

PERSONAL DATA PROCESSING POLICY

DURING THE EVENTS ORGANISED BY MARINE SERVICES GROUP

VERSION 06/2023

During the events organized by **Marine Services Group** personal data processing shall be carried out by the companies (and their branch and representative offices) within **Marine Services Group** as joint controllers:

- Marine Insurance Services SIA, reg. No. 40003693065, 4a Baznīcas Street, Riga, LV-1010, Latvia
- Marine Legal Services SIA, reg. No. 50003932671, 4a Baznīcas Street, Riga, LV-1010, Latvia
- Marine Shipment Services SIA, reg. No. 40103608826, 4a Baznīcas Street, Riga, LV-1010, Latvia
- Inter Survey SIA, reg. No. 40103169281, 4a Baznīcas Street, Riga, LV-1010, Latvia
- Mūsu Domīnija SIA, reg. No. 40003774934, 4a Baznīcas Street, Riga, LV-1010, Latvia

Contact details for communication on personal data processing issues:

- e-mail: info@marineservices.lv
- correspondence address: 4a Baznīcas Street, Riga, LV-1010, Latvia

1. PURPOSES OF PERSONAL DATA PROCESSING

Demonstration of the course of the events organized by **Marine Services Group** in mass media and social networks in order to promote recognizability of the brand name of **Marine Services Group**, and also in advertising materials in order to promote all present and future events organized by **Marine Services Group**.

2. WHAT PERSONAL DATA ARE PROCESSED?

When attending the events organized by Marine Services Group, the visitors of the events may be recorded on photographs and video, and they may also be asked to give interviews or express their opinion regarding the course of the events by recording the given name, surname and, where necessary, additional information which he or she would like to provide. In the case if the visitor acquires any prizes or wins in any of the competitions organized by Marine Services Group, the relevant photo and video materials may be used for creating the public image of Marine Services Group and for ensuring recognizability of the brand name, by publishing the photo and video materials on the social networks of Marine Services Group, and also on any other mass media. Also, especially, if a visitor has received an invitation to any of the events organized by Marine Services Group, then in order to ensure safe occurrence of the measure the information identifying the visitor may be additionally requested (the given name, surname, etc.)

3. WHAT IS THE LEGAL BASIS FOR THE PERSONAL DATA PROCESSING?

With a view to demonstrating the events organized by Marine Services Group on mass media and social networks in order to ensure the recognizability of Marine Services Group, personal data processing shall be carried out on the basis of Article 6(1) (a) and (f) of the General Data Protection Regulation, i.e.

- the companies within Marine Services Group as controllers are entitled to process personal data if the Data subject himself or herself has provided consent to his or her personal data processing for one or several purposes. The consent of a person is his or her free will and an independent decision which is provided voluntarily, thus allowing the companies within Marine Services Group as controllers to process personal data for the purposes laid down in the Policy. Consent of the person shall be binding if it is provided verbally (for example, before a measure and a person is provided with information in this policy that the personal data processing will be carried out and that the person agrees, by visiting the measure, giving interviews, taking photos and video knowingly, to the use of his or her personal data for the achievement of the objectives provided for in the policy). The person has the right to revoke his or her consent given previously at any time by using the contact information indicated in the Policy. Revocation of the consent does not affect the lawfulness of such data processing that was carried out while the consent of the person was effective. By revoking consent, data processing cannot

be discontinued which is carried out on the basis of other legal grounds, for example, on the basis of legitimate interests of the companies within Marine Services Group as controllers and third parties.

- the companies within Marine Services Group as controllers have a legitimate interest to demonstrate the measures organised thereby or the measures in which it participates on mass media and social networks, thus ensuring the recognisability of the brand name of Marine Services Group. The companies within Marine Services Group as controllers, when selecting what information to publish, shall always apply the highest ethical standards, thus trying to ensure that the rights and freedoms of the data subject will not be infringed by publications. Concurrently, the companies within Marine Services Group as controllers shall be aware that they, possibly, are not informed regarding all the facts and circumstances, therefore they shall, in order to ensure fair data processing, not prevent any of the data subjects from contacting the companies within Marine Services Group as controllers at any time by using the indicated information (e-mail: info@marineservices.lv), in order to object against data processing.

4. WHO CAN ACCESS THE INFORMATION?

The companies within Marine Services Group as controllers shall plan to keep the information obtained on the servers owned by them in the premises located at 4a Baznīcas Street, Rīga, LV-1010, Latvia, or to use Microsoft Cloud Azure cloud solutions. And also, the companies within Marine Services Group as controllers, in order to perform the fair data processing principle, shall explain that by complying with the circumstance that the purpose of the referred to data processing is to publish information regarding the measures of Marine Services Group, the obtained materials will be publicly accessible and any third person will be able to access them.

5. TO WHOM INFORMATION IS DISCLOSED?

Personal data recipients may be employees of the companies within Marine Services Group as controllers, Processors, law-enforcement and supervisory authorities.

Personal data which are processed in electronic environment are transferred to third persons. In such case the Processors selected by the companies within Marine Services Group as controllers (google.com (google analytics), facebook.com etc.) shall be recognisable as companies co-operating outside of the European Union and European Economic Area member states, therefore the companies within Marine Services Group as controllers encourage becoming acquainted with the privacy policies of these companies or addressing the companies within Marine Services Group as controllers individually with a request to provide additional information regarding co-operation conditions.

6. HOW IS A DATA SUBJECT INFORMED REGARDING PERSONAL DATA PROCESSING?

The Data subject shall be informed regarding personal data processing indicated in this Policy by using a multi-level approach which contains the following methods:

- by announcing the information regarding the events organised by Marine Services Group, the companies within Marine Services Group as controllers provide basic information by encouraging becoming acquainted with the policy or asking the companies within Marine Services Group as joint controllers before or during the events.

This Policy of the Controller is publicly available on the internet on the website of Marine Services Group www.marineservices.lv, "ABOUT MSG", "Facts & Figures".

7. DATA SUBJECT RIGHTS

7.1. Data subjects have the right to request from companies within Marine Services Group which are joint controllers, access to their personal data and receive detailed information on what personal data on him or her are at the disposal of Marine Services Group as the joint controller, for what purposes the companies within Marine Services Group as joint controllers are processing such personal data, the categories of personal data recipients (persons to whom personal data are disclosed or to whom they are intended to be disclosed, unless regulatory enactments allow the companies within Marine Services Group as joint controllers to provide such information in a particular case (for example, the companies within Marine Services Group as joint controllers may not provide information to the Data subject regarding the relevant state authorities which are persons directing the criminal procedures, subjects of investigatory operation or other authorities, the data of which are prohibited to be disclosed by regulatory enactments), information regarding the period of time during which the personal data will be stored, or criteria used for the determination of the abovementioned time period.

7.2. If the Data subject considers that the information at the disposal of the companies within Marine Services Group as controllers is out-of-date, incorrect or wrong, the Data subject has the right to request the correction of his or her personal data.

7.3. The Data subject has the right to request the deletion of his or her personal data, or to object to the processing thereof, if the person considers that data have been processed illegally, or they are not necessary anymore in relation to the purposes for which they have been collected and/or processed (upon implementing the right of principles "to be forgotten").

7.4. The companies within Marine Services Group as joint controllers shall provide information that the personal data of the Data subject may not be deleted if the personal data processing is necessary:

- in order for the companies within Marine Services Group as joint controllers to protect essentially important interests of the Data subject or other natural person, including the life and health thereof;
- in order to protect the property of the companies within Marine Service Group as joint controllers;
- in order for the companies within Marine Services Group as joint controllers or a third person to bring an action, exercise or defend the regulatory (legal) interests thereof;
- for the purpose of archiving in conformity with the regulatory enactments in force in Latvia which regulated the establishment of archives.

7.5. The Data subject has the right to request that the companies within Marine Services Group as joint controllers restrict the personal data processing of the Data subject if one of the following circumstances exist:

- the Data subject contests the correctness of the personal data - for a period of time during which the companies within Marine Services Group as joint controllers may inspect the correctness of the personal data;
- the processing is unlawful, and the data subject objects to the erasure of the personal data and requests the restriction of their use instead;
- the companies within Marine Services Group as controllers do not need personal data for processing anymore, however they are necessary for the Data subject in order to bring an action, exercise or defend lawful rights;
- the data subject has objected against processing while it is not verified whether legitimate reasons of the controller are more important than legitimate reasons of the data subject.

7.6. If personal data processing of the Data subject is restricted in accordance with Paragraph 7.5, such personal data, except for storage, shall only be processed with consent of the Data subject or in order to bring an action, exercise or defend lawful rights, or in order to protect the rights of another natural or legal person, or important public interests.

7.7. Before revocation of the restriction of personal data processing of the Data subject the companies within Marine Services Group as joint controllers shall inform the Data subject.

7.8. The Data subject has the right to submit a complaint to the Data State Inspectorate, if he or she considers that the companies within Marine Services Group as joint controllers have illegally processed his or her personal data.

7.9. The Data subject may submit a request regarding the implementation of his or her rights in the following way:

- in written form on site in the premises of the companies within Marine Services Group as joint controllers, by presenting a personal identification document (for example, a passport or ID card), because the Data subject has a duty to identify himself or herself;
- in the form of electronic mail, by signing it with a secure electronic signature. In such a case it is presumed that the Data subject has identified himself or herself by submitting a request which is signed with a secure electronic signature. Concurrently, the companies within Marine Services Group as joint controllers shall reserve the right to request the additional information from the Data subject in the case of doubts if it considers it to be necessary;
- by using postal consignment. In such case a reply will be drawn up and sent by using a registered letter, thus securing that unauthorised persons may not receive such consignment. Concurrently, the companies within Marine Services Group as joint controllers shall reserve the right to request additional information from the Data subject in the case of doubts if it considers it necessary.

7.10. Besides, the Data subject has an obligation, as soon as possible, to clarify the date, time, place and other circumstances which could help to execute his or her request, in his or her request.

7.11. After the receipt of a written request of the Data subject regarding exercising his or her rights, the companies within Marine Services Group as joint controllers shall:

7.11.1. verify the identity of a person;

7.11.2. assess the request, if:

- the request may be ensured, for example, viewing video materials or listening to audio recordings, then the Data subject as a submitter of the request may receive a copy of the video material or audio recording, or other data;
- additional information is necessary in order to identify the Data subject who is requesting the information, the companies within Marine Services Group as joint controllers may request additional information from the Data subject in order to be able to select the information correctly (for example, interview, photographs) where the Data subject may be identified;
- the information is deleted or the person who requests the information is not the Data subject or the person may not be identified, the companies within Marine Services Group as joint controllers may refuse the request in accordance with the policy and/or regulatory enactments.

8. HOW ARE THE PERSONAL DATA PROTECTED?

8.1. The companies within Marine Services Group as joint controllers shall ensure, review on a regular basis and improve personal data protection measures in order to protect the personal data of natural persons from unauthorised access, accidental loss, disclosure or destruction. In order to ensure it, the companies within Marine Services Group as joint controllers shall use corresponding technical and organisational requirements, including firewalls, intrusion detection, analysis software and data encryption.

8.2. The companies within Marine Services Group as joint controllers shall carefully inspect all service providers which on behalf of and for the companies within Marine Services Group as joint controllers process personal data of natural persons, and also assess, whether co-operation partners (personal data processors) apply corresponding security measures in order for the personal data processing to be carried out appropriately to the delegation of the companies within Marine Services Group as joint controllers and the requirements of regulatory enactments.

8.3. In the case of a personal data security incident, if it will cause a potentially high risk to the rights and freedoms of the Data subject, the companies within Marine Services Group as joint controllers shall notify the relevant Data subject thereof, if it will be possible, whether the information will be published on the website of Marine Services Group or in other possible way for example by using mass media (TV, radio, newspaper, social networks etc.).

Version valid since 01.06.2023., approved by order of 30.05.2023.