

**AS "RIGA PORT" GROUP COMPANIES
PRIVACY POLICY**

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1. Terms, definitions, abbreviations

- 1.1. RP - AS "Riga Port", Registration No 40103523241.
- 1.2. RP Group - the RP and the capital company in which the RP directly or indirectly holds shares.
- 1.3. RP Group Company - RP or a corporation in which RP directly or indirectly owns shares and is bound by this Policy.
- 1.4. RP Management - RP Group company SIA "Riga Port Management", single registration No.40103353827, which provides management services (including but not limited to accounting, legal, personnel management, information systems services) to RP Group companies under a contract.
- 1.5. Controller - an RP Group company to which the Data Subject has provided his or her Personal Data on the basis of a contractual or pre-contractual relationship or whose services the Data Subject (or a legal person or entity of which the Data Subject is the beneficial owner) intends to use or uses. The Controller shall carry out the Processing of Personal Data and determine the purposes and means of the Processing and shall be responsible for the Processing of Personal Data in accordance with the requirements laid down by law.
- 1.6. Data Subject - a natural person who can be identified, directly or indirectly, and whose personal data is held by an RP Group company (e.g. employee, whistleblower, visitor, website user, applicant, customer, contractor, participant in a procurement procedure, authorised representative, beneficial owner, contact person, protected user and other persons not listed here).
- 1.7. Regulation - 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/EK (General Data Protection Regulation)
- 1.8. Personal Data - any information relating directly or indirectly to an identified or identifiable natural person (Data Subject).
- 1.9. Processing - any action (including collection, recording, storage, alteration, access, request, transfer, copying, erasure, etc.) of Personal Data.
- 1.10. Employee - a natural person who performs specific duties under the direction of an employer for a fixed remuneration on the basis of an employment contract in an RP Group enterprise.
- 1.11. Policy - This is the privacy policy for RP Group companies.
- 1.12. Personal data breach - a breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data processed.

The terms and concepts used in the Policy, which are related to the protection of Personal Data, insofar as they are not defined differently, correspond to those terms and concepts specified in the Regulation, the Law on Processing of Personal Data and other applicable laws and regulations in Latvia regarding the processing of Personal Data.

2. General Provisions

- 2.1. The purpose of the Privacy Policy is to provide the Data Subject with information on the purpose of the processing of Personal Data carried out by RP Group companies, the legal basis for the processing, the scope of the processing, the time limits for the processing, the safeguards, as well as the Data Subject's rights in relation to the processing of Personal Data.
- 2.2. The Privacy Policy is applicable to any Data Subject whose Personal Data is processed by an RP Group company, regardless of the form and manner in which the Data Subject

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provides Personal Data - in person or verbally, on paper, by telephone, by electronic mail, on a website or otherwise, and regardless of the systems, digital storage methods and form in which the Personal Data is processed by an RP Group company.

- 2.3. RP Group companies are concerned about the privacy of Data Subjects and the protection of Personal Data, respecting the rights of Data Subjects to lawful processing of Personal Data in accordance with applicable national data protection laws, the Regulation and other applicable privacy and data processing laws.
- 2.4. The Policy applies to all RP Group companies listed in Section 3.3 of the Policy. The RP Group's Board is responsible for ensuring compliance with the Policy.

3. About the Controller

- 3.1. Each RP Group company may be a controller, processor or joint controller when processing Personal Data of a Data Subject.
- 3.2. The Data Controller is the RP Group company that holds the Data Subject's Personal Data obtained, for example, on the basis of a contractual relationship or prior to the establishment of a contractual relationship, by the Data Subject submitting an application or visiting the RP Group company's premises, or otherwise.
- 3.3. The following RP Group companies are the processors and controllers of Personal Data:

<i>Name</i>	<i>Reg. No.</i>	<i>Registered office</i>	<i>E-mail address</i>
AS "Rīga Port"	40103523241	Eksporta ielā 15 k-1, Rīga, LV-1045	info@rigaport.lv
SIA "RĪGAS CENTRĀLAIS TERMINĀLS"	40103626836	Eksporta ielā 15 k-1, Rīgā, LV-1045	info@rigaport.lv
AS "BALTIJAS TRANZĪTA SERVISS"	40003444208	Andrejostas ielā 29, Rīgā, LV-1045	info@btserviss.lv
SIA "Ekspostostas īpašumi"	40003020348	Eksporta ielā 15 k-1, Rīgā, LV-1045	info@rigaport.lv
SIA "Rīga Port Electric"	40003752513	Eksporta ielā 15 k-1, Rīgā, LV-1045	info@rigaport.lv
SIA "Rīga Port Management"	40103353827	Eksporta ielā 15 k-1, Rīgā, LV-1045	info@rigaport.lv
SIA "Rīgas Ogļu Termināls"	40103543661	Eksporta ielā 15 k-1, Rīgā, LV-1045	info@rigaport.lv
SIA "Rīga Port Terminal"	40003242169	Eksporta ielā 15 k-1, Rīgā, LV-1045	info@rigaport.lv
SIA "Rīgas beramkravu termināls"	40003810510	Eksporta ielā 15 k-1, Rīgā, LV-1045	info@rigaport.lv
SIA "JUTA TERMINĀLS"	50003256781	Eksporta ielā 15 k-1, Rīgā, LV-1045	info@rigaport.lv
SIA "KRAVU EKSPEDĪCIJA"	40003796950	Eksporta ielā 15 k-1, Rīgā, LV-1045	info@rigaport.lv
SIA "Rīga Ropax Terminal"	40203289209	Eksporta ielā 15 k-1, Rīgā, LV-1045	info@rigaport.lv
SIA "Rīga Port Agency"	40203378367	Eksporta ielā 15 k-1, Rīgā, LV-1045	info@rigaport.lv
SIA "Rīga fertilizer terminal"	40103261378	Jūrkalnes iela 48 k.1, Rīga, LV-1005	info@rft.lv

4. Contact details

The contact details of each RP Group company for matters related to the processing of Personal Data and for reporting possible Personal Data breaches are set out in Section 3.3 of the Policy. You can ask further questions about the processing of your personal data using the contact details above. A request to exercise your rights may be made in accordance with the procedure set out in Section 11 of the Privacy Policy.

5. Purpose of the processing of personal data

- 5.1. RP Group companies process Personal Data for the following purposes:
 - to comply with external legal requirements;
 - to ensure the operation of RP Group companies;
 - for the delivery of services by RP Group companies;
 - for the conclusion and performance of contracts;
 - to ensure quality of service;
 - maintaining the information and technical systems needed to deliver services;
 - to identify the Data Subject;
 - to communicate with the Data Subject;

- to provide information and offers to the Data Subject, including for new services;
- for administering invoices and other financial documents;
- accounting, planning, statistics;
- for record-keeping;
- for organising staff training, maintaining and assessing their skills;
- for designing, maintaining and ensuring internal processes;
- for the processing of applications/complaints and other documents from the Data Subject;
- to prevent, investigate and deter crime and misconduct;
- fraud prevention;
- to ensure compliance with national and international sanctions;
- effective cash-flow management, including payment and debt administration, debt recovery actions (alerting, litigation, recovery);
- to provide information to public administrations in the cases and to the extent provided for in external legislation;
- to protect property;
- to protect a person's vital interests, including life and health;
- to obtain evidence for insurance purposes;
- to ensure the security of port facility;
- for video surveillance in the grounds and premises;
- other specific purposes of which the Data Subject is informed prior to the provision of the data.

5.2. In any of these cases, the RP Group company shall process Personal Data in a proportionate and necessary manner, to the extent sufficient for that purpose and only to the extent permitted by the specific purpose for which the Data is processed.

6. Categories and types of personal data

6.1. RP Group companies process mainly the following categories and types of Personal Data:

<i>Data category</i>	<i>Examples*</i>
Identification data	name, surname, personal identification number/ID, date of birth, place of birth, identity document number and date of issue, country and issuing authority, period of validity, position, photo
Contact details	address, telephone number, e-mail address
Special categories of data	Health data (including breath alcohol concentration data), trade union membership data, race,
Employment data	employer/previous employer details, occupation, work experience, education, professional certificates, details of current employment, positions, professional activities
Contract (transaction) details	contract number, signature/approval data, type, title, status, contractors,

	contract term, number of annexes, date of annex, transaction value, tariffs
Data required for the preparation and performance of the contract	mandatory data on the goods, the customer's cargo, its location, vehicle data, vehicle registration certificate data, information provided by the protected user (his representative) on the reasons why a reduction should be granted, etc.
Location data	data on the person's access to the territory/ premises of the RP Group company using the issued personal pass, vehicle and employee location data, details of absence (duration, reason)
Settlement details	current account number, invoice number, date, amount, type of invoice, due date, amount owed, debt recovery information, payment history, balance sheet
Visual (video) data	video data at RP Group company sites and RP Group company events, date and time of recording
Photos and images	photos from RP Group events, date and location of photos, posting of employee photos on websites under contact details
Activities on websites	visitor's IP address, date, time, duration of visit, data downloaded, sections viewed, actions taken on the portal
Information about the object (vehicle, immovable property, land unit or structure, construction project, address for service)	address, name, cadastral number, designation, land registry data, cadastral data, vehicle and registration certificate data
Access data to systems, databases	access to systems and databases and usernames and passwords granted to employees, the outsourced service provider, the client
System audit data	date, operator, type of activity
Communication data	type, number, date, registrant, content, channel, delivery status of incoming/outgoing communication
Consent information	Subject-by-subject indication of consent given by the data subject, date and time of consent, source, type
Data on objections/complaints/whistleblower reports	Number and content, date of registration/resolution, type, description
Data reflected in applications/requests	Data reflected in the Data Subject's application
<u>User-generated data on RP Group company websites</u>	<u>Click and visit history (for further information, please refer to the Cookie Policy on the RP Group company website).</u>

*Examples do not include an exhaustive list of the data in the data category. Only data or a set of data that allow, directly or indirectly, the identification of a natural person shall be protected. Listed data of one or more categories without being linked to a specific natural person do not in themselves constitute a protected data object.

7. Legal basis for processing personal data

7.1. RP Group companies process Personal Data of the Data Subject on the following legal grounds:

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- 7.1.1. The data subject's written consent to the processing of Personal Data for specified purposes (Article 6(1)(a) of the Regulation). The Data Subject's consent is his or her free will and independent decision, which may be given at any time, thereby authorising the processing of Personal Data for the purposes specified. The Data Subject's consent shall be binding on them. The Data Subject may provide consent to the processing of his or her Personal Data in writing to the RP Group company in person, by post or electronically if the document is signed with a secure electronic signature. The Data Subject shall have the right to withdraw his or her prior consent at any time through the indicated communication channels. The notified changes will take effect within three working days; Withdrawal of consent shall not affect the lawfulness of data processing based on the consent given before the withdrawal;
- 7.1.2. for the conclusion and performance of a contract to which the Data Subject is a party or for the performance of measures at the request of the Data Subject prior to the conclusion of the contract (Article 6(1)(b) of the Regulation), e.g. telephone or e-mail address information provided in the contract is used only to communicate with the Data Subject;
- 7.1.3. to comply with a legal obligation imposed on RP Group companies to comply with external legislation, such as:
- conducting customer due diligence to ensure compliance with sanctions and avoiding involvement in money laundering and terrorist financing;
 - organising electricity distribution system services;
 - providing the statutory reduction of the protected user's payment and accounting for the processing of information reflecting the service and billing information received and the payment reduction granted;
 - ensuring control of the free customs procedure; ensuring the operation of the port facility security system;
 - organising rail services;
 - maintaining rail infrastructure and ensuring rail safety;
 - keeping unauthorised persons away from railway infrastructure and RP Group companies' facilities, thus ensuring the maintenance of public order and the safe organisation of railway traffic;
 - keeping records and analysing railway accidents;
 - organising accounting and record-keeping;
 - renting out immovable property;
 - taking the necessary precautions to prevent or, if this is not possible, reduce pollution of the environment or the risk thereof;
 - etc. (Article 6(1)(c) of the Regulation).
- 7.1.4. to protect the vital interests of the Data Subject or of another natural person, e.g. by video surveillance to protect the life, health of natural persons (Article 6(1)(d) of the Regulation);
- 7.1.5. to pursue or defend the legitimate interests of the RP Group company or of third parties (Article 6(1)(f) of the Regulation). The legitimate interests of RP Group companies are, for example, to:
- carry out commercial activities;
 - verify the identity and legal capacity of the Data Subject before the conclusion of the contract or during the Data Subject's service - by telephone, electronically, in person;

- ensure compliance with contractual obligations;
- send messages or otherwise communicate about the progress of the Contract and events relevant to the performance of the Contract;
- inform about changes to the service and the price list;
- consider applications, requests, reports, complaints from the Data Subject;
- administer payments and debts;
- provide electricity trading services;
- provide cargo handling, accounting, IT, etc;
- provide and administer property rental, management and administration services;
- implement and maintain the information and technical systems needed for record-keeping, personnel management and service delivery;
- maintain and manage buildings, structures and land;
- provide information activities on the services provided;
- ensure efficiency in the provision of services, sales and delivery of goods;
- ensure effective corporate governance processes;
- inform the public about the company's activities;
- ensure and improve the quality of services and service;
- keep customers informed about new developments and opportunities in the sector;
- training and employing of trainees;
- avoid undue financial risks to business (including credit risk assessment before and during the sale of goods and services);
- collect debts, protect the interests of RP Group companies in court and before other public authorities;
- prevent fraud, corruption and other criminal offences;
- inform the public about the company's activities;
- analyse, develop and implement improvements to the websites of RP Group companies;
- provide health insurance for employees;
- promote physical activity and sport for workers;
- in certain cases, also with the consent of the Data Subject;
- providing corporate governance, financial and business accounting and analysis;
- comply with national and international sanctions;
- apply to public administration and law enforcement authorities and the courts to protect legal interests;
- building the public image and visibility of the RP Group.

8. Scope of processing and protection of personal data

- 8.1. RP Group companies process Personal Data to the extent necessary to achieve the purposes set out in the Policy and in the manner required and permitted by the laws and regulations of the Republic of Latvia and the European Union.
- 8.2. RP Group companies and their contracted Personal Data Processors shall ensure the confidentiality of Personal Data. RP Group companies regularly review and improve their Personal Data protection measures to prevent Personal Data from being compromised and to protect Personal Data from unauthorised access, accidental loss, disclosure or destruction. To ensure this, RP Group companies shall make use of modern technological capabilities, taking into account the privacy risks involved and the reasonable organisational, financial and technical resources available to RP Group companies, including at least the following security measures:
- internal legislation on Personal Data Protection;
 - confidentiality rules for employees of RP Group companies;
 - Contracts/agreements with contractors governing the protection of personal data;
 - restricted/controlled access to the property and information systems of RP Group companies where Personal Data is processed;
 - Educating employees of RP Group companies on Personal Data Protection;
 - various protection mechanisms for information technology, such as firewalls, secure passwords, intrusion protection and detection programmes, data encryption mechanisms, etc;
 - safety measures are implemented in accordance with fire safety regulations and general regulatory requirements for the safe operation and protection of electrical equipment (to protect the technical resources and information of RP Group companies from emergency conditions);
 - RP Group companies shall put in place measures to control the entry and presence of persons on the premises of RP Group companies where processing of personal data is carried out.
- 8.3. RP Group companies shall not be held liable for any unauthorised access to Personal Data and/or loss of Personal Data where this is beyond the control of the RP Group company, for example due to the fault and/or negligence of the Data Subject (e.g. loss of password).
- 8.4. In the event of a personal data breach, the RP Group company will notify the Data Subject.
- 8.5. RP Group companies do not carry out automated decision-making and processing of Personal Data in relation to the Data Subject.

9. Transfer/disclosure of personal data

- 9.1. RP Group companies may transfer Personal Data to persons to whom the RP Group company has the right (for the exercise of its legitimate interests) or obligation to disclose them in accordance with laws, regulations or concluded agreements, or if the Data Subject's explicit and unambiguous consent has been obtained.
- 9.2. RP Group companies do not regularly or systematically transfer Personal Data to third countries (i.e. countries outside the European Union and the European Economic Area), however, Personal Data held by RP Group companies may be processed by developers or service providers located in third countries (for the purposes of the Regulation - transfer of Personal Data to third countries) in the capacity of a data processor. In this case, when transferring Personal Data, the RP Group company shall ensure that the

procedures laid down in the laws and regulations ensure the processing of Personal Data and a level of protection equivalent to that provided for in the Regulation.

- 9.3. In addition to the provisions of Clause 9.1, the RP Group company - Riga Port Electric Ltd - as an electricity trader, may receive and transfer the data of the protected user (its representative) to the following persons: (1) the information system managed by the State Construction Control Bureau, which ensures the granting and cancellation of the protected user status, (2) the person designated by the protected user to the contractor to whom the payment reduction due to the protected user will be applied, (3) the person in whose interest the application for the protected user marketing service will be submitted, (4) from the person applying for the protected user marketing service.

10. Duration of storage of personal data

- 10.1. RP Group companies shall not retain personal data for longer than is necessary for the purpose of the processing or longer than is required by external law. The duration of storage of Personal Data is determined by various criteria, such as external legal requirements, technical possibilities for storing Personal Data, etc.
- 10.2. RP Group companies store and process personal data of Data Subjects for as long as at least one of the following conditions exists:
- 10.2.1. as long as there is an obligation to retain the data under external law, e.g. in the performance of obligations under the Accounting Law, the Law on Archives, the Law on Prevention of Money Laundering and Financing of Terrorism and Proliferation;
- 10.2.2. as long as the contract concluded with the Data Subject is valid;
- 10.2.3. while RP Group companies pursue their legitimate interests (e.g. handling claims, defending rights, resolving issues, upholding lawsuits or complying with statutes of limitations, etc.);
- 10.2.4. visual (video) data is stored for a maximum of 1 (one) month after it was recorded. After 1 (one) month, the relevant data shall be deleted, except in cases where a specific video recording has been requested by a law enforcement authority during its retention period for the investigation of a criminal offence or, when recording the signs of a criminal offence, the Controller or the Controller's employees have separately retained the relevant recording as evidence to be used to protect the rights and interests of the Controller in accordance with the procedure established by laws and regulations.
- 10.3. After the circumstances referred to in paragraph 10.2 of the Policy cease to exist, the Personal Data shall be deleted, unless another retention period is provided for by external law.

11. Rights of the data subject

- 11.1. The Data Subject shall have the following rights with respect to the Processing of his or her data classified as Personal Data under applicable laws and regulations:
- 11.1.1. to receive the information about the Controller and the Processing provided for in the laws, regulations and administrative provisions (Article 13 of the Regulation);
- 11.1.2. to obtain information as to whether the Data Controller processes the Personal Data of the Data Subject concerned and to have access to the Personal Data processed, as well as to obtain the information required by laws and regulations (Article 15 of the Regulation);
- 11.1.3. request that the Controller rectifies or supplements inaccurate, incomplete or incorrect Personal Data of the Data Subject;

- 11.1.4. request the erasure of their Personal Data, except where the Personal Data whose erasure is requested is processed on the basis of another legal basis, such as a contract or obligations under the relevant laws or regulations;
- 11.1.5. request to restrict the Processing of their Personal Data in accordance with applicable laws and regulations while the Controller assesses the validity of the request in accordance with applicable laws and regulations;
- 11.1.6. to receive their Personal Data provided by them and processed on the basis of the Data Subject's consent or in the performance of a contractual obligation with the Data Subject in a structured, commonly used and machine-readable form and, where technically feasible, to transfer such data to another service provider (data portability);
- 11.1.7. object to the Processing of their Personal Data where the Processing is based on the legitimate interests of the Data Controller, except where necessary in connection with legal proceedings or litigation, or where the legitimate interests of the Data Controller override the interests, rights and freedoms of the Data Subject;
- 11.1.8. lodge a complaint with the data protection supervisory authority (the Data State Inspectorate (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 the laws and regulations applicable to the protection of Personal Data;
- 11.1.9. to be informed in the event of a Personal Data breach in relation to his or her Personal Data which may result in a high risk to the rights and freedoms of the Data Subject.
- 11.2. The Data Subject shall exercise the rights set out in the Policy and in the law by contacting the Controller:
 - by arriving at the Controller's registered office (Section 3.3 of the Policy) and presenting an identity document;
 - via e-mail - by signing the letter with a secure electronic signature and sending it to the Controller's e-mail address specified in Section 3.3 of the Policy;
 - by writing to the RP Group company at its registered office.
- 11.3. Upon receipt of a Data Subject's request, the RP Group Company shall verify the identity of the Data Subject and assess and comply with the request in accordance with the law. In order for the Data Subject to receive information about themselves, the RP Group company will need to identify the Data Subject, as RP Group companies cannot provide information to a person without verifying that the information is provided directly to the Data Subject. Depending on the specific situation, the RP Group company may ask the Data Subject to prove his or her identity with an identity document or otherwise.
- 11.4. The RP Group company shall have the right to refuse to comply with the Data Subject's rights in the cases provided for by the regulatory enactments, as well as in the case when the Data Subject unreasonably refuses to provide his/her identifying information.
- 11.5. The Data Subject must take into account the opening hours of RP Group companies.
- 11.6. RP Group companies shall reply to the Data Subject in accordance with the manner of receipt of the reply indicated by the Data Subject.
- 11.7. If the reply is sent by post, it shall be addressed to the person whose Personal Data has been requested by registered letter. If the reply is provided electronically, it shall be signed with a secure electronic signature (if the application has been submitted with a secure electronic signature or if the email address of the Data Subject is provided in the application).
- 11.8. The RP Group company shall ensure that the requirements for the processing and protection of Personal Data are met in accordance with the law and, in the event of an objection by the Data Subject, shall take the necessary action to resolve the objection.

However, if this fails, the Data Subject has the right to apply to the supervisory authority, the Data State Inspectorate, 17 Elijas iela, Riga (www.dvi.gov.lv).

- 11.9. The data subject has the right to receive, free of charge, information about personal data processed by an enterprise of the RP Group concerning him or her.
- 11.10. The receipt and/or use of information about yourself may be restricted in order to prevent adverse effects on the rights and freedoms of others (including employees of RP Group companies) or where the provision of data is prohibited by external law.
- 11.11. Where requests for information are manifestly unreasonable or excessive, in particular because of their regular recurrence, the RP group undertaking may either: (a) charge a reasonable fee taking into account the administrative costs involved in providing the information or communication or carrying out the action requested; or (b) refuse to comply with the request.

12. Visits to websites and processing of cookies

- 12.1. RP Group companies' websites may use cookies.
- 12.2. Cookies are small text files that the Site creates and stores on the Data Subject's device (computer, tablet, mobile phone, etc.) when the Data Subject visits the Site in order to recognise the Internet user and facilitate the use of the Site. Cookies "remember" the Data Subject's experience and basic information as a user of the Site and thus improve the ease of use of the Site and the ability of the Data Subject to obtain information of interest.
- 12.3. Internet browsers may be configured to warn the Site visitor about the use of cookies and to allow the choice of whether the Data Subject, as a Site visitor, agrees to accept them. Not accepting cookies will not prevent the Data Subject from using the Site, but it may limit the use of the Site, for example by limiting the speed of the Site.
- 12.4. The cookies collected on the Site do not contain personal data and are not used to identify a person, i.e. the information cannot be linked to any specific person.
- 12.5. Cookies are used to process data on the history of use of the Site, to diagnose problems and deficiencies in the operation of the Site, to collect statistics on the habits of users of the Site, as well as to ensure the full and convenient use of the functionality of the Site.
- 12.6. If the Data Subject does not wish to allow the use of cookies, the Data Subject may stop the use of cookies by changing the settings of his/her web browser, however, in such case the use of the Site may not be possible. Deleting stored cookies is possible in the settings section of the internet browser of the Data Subject's device by deleting the history of stored cookies. Cookies cannot contain computer viruses, nor can they be used to install spyware or malware on the Data Subject's device.
- 12.7. Further information and specific rules on cookies can be found on the respective RP Group company's in the cookie policy on the website, as the cookies used may vary from Site to Site.

13. Information to data subjects on video surveillance by RP Group companies

- 13.1. The Controller shall indicate the Personal Data obtained as a result of the video surveillance in the information signs on the video surveillance.
- 13.2. The purpose of video surveillance is to:
 - 13.2.1. protect property, including documents and information (e.g. protect movable and immovable property of RP Group companies against unlawful activities, thereby reducing the risk of damage);

- 13.2.2. protect the vital interests of persons, including their health and life (e.g. to protect the life and health of persons who may be endangered by dangerous installations, to reduce accidents at work);
- 13.2.3. ensure that ship and port security measures (e.g. prevention of hazards to ships and port facilities, provision of a safe service) provided for by laws and regulations are implemented;
- 13.2.4. ensuring safety (e.g. preventing safety hazards to railway infrastructure, providing a safe service)
- 13.2.5. monitoring access (e.g. to the site, buildings);
- 13.2.6. monitoring order in relations with visitors and employees of the premises and buildings (e.g. ensuring compliance with the pass regulations, technological processes, work rules, internal regulations and occupational health and safety requirements);
- 13.2.7. monitoring polluting activities in the areas of the RP Group companies where the activities are carried out in order to prevent the spread of pollution in good time;
- 13.2.8. ensure that accidents are recorded and the circumstances of the accidents are established.
- 13.3. The purpose of video surveillance is to prevent, detect and investigate unlawful activities, incidents and infringements and to preserve evidence of such activities in relation to the purposes of video surveillance set out above.
- 13.4. The basis for the processing of Personal Data obtained as a result of video surveillance - Article 6(1)(d) and (f) of the Regulation, as the processing of Personal Data is necessary to protect the vital interests (in particular life and health) of the natural person, as well as to ensure the legitimate interests of the RP Group company.
- 13.5. The following conditions shall be complied with in order to achieve the purpose of the video surveillance:
 - 13.5.1. video surveillance is carried out within a perimeter such that no more of the site is monitored than is necessary to achieve the purpose of the video surveillance;
 - 13.5.2. video surveillance is not carried out in areas where a person has a particularly high expectation of privacy (e.g. toilets, changing rooms, shower rooms);
 - 13.5.3. information signs on video surveillance are posted at the video surveillance sites in accordance with the requirements set out in the Regulation and other regulatory enactments. Other requirements of the Regulation are communicated to the Data Subject in this Policy;
 - 13.5.4. Personal data collected during video surveillance is collected from the Data Subject who is within the field of view of the installed video surveillance equipment, without personal identification.
- 13.6. The retention period of Personal Data collected during video surveillance is set out in Section 10.2.4 of the Policy.
- 13.7. 1Categories of data processed during video surveillance - visual (video) data, such as recordings and video images, photo recordings, date and time of recording.
- 13.8. Personal data collected during video surveillance may be transmitted, transferred or made available to the following recipients:
 - 13.8.1. Pre-trial investigation authorities, subjects of operational activity, state security authorities, prosecutor's office (to obtain evidence in criminal cases), courts (to obtain evidence in pending cases) and other state administration authorities in cases stipulated by regulatory enactments upon receipt of a substantiated request;
 - 13.8.2. RP Group companies and their authorised persons involved in the administration of the CCTV system or for the purpose of processing for those purposes, outsourced providers

of maintenance, development or servicing of the CCTV system, security service providers providing security services, insurance service providers for the investigation of insurance claims, other persons involved in the provision of services to RP Group companies, including providers of archiving, document destruction services on the basis of a contract or internal regulations of RP Group companies;

- 13.8.3. to the Data Subject on the basis of a written application.
- 13.9. The procedures for the transfer of personal data are laid down in the Controller's internal legislation and are monitored.
- 13.10. Personal data collected during video surveillance will not be transferred to third countries or international organisations.
- 13.11. Data Subject Rights (in addition to those set out in Section 11 of the Policy):
 - 13.11.1. obtain, upon written request, all the information collected about him or her as a result of video surveillance, unless disclosure is prohibited by law or the information has already been deleted;
 - 13.11.2. within one month of the date of the request, receive the above information free of charge or be reasonably refused;
 - 13.11.3. access to information relating to their Personal Data obtained during video surveillance which is held by the Controller (including where it is technically accessible) but cannot be rectified or supplemented, otherwise it will be considered falsification or misrepresentation of information.
- 13.12. RP Group companies reserve the right not to release CCTV footage in cases where such release:
 - 13.12.1. would affect other data subjects and it would not be technically feasible to release the information without prejudice to the rights of other data subjects;
 - 13.12.2. affecting the release of information from port facility security CCTV systems;
 - 13.12.3. require an excessive commitment of time, staff or financial resources because of their size or complexity.

14. Policy availability and amendments

- 14.1. Policy Version 05 is effective from the date of its approval.
- 14.2. The Policy is available at www.rigaport.lv , as well as in the Human Resources Department of RP Management during business hours.
- 14.3. Amendments and additions to the Policy may be made at any time by informing/ making them available to the Data Subject, by posting the relevant information on the Website www.rigaport.lv and by ensuring the availability of the current version of the Policy in the Human Resources Department of RP Management during its working hours.
- 14.4. The RP retains the previous versions of the Privacy Policy and these are available in the RP.
- 14.5. Register of changes

Version	Date	Description of changes	Reviewer
01	08.2019	Original version	
02	09.2020	Clarification of the list of RTO Group companies specified in Section 3.3 (deletion of Ostas projekti SIA, which is no longer an RTO Group company), as well as the addresses of the companies (taking into account the move from Andrejostas iela 29,	

03	12.07.2022.	<p>In Section 1.6, the term is clarified by adding 'protected user'</p> <p>In Section 3.3 the list of controllers of Personal Data within the RTO Group is updated;</p> <p>In Section 6.1 the data categories and examples have been specified</p> <p>In Section 7.1.3 the examples have been supplemented;</p> <p>Section 9.3 has been added</p> <p>Section 11.7 clarifies the communication of the response to the Data Subject</p> <p>Section 11.8 specifies the address of the State Data Inspectorate;</p> <p>Sections 13.2.3., 13.2.4. specify the purposes of video surveillance;</p>	
04	09.01.2023	<p>In connection with the reorganisation of SIA "Rīgas tirdzniecības osta", unified registration No 40003755064, registered with the Register of Enterprises on 28.12.2022, as a result of which SIA "Rīgas tirdzniecības osta" has been merged with AS "Rīga Port", unified registration No 40103523241, and has ceased to exist without liquidation proceedings, as well as in connection with other changes in the Policy text:</p> <ul style="list-style-type: none"> • Rīga Commercial Port and RTO have been replaced by Rīga Port and RP; • RTO Management replaced with RP Management; • RTO Elektrotīkli replaced with Rīga Port Electric; • In Section 3.3 SIA "Rīgas tirdzniecības osta", AS "ŽURNĀLI UN DIENA" have been deleted. AS "RTO Ieguldījumi" 	
05	28.02.2023.	<p>Categories and types of personal data specified (including user-generated data on the RP website)</p>	