

I CONFIRM:

SIA "PICHE" Chairman of the Board

Pēteris Senkāns

## PICHE GROUP PRIVACY AND COOKIE POLICY

The purpose of the privacy and cookie policy is to provide the natural person - the data subject - with information on the purpose, scope, protection and term by processing the personal data during the collection of data and processing the personal data relevant to the data subject.

The privacy and cookie policy applies to personal data collected by PICHE Group companies (PICHE SIA, 40003743883; P14 SIA, 40203074288; P32 SIA, 40203113231; P23 SIA, 40203113227; P50 SIA, 40203172485; P59 SIA, 40203181473), hereinafter PICHE.

### 1. Personal data controller:

1.1. The administrator of personal data processing is SIA "PICHE", the unified registration no. 40003000252, legal address - Egļu Street 23, Riga, LV-1024, actual address – Lidostas park, Marupes county, LV-2167.

1.2. In all questions related to the processing of personal data, please contact SIA "PICHE": by sending a letter to the e-mail address: [info@piche.eu](mailto:info@piche.eu) or by post to the address – Lidostas park, Mārupes nov., LV-2167, or by calling - + 371 26545424. Questions about personal data processing can be asked in person by requesting a visit at least 3 (three) working days in advance. You may request the exercise of your rights in accordance with this Privacy Policy.

### 2. Applicable to the Privacy and Cookies Policy

2.1. Personal data is any information that can be directly or indirectly linked to an individual. This applies to the company's customers and partners, as well as employees. Data includes, for example, a person's name, address and telephone number, and the computer's IP address.

2.2. The Privacy and Cookies Policy applies to ensure the protection of privacy and personal data with respect to (Persons):

2.2.1. Natural persons - cooperation partners, employees, as well as third parties who receive or transfer any information to the PICHE group companies in connection with the provision of services (including contact persons, payers, etc.);

2.2.2. Visitors to the office, construction site and other premises and areas of the PICHE group company, including those subject to video surveillance;

2.2.3. Users of the PICHE website (<http://www.piche.eu/>);

2.3. PICHE takes care of the privacy of individuals and the protection of personal data as far as possible, respects the right of individuals to the lawfulness of personal data processing under Regulation 2016/679 of the European Parliament and of the Council on the protection

of individuals with regard to the processing of personal data and on the free movement of such data and other laws and regulations in the field of privacy and data processing and protection.

2.4. The privacy and cookie policy applies to the processing of data, regardless of the form in which the data is provided and processed.

2.5. PICHE may lay down additional rules regarding the processing of certain data by informing the Person before receiving the data from that person.

3. PICHE shall process personal data for the following purposes:

3.1. For the provision of services and enforcement of the contract. The purpose concerns the provision of services and the performance of concluded contracts (transactions). Personal data processing is performed on the basis of law and agreement (transaction);

3.2. For the preparation, conclusion or amendment of the contract. The target applies to new applications for an existing or new transaction, including services. Personal data processing is performed on the basis of law or agreement (transaction);

3.3. Fulfillment of contractual obligations and provision of services;

3.4. Advertising and distribution of services for commercial purposes;

3.5. For reviewing and processing applications, complaints and claims;

3.6. Settlement administration, debt recovery and collection. The purpose refers to the activities performed within the settlement with persons. Personal data processing is performed on the basis of law and agreement (transaction);

3.7. Website maintenance and performance improvement;

3.8. For the provision of information to public administration institutions and subjects of operational activities in the cases and to the extent specified in external regulatory enactments;

3.9. For the processing of personal data for internal administrative purposes within the PICHE Group. The purpose concerns the processing of personal data for the internal administrative purposes of the group companies, such as the prevention of illegal transactions. The processing of personal data is carried out on the basis of a legitimate interest;

3.10. For the implementation of regulatory enactments. The purpose refers to the basis for the processing of personal data provided for regulatory enactments, for example, accounting, taxes, fees, etc. areas;

3.11. Accounting / financial and tax management. The purpose concerns accounting, payment of taxes, settlements, etc. The processing of personal data is performed on the basis of law and agreement (transaction).

4. How personal data is obtained

4.1. The information that PICHE obtains about the Person depends on the content of the transaction. Information is also obtained, which is provided in the framework of any kind of cooperation.

4.2. Information received by PICHE from the Person himself, in the process of cooperation or communication, for example, by concluding a contract, submitting an application or other document, contacting PICHE, incl. using the opportunities offered on the website and social networks.

4.3. Personal data obtained as a result of video surveillance for the purpose of protecting PICHE's property or for legitimate purposes.

4.4. When requesting information from public registers - Lursoft, Crediweb, Land Register, Land Service, Commercial Register, Solvency Register, Commercial Pledge Register, etc.

4.5. When visiting the PICHE website (<http://www.piche.eu/>), cookies and similar technologies are used. Cookies are files that store information about a person who visited a website, hard drive or web browser, and thus can determine who has visited the website before.

## 5. Legal basis for personal data processing

5.1. Processing with the consent of the data subject;

5.2. Processing for concluding a contract and fulfilling contract obligations;

5.3. Processing for the purpose of fulfilling the requirements of regulatory enactments;

5.4. Processing on the basis of legitimate interests. PICHE has a legitimate interest in commercial cooperation; to ensure the fulfillment of the obligations assumed by the contract; to develop your product, service and introduce it to the market, incl. to advertise; to inform about the fulfillment of contractual obligations; to ensure and improve the quality of services; administer incoming / outgoing payments; protection of their legal interests in law enforcement agencies, etc.

## 6. Processing and protection of personal data

6.1. PICHE only collects and stores data that is necessary for the conduct of its business.

6.2. PICHE processes and protects Personal Data using the capabilities of modern technology, taking into account existing privacy risks and reasonably available organizational, financial and technical resources.

6.3. As part of its business cooperation, PICHE may authorize its partners to carry out certain service activities, such as occupational health and accident insurance services, accounting services, etc. If, by carrying out these tasks, the partners process personal data held by PICHE, the partners concerned shall be considered as processors of personal data on the basis of a cooperation agreement. When transferring personal data to cooperation partners, PICHE shall ensure that the cooperation data is used by the cooperation partners only for the implementation of the task delegated by PICHE and only to the extent necessary for the performance of the delegated task.

## 7. Categories of recipients of personal data, or to whom the data are disclosed

7.1. PICHE does not disclose personal data to third parties (any person other than the data controller or the data subject in question) unless:

7.1.1 the data must be transferred to a third party within the framework of the concluded agreement in order to perform any function necessary for the performance of the agreement or delegated by law (for example, to the bank within the framework of settlement or to provide a service);

7.1.2 the data subject has given consent to the transfer of his or her data;

7.1.3 the obligation to transfer data is imposed by the regulatory enactments binding on PICHE, only to the extent specified in the regulatory enactments;

7.1.4 transfer of data to law enforcement authorities, protection of PICHE's legitimate interests, for example through police, court, etc.

7.2. Personal data may be disclosed between PICHE group companies, ensuring data security in accordance with regulatory requirements.

7.3. Personal data may be disclosed to cooperation partners: successful receipt of services and goods necessary for conducting business (postal services, courier services, accounting services, IT services, security services, legal services, audit services, supply of office supplies, delivery of construction materials to the site, etc. ).

7.4. Personal data may be disclosed to law enforcement authorities, rescue services in accordance with the requirements of regulatory enactments.

7.5. Personal data may be transferred in connection with the reorganization, sale, acquisition, etc. of a PICHE group company.

8. Disclosure of personal data outside the European Union

8.1. PICHE does not transfer personal data outside the European Union.

8.2. In case if PICHE is in need to transfer personal data outside the European Union, it will comply with regulatory requirements and ensure a high level of protection of the personal data to be transferred.

9. Duration of personal data storage

9.1. Personal data shall be stored for no longer than it is necessary for the purposes for which the relevant personal data are processed, unless the storage of longer data is determined by the requirements of regulatory enactments.

9.2. The duration of data storage complies with the provisions of regulatory enactments, for example, review of claims, protection of rights, resolution of issues, observance of limitation, etc., as well as respecting the rights of natural persons, for example, determining data retention for a period of time, if any.

9.3. PICHE processes and stores personal data until at least one of the following criteria is met:

9.3.1 The contract on the basis of which the data is processed / stored is in force;

9.3.2 Data must be stored in accordance with the requirements of regulatory enactments, to the extent specified in regulatory enactments;

9.3.3 There is a legal obligation to process and / or store data;

9.3.4 The data subject's consent to process his data is valid;

9.3.5 Data processing is carried out to ensure legitimate interests.

9.4. At the end of the data storage period, personal data is deleted or destroyed (burned, shredded, etc.).

## 10. Rights and obligations of the data subject

10.1. The data subject has the right to receive all information in PICHE's possession about him, as well as all information relating to the acquisition, processing, storage, transfer, deletion, etc. of the data subject's personal data.

10.2. A person is entitled to obtain information about those natural or legal persons who have received information about the data subject from the Data Controller within a certain period of time. It is prohibited to include in the information provided to a person state institutions which are the promoters of criminal proceedings, subjects of operative activities, or other institutions in respect of which the law prohibits the disclosure of such information.

10.3. The person has the right to withdraw his consent to future processing / storage operations at any time.

10.4. The person is entitled to lodge a complaint with the supervisory authority about PICHE;

10.5. To the extent provided for in regulatory enactments, a person has the right to request access to his or her personal data, as well as to request the addition, correction or deletion of processed data or restriction of processing, as well as the right to object to processing, including personal data processing interests as well as the right to data portability. This right shall be exercised in so far as the processing does not result from PICHE's obligations under applicable law or in the public interest.

10.6. If a request is received from a Person for the exercise of his / her rights, PICHE shall verify the identity of the Person and provide a response to the Person as soon as possible, making sure that the Person has received the response.

10.7. The person is obliged to provide PICHE with information on changes in his / her personal data within a reasonable period of time.

10.8. It is the individual's responsibility to read this Privacy Policy before cooperating with PICHE.

## 11. Consent to data processing and right to withdraw

11.1. If the processing of Personal Data takes place on the basis of consent to the processing of personal data, the Person has the right to withdraw his consent at any time. Withdrawal of consent does not affect data processing carried out while the Person's consent was valid.

11.2. Withdrawal of consent may not suspend the processing of data on other legal grounds.

## 12. Other provisions

12.1. PICHE does not perform automated decision making or profiling for individuals.

12.2. PICHE reserves the right to make additions or changes to the Privacy Policy.

12.3. PICHE maintains previous versions of the Privacy and Cookies Policy and they are available on its website (<http://www.piche.eu/>).

/ Chairman of the Board Pēteris Senkāns /