

## Privacy Policy

According to the Cabinet of Ministers Regulation No 857 of 11th December 2012 "Regulation of the Investment and Development Agency of Latvia" ("Latvijas Investīciju un attīstības aģentūras nolikums"), the Investment and Development Agency of Latvia ("Latvijas Investīciju un attīstības aģentūra") (hereinafter - LIAA) is a direct administrative institution subordinate to the Minister of Economy. The mission of LIAA is to promote the competitiveness and export capacity of Latvia enterprises in international markets, to promote the development and export of knowledge-intensive goods and services, to encourage the growth of foreign investment, to implement the national tourism development policy, the national innovation policy, to promote the positive international image of Latvia.

LIAA provides information on LIAA services, as well as information on how it collects and processes personal data through the LIAA website [www.liaa.gov.lv](http://www.liaa.gov.lv), other websites created and provided by LIAA, as well as the national platform for business development [www.business.gov.lv](http://www.business.gov.lv) and the LIAA mobile application "BUSINESS.GOV.LV", available in Google Play Store and Apple AppStore.

In order to achieve this objective, LIAA has defined the following functions:

- implementing measures to improve the export performance of Latvia companies and boost foreign trade;
- attract foreign investment into the Latvia economy;
- promoting business start-ups and development;
- to foster innovation activities in enterprises, the introduction and development of innovations at national and international level, cooperation between the research and business sectors, and the processes of technology transfer and commercialisation of technology rights;
- implementing measures under state aid programmes;
- administering activities co-financed by EU funds and other foreign financial instruments;
- to carry out the functions set out in the Tourism Law of Republic of Latvia;
- create a partnership network of public administration, local authorities, private bodies and individuals (experts), as well as non-governmental organisations to promote positive international visibility of Latvia;
- ensure the implementation of the customer support functions of the Latvia single product contact point and the single service contact point.

In order to carry out the above functions effectively, LIAA needs to collect personal data<sup>[1]</sup>. The purpose of the Privacy Policy is to provide the data subject - the natural person whose data are processed - with information on the purpose, scope, protection, duration of processing and the rights of the data subject.

### General rules

1. This Privacy Policy describes in general terms the basic principles of the processing and protection of personal data by LIAA:
  1. detailed information on the processing of personal data may be provided in other legislation and documents relating to a specific action or project;
  2. LIAA shall ensure the confidentiality of personal data processed and shall implement appropriate technical and organisational measures to protect personal data against

unauthorised access, unlawful processing or disclosure, accidental loss, alteration or destruction;

3. Purpose of personal data processing: in order to ensure the achievement of the functions set by LIAA, LIAA processes personal data in order to:
  1. plan and organise measures to improve the export performance of Latvia`s companies and boost foreign trade;
  2. promote and plan the attraction of foreign investment into the Latvia economy, and organise measures to support and retain foreign investment;
  3. promote and plan business start-up and development, innovation and technology transfer, and organise business start-up, development, innovation and technology transfer activities;
  4. planning and organising measures under national aid programmes;
  5. administering activities co-financed by European Union funds and other foreign financial instruments;
  6. plan and organise events to promote tourism in Latvia;
  7. to monitor and ensure order in the premises and territories under the supervision of LIAA, for the safety of LIAA employees and visitors, protection of property, prevention and detection of unlawful acts;
  8. ensure the fulfilment of the obligations of the LIAA arising from the requirements of other regulatory enactments applicable to the activities of the LIAA (e.g. employment, labour protection, accounting, etc.).
2. LIAA processes personal data through its employees and/or the personal data processors it engages. In such case, LIAA shall take the necessary measures to ensure that the personal data processor also processes personal data in accordance with LIAA's instructions and in compliance with applicable laws and regulations, and shall require the personal data processor to take appropriate security measures.
3. Legal basis for processing personal data (in order of priority):
  1. the conclusion and performance of transactions by LIAA or persons represented by it, including the conclusion and performance of a contract to which the data subject is a party;
  2. performance of LIAA's obligations arising from applicable laws and regulations;
  3. carrying out a task in the public interest;
  4. the legitimate interests of LIAA or the persons it represents;
  5. the data subject's consent.
4. Main categories of data subjects for whom LIAA collects personal data:
  1. LIAA client contact persons;
  2. LIAA clients - natural persons;
  3. Other persons in contact with LIAA;
  4. Job applicants;
  5. LIAA employees and their relatives;
  6. Counterparties, including subcontractors and natural persons related to subcontractors;
  7. Visitors to buildings and premises owned, held or used by LIAA;
  8. Visitors to LIAA websites;
  9. Personalised users of LIAA websites;
  10. Recipients of LIAA information notices;
  11. Visitors to events organised by LIAA.
5. Personal data are collected both from the data subject and from external sources, i.e. from other publicly accessible or restricted databases from which LIAA receives information on the basis

of a separately concluded agreement with the database holder. The categories of personal data that LIAA collects and processes are mainly, but not exclusively:

1. identification data - name, surname, personal identification number, date of birth, authorisation data (when logging in via Latvija.lv);
2. contact details - address, phone number, email address;
3. professional data - education, job title, workplace, business data (sectors of activity);
4. financial details - bank accounts, payment details;
5. images of persons taken by photography, filming (including audio recording) or video surveillance;
6. website visitor data (information about the website used (in accordance with the cookie policy), information about the device and connection used (such as browser, operating system and other data collected by Google Analytics) and user account information (if the website user has an account);
7. content preferences, i.e. areas of support, sectors and topics of interest;
8. data on state aid and other services received by the LIAA client;
9. data about the user's activities (IP address and date, time of connection);
10. data obtained and/or generated in the performance of obligations under laws and regulations, such as data resulting from requests for information to/from law enforcement authorities, tax administration authorities, courts, etc.

### **Obligations of LIAA when processing personal data**

6. LIAA shall provide, within the scope of processing of personal data:

1. information to the data subject in accordance with Regulation [\[2\]](#) Article 13;
2. technical and organisational measures to ensure the security and protection of personal data;
3. upon receipt of an appropriate request from the data subject, rectification or erasure of the personal data provided, if permitted by laws and regulations.

7. LIAA undertakes to notify the data subject without undue delay of a personal data breach in the event that a personal data breach could result in a high risk to the rights and freedoms of the data subject.

### **Processing security requirements**

8. Taking into account the level of information technology, the costs of implementation, use and the nature, extent, context and purposes of the processing, as well as the varying likelihood and severity of the risks to the rights and freedoms of the data subject, LIAA shall implement appropriate technical and organisational measures to ensure an adequate level of security.

9. The mandatory technical protection of personal data shall be implemented by LIAA through physical and logical safeguards, ensuring:

1. protection against compromise of personal data due to physical exposure;
2. protection by software, passwords, encryption, cryptography and other logical means of protection.

10. When processing personal data, LIAA shall ensure:

1. access by authorised persons to the technical resources used for processing and protecting of the personal data;
2. that media containing personal data are processed by persons authorised to do so;
3. the resources used to process personal data are transferred by persons authorised to do so.

### **Rights of the data subject**

11. The data subject has the right to:

1. access to their personal data and receive the information required by Article 15 of the Regulation;
2. request the LIAA to rectify your personal data;
3. request the LIAA to delete your personal data;
4. request from LIAA the restriction of the processing of your personal data or the right to object to such processing in accordance with Articles 17 and 21 of the Regulation;
5. withdraw your consent to the processing of your personal data at any time.

12. The data subject may submit a request for the exercise of his/her rights in writing in person at the Customer Service Department of LIAA, presenting an identity document, or by electronic mail, signed with a secure electronic signature and sent to the address [pasts@liaa.gov.lv](mailto:pasts@liaa.gov.lv). If the data subject has submitted a request for the exercise of his/her rights in written form by electronic mail without a secure electronic signature, LIAA will provide information only on the data received from the e-mail address of the sender of the request.

13. The data subject may access his/her personal data processed within the framework of the LIAA national platform for business development "BUSINESS.GOV.LV" through the LIAA application "BUSINESS.GOV.LV", as well as on the website <https://www.business.gov.lv>. More detailed procedure of personal data processing within the framework of the LIAA national platform for business development "BUSINESS.GOV.LV" and the LIAA mobile application "BUSINESS.GOV.LV" is determined by the "LIAA BUSINESS.GOV.LV Privacy Policy".

14. Upon receipt of a request from a data subject to exercise his/her rights, LIAA shall verify the identity of the data subject, assess the request and execute it in accordance with the regulatory enactments. If a data subject submits a privacy-related complaint, LIAA will record the name and/or company name of the data subject, the name, email, country of the person concerned by the complaint, and the information on which the complaint is based. LIAA will use the information provided by the data subject to investigate the data subject's complaint and send the data subject a response once the complaint has been investigated, as well as to take steps to verify the facts alleged in the complaint and for other purposes as may be necessary in connection with the information provided in the complaint.

15. Upon receipt of information that personal data processed by LIAA are no longer correct, LIAA shall, without undue delay, make the appropriate corrections.

16. The data subject may exercise the right to have his or her personal data erased or to have the data processing restricted (including the right to object to processing pursuant to Articles 17 and 21 of the Regulation) if LIAA has no legal basis and/or no obligation to continue the processing pursuant to applicable laws and regulations.

17. LIAA may respect the rights of the data subject only to the extent that it is technically feasible, for example, it is not feasible for the LIAA to rectify or erase personal data which have been made public and the rectification or erasure of which cannot be technically ensured by the LIAA.

18. The data subject shall have the right to lodge a complaint with the data protection supervisory authority (the Data State Inspectorate ([www.dvi.gov.lv](http://www.dvi.gov.lv))) regarding the use of personal data if the data subject considers that his/her rights and interests have been violated in accordance with applicable laws and regulations.

### **Storage period**

19. Personal data shall be processed for as long as is necessary for the purpose of the processing. The retention period may be determined or justified by the contract with the client, the legitimate interests of LIAA or applicable laws and regulations.

20. Personal data shall be deleted after the circumstances referred to in Paragraph 19 have ceased to exist.

### **Personal data processing locations and transfers**

21. Personal data are processed:

1. Pērses iela 2, Rīga, and on information processing servers owned by LIAA and/or provided for use to LIAA;
2. LIAA business incubators ([click here for incubator locations](#));
3. LIAA representation offices abroad ([click here for the locations of the representation offices](#)).

22. LIAA may transfer Personal data to:

1. the person providing the functionality of LIAA applications, data processing or IT services (information technology service providers, cloud-based software service providers, web page content hosting and management, data analysis, data backup, security and storage service providers (LIAA stores personal data on servers located in secure data centres in the EU or EEA));
2. a person engaged to provide a service or information to LIAA;
3. a person who has the right to receive the personal data in accordance with the requirements of the applicable regulatory enactments, e.g. law enforcement authorities, institutions involved in the supervision of EU funds for the performance of their duties under the regulatory enactments;
4. a person to whom LIAA is required to provide information within the framework of the performance of its functions under regulatory enactments.

### **Basic types of processing of personal data**

23. LIAA client contact persons.

1. LIAA processes the personal data of existing LIAA customer contacts using the Customer Relationship Management (CRM) system.

2. The collection and addition of customer contact data to the CRM is initiated by a LIAA employee.
3. Customer contact details may include the name of the person, the name of the organisation (which the person represents), the position in the organisation (which the person holds), email, telephone and other information provided by the organisation's contact person.
4. The personal data of customer contacts are visible to LIAA employees who can use it:
  1. to produce statistical reports;
  2. to provide the client with information about LIAA services or events organised by LIAA or others that may be of interest to the client, such as information about industry news, other relevant services, invitations to events;
  3. to enter into transactions with clients, including monitoring their performance, and to provide services to LIAA;
  4. to implement the functions of LIAA established by the regulatory enactments, including providing data to clients looking for business partners in Latvia, organising events.

#### 24. Clients of LIAA - natural persons.

1. LIAA processes the data of existing LIAA clients - natural persons using CRM.
2. The collection and addition of the data of the LIAA client - natural person to the CRM is initiated by the LIAA employee.
3. LIAA client's - natural person's data includes name, surname, position, e-mail, telephone and other contact information.
4. The data of the LIAA client - natural person is visible to LIAA employees who can use it:
  1. for statistical reporting;
  2. providing information about LIAA services or events organised by LIAA or others that are relevant to the company's profile, in which the client may be interested, e.g. information about industry news, invitations to events;
  3. for concluding transactions with natural persons, including the monitoring of such transactions, and for the provision of LIAA services;
  4. implementation of the functions set out in the regulatory enactments of LIAA, including the organisation of events.

#### 25. Other persons in contact with LIAA.

1. LIAA as a public administration authority also collects personal data in cases when persons apply to LIAA in order to resolve issues within the administrative procedure or to receive information, submit a complaint or feedback.
2. In such cases, the personal data collected shall be processed by LIAA only within the framework of the resolution of the specific issue.

#### 26. Persons applying for a job.

1. LIAA, when organising recruitment, collects and further processes the personal data of the applicant (the natural person who has applied for the vacancy).
2. Applicants are obliged to provide only up-to-date and valid information and, when applying for a vacancy, not to provide data that would be considered sensitive personal data (such as

their state of health or political opinions) or other data that are not necessary for the assessment of the applicant's suitability for the post in question.

3. By applying for a vacant post, the applicant declares his/her free will to participate in the selection process and declares that he/she is aware of the rules on the processing of personal data in the selection process.
4. LIAA shall keep the personal data submitted by applicants for a maximum period of 6 months after the end of the selection process (not applicable to a person with whom an employment or civil service relationship is established).

27. LIAA employees and their relatives:

1. LIAA collects and processes employees' personal data only for the purpose of ensuring employment relations within the scope specified in the regulatory enactments and the employment contract (applicable only to employees with whom an employment contract has been concluded)
2. Data of relatives of LIAA employees are collected and processed by LIAA in the cases stipulated by normative acts for the purpose of granting material benefits provided for by the legislation.
3. LIAA shall keep personal data of employees and their relatives for the period specified in the regulatory enactments.

28. Counterparties (including subcontractors and natural persons related to subcontractors).

1. LIAA collects and processes personal data of LIAA's suppliers (including subcontractors and natural persons related to suppliers and subcontractors) in order to conclude transactions, monitor the performance of transactions (receive goods/services from LIAA's suppliers and, where applicable, provide professional services to LIAA's customers).
2. Personal data submitted by the counterparty shall be processed by LIAA only in accordance with the subject matter of the transaction, within the scope of the transaction and only in accordance with the requirements of the applicable legislation.
3. The personal data of the counterparty includes name, surname, personal identification number, job title, email, telephone and other information related to the transaction.

29. Visitors to the buildings and premises in the possession, custody or use of LIAA.

1. LIAA video surveillance without audio recording is carried out in the LIAA building in Riga, Pērses iela 2.
2. The purpose of video surveillance is to monitor order in the premises subject to video surveillance, ensure the safety of the employees and visitors, protect property, prevent and detect illegal activities.
3. The video surveillance recording is kept for 30 days from the date of its creation. After this period, the video surveillance recording shall be immediately overwritten (cyclically replaced by subsequent video surveillance recordings). If, within that period, signs of an unlawful act are detected or a request is received for the provision of the data shown in the video surveillance recording, the data shall be kept separately until the necessary action has been taken.
4. LIAA shall post information signs in all the locations to warn that video surveillance is being carried out.

### 30. Visitors to LIAA websites.

1. This policy summarises the cookie<sup>[3]</sup> principles. The cookie term conditions of each LIAA website may be supplemented by other conditions specific to that website. Each website's cookie policy is available in the Cookie Policy section of LIAA's websites.
2. LIAA websites use cookies to improve the quality of the services offered:
  1. recognise new or past customers;
  2. remember screen preferences, such as contrast colour settings or font sizes;
  3. remember whether the data subject has responded to the pop-up survey (without being asked to do so again);
  4. remember if the data subject has given consent to LIAA to use cookies on this website;
  5. remember whether the data subject has already subscribed to the newsletter pop-up (without being asked to do so again);
  6. collect reliable site usage information to enable LIAA to measure how well the site is meeting the needs of its users and to make any necessary improvements;
  7. analyse which pages of the LIAA websites the data subject visits and which consumer privacy tools the data subject uses;
  8. the data subject may delete or block cookies at any time;
  9. some cookies may be placed by a third party service provider that performs certain functions for LIAA.

### 31. Personalised users of LIAA websites and LIAA databases (including www.business.gov.lv) and application "BUSINESS.GOV.LV").

1. On some LIAA websites and/or LIAA databases, LIAA provides the data subject with the possibility to become a personalised user of the website and/or database.
2. In order to register a user of the website and/or database, LIAA collects and processes the following personal data: user name and e-mail address.
3. Each website and/or database where you can become a personalised user may publish separate rules on the processing of personal data that explain why and how personal data are collected and processed. Before registering as a user, the data subject is obliged to read the terms and conditions, if any, of the website and/or database in question for the processing of natural persons' data.
4. If, using the LIAA mobile application "BUSINESS.GOV.LV", its user applies to participate in an event organised by LIAA, LIAA creates and processes (including storing) a personalised QR code of the event participant.

### 32. Recipients of the LIAA newsletter.

1. LIAA provides the data subject with the possibility to become a recipient of the LIAA newsletter (by e-mail).
2. In order to send the data subject newsletters, LIAA collects and processes the data subject's e-mail address. In order to ensure receipt of specific newsletters (e.g. only one sector), LIAA may ask the data subject to provide other information (e.g. field of activity, company name).
3. The data subject may unsubscribe from the emails at any time using the link provided in the messages sent.

### 33. Attendees of events organised by LIAA.



1. In order to ensure publicity, promotion and information about the event, LIAA may film and photograph the event.
2. In order to inform the participants of the event, LIAA shall provide information at the event and at the venue of the event, by placing information signs complying with the regulatory enactments, that the event will be filmed or photographed.
3. LIAA shall be entitled to use the material resulting from the photography and filming, in whole or in part, for any form of informing about the event. LIAA will exercise these rights freely at its own discretion, including the right to pass them on to third parties. The data subject shall have the right to request from LIAA information on the third parties to whom the right to use the material resulting from the photography or filming has been transferred.
4. The data subject may object at any time to the measures set out in this section and request that they be discontinued only if the data subject is directly identifiable in the photograph or video and it is technically feasible for LIAA to erase the data subject's personal data or to refrain from using the photograph or video.

### **Transfer of the obligation to process personal data to third parties.**

34. For the processing of personal data of an individual, the LIAA may engage one or more processors to process personal data on behalf of the LIAA (hereinafter referred to as The Processor).

35. LIAA shall enter into a contract with each Processor, which shall also include a provision on compliance with this Policy and individual personal data processing rules, if any, during the processing of personal data, including that the Processor shall:

1. collect and use the personal data of the data subject only for the purposes and to the extent specified by LIAA;
2. shall not disclose the personal data of the data subject, unless provided for by laws and regulations or unless it is necessary for the protection of rights and interests provided for by laws and regulations;
3. implement appropriate technical and organisational measures to ensure the protection of personal data when processing;
4. ensure that those authorised to process personal data are committed to confidentiality;
5. ensure that personal data are not accessible to third parties and immediately inform LIAA of cases in which third parties have access to personal data;
6. ensure that any natural person acting under the authority of the processor who has access to the personal data does not process it without the instructions of the LIAA;
7. erase personal data collected and processed on behalf of LIAA as soon as the legal basis for their processing ceases to exist.

Taking into account the state of the art, the costs of implementation and the nature, extent, context and purposes of the processing, the LIAA requires the processor to implement appropriate technical and organisational measures to ensure an adequate level of security. The Processor shall implement the minimum technical protection of personal data by physical and logical safeguards, ensuring:

1. protection against compromise of personal data due to physical exposure;
2. protection by software, passwords, encryption, cryptography and other logical means of protection.

## **Personal data controller.**

37. The Data Controller is the Investment and Development Agency of Latvia, Pērses iela 2, Riga, LV-1442, phone: 67039400, e-mail: [pasts@liaa.gov.lv](mailto:pasts@liaa.gov.lv)

38. For questions regarding the data processing process, the LIAA may be contacted:

- by e-mail to [pasts@liaa.gov.lv](mailto:pasts@liaa.gov.lv) or [datu.aizsardziba@liaa.gov.lv](mailto:datu.aizsardziba@liaa.gov.lv)
- by submitting an application in person or by post.

The Controller shall be entitled to unilaterally amend this Privacy Policy at any time in accordance with the applicable laws and regulations by informing the data subjects thereof by e-mail or via the Controller's website.

[1] Any information relating to an identified or identifiable natural person.

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

[3] Cookies are small pieces of information that a website stores on a data subject's computer or mobile device when they visit a website. It allows the server to collect information from the data subject's browser so that the data subject does not have to re-enter data when they return to the website or move from one page to another. More information on how cookies work is available at [www.cookiecentral.com](http://www.cookiecentral.com).