

LINSTOW PRIVACY POLICY

1. GENERAL INFORMATION

The purpose of this Privacy Policy is to provide you with information about what personal data is processed by companies belonging to Linstow Group: **SIA Linstow Baltic, SIA LINSTOW, SIA Sporta 2, SIA Attīstības E75, SIA Satekles Business Center, SIA Satekles Business Center 2** (hereinafter – **Companies**), the principles, purpose, scope, protection, processing terms, erasure procedure, as well as the rights available to you in relation to the processing of personal data by us.

This Privacy Policy applies both to personal data that we have obtained directly from you and to personal data that we have obtained from third parties.

We are entitled to use the personal data for the purposes described in this Privacy Policy as well as for other purposes that we have informed you about at the time of obtaining the personal data.

2. WHO IS ENTITLED TO PROCESS YOUR PERSONAL DATA AND TO WHOM CAN YOUR PERSONAL DATA BE TRANSFERRED?

Your personal data may be processed by the Companies indicated in the relevant section of the Privacy Policy, which specifically describes the services we provide or the activities we perform.

At the same time, in certain cases, we are entitled to authorise a third party to process your personal data. Please note that we will only transfer your personal data to third parties:

- a) **if we have entered into a contract** with the recipient of your personal data and have ensured that the security requirements for the transfer and receipt of personal data are adequately met; or
- b) **if we are under a legal obligation** to transfer your personal data to the relevant recipient; or
- c) **in the public interest, to law enforcement authorities for the performance of their lawful functions**, including the police for the prevention and investigation of crime and offences and the municipal police for public order purposes. We may transfer your personal data to the following categories of recipients:
 - 1) **personal data processors** providing certain services to us. The processor only receives the amount of personal data from us that is necessary for the performance of the specific task or the provision of specific services. The processor only processes your personal data upon our instructions and does not use it for other purposes, nor does it transfer your personal data to other parties without our prior consent;
 - 2) **other recipients of personal data**, including state and local authorities, as well as courts, to enable us to comply with legal requirements imposed on us or to defend our legitimate interests.

Personal data is only processed within the EU/EEA and is not transferred outside the EU/EEA.

3. WHAT DO WE DO TO PROTECT YOUR PERSONAL DATA?

We make sure that your personal data is always secure and that it is processed in accordance with applicable legal purposes and principles.

To ensure that personal data can only be accessed by authorised persons and to prevent the unauthorised disclosure or use of personal data, we use a variety of security technologies and procedures.

4. WHEN MAY WE PROCESS YOUR PERSONAL DATA AND FOR WHAT PURPOSES?

We only process your personal data if we have at least one of the following legal grounds for doing so:

- a) **your consent** – where you have explicitly given consent in writing or confirmed such consent by your actions (for example, to receive information about our newsletters and activities by e-mail). In such cases, we will only process personal data that you have explicitly consented to processing;
- b) **our legitimate interests** – for example, to prevent and detect criminal offences against your, our and our partners' property; and the vital interests, including the life and health, of any person on the premises/grounds we manage; to obtain evidence for insurance purposes in respect of insurance claims; and in certain circumstances we are also entitled to defend our own interests, for example, if you have made a claim; to communicate with employees and visitors in an emergency (evacuation, etc.) or in connection with a visit to the facilities we manage or for marketing purposes, and in other cases.

In these cases, we only process your personal data to the extent that is strictly necessary for the fulfilment of our legitimate interests.

Where the processing of your personal data is based on our legitimate interests, we assess the potential impact on your rights and freedoms and ensure that our legitimate interests in processing your personal data do not adversely affect your rights and freedoms;

- c) **entering into or performance of a contract** – for example, if you intend to purchase a product from us, you enter into a contract with us. To enter into a contract with you, we need certain personal data about you. We also need your personal data to enable us to fulfil our contractual obligations, for example, to deliver the goods you have purchased to a specific address;
- d) **legal obligation** (legal duty) – in some cases, the law imposes certain obligations on us, such as identifying the purchaser, sending a report to the tax authorities, etc. In such cases, we only process your personal data to the extent that is strictly necessary for the performance of such obligations.

5. FOR HOW LONG DO WE STORE YOUR PERSONAL DATA?

We only process your personal data for as long as we have a legal basis to do so or for as long as other conditions binding on us are in force. For example, the following circumstances may affect the storage periods of your personal data:

- a) **our legitimate interest** in storing personal data for a certain period of time;
- b) **there is a legal obligation** to keep personal data for a certain period;
- c) **as long as your consent** to the processing of your personal data **is valid** unless there is another legal basis for processing your personal data.

If the above conditions for processing your personal data no longer apply, your personal data will be permanently erased/destroyed and/or anonymised. However, please note that when specific grounds expire, new additional grounds may arise which may justify the need to keep personal data for longer (e.g., regulatory requirements, our legitimate interests in the case of disputes, etc.).

6. WHAT ARE YOUR RIGHTS?

To ensure that your personal data is processed appropriately, you have rights that you can exercise in relation to your personal data.

- a) **Access to your personal data** – you have the right to request information about the personal data that we process relating to you.

- b) **Right to the rectification of your personal data** – if you believe that the personal data we have processed about you is not accurate, complete or appropriate, you have the right to ask for your personal data to be updated or rectified.
- c) **Right to withdraw your consent** – If we process your personal data based on your consent, you have the right to withdraw your consent at any time.
If you wish to withdraw your consent to receive electronic information about our newsletter, you can take the appropriate steps specified in the e-mail you receive or contact us.
- d) **Right to object to or restrict the processing of personal data** – if we process your personal data on the basis of our legitimate interests, you have the right to object to our processing of your personal data. If you believe that our processing of your personal data is not lawful, you may request that we restrict the processing of your personal data.

If we receive an objection from you regarding our processing of your personal data based on our legitimate interests, we will no longer process your personal data or restrict the processing of your personal data unless we can justify the processing of your personal data on the basis of our legitimate interests or our right to defend our legal claims.
- e) **Right to request the erasure of your personal data** – if you believe that we no longer need your personal data for the purposes for which it was collected or you have withdrawn your consent and in other circumstances, you may request the erasure of your personal data.

Please note that we will only be able to delete your personal data where we are not under a binding obligation to retain your personal data for certain legal purposes or where there is no other legal basis for us to process your personal data.
- f) **Right to request the transfer of your personal data** – you have the right to receive your personal data that you have provided and that is processed on the basis of consent and the performance of a contract, in written form or in one of the most commonly used electronic formats. If technically possible, we may also transfer your personal data to another service provider at your request.
- g) **Right to file a complaint about our processing of personal data** – if you believe that our processing of your personal data violates your rights, you can file a complaint with us at any time. We will examine your complaint promptly and respond within the time limits provided by law. You are also entitled to file a complaint with the Data State Inspectorate (www.dvi.gov.lv).

7 CONTACT DETAILS

If you have any questions about the processing of your personal data by us or wish to exercise your rights, please contact us in the following ways:

- contact us by e-mail: dpo@linstow.lv
- contact us by post: **Stacijas laukums 4, Rīga, LV-1050.**

This Privacy Policy is Available to You:

- at the facilities managed by us – at the information centre of the Shopping Centre Origo, at the reception of the Business Centre Origo One, at the security post of the Sporta 2 quarter;
- on our public websites – origo.lv, davanukarte.origo.lv, origoone.lv, linstowbaltic.lv, sporta2.com, sateklesbiznesacentrs.lv; linstowartaward.lv; intra.origoone.lv; sbcintra.lv;

8. PERSONAL DATA PROCESSING FOR SECURITY PURPOSES

Video surveillance

As part of the security measures, we:

- a) carry out continuous video surveillance with recording in the common areas of the facilities we manage, around the perimeter of the building and on the grounds;
and
- b) occasionally carry out video surveillance using cameras attached to the clothing of security guards, which record both video and audio in the premises and territory of the facilities we manage.

All persons within the field of view of the surveillance cameras are monitored.

Video surveillance data is not published. We are only entitled to use your personal data for the prevention or detection of criminal offences relating to the protection of property and the protection of vital interests of individuals, including life and health, for the monitoring and maintenance of public order, and for obtaining evidence for insurance purposes.

Identification and Registration of Employees, Suppliers, Service Providers, and Visitors to the Business Centre

We identify and register employees, suppliers, service providers, and business centre visitors when they arrive at the facilities we manage in a certain area and/or at a certain time. We process personal data electronically or on paper to identify which persons are present in the facilities we manage in a particular area at a particular time.

Personal Data Controllers for the Processing of Personal Data for Security Purposes

The following companies process your personal data for security purposes and are considered to be controllers or joint controllers of your personal data:

#	Our Activities	Controllers/Joint Controllers and Their Contact Details
1	Video surveillance in the common areas of SC Origo and BC Origo One, around the perimeter of the building and on the grounds.	<ul style="list-style-type: none"> • SIA LINSTOW, reg. No.: 50003315411 • SIA Linstow Baltic, reg. No.: 50003702891 Contact details of both controllers/joint controllers: Legal address: Stacijas laukums 4, Riga, LV-1050, Latvia, e-mail: dpo@linstow.lv
2	Video surveillance with audio recording in the premises and on the grounds of SC Origo and BC Origo One.	
3	Identification and registration of employees and visitors and service providers of SC Origo and BC Origo One for access to the facility.	
4	Video surveillance at the offices of SIA Linstow/SIA Linstow Baltic.	
5	Video surveillance in the common areas and grounds of the Sporta 2 quarter.	<ul style="list-style-type: none"> • SIA Sporta 2, reg. No.: 40203297013 • SIA Linstow Baltic, reg. No.: 50003702891 Contact details of both controllers/joint controllers: Legal address: Stacijas laukums 4, Riga, LV-1050, Latvia, e-mail: dpo@linstow.lv
6	Identification and registration of employees and visitors and service	

#	Our Activities	Controllers/Joint Controllers and Their Contact Details
	providers of Sporta 2 quarter for access to the facility.	
7	Video surveillance in common areas, around the perimeter of the building and on the grounds: Elizabetes iela 75, Riga.	<ul style="list-style-type: none"> • SIA Attīstības E75, reg. No.: 40203193608 • SIA Linstow Baltic, reg. No.: 50003702891 Contact details of both controllers/joint controllers: Legal address: Stacijas laukums 4, Riga, LV-1050, Latvia, e-mail: dpo@linstow.lv
8	Video surveillance in common areas, around the perimeter of the building and on the grounds: Elizabetes iela 95, Satekles iela 1C, and Ernesta Birznieka-Upīša iela 4, Riga (<i>from the commissioning of the facility – May 2025</i>)	<ul style="list-style-type: none"> • Satekles Business Center SIA, reg. No.: 40003344175 • SIA Linstow Baltic, reg. No.: 50003702891 Contact details of both controllers/joint controllers: Legal address: Stacijas laukums 4, Riga, LV-1050, Latvia, e-mail: dpo@linstow.lv
9	Identification and registration of employees, visitors and service providers of BC Satekles Business Center for access to the facility.	
10	Video surveillance in the area: Ernesta Birznieka Upīša iela 8, Satekles iela 1, Riga.	<ul style="list-style-type: none"> • Satekles Business Center 2 SIA, reg. No.: 40203439962 • SIA Linstow Baltic, reg. No.: 50003702891 Contact details of both controllers/joint controllers: Legal address: Stacijas laukums 4, Riga, LV-1050, Latvia, e-mail: dpo@linstow.lv

Processors and Recipients of Personal Data for Security Purposes

Your personal data that we process for security purposes may also be transferred to other companies – personal data processors or recipients of personal data other than data processors for the prevention or detection of criminal offences, for the supervision and maintenance of public order, and for insurance purposes.

Your personal data may be transferred to the following categories of data processors and recipients:

- a) Providers of security and security system maintenance services;
- b) Providers of insurance services;
- c) Institutions (e.g., pre-trial investigation authorities, operational entities, national security authorities, prosecutors, courts and other law enforcement authorities, tax administrations, supervisory authorities and out-of-court dispute resolution authorities);
- d) Other personal data processors or recipients approved by us.

Below is a table showing the legal grounds and purpose of the processing of personal data carried out for security purposes:

Our Video Surveillance:		
Personal data	Legal Grounds	Purpose of the Processing
Picture of the person Location of the recording of a picture of the person Time of the recording of a picture of the person Actions of the person	Legitimate interests	For the prevention or detection of criminal offences relating to the protection of property and the protection of vital interests of individuals, including life and health, for the monitoring and maintenance of public order, and for obtaining evidence for insurance purposes.
Our Audio Recordings:		
Voice of the person Location of the recording of the voice of the person Time of the recording of the voice of the person Content of the speech of the person	Legitimate interests	For the prevention or detection of criminal offences relating to the protection of property and the protection of vital interests of individuals, including life and health, for the monitoring and maintenance of public order, and for obtaining evidence for insurance purposes.
Our Identification and Registration of Employees, Visitors and Service Providers:		
Name, surname Personal identity number or part thereof Picture of the person and other data in the personal identification document	Legitimate interests	To identify the person and to ensure access to the facility.

Name, surname Position Name of company represented	Legitimate interests	To issue an <u>employee</u> pass and register in the security system. To issue a <u>visitor's</u> pass and register the visit in the visitor's register. To transfer information about the visitor to the person whom the visitor has come to visit.
Phone E-mail	Legitimate interests	To communicate with an employee or visitor.
Date, time, place of visit	Legitimate interests	For the prevention or detection of criminal offences relating to the protection of property and the protection of vital interests of individuals, including life and health, for the monitoring and maintenance of public order, and for obtaining evidence for insurance purposes.

Time Limits for Processing Personal Data for Security Purposes

For the purposes of the video surveillance organised by us (with video recording, and in some cases also audio recording if the video surveillance is carried out with video cameras attached to the clothing of security guards) and the identification and registration of employees, visitors and service providers, we process personal data within the following time limits:

Our Activity	Type of Provision or Storage of Personal Data	Time Limit (for Erasure/Destruction).
Video surveillance (audio and/or video)	Electronic data	Not more than 30 days after the recording has been made by SIA Linstow Baltic, SIA LINSTOW, SIA Sporta 2, SIA Attīstības E75, SIA Satekles Business Center 2; Not more than 60 days after the recording at SIA Satekles Business Center
	Electronic data in the event of an investigation or request for information by law enforcement authorities	Until the investigation is completed or the information is provided to the law enforcement authority
Identification and registration of employees, visitors and service providers	Electronic data	Until the purpose of the processing of personal data has been achieved
	Paper format data	
	Electronic data and paper format data in the event of an investigation or request for information by law enforcement authorities	Until the investigation is completed or the information is provided to the law enforcement authority

We may also process personal data for longer than the time limits set out in the table (above) where there is a legal obligation or legitimate interest.

9 PROCESSING OF PERSONAL DATA FOR MARKETING AND PUBLIC RELATIONS PURPOSES, PUBLIC ACTIVITIES

Event Photography, Filming

Activities that are organised by us, which are public events, may be photographed and/or filmed. If you participate in such events, you may be visible in the photos and/or videos taken. If you come to an event organised by us with a child (i.e., a person under the age of 18), your child may also be photographed and/or filmed during the event organised by us.

Our activities that are not open to everyone, such as lotteries or contests, social activities, or congratulating winners, may also be photographed and/or filmed.

For marketing and public relations purposes, we create promotional material in collaboration with models. Therefore, these persons may also be photographed and/or filmed.

We are entitled to use the personal data we collect about you and your children from photographing and filming our activities for various marketing, public relations and publicity purposes, including but not limited to publication, posting and distribution on social media, websites, advertising videos, television, print media, and other publicity materials.

Use of Photographs and Videos Produced by Third Parties

For our own purposes, we tend to use photographs and videos that have been created by third parties who are not part of Linstow Group companies.

Such photographs and videos may also contain your personal data, which we are entitled to use for various marketing, public relations and publicity purposes, including but not limited to publication, posting and distribution on social media, websites, advertising videos, television, print media, and other publicity materials.

Collaboration with Content Creators

To promote our services, products and events, we may work with content creators.

We may process the personal data of such content creators for marketing, public relations and publicity purposes, including but not limited to publication, posting and distribution on social media, websites, advertising videos, television, print media, and other publicity materials.

Newsletter Subscription

You can subscribe to receive our newsletter by e-mail and/or SMS, by entering your contact details (e-mail, phone) in the form on the website or by submitting these details in person during marketing activities or in any other way offered.

We are entitled to use your personal data collected from newsletter subscriptions to send you information about our news, events and offers for marketing purposes.

Lotteries and/or Contests

The lotteries and/or contests organised by us are public events. By providing the required personal data, you can participate in lotteries and/or contests organised by us and receive a prize.

We are entitled to use your personal data relating to your participation in lotteries and/or contests organised by us for the purpose of organising the lottery and/or contest concerned. We are entitled to use your personal data about winning and receiving prizes in lotteries and/or contests organised by us for various marketing and public relations purposes, including but not limited to publication, posting and distribution on social media and websites. Neither your personal identity number, phone number nor e-mail address will be published as part of the lotteries and/or contests organised by us.

Feedback, Questions, Suggestions

You can comment on your experience at the facilities managed by us, as well as contact us with questions and suggestions, by submitting a written application on-site (at the information centre or reception), by e-mail or by post (to the address listed on our websites), or by any other means. We are entitled to use the personal data you provide to clarify the circumstances of the situation you have referred to and to deal with any issues relating to such, including the right to transfer the personal data you provide to processors and controllers that deal with the matter and/or communicate with you.

Personal Data Controllers for the Processing of Personal Data for Marketing, Public Relations and Public Activities

The following companies process your personal data for our marketing, public relations and publicity activities and are considered to be controllers or joint controllers of your personal data:

#	Our Marketing, Public Relations and Publicity Activities	Controllers/Joint Controllers and Their Contact Details
1	Photography, filming of events (e.g., SC Origo, BC Origo One events). Use of photographs and/or videos taken by third parties. Processing of personal data of content creators. Subscription to the SC Origo, BC Origo One newsletter. SC Origo, BC Origo One lotteries and/or contests, congratulating winners. Invitation, registration of participants in events. Feedback, questions, suggestions.	<ul style="list-style-type: none"> • SIA Linstow, reg. No.: 50003315411 • SIA Linstow Baltic, reg. No.: 50003702891 Contact details of both controllers/joint controllers: Legal address: Stacijas laukums 4, Riga, LV-1050, Latvia, e-mail: dpo@linstow.lv .
2	Photography, filming of events (e.g., Sporta 2 quarter events). Use of photographs and/or videos taken by third parties. Processing of personal data of content creators. Subscription to the Sporta 2 quarter newsletter.	<ul style="list-style-type: none"> • SIA Sporta 2, reg. No.: 40203297013 • SIA Linstow Baltic, reg. No.: 50003702891; Contact details of both controllers/joint controllers: Legal address: Stacijas laukums 4, Riga, LV-1050, Latvia, e-mail: dpo@linstow.lv

#	Our Marketing, Public Relations and Publicity Activities	Controllers/Joint Controllers and Their Contact Details
	<p>Sporta 2 quarter lotteries and/or contests, congratulating winners.</p> <p>Invitation, registration of participants in events.</p> <p>Feedback, questions, suggestions.</p>	
3	<p>Photography, filming of the events (Satekles Business Center events).</p> <p>Use of photographs and/or videos taken by third parties.</p> <p>Processing of personal data of content creators.</p> <p>Invitation, registration of participants in events.</p> <p>Feedback, questions, suggestions.</p>	<ul style="list-style-type: none"> • Satekles Business Center SIA, reg. No. 40003344175 • SIA Linstow Baltic, reg. No.: 50003702891 <p>Contact details of both controllers/joint controllers:</p> <p>Legal address: Stacijas laukums 4, Riga, LV-1050, Latvia, e-mail: dpo@linstow.lv</p>
4	<p>Photography, filming of the events (Linstow Baltic events).</p> <p>Registration of participants to events; congratulating winners.</p> <p>Use of photographs and/or videos taken by third parties.</p> <p>Processing of personal data of content creators.</p> <p>Invitation, registration of participants in events.</p> <p>Feedback, questions, suggestions.</p>	<ul style="list-style-type: none"> • SIA Linstow Baltic, reg. No.: 50003702891; <p>Legal address: Stacijas laukums 4, Riga, LV-1050, Latvia, e-mail: dpo@linstow.lv.</p>

Processors and Recipients of Personal Data for Marketing, Public Relations and Public Activities

We only use trusted partners – processors of personal data through whom we provide the services necessary for the successful organisation and conduct of our activities. Also, your personal data may be transferred to other recipients if there are appropriate legal grounds.

Your personal data may be transferred to the following categories of data processors or recipients:

- a) Agencies organising events, contests, lotteries, surveys, and studies;
- b) Photographers or photography agencies;

- c) Public relations and digital service agencies;
- d) Postal service providers;
- e) Mobile and e-mail marketing service providers;
- f) Information centre, reception, security, and administration service providers;
- g) Institutions (e.g., law enforcement authorities, tax administrations, supervisory authorities, and out-of-court dispute resolution authorities);
- h) Auditors, financial and legal advisers;
- i) Other personal data processors and recipients approved by us.

You can find below the legal grounds and purpose for processing your personal data for marketing, public relations and public activities purposes:

Photography, Filming of Events, Promotional Materials		
Personal data	Legal Grounds	Purpose of the Processing
Personal data included in the photographs or filming materials – your appearance, your child’s appearance, location, time, activities, etc.	Legitimate interests	Image building and visitor promotion of our facilities. Promotion of events organised by us. Historical/retrospective coverage of our events and preservation of historical material. Promotion of the products/services we offer.
Use of Third-Party Photographs and/or Videos		
Personal data	Legal Grounds	Purpose of the Processing
Personal data included in the photographs or filming materials – your appearance, your child’s appearance, location, time, activities, etc.	Legitimate interests	Image building and visitor promotion of our facilities. Promotion of events organised by us. Historical/retrospective coverage of our events and preservation of historical material. Promotion of the products/services we offer.
Collaboration with Content Creators		
Personal data	Legal Grounds	Purpose of the Processing
Name, surname, personal data contained in photographs or	Legitimate interests	Image building and visitor promotion of our facilities.

filming material, and other personal data disclosed by the content creator		Promotion of events organised by us. Historical/retrospective coverage of our events and preservation of historical material. Promotion of the products/services we offer.
Our News		
Personal data	Legal Grounds	Purpose of the Processing
Contact details (e-mail, phone)	Your consent	To send news and offers.
Lotteries and/or Contests Organised by Us		
Personal data	Legal Grounds	Purpose of the Processing
Name, surname Personal identity number	Legitimate interests	Identification. To enable us to identify you as a participant in a lottery or contest.
	Legal obligation	Identification. To enable us to identify you as a participant in a lottery or contest. To enable us to fulfil our obligations to tax authorities and lottery supervisory authorities.
Contact details (phone, e-mail)	Legitimate interests	To enable us to contact you in the event of receiving a prize.
Feedback, Questions, Suggestions		
Personal data	Legal Grounds	Purpose of the Processing
Name, surname	Legitimate interests	Identification. To enable us to identify you as the applicant.
Contact details (phone, e-mail)	Legitimate interests	To enable us to contact you.
Other personal data provided by the applicant on his/her own initiative	Legitimate interests	To enable us to clarify the circumstances of the situation you have referred to and to deal with any related issues.
Public Activities		

Personal data	Legal Grounds	Purpose of the Processing
Name, surname Personal identity number	Your consent	Identification so that we can ensure a successful public activity.
	Legal obligation	Identification. To enable us to identify you as a participant in the public activity. To enable us to fulfil our obligations to the tax authorities.
Contact details (phone, e-mail)	Your consent	To enable us to contact you.
Other personal data provided by the applicant on his/her own initiative or to fulfil the requirements for participation in the public activity	Your consent	Information to enable us to ensure a successful public activity.

Time Limits for Processing Personal Data for Marketing, Public Relations and Public Activities

For the purposes of organising our marketing, public relations and public activities, we process your personal data within the following time limits:

Our Activity	Type of Provision or Storage of Personal Data	Time Limit (for Erasure/Destruction).
Photography, filming, promotional materials for events, public activities	Electronic data	All materials with historical significance – forever
	Paper format	Until the purpose of the processing of personal data has been achieved, but for no longer than 5 years after the event
Use of third-party photo and video material	Electronic data	All materials with historical significance – forever
	Paper format	Until the purpose of the processing of personal data has been achieved, but for no longer than 5 years after publication
Collaboration with influencers	Electronic data	All materials with historical significance – forever
Receipt of news	Electronic data	Until the purpose of the processing of personal data has been achieved
Lotteries or contests	Electronic data	Until the purpose of the processing of personal data has been achieved

	Paper format	Until the purpose of the processing of personal data has been achieved, but for no longer than 5 years after the event
Feedback, Questions, Suggestions	Electronic data	Until the purpose of the processing of personal data has been achieved, but for no longer than 5 years after receipt
	Paper format	Until the purpose of the processing of personal data has been achieved, but for no longer than 5 years after receipt
Public Activities	Electronic data	Until the purpose of the processing of personal data has been achieved
Lists of participants to events	Electronic data Paper format	Until the purpose of the processing of personal data has been achieved, but for no longer than 5 years after the event

We would like to point out that we may also process personal data for longer than the time limits set out in the table (above) where there is a legal obligation or legitimate interest.

If you do not want to be included in the photographs or videos of our events, please contact us at the e-mail address or postal address provided in this Privacy Policy by sending us an application.

10 PROCESSING OF PERSONAL DATA FOR THE PROVISION OF ELECTRONIC PRODUCTS

Origo Gift Card and Origo Online Shop

We process your personal data to provide the Origo gift card and Origo online shop services.

Controllers and Processors of Personal Data and Recipients for the Purpose of Providing the Origo Gift Card and Origo Online Shop

The processing of your personal data for the provision of these services is carried out by the following companies, which are considered to be controllers, joint controllers and processors of your personal data:

#	Our Activities	Controllers/Joint Controllers/Processors and Their Contact Details
1	SC Origo gift card services <i>(issuance, acceptance, renewal, card balance transfer, beneficiary contact details, etc.)</i>	<ul style="list-style-type: none"> Controller: SIA Transact Pro, reg. No.: 41503033127 Legal address Kr. Valdemāra iela 62, Riga, LV-1013; e-mail: info@transactpro.lv Processor: SIA Linstow, reg. No.: 50003315411 Legal address: Stacijas laukums 4, Riga, LV-1050, Latvia, e-mail: dpo@linstow.lv
2	SC Origo online shop service <i>(order formation and organisation of delivery of goods (SC Origo gift cards, packaging, etc.))</i>	<ul style="list-style-type: none"> SIA Linstow, reg. No.: 50003315411 SIA Linstow Baltic, reg. No.: 50003702891; Contact details of both controllers/joint controllers: Legal address: Stacijas laukums 4, Riga, LV-1050, Latvia, e-mail: dpo@linstow.lv .

We may also transfer your personal data to other companies – personal data processors for the performance of various services (Origo Information Centre services, SMS or e-mail messages, etc.).

Personal Data Processors for the Origo Gift Card and Origo Online Shop

Your personal data may be transferred to the following categories of service providers for processing. Also, your personal data may be transferred to other recipients if there are appropriate legal grounds:

- a) Customer service companies providing security and information centre services;
- b) Postal service providers;
- c) Mobile and e-mail marketing service providers;
- d) Institutions (e.g., law enforcement authorities, tax administrations, supervisory authorities, and out-of-court dispute resolution authorities);
- e) Auditors, financial and legal advisers;
- f) Other personal data processors and recipients approved by us.

You can find below the legal grounds and purpose of the processing of your personal data for the provision of electronic products:

SC ORIGO Gift Card		
Personal data	Legal Grounds	Purpose of the Processing
Name, surname	Legitimate interests	Identification: when requesting or receiving the service; for your claims. To ensure internal control.
	Legal obligation	Identification: for money transfers.
	Your consent	Identification when making a purchase by writing the details on the purchase receipt.
Personal identity number	Legal obligation	Identification: for money transfers.
	Your consent	Identification when making a purchase by writing the details on the purchase receipt.
Contact details (telephone, e-mail or postal address)	Legitimate interests	For communication: to provide the requested service, to reply to an application/claim.
Bank details	Legal obligation	To make a bank transfer, if the customer has requested the relevant service.
SC ORIGO Online Shop		
Personal data	Legal Grounds	Purpose of the Processing
Name, surname of the purchaser	Legitimate interests	Identification: To place an order and invoice, to pay by bank transfer.

	Your consent	To create a registered user.
Contact details (e-mail, phone)	Legitimate interests	Communication. To be informed of the status of the order, to clarify the order details promptly.
	Your consent	To create a registered user.
E-mail	Your consent	To send offers from the SC Origo online shop.
Name, surname of the recipient	Legitimate interests	Identification. If the recipient is a person other than the purchaser, whom the purchaser has instructed to deliver the order.
Personal identity number	Legitimate interests	To enable identification (e.g., to receive an order).
Delivery address	Legitimate interests	To ensure the delivery of an order if you have opted for a delivery service.
Order data	Legitimate interests	For statistical purposes and to protect our legitimate interests (for example, to provide evidence).

Time Limits for Processing Personal Data for the Origo Gift Card and Origo Online Shop

For the provision of electronic products, we process your personal data within the following time limits:

Our Services	Type of Provision or Storage of Personal Data	Time Limit (for Erasure/Destruction).
SC Origo gift card services	Customer applications/requests (paper/electronic data) Electronic order documents (purchase of gift cards)	5 years after the provision of the personal data
SC Origo online shop	Electronic order documents (purchase and delivery of packaging, delivery of gift cards)	5 years from the date of provision
	Registered customer profile data	within 1 month of the customer's request to delete their profile data
	Electronic data on unpaid orders	1 month after placing the order

We would like to point out that we may also process personal data for longer than the time limits set out in the table (above) where there is a legal obligation or legitimate interest.

To ensure that we comply with our obligations regarding the processing of personal data, we regularly monitor our personal data processing activities. Therefore, we are entitled to unilaterally change this Privacy Policy at any time.

This Privacy Policy was last updated on 22 April 2025.