed that the device is ready to be picked up for the first time. Thus, if after receiving information on picking up the device the Customer does not arrive to pick up or if the device is not picked

up by the Customer in another manner within time period of 6 (six) months from the moment the Customer has been informed that the device is ready to be picked up, the Customer should take into consideration that after the previously mentioned time period it will not be possible for the Service centre to restore data and it will not be possible to process claims concerning this service. Under justifiable circumstances from the Customer concerning the necessity to store data for a longer time period, the Customer must submit clear and unmistakable claim in timely manner for limiting deletion of specific data. These claims will be reviewed in accordance to regulatory enactments and this Privacy policy and an answer will be provided.

No restrictions apply to the storage of Anonymised Data, however, we also store such data only in the amount and for the period of time that is necessary.

Our goal is to ensure that the information about the Customer is correct and up-to-date. Therefore, We ask Our Customer to notify any changes in the information provided by the Customer.

## **8. How TSC uses cookies**

Similar to other websites, in TSC website use of cookie technology is possible. More detailed information on cookies is available in TSC cookie usage regulation, which is available in TSC website <https://www.tsc.lv>. Unless otherwise provided by regulatory enactments, any person has the rights to decline further processing of their data, however in such case, especially if the mentioned data is technically important, there exists a chance that we will not be able to provide this service in the same manner as previously.

## **9. What are the rights of the Customer and what do We expect from the Customer**

### **Rights of the Customer:**

- To submit an application and to receive information about the data about the Customer that We obtain and store, unless otherwise provided in applicable laws and regulations. The Customer can receive information about himself/herself by contacting Us in writing or visiting any of Our Customer service centres;
- To request access to his/her data, correction or deletion of the data, necessary additions or restrictions of the processing, as well to execute the rights to object against the processing, including against the data processing within the framework of legitimate interests, insofar as provided by laws and regulations, as well as to execute the rights for data transmission. We inform that in the case of data correction, deletion, restriction, discontinuation or transmission it is possible that the Services will be irreversibly suspended. If the Customer chooses to receive information about himself/herself remotely, for example, by mail, the Customer will be held liable for the safety of the chosen form of data receipt and the conduct of the person representing the claimant;
- To recall at any time the consents given to Us. To give or to recall consent is a free choice of the Customer and it does not impose any additional duties. However, if the Customer decides to recall any of his/her consents, it should be taken into account that the recall does not influence processing that has been done before the recall, and data processing related to consent will no longer be provided and the Customer will no longer have the possibilities in previous amount;
- To contact Us and market supervising institutions about the data processing issues. If support is needed to receive broader scope of information about this Privacy Policy, data processing aspects or applicable laws and regulations on data protection, We ask to contact Us so that We can consider the issue and reply appropriately. In any case the Customer always has the right to submit a complaint to the responsible institution related to the data processing supervision issues;
- To contact Us about all questions that the Customer might consider important, including about the Privacy Policy and applicable data protection. We will replay as soon as possible, but not later than within one month from the receipt of the application, unless the scope of the question will not require additional time.

We consider Customers' applications related to the above mentioned rights without any charge. Consideration of the application may be rejected or a proportional charge may be applied, if obviously unjustified or excessive applications are submitted, or on any other event provided for by laws and regulations. Applications may be submitted at any of Our equipment reception points or remotely ensuring that it is possible to identify the person as a concrete Personal Data subject and verify the nature and justification of the submitted claim.

### **Responsibility of the Customer:**

- To inform Us about the changes in the submitted information and data. It is important for Us to have true and up-to-date information about the Customer;
- To provide necessary information so that We can identify the Customer in relation to the Customer's claim and to be sure that the communication or cooperation is directly with the particular Customer. It is necessary for the protection of Customer's and other persons' data, so that We can be sure that the Customer is the subject of Personal Data and that the information about the Customer that has been revealed during the

communication and/or cooperation is provided only to the Customer, without prejudicing the rights of other persons. For example, in the case when the Customer wants to find out information about himself/herself by sending Us a request. In such a case it is important for Us to assure that it is the Customer who has submitted and signed the particular request. So We can ask to provide additional identifying information. However, if the Customer does not provide additional information and/or We have doubts about the person who has submitted the request, to ensure Customers' data protection (to avoid data exposure to third parties) We can reject to disclose the data until we assure that it is the Customer who has requested the information.

- Before initiating cooperation with Us please get acquainted with this Privacy Policy, as well as with any person who is related to the Customer and whose interests may be affected in Customer's data processing processes. This Privacy Policy is an integral part of Our Services. We expect that the Customer uses in good faith the data that have been provided to Us and that legal interests of other persons are not affected. In cases when under certain conditions the Customer can provide access or allow shared use of his/her Services and/or equipment to another person, the Customer is responsible for informing these persons about data processing done within the framework of particular processes and resulting liabilities. In cases when data directly refer to another person (in case the data subject changes), the Customer must immediately inform Us about it. Until full identification of the persons, data refer to the Customer as the data subject.

#### **10. How is it possible to get information about the changes in this Privacy Policy**

We continuously improve and develop our operations and thus we amend and supplement this Privacy Policy from time to time. Therefore, We ask the Customer to get acquainted with the current version of the Privacy Policy on a regular basis on Our homepage and in other Our communication channels. When We will make changes to this Privacy Policy, We will publish information about it on Our homepage.

#### **11. How to contact Us**

In case of any question about this Privacy Policy or processing of Personal Data, We ask you to contact Us or Our data protection specialist using the [contact information](#) which is given in this Privacy Policy.