

PRIVACY POLICY

The purpose of the **ATAS** Limited Liability Company (hereinafter - **ATAS**) Privacy Policy is to provide a natural person - data subject, with information about the purpose, scope and protection of the personal data processing, as well as other personal data processing information of a data subject.

ATAS processes personal data in accordance with Regulation 2016/679 of the European Parliament and of the Council (EC) dated on 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and which repeals Directive 95/46/EC (General Data Protection Directive) (hereinafter the **Regulation**), and other applicable regulations.

Contact information of ATAS - legal address: Katlakalna iela 1, Riga, Latvia, LV-1073; phone: +371 67775799; e-mail: finance@atas.net.

ATAS ensures confidentiality of personal data and has implemented appropriate technical and organizational measures to protect personal data. Trained and certified personal data protection specialists are involved in ensuring the compliance of ATAS processing of personal data.

ATAS Privacy Officers may be contacted by writing to info@fpda.lv. Please note that the above methods of contacting ATAS data protection specialists are not intended to request information as part of exercising your rights as a data subject.

We inform you that ATAS may make changes to this Privacy Policy (hereinafter the **Policy**), so you should check this Policy to make sure you are informed and aware of any changes.

THE ABOVE POLICY WAS LAST UPDATED ON NOVEMBER 25, 2021

Purposes, legal basis of personal data processing and categories of data

ATAS processes personal data primarily for the following purposes:

- To activate and maintain a user account (based on *subparagraph "a", part one Article 6 of the Regulation*, and based on your voluntary consent).

Categories of data to be processed: *name, e-mail, phone number and date of birth;*

- Performance of mutual contractual obligations, maintenance of the account from the beginning to use any of the services offered by ATAS (on the basis of *subparagraph "b", part 1, Article 6 of the Regulation* on the basis of the concluded contractual relationship).

Categories of personal data subject to processing: *name, surname, date of birth, e-mail, phone number, address, country, skype user name, information on mutual settlements for statistical purposes;*

- To meet the accounting requirements, including the drawing up of relevant supporting documents and the performance of obligations (based on *subparagraph "c", part 1, Article 6 of the Regulation*, in compliance with the requirements of normative acts).

Categories of personal data subject to processing: *name, surname, date of birth, taxpayer's registration number, taxpayer's country, address, telephone number, e-mail address, bank account number and information about commercial bank account or information about PayPal user account;*

- For the purpose of sending commercial messages and news (on the basis of ***subparagraph "a", part 1, Article 6 of the Regulation***, and on the basis of your voluntary consent).

Categories of personal data processed: *e-mail address;*

- To improve and ensure the efficiency of the ATAS system, in accordance with the legitimacy of ATAS (on the basis of ***subparagraph "f", part 1, Article 6 of the Regulation***).

Categories of personal data processed: *e-mail address;*

- Data stored automatically in order to ensure the functionality of the system, in accordance with the legitimacy of ATAS (based on ***subparagraph "f", part 1, Article 6 of the Regulation***).

Categories of personal data subject to processing: *IP address, activity on the platform, data on the platform visits.*

Please note that you are responsible for providing ATAS with accurate personal data and, in case of any changes, you are obliged to correct your inaccurate personal data by informing ATAS.

Recipients of personal data

Personal data from ATAS can be obtained by competent institutions in the manner prescribed by the legislation, which will be the fulfillment of a legal obligation, for example, ATAS will transfer data to the State Revenue Service, which is the tax control authority in Latvia.

ATAS uses personal data processors to process personal data. In such cases, ATAS takes necessary measures to ensure that such processors of personal data process personal data in accordance with ATAS instructions and in accordance with applicable laws and regulations, and requires appropriate security measures.

We engage processors to provide the <https://atas.net/> platform services to you. These include, for example, financial institutions, customer and partner support services, advertising services and software providers. Please note that the processors have access to your personal data to the minimum extent necessary to perform their delegated tasks.

Duration of personal data storage

ATAS will retain personal data in accordance with the defined purposes for processing personal data and the legal basis for processing personal data for as long as at least one of these criteria exists:

- ATAS has a legal obligation to retain this data;
- ATAS needs to pursue its legitimate interests;
- ATAS needs to fulfill its contractual obligations;
- The consent of the data subject to processing the personal data of the person concerned has been obtained.

Security of information

ATAS implements all technical and organizational measures to protect your personal data, thus preventing possible violation of personal data, which means that access to your personal data is limited, ATAS employees are trained and strict confidentiality rules are established for both employees and processors of personal data.

Protecting individuals' personal data is a priority for ATAS.

Access to their personal data and other rights of the data subject

- In order to obtain information on the personal data subject to processing by ATAS with respect to a data subject, the data subject has the right to contact ATAS and obtain the information in the manner prescribed by laws and regulations, or by viewing it in their profile on the <https://atas.net/> platform.
- The data subject has the right to request the restriction of the processing of personal data, to object to the processing of personal data, to request the correction of personal data and, in certain cases, their deletion, in accordance with the provisions of the Regulation.
- ATAS communicates with the data subject: by post, sending mail to the address indicated by the data subject, by registered letter, identifying it in advance; by e-mail, responding to the same e-mail in which the data subject sent the application, signed with a secure electronic signature.
- In the event of a personal data breach or suspected personal data breach, we recommend that you contact ATAS or contact ATAS data protection specialists. Complaints about personal data breach can also be submitted to the personal data supervisory authority - Data State Inspectorate (address: Elijas Street 17, Riga, Latvia, LV-1050).