

## **LLC Saules aptieka Personal Data Processing Policy**

In order to provide quality services to the customers, LLC (SIA) Saules aptieka needs to collect, process and use certain types of information about individuals. This Personal Data Processing Policy (hereinafter the Policy) explains how LLC Saules aptieka processes personal data, determines the procedure for exercising the rights of the data subject and other issues related to the protection of personal data.

LLC Saules aptieka, as a controller, performs the processing of personal data in accordance with General Data Protection Regulation 2016/679 (hereinafter the Regulation), the Personal Data Processing Law, the Law On the Rights of Patients, the Medical Treatment Law as well as other laws and regulations in force in Latvia. LLC Saules aptieka ensures the confidentiality of personal data within the framework of the applicable laws and regulations and implements appropriate technical and organisational measures for the protection of personal data. LLC Saules aptieka protects personal data by using modern technological possibilities, taking into account the existing privacy risks and reasonably available organisational, financial and technical resources.

### **Data controller and its contact information**

Personal data controller - LLC Saules aptieka, unified registration No. LV40003373494, registered office: O. Vācieša 13, Riga, LV1004.

Contact information for issues related to personal data processing and protection: *dataspecialists@saulesaptieka.lv* By using this e-mail address or contacting LLC Saules aptieka at its registered office, it is possible to ask a question about the processing and protection of personal data by LLC Saules aptieka. A request for the exercising of your rights may be submitted in accordance with the procedures set forth herein and in accordance with the laws and regulations.

### **Obtaining and processing of personal data**

LLC Saules aptieka basically obtains personal data from the data subject when providing pharmaceutical care services, or from cooperation partners, state institutions or third parties, if it has a legal reason. LLC Saules aptieka also obtains personal data via the LLC Saules aptieka website: [www.saulesaptieka.lv](http://www.saulesaptieka.lv). Personal data of the data subject are processed in paper or electronic form. The processing of personal data is carried out by authorised employees of LLC Saules aptieka as well as processors of LLC Saules aptieka, with whom an appropriate agreement has been entered into. The processing of personal data mostly takes place to enable LLC Saules aptieka to provide pharmaceutical services to customers, fulfil any of the obligations or exercise any right set forth in the laws and regulations.

In order for LLC Saules aptieka to provide pharmaceutical care to customers, it may also be necessary to process specific categories of personal data.

LLC Saules aptieka is applying the Policy to ensure the protection of privacy and personal data concerning the Customers:

- ✓ individuals – customers (including potential, former and existing ones) and other service users, as well as third parties who receive from or transfer to LLC Saules aptieka, any information in connection with the provision of services to an individual;
- ✓ employees (including potential, former and existing ones);
- ✓ visitors of internet pharmacy and maintained websites.

## **Purposes/objectives, legal grounds and principles of personal data processing**

LLC Saules Aptieka only processes personal data for the following purposes, if there are legal grounds to do so:

✓ **Providing pharmaceutical care** (including providing services in the digital environment) - for the provision of services, the supply of goods and the provision of warranty services (for the performance of contractual obligations), the improvement, development and promotion of the assortment and services offered by the pharmacy (including the provision of commercial communications until the customer's consent is valid); for communicating with customers; to conduct customer surveys.

✓ **Pharmaceutical care planning and analytics** - for statistics and business analysis; planning and accounting; measuring effectiveness; market and public opinion research; reporting.

✓ **For the effective provision of the business management process**, including informing the public about the work of the company; reviewing customer objections; customer retention, loyalty promotion; billing administration; maintaining websites and improving their operation; ensuring the provision of information to state and local government institutions in accordance with the procedures set forth by the laws and regulations.

✓ **Property protection and personal safety** - video surveillance can be carried out in the pharmacies of LLC Saules aptieka in order to capture a criminal offence, to identify potential offenders. In the "Saules Aptieka" pharmacy at Dunties iela 19a customers are served in the premises where CCTV cameras are deployed. Information about video surveillance is placed in the form of warning signs before the video surveillance zone. Video surveillance is carried out without audio recording and the recording is saved for up to 45 days. Requests by the data subject regarding the above video surveillance must be submitted to the controller LLC Skai Pluss by e-mail: [datuspecialists@skyandmore.lv](mailto:datuspecialists@skyandmore.lv).

✓ **Personnel management** - to provide for recruitment and management processes with respect to the potential, existing and former employees.

## **Legal grounds for the processing of personal data**

LLC Saules aptieka processes the personal data based on the following legal grounds:

- ✓ entering into and fulfilment of a contract - in order to enter into the contract after receipt of the Customer's application and ensure its fulfilment;
- ✓ to perform the laws and regulations - in order to fulfil the duties of LLC Saules aptieka defined in binding external laws and regulations, including the provision of pharmaceutical care;
- ✓ in accordance with the consent of the Customer, the data subject;
- ✓ for lawful (legitimate) interests - in order to implement the lawful (legitimate) interests arising from the obligations existing between LLC Saules aptieka and the Customer, and from the law.

## **Data protection principles**

LLC Saules aptieka processes personal data:

- ✓ lawfully, in good faith and in a way transparent for the data subject;
- ✓ adequately, appropriately and limited only to those needed to attain the purposes of processing;
  - ✓ only in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;
  - ✓ by storing personal data for no longer than necessary for the purposes for which they were processed;
  - ✓ by informing the customers why the processing of personal data is required.

### **Duration for the storage of personal data**

LLC Saules aptieka stores personal data according to the defined purposes of processing of personal data and legal grounds for the processing of personal data, while at least one of the following criteria exists:

- ✓ a legal obligation to store the data exists;
- ✓ it is necessary to implement the legitimate interests;
- ✓ it is necessary to fulfil the contractual obligations assumed;
- ✓ the consent of the data subject to the processing of data is valid.

In individual cases, LLC Saules aptieka keeps your personal data in the archive to retain evidence, for historical purposes or for their use for statistical purposes. The period for which LLC Saules aptieka will retain personal data depends on the purpose for which they were collected, as well as to ensure the data retention requirements in accordance with the laws and regulations.

### **Personal data recipients**

LLC Saules aptieka does not transfer information to any third parties without a legal reason, and it registers persons who have received information from LLC Saules aptieka in the procedure set forth by the laws and regulations.

### **Personal data protection**

LLC Saules aptieka ensures, reviews on a regular basis and improves the personal data protection measures in order to protect personal data of individuals from unauthorised access, accidental loss, disclosure or destruction. To ensure this, LLC Saules aptieka enforces appropriate technical and organisational requirements. LLC Saules aptieka carefully evaluates all service providers that process personal data of individuals on behalf of and as per the assignment of LLC Saules aptieka, and also determines that the service providers (personal data processors) use appropriate security measures in order for the processing of personal data of individuals to be performed in conformity with the delegation of LLC Saules aptieka and the requirements of the laws and regulations.

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

- ✓ The right to be informed about why LLC Saules aptieka processes personal data.
- ✓ The right to request information about what personal data LLC Saules aptieka stores about the particular customer. We provide this information free of charge. We are obliged to respond within one month, unless we extend the period for the provision of a response to two months, taking into account the complexity and number of requests.
- ✓ The right to correct data. The customer is entitled to correct the data if they are inaccurate or incomplete. We are obliged to respond within one month. If we decide not to correct the data, we will provide you with an explanation of why we will not correct it, and will provide you with information about your right to file a complaint with the Data State Inspectorate.
- ✓ The right to the deletion of data (the right "to be forgotten") The Customer is entitled to request the deletion of his/her personal data or cessation of their processing. We will not always be able to fulfil your request, for example, if we are obliged to retain the information. If we decide not to delete the data, we will provide you with an explanation of why we will not delete the data, and will provide you with information about your right to file a complaint with the Data State Inspectorate.
- ✓ The right to restrict data processing in individual cases, the customer is entitled to restrict the processing of his/her personal data, for example, if the information is not accurate. If the processing of personal data is restricted, we may retain relevant information about it, to ensure that this right is respected in the future. If we decide to cancel such a restriction, we will notify you of it.

✓ The right to data portability If we process personal data in accordance with the consent of the customer (data subject) or based on the agreement, and data are stored in a structured, widely used and machine-readable format, the customer is entitled to request the transfer of personal data directly from one controller to another controller, if technically possible.

✓ The right to object. The customer may object to the use of his/her personal data for direct marketing purposes or for scientific or historical research purposes, or for statistical purposes, except where processing is necessary to fulfil a task performed in the public interest.

## **Personal data protection violations, complaints and comments**

### **Data protection violation**

If you are concerned about how we process your personal data, or you think something has gone wrong, for example, if you receive a letter from LLC Saules aptieka that is not addressed to you, please contact with data protection specialist, writing to an email: *datuspecialists@saulesaptieka.lv* and report a possible personal data protection violation.

In the event of a personal data security incident, if it will cause a potentially high risk to the rights and freedoms of the data subject, LLC Saules aptieka will notify such to the relevant data subject or the information will be published on the LLC Saules aptieka website, or in another possible way, as well as will ensure the provision of information to the Data State Inspectorate.

### **Complaints and comments**

If you wish to file a complaint or comment on how LLC Saules aptieka processes personal data, you can write to email: *datuspecialists@saulesaptieka.lv*. If you are still not satisfied with how LLC Saules aptieka deals with your complaint regarding the processing of personal data, you can contact: **Data State Inspectorate**, Blaumaņa 11/13-11, Riga, LV-1011, Telephone: 67 22 31 31; Fax: 67 22 35 56; E-pasts: [info@dvi.gov.lv](mailto:info@dvi.gov.lv).

### **Changes in the Policy**

LLC Saules aptieka has the right to make changes to this Policy at any time, which are published on the website <http://www.saulesaptieka.lv>, as well as displayed in the premises of LLC Saules aptieka.

This document was last updated on 21 January 2019.