

# **LATVIAN ATHLETICS ASSOCIATION PRIVACY POLICY**

*(approved on September 3, 2020)*

## **1. PURPOSE OF THE PRIVACY POLICY**

The purpose of the private policy and the personal data (data subject) information on the purpose, scope, protection and processing of personal data during the acquisition of data and the processing of personal data of the data subject.

## **2. PERSONAL DATA MANAGER AND HIS CONTACT INFORMATION**

Personal data processing controller and Latvian Athletics Association (hereinafter - LAA), registration number: 40008029019, legal address: Stabu Street 18-1, Riga, LV-1011, phone: (+371) 29511674, e-mail: lvs@athletics.lv. You can find LAA properties, for example, <http://www.athletics.lv>. Using this contact information or contacting the LAA legal address, you can ask questions about the processing of personal data. A request to exercise your rights may be made in accordance with Section 12 of the Privacy Policy.

## **3. SCOPE OF THE DOCUMENT**

"Personal data" means any information allowing the identification or identification of a natural person ("data subject"). An identifiable natural person is one who refers directly to indirect identification, in particular by reference to an identifier such as that person's name, identification number, location, online identifier or one or more examples of the natural, physiological, genetic, mental, economic, cultural or social identity factors. Definitions, explanations and categories of personal data are provided in the Appendix to the Privacy Policy.

The Privacy Policy applies to ensuring the protection of privacy and personal data on:

- natural persons - customers, employees and other service users (including potential people, former people and current people), as well as third parties related to the provision of services to natural persons (Customer) who receive or transfer any information to LAA (including including contact persons, payers, etc.);
- for visitors of sports centers - in the training and competition venues provided by LAA;
- LAA office visitors;
- LAA premises (including - LAA office) and territory where video surveillance is performed (for customers, visitors and employees);
- Visitors to the website maintained by LAA.

LAA takes care of Customers' privacy and protection of personal data in compliance with the Customers' right to a personal data processing legislation agreement with applicable legislation - the Personal Data Processing Law, Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 the processing of data and the free movement of such data (General Data Protection Regulation) and other applicable privacy and data processing legislation.

The Privacy Policy applies to data processing, regardless of the form and / or environment in which personal data is provided to the Customer (LAA-owned websites,

in paper format or by telephone) and is sometimes processed in the LAA system or in paper form.

With regard to specific types of data processing (for example, cookie processing, etc.), environment, there may be additional, specific rules for purposes, of which the Clients are informed at the moment when he provides data to LAA.

#### **4. PURPOSES OF PERSONAL DATA PROCESSING**

LAA processes personal data for the provision of services:

- Identification of customers and preparation of offers;
- preparation, conclusion, supplementation, switching and termination of the contract, fulfillment of contract obligations;
- Customer service;
- provision / maintenance of services;
- improvement of services, development of new services;
- promoting, advertising and disseminating the use of services;
- acceptance, examination and processing of objections;
- Customer satisfaction measurement, retention, loyalty building;
- settlement administration;
- debt recovery and recovery;
- maintenance and improvement of websites.

LAA data processing data processing and analysis:

- accounting, planning and statistics;
- data quality assurance and efficiency measurement;
- public opinion research;
- preparation of reports;
- For conducting customer surveys.

LAA for the provision of personal data information to a public administration institution and a subject of operational activities in the cases and to the extent specified in external regulatory enactments, as well as for other specific purposes, about which the Clients are informed at the moment when providing such data to LAA.

LAA makes every effort to ensure that your personal data is:

- processed lawfully, fairly and transparently in that way;
- collected for well-formulated and legitimate purposes and not further processed in a manner incompatible with those purposes;
- adequately, appropriately and limited to the necessary purposes for which they are processed;
- accurately and, if necessary, updated;
- stored in a form that allows you to identify for no longer than is necessary for the purposes for which the personal data are processed;
- processed to ensure adequate security of personal data.

#### **5. LEGAL BASIS FOR PERSONAL DATA PROCESSING**

LAA processes the Customer's personal data on the basis of the following legal bases:

- for concluding and executing the agreement - to enter into the agreement upon the Client's application and ensure its execution;
- for fulfillment of regulatory enactments - to fulfill the obligations specified in the external regulatory enactments binding on LAA;

- in accordance with the consent of the Customer - the data subject;
- legal (legitimate) interests - in order to realize the legal (legitimate) interests of LAA and the Client, or the concluded agreement, or the legal (legitimate) interests of LAA specified by law.

LAA's legitimate interests are:

- to perform the activities of a sports organization specified in regulatory enactments;
- provide sports services;
- to verify the Customer's identity during the Customer's service - by telephone, electronically, in person;
- to ensure the fulfillment of contractual obligations;
- prevent unreasonable financial risks for its operations;
- to analyze the operation of LAA home pages, websites and mobile applications, to develop and implement their improvements;
- administer the Client's account on LAA websites, websites and mobile applications;
- take actions to retain Customers;
- segment the Customer database for more efficient provision of services;
- design and develop services;
- advertise your services by sending advertising notices;
- send other reports on the progress of the contract and events relevant to the performance of the contract, as well as conduct customer surveys on the services and experience of their use;
- to inform about changes in the procedure for providing the service and the price list;
- inform Clients about news in the industry;
- provide environmental education activities;
- prevent fraud;
- provide organizational governance, financial and accounting records and analytics;
- to ensure efficient LAA management processes;
- to ensure the efficiency of service provision;
- to ensure and improve the quality of services;
- administer payments;
- administer overdue payments;
- apply to public administration and operational activities institutions and courts to protect their legal interests;
- to inform the public about its activities.

In some cases (for example, for direct marketing purposes), your personal data may be processed with your voluntary and explicit consent. You can easily revoke your consent at any time for free.

Sometimes personal data may be processed if it is necessary for the legitimate interests of LAA (for example, video surveillance at the entrance to LAA premises, ensuring the security of property, employees, visitors and Customers). In such cases, LAA discloses the person's legitimate interests in LAA. However, LAA does not process personal data on the basis of this legal basis if the interests of persons or their fundamental rights and freedoms are in conflict with such legitimate interests.

In all cases, when processing personal data, LAA strictly observes the requirements of the General Data Protection Regulation, as well as national data protection legislation.

## **6. RULES ON DATA PROCESSING FROM A CONTROLLER TO ANOTHER DATA CONTROLLER**

These data processing regulations are applicable only to the processing of personal data arising from contracts for services provided by another organization or legal entity to LAA.

Both Parties shall act as independent data controllers.

The Parties shall take appropriate technical and organizational measures to ensure the security of the processing of personal data.

The Parties shall immediately, but not later than within 2 (two) working days, inform the other Party of the received data subject's request, if it concerns or affects the other Party's processing of personal data (eg request to restrict data processing) or affects personal data (eg request to correct data). The Parties shall cooperate with each other in good faith (for example, by exchanging information on the processing of personal data) in order to comply with reasonable requests from data subjects and to ensure the accuracy of the data throughout the processing.

## **7. PROCESSING OF PERSONAL DATA**

LAA processes the Customer's data using modern technology, taking into account the existing privacy risks and LAA reasonably available organizational, financial and technical resources.

LAA can make automated decisions regarding the Client. The Client is informed about such LAA activities separately in accordance with regulatory enactments. The Customer may object to automated decision-making in accordance with the law, however, being aware that in certain cases this may limit certain opportunities of the Customer (for example, to receive LAA offers).

Automated decision-making that has legal consequences for the Customer (for example, approval or rejection of the Customer's application) may be performed only during the conclusion or performance of the agreement between LAA and the Customer or on the basis of the Customer's explicit consent.

In order to ensure the quality and operative fulfillment of the obligations of the agreement concluded with the Customer, LAA may authorize its cooperation partners to perform certain service provision activities, for example, performance of service installation works, invoicing and the like. If, in performing these tasks, LAA or cooperation partners process the Customer's personal data held by LAA, the respective LAA cooperation partners are considered to be LAA data processing operators (processors) and LAA has the right to transfer to its cooperation partners the Customer's personal data necessary for these activities to the extent as necessary to carry out these activities.

LAA cooperation partners, as a processor of personal data, ensure the fulfillment of personal data processing and protection requirements in accordance with LAA requirements and legal acts, and do not use personal data for purposes other than fulfilling the obligations of the agreement concluded with the Customer on behalf of LAA.

## **8. PROTECTION OF PERSONAL DATA**

LAA protects the Customer's data by using the possibilities of modern technologies, taking into account the existing privacy risks and LAA reasonably available organizational, financial and technical resources.

## **9. CATEGORIES OF RECIPIENTS OF PERSONAL DATA**

LAA does not disclose to third parties the Customer's personal data or any information obtained during the provision of services and the term of the agreement, including information on the services received, except for:

- if the data must be transferred to the relevant third party within the framework of the concluded contract in order to perform any function necessary for the performance of the contract or delegated by law;
- delivery of invoices to the Customer;
- sending postal items to the Customer for changes in the content of the agreement or the price list;
- in accordance with the Client's explicit and unambiguous consent;
- persons provided for in external regulatory enactments upon their justified request, in accordance with the procedures and to the extent specified in external regulatory enactments;
- in cases specified in external regulatory enactments, for the protection of the legitimate interests of the LAA, for example, by applying to a court or other state institutions against a person who has violated the interests of this legal LAA.

Usually LAA collects personal data from the data subject. However, sometimes the LAA also has to collect personal data from other persons, such as the state register, the police or another state institution, or other persons. In all cases, LAA does not knowingly collect excessive personal data that is not necessary to achieve the legal purposes of processing such data. In addition, LAA informs data subjects about the collection of their personal data from other persons, unless they already have such information at their disposal, or there are other legal grounds that prevent the provision of such information.

LAA provides a typical (unlimited) list of subjects to whom personal data may be transferred:

- IT system maintenance service providers;
- Debt collection companies;
- State and local government institutions;
- Sports and other organizations (federations, foundations, foundations, etc.);
- Sports schools and sports clubs;
- et al.

In all cases, LAA transfers to third parties as little personal data as is necessary to achieve the legitimate purpose of such transfer. In addition, LAA cooperates only with those outsourcing partners who guarantee the implementation of appropriate technical and organizational measures in such a way that the processing of your personal data complies with legal requirements and ensures the protection of your rights. LAA also constantly monitors its outsourcing partners for compliance with data protection requirements.

## **10. ACCESS OF PERSONAL DATA BY THIRD COUNTRY ENTITIES**

LAA ensures the procedures specified in regulatory enactments for ensuring a level of personal data processing and protection that is equivalent to that specified in the General Data Protection Regulation.

## **11. DURATION OF PERSONAL DATA RETENTION**

LAA stores and processes the Customer's personal data as long as at least one of the following criteria exists:

- only as long as the agreement concluded with the Client is valid;
- while LAA or the Client may realize its legitimate interests (for example, submit objections, bring or bring a claim to court) in accordance with the procedures specified in external regulatory enactments;
- as long as one of the parties has a legal obligation to retain the data;
- as long as the Customer's consent to the relevant personal data processing is valid, if there is no other legal basis for data processing.

After the above conditions end, the Customer's personal data is deleted.

LAA stores your personal data securely and does not transfer it to other unauthorized persons. However, part of the personal data processed by LAA may be transferred to other persons or state institutions in accordance with the legal obligations specified in the European Union or national legislation, or in order to properly perform contractual obligations. Your personal data may also be transferred to third parties at your request or in accordance with the terms of the agreement.

Your personal data can be stored in various documents or files in both paper and electronic form. Legislation may provide for different conditions for data retention. LAA does not store any personal information for longer than is required by law or for data processing purposes. Generally, information containing your personal data is deleted after the deadline for receiving complaints and claims.

Even if you decide to terminate your cooperation with LAA, LAA may still store your personal data due to possible complaints and claims. In addition, LAA needs to store your personal data in order to be able to answer your questions or provide you with the necessary information about mutual cooperation. However, LAA does not use your personal data for purposes other than those for which LAA has informed you.

## **12. RIGHTS OF THE DATA SUBJECT**

The customer has the right to receive the information specified in regulatory enactments in connection with the processing of his data. In accordance with regulatory enactments, the Customer also has the right to request LAA access to its personal data, as well as to request LAA to supplement, correct or delete them, or restrict processing in relation to the Customer, or the right to object to processing (including personal data processing, based on the legal (legitimate) interests of LAA), as well as the right to data portability. This right shall be exercised insofar as the data processing does not arise from the obligations of the LAA imposed on it by the applicable regulatory enactments and which are performed in the public interest.

The Client may submit a request for the exercise of his rights:

- in writing in person at the LAA office, presenting an identity document;
- while LAA or the Client may realize its legitimate interests in accordance with the procedures specified in external regulatory enactments (for example, submit objections or bring or bring a claim to court);
- in the form of electronic mail, signing with a secure electronic signature;

Upon receipt of the Customer's request for the exercise of its rights, LAA verifies the Customer's identity, evaluates the request and executes it in accordance with regulatory enactments.

LAA shall send the answer to the Customer by post to the contact address indicated by him in a registered letter or with a secure electronically signed reply by e-mail upon

the Customer's request, taking into account, if possible, the method of receiving the reply specified by the Customer.

LAA ensures the fulfillment of data processing and protection requirements in accordance with regulatory enactments and, in case of the Customer's objections, performs useful actions to resolve the objection. However, if this fails, the Customer has the right to apply to the supervisory authority in the field of data protection - the Data State Inspectorate.

You have the rights set out in the General Data Protection Regulation and listed below. Please note that some of these rights are not absolute and LAA does not always and unconditionally satisfy your request for their exercise.

Your rights	Description of rights
Right of access to your data	You can request confirmation of whether your personal data is being processed and, if so, access your personal data and information about their processing.
Right to rectify data	You can request the correction of inaccurate personal data to ensure the accuracy of the data. You can request the deletion of your personal data without undue delay.
Right of erasure ("right to be forgotten")	You can request the deletion of your personal data without undue delay.
Right to restrict data processing	You can request a restriction on the processing of your personal data if one of the following conditions occurs: - You object to the accuracy of personal data - for a period of time that allows LAA to check the accuracy of personal data; - The processing of the data is illegal and you object to the deletion of personal data and instead request a restriction on the use of the data; - LAA no longer needs your personal data, but you request them to defend your legal interests or file a complaint; - You have objected to the processing of your personal data until it has been verified that the legal basis of LAA data processing is in your interests.
Right to data portability	You can request to receive your personal data in a structured, generally accepted and machine-readable format and you can send (or ask LAA to send) them to another data controller.
Right to object	You have the right to object to the processing of your personal data on the

	basis of LAA's legitimate interests, as well as to object to the processing of personal data for direct marketing purposes.
The right to object to data processing based solely on automated decision-making	You can ask to be excluded from decisions based solely on automated processing, including profiling, which have legal consequences or significantly affect you.

You can ask LAA for a detailed explanation of your rights (see contact information on the LAA website) or find it in the General Data Protection Regulation. To exercise your rights, please contact LAA.

1 (one) time a year LAA provides free of charge information on the processing of your personal data. If you submit a request more than 1 (one) time a year or if your request is unfounded, repeated or disproportionate, LAA may charge a reasonable fee based on administrative costs. LAA will ask you to provide proof of your identity (eg an identification document). LAA may also ask you to clarify your request in order to expedite LAA's response. LAA will respond to your request within 30 (thirty) days after receiving your application. This deadline may be extended if your request is complicated or if you have submitted several requests (in which case LAA will inform you about the delay in replying).

### **13. CUSTOMER'S CONSENT TO DATA PROCESSING AND RIGHT TO WITHDRAW IT**

The Client may give consent to the processing of personal data, the legal basis of which is consent (for example, analysis of data on service usage habits, individually prepared advertising, etc.), on the website <http://www.athletics.lv>, LAA service application forms, other websites (for example , newsletter registration forms), by calling the phone number (+371) 29511674, writing an e-mail to [ivs@athletics.lv](mailto:ivs@athletics.lv) or in person.

A list of personal data categories for data that may be processed in accordance with the Customer's consent and other legal bases is available in the Appendix to the Privacy Policy.

The customer has the right to revoke the consent for data processing at any time in the same way as it was given, that is: on the website <http://www.athletics.lv>, by calling the phone number (+371) 29511674, writing an e-mail to [ivs@athletics.lv](mailto:ivs@athletics.lv) or in person. And in that case, further processing based on the prior consent for the specific purpose will no longer take place.

Withdrawal of consent does not affect data processing performed at the time when the Customer's consent was valid. Withdrawal of consent may not suspend the processing of data on other legal grounds.

### **14. COMMUNICATION WITH THE CUSTOMER**

LAA communicates with the Customer using the contact information provided by the Customer (telephone number, e-mail address, postal address, information provided on the website <http://www.athletics.lv>).



LAA communicates on the fulfillment of service contractual obligations on the basis of the concluded contract (for example, change of service, information on invoices, changes in services, etc.).

During communication (incoming calls, e-mails) LAA verifies the Customer's identity according to the following criteria:

- Phone call: caller's contact phone - whether specified in the contract; Customer agreement number; personal code; name and surname;
- E-mail: writer's e-mail - whether specified in the contract; Customer agreement number; personal code; name and surname;
- In person: identity document;
- Postal items.

## **15. ADVERTISING NOTICES**

LAA communicates advertising announcements about LAA and / or third party services and other announcements not related to the provision of directly agreed services (for example, Customer surveys) in accordance with the provisions of external regulatory enactments or in accordance with the Customer's consent.

The Customer may consent to the receipt of advertising notices by LAA and / or its cooperation partners on LAA service application forms, service portals / applications (<http://www.athletics.lv>, etc.), LAA and other Internet sites (for example, newsletter registration forms).

The Customer's consent to receive advertising notices is valid until revoked (also after the termination of the service agreement). The customer may at any time opt out of receiving further advertising in one of the following ways:

- by sending an e-mail to the address [lvs@athletics.lv](mailto:lvs@athletics.lv);
- by calling (+371) 29511674;
- in person (by submitting in writing);
- by using the automated opt-out option in the ad notification by clicking on the opt-out link at the end of the relevant ad notification (email).

LAA stops sending advertising notifications as soon as the Customer's request is processed. The processing of the request depends on the technological possibilities, which can be up to 3 (three) days.

By expressing his opinion in surveys and leaving his contact information (e-mail, telephone), the Customer agrees that LAA may contact him using the contact information provided in connection with the assessment provided by the Customer.

## **16. USE OF COOKIES**

"Cookies" are detailed information that the website stores on your computer or mobile device when you visit the website. It allows the server to collect information from your browser, so you don't always have to re-enter data when you return to the website or move from one page to another. More information on how cookies work is available at <http://www.cookiecentral.com>.

The LAA website uses cookies to improve the quality of the services offered. LAA uses session cookies, persistent cookies and third party (partner) cookies to:

- recognize new or previous Customers;
- Remember your screen preferences, such as contrast color settings or font size.

- remember whether or not you have given your consent to the use of cookies on the website;
- compile anonymous statistics on how and what services you have been looking for offered by LAA;
- send the advertisement that is most relevant to you and best suits your interests. Cookies are also used to limit the number of times you see an ad and to help measure the effectiveness of your ad campaign;
- to collect reliable information on the use of the site, which allows LAA to measure how well the site meets the needs of its users and to make any necessary improvements;
- Analyze website traffic from specific geographical regions.

Please note that some cookies may be placed by a third-party service provider that performs certain functions for LAA.

LAA cooperates with third parties to track your activities on the LAA website, to improve LAA's marketing activities and to provide you with advertising based on your visit to the LAA website.

The LAA website may contain links to third-party websites that have their own terms of use and personal data protection, for which LAA is not responsible.

## **17. OTHER PROVISIONS**

LAA has the right to make amendments and additions to the Privacy Policy by posting them on the LAA website.

LAA appreciates your feedback and welcomes your feedback regarding the protection of your personal data (see contact information on the LAA website). You can also send your application to the LAA office (details can be found on the LAA website). LAA confirms that it will thoroughly investigate all possible cases of non-compliance with this Privacy Policy and legislation, as well as take all necessary risk prevention measures to ensure maximum protection of your personal data.

The protection of personal data in Latvia is regulated by the State Data Inspectorate, address: Blaumaņa Street 11 / 13-15, Riga, LV-1011.

### CATEGORIES OF PERSONAL DATA

No.	Data category	Examples
1.	Personal identification data	name, surname, personal identification number / identification code or number, date of birth, passport number / ID number, date of issue of the passport / ID and period of validity
2.	Personal contact information	address, telephone number, e-mail address
3.	Special categories of personal data ("Sensitive data")	marital status, health data
4.	Customer contact details	name, surname, e-mail address, telephone number of the contact person
5.	Customer data	Customer number, Customer registration date, status
6.	Customer profiling data (1)	belonging to a category, segment (for profiling the Client's data analysis permission is taken into account)
7.	Service data	service name, price, discount, discount expiration date
8.	Service contract details	contract number, date of signature / approval, type, annex number, date of annex
9.	Transaction details	transaction number, date, transaction name, type, status
10.	Communication data	type of incoming / outgoing communication, number, date, registrant, content, channel, delivery status
11.	Payment details	payment agreement number, decision, payment schedule
12.	Billing information	settlement system account number, bank account number, invoice number, date, amount, invoice receipt method, payment date, debt amount, debt collection information
13.	Opposition particulars	opposition number, date of registration / resolution, type, description
14.	Customer survey data	the name of the survey, the date of dispatch, the date of the reply, the survey questions and the answers provided
15.	Photos and pictures	photos from Customer events, sports events (competitions, etc.), date the photo was taken
16.	Video data	video from Customer events, sports events (competitions, etc.), video surveillance at LAA objects, recording date
17.	Call recording data	LAA Customer service telephone call records, date and time

18.	Access data systems	Customer assigned number and created password
19.	Consent information (2)	Customer's consent sign by topics, date and time of consent, source
20.	Customer vehicle data	State registration number, make and model of the customer's vehicle (for the provision of parking service in the territory of LAA, during events or competitions organized by LAA)

\* Examples do not include an exhaustive list of data belonging to the relevant data category.

(1) Profiling - takes the form of any form of automated processing of personal data which assesses personal aspects relating to a natural person, in particular to analyze or predict aspects relating to performance, economic situation, health, personal preferences or interests, reliability or behavior, location or movement, as long as such processing has legal consequences for the natural person or as long as it has a significant effect on the natural person in a similar way.

(2) Consent - the Client's free, unambiguous statement of will, by which the Client allows the processing of his / her personal data in accordance with the information provided by LVS.

### **Information on video surveillance**

Section 36 ("Video Surveillance Conditions"), Paragraph three of the Personal Data Processing Law provides that if the controller uses an information sign to inform data subjects about video surveillance, the sign shall indicate at least the name, contact information, purpose of data processing, as well as an indication of the possibility to obtain other information specified in Article 13 of the General Data Protection Regulation:

- Name of the manager: Latvian Athletics Union;
- Registration number: 40008029019;
- Legal and actual address: Stabu Street 18-1, Riga, LV-1011;
- Contact information: phone: (+371) 67557988; e-mail: lvs@athletics.lv; <http://www.athletics.lv>.
- Intended purpose of personal data processing: detection and prevention of illegal offenses related to the protection of property, protection of vital interests of persons, including protection of life and health, security and order, possible prevention of corruption.

The most effective way to ensure this is to place appropriate information signs before entering the video surveillance area, as well as elsewhere in the area or premises where the video surveillance is carried out. Accordingly, LVS information signs are placed at the entrances of the LVS office before persons enter the video surveillance area.

The manager may decide to place additional information in the information signs. Accordingly, the provision of information on video surveillance ensures that individuals are clear where the video surveillance is being carried out, and that these indications are not far from the video surveillance site or filmed area, so that data subjects can know exactly where their personal data is being processed.