

Personal data processing policy of clients, partners and visitors of the Ltd “CrossChem” Laboratory:**1. Information about the Manager**

Manager: Ltd “CrossChem”, registration number: 40003888244, legal address: “Naftaluka”, Olaine parish, Olaine, LV-2127

Contact details for communication: Phone: +371 2662 4000

Electronic mail (Email) address: info@crosschem.lv

2. General characterization of processing of personal data of Ltd “CrossChem”.

The Ltd “CrossChem” carries out the processing of personal data for the following group of persons: clients and co-operation partners, representatives of clients and partners, potential clients with whom no contractual relationship has been established and who are interested in the terms and/or costs of the provision of the services of the Ltd “CrossChem” Laboratory, former customers, clients, including clients whose contractual obligations have not been fulfilled and participants in public events organized by the Ltd “CrossChem” Laboratory, visitors of the website, participants in marketing activities, and other persons whose data may be put at the disposal of the data manager in relation to the personal data processing purposes specified in this document.

3. Legal basis for the processing of personal data

Personal data of Ltd “CrossChem” shall be processed only in accordance with the legitimate purposes predefined, including:

A) For the conclusion of a service contract and provision of services, as well as fulfilment and provision of obligations specified in the concluded contracts

Within the framework of this purpose, the Ltd “CrossChem” will process the information which will be submitted by participating in the procurement procedure organized by the Ltd “CrossChem”. Ltd “CrossChem” will collect and process personal data that need to be included in the contract to be concluded, as well as in order to identify, ensure the provision of the service and the corresponding payment calculation and payment process, as well as to communicate in relation to the provision of the service and/or performance of the contract in related matters (including the sending of invoices), in particular cases also in order to ensure administration of unpaid payments.

For this purpose and for the sub-purposes indicated above, the Ltd “CrossChem” shall require at least the following personal data: name, surname, personal identity number, address (postal and legal address), bank account number, telephone number and e-mail address of the representatives of the customer, customer and/or co-operation partner.

The main legal bases to be used to achieve these objectives are:

- conclusion of a contract with the data subject (point (b) of the first paragraph of Article 6 of the General data Protection Regulation);
- fulfilment of legal obligations (Article 6, first paragraph, point (c) of the General data Protection Regulation);
- Legitimate interests of the data manager (point (f) of the first paragraph of Article 6 of the General data Protection Regulation), e.g. identification of the contact person of the client and/or

the co-operation partner, ensuring communication with the client.

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General data Protection Regulation).

B) Compliance with regulatory obligations

Within the scope of this purpose, Ltd “CrossChem” will collect and process personal data in order to comply with the requirements of regulatory acts, including the Law on Accounting, Cabinet of Ministers Regulation No. 877 “Accounting settlement Regulations” and other regulatory enactments in force in the Republic of Latvia.

For this purpose, Ltd “CrossChem” may process at least the following personal data: name, surname, personal identity number, address (postal address), bank account number, telephone number and e-mail address of the customer, customer and/or partner representative.

The main legal bases to be used to achieve these objectives are:

- Fulfilment of legal obligations (Article 6, first paragraph, point (c) of the General data Protection Regulation);
- Legitimate interests of the controller (Article 6, first paragraph, point (f) of the General data Protection Regulation).

C) Ensuring the proper provision of the service

For this purpose, the data manager may need to maintain and develop technical systems and IT infrastructure, use technical and organizational solutions that may also use personal data (e.g. via cookies) to ensure the proper provision of services.

The main legal bases to be used to achieve these objectives are:

- Legitimate interests of the data manager (General data Protection Regulation, Article 6, first paragraph, point (f))

D) Provision of marketing activities

Within the scope of this purpose, the data manager may need to collect and process personal data in order to ensure participation of the client, client and/or representative of the co-operation partner in public events organized by Ltd “CrossChem”, as well as to inform regarding the news and services provided by Ltd “CrossChem”. In some cases, for marketing purposes, Ltd “CrossChem” may perform filming and photography at organized public events (the participants of the event will be informed of the conduct of such activities upon receipt of information on the conduct of the event).

For this purpose, the data manager may need at least the following personal data: Name, surname, address, telephone number, e-mail address, photo, data contained in video recordings filmed during the event, and data contained in video surveillance recordings in the company's territory and buildings.

The main legal bases to be used to achieve these objectives are:

- Consent of the data subject (point (a) of the first paragraph of Article No. 6 of the General data

Protection Regulation);

- Conclusion and performance of the contract with the data subject (point (b) of the first paragraph of Article No. 6 of the General data Protection Regulation);
- Legitimate interests of the data manager (point (f) of the first paragraph of Article No. 6 of the General data Protection Regulation), such as the provision of communications.

E) Ensuring security, preventing threats to property interests, providing evidence in cases of dispute and ensuring the important legitimate interests of Ltd “CrossChem” Laboratory and other relevant third parties

Within the scope of this purpose, Ltd “CrossChem” performs video surveillance of the territory, buildings and other properties of the undertaking, uses personal data controllers for ensuring various functions, uses the rights granted in regulatory enactments for ensuring the legitimate interests thereof.

For this purpose, the data manager may need to process at least the following personal data: data contained in video recordings, data on site visits recorded in access control systems, etc.

The main legal bases to be used to achieve these objectives are:

- Legitimate interests of the controller (Article No. 6, first paragraph, point (f) of the General data Protection Regulation).

5. Access to personal data

The Ltd “CrossChem” shall take appropriate measures to process personal data in accordance with applicable law and ensure that personal data are not accessed by third parties who do not have an appropriate legal basis for the processing of personal data.

Personal data may be accessed as necessary by:

- Employees of Ltd “CrossChem” or directly authorized persons who need it for the performance of their duties, such as accountants, managers or, if the data is public, all employees;
- Data managers of personal data according to the services they provide and only to the extent necessary, such as auditors, financial management and legal advisers;
- In cases specified in the law of the State and local government institution, for example, law enforcement institutions, local government;
- Third parties, after careful consideration of whether such transfers have an appropriate legal basis.

6. Cooperation partners in the processing of personal data

The Ltd “CrossChem” shall take appropriate measures to ensure the processing, protection and transfer of personal data to data managers in accordance with the applicable legislation.

The Ltd “CrossChem” carefully selects the personal data processors and assesses the necessity of the data and the amount of data to be transferred when transferring the data. The transfer of data to processors shall be subject to the requirements of confidentiality and secure processing of personal data.

The Ltd “CrossChem” shall cooperate with the following categories of personal data processors:

- Auditors, consultants (financial and/or legal);

- IT infrastructures, database owner/developer/technical operator;
- Other persons associated with the provision of our services.

7. Transfer of personal data to countries outside the European Union (EU) or the European Economic area (EEA)

Ltd "CrossChem" does not transfer data to countries outside the European Union or the European Economic area.

8. Storage periods of personal data

Personal data of Ltd "CrossChem" shall be stored in accordance with the relevant purposes for the processing of personal data and in accordance with the requirements of the applicable legislation.

When assessing the length of the storage of personal data, the Ltd "CrossChem" shall take into account the legal requirements in force, aspects of performance of contractual obligations, client instructions, as well as the legitimate interests of the controller. If personal data are no longer necessary for the specified purposes, the Ltd "CrossChem" shall delete or destroy them.

Personal data necessary for the performance of the contractual obligations - shall be stored until the contract is performed or other retention periods are fulfilled (see below).

The personal data to be stored in order to comply with the legislation shall be stored within the time limits laid down in the relevant legislation.

In order to prove fulfilment of its obligations, the Ltd "CrossChem" shall store the general limitation period of the claim, in accordance with the time periods for limitation of claims laid down in laws and regulations – 10 years in the Civil Law, 3 years in the commercial Law and other time periods, taking into account also the time periods for bringing actions laid down in the Civil Procedure Law.

The data obtained as a result of the video surveillance shall be stored for 14 days by the Ltd "CrossChem", in individual cases, if the data is necessary for the provision of evidence, the data shall be stored until the moment when the specified target is reached.

9. Rights of the data subject regarding to the processing of personal data

In accordance with the provisions of the General data Protection Regulation, the data subject has the right to request access to his personal data held by the data manager, to request their correction, deletion, restriction of processing. The data subject shall have the right to object to the processing of data and the right to the portability of data in the cases and in accordance with the procedures laid down in the General data Protection Regulation.

In case of receipt of a request from a data subject, the Ltd "CrossChem" shall provide an answer within the time periods specified in regulatory enactments (not later than 1 (one) month if there is no specific request that takes longer to prepare a response).

Obtain information on personal data stored by the data manager or exercise rights other than those of the data subject in one of the following ways:

- In the data manager's office: "Naftaluka", Olaine parish, Olaine, LV-2127, every working day from noon 9:00-16:30 (arrival time agreed in advance);

- By application, by post, to the following address: "Naftaluka", Olaine parish, Olaine, LV-2127;
- When submitting an application (signed with a secure electronic signature), sending it to e-mail: info@crosschem.lv.

If the data subject considers that Ltd "CrossChem" has failed to resolve the problem raised and the data subject's right to protection of personal data has been violated, the data subject has the right to file a complaint with the State Inspectorate of Data (Elijas iela 17, Riga, LV-1050).

Annex No.1**Ltd "CrossChem" Privacy Policy Annex Data categories:**

No.	Data Category	Examples
1.	Personal identification data	Name, surname, position
2.	Person Contact information	Address, telephone number, email address
3.	Customer Contact data	Contact name, email address, telephone number
4.	Supplier data	Vendor number, invoice information, address, bank account number
5.	Activities performed on the websites of Ltd "CrossChem"	IP address, name of activity performed, date and time of viewing sections of the Internet page
6.	Photographs and images	Photographs from customer events, date of photo shooting
7.	Video data	Video from customer events, recording date
8.	Consent information	Consent mark expressed by customer by subject, date and time of consent, source

CONFIRM
Ltd "CrossChem"
Chairman of the Board


/Ričards Andersons /
13th of February 2023