

PRIVACY POLICY (PRICIY DISCLAIMER)

A responsible approach to the security of personal data is our priority and we would like to provide information on how personal data is processed in the APF group - in all companies directly controlled by the joint stock company "APF Holdings", registration number 50203047991.

The joint data controllers of your Personal Data are the APF Group companies to whom you have provided your personal data on the basis of a contractual or pre-contractual relationship, or whose services you (or the legal entity or entity of which you are the beneficial owner) intend to use and /or, which determines the purposes and means of Personal Data processing:

Joint Controllers - APF group companies:

- Joint stock company "**APF Holdings**", registration number 50203047991, address: Malduguņu Street 4, Mārupe, Mārupe district, LV-2167, Latvia;
- Limited liability company "**Alūksnes putnu ferma**", registration number 43203003333, address: "Putni", Ziemera parish, Alūksnes district, LV-4301, Latvia;
- Limited liability company "**APF Trading**", registration number 50203051041, address:
- Limited liability company "Oluksne", registration number 50203050741, address: "Putni", Ziemera parish, Alūksnes district, LV-4301, Latvia;
- Limited Liability Company "**APF Energy**", registration number 40203352847, address: 4 Malduguņu Street, Mārupe, Mārupe district, LV-2167, Latvia;
- Limited liability company "**Preiļu putni**", registration number 40203289853, address: Malduguņu Street 4, Mārupe, Mārupe district, LV-2167, Latvia.

The contact information of the joint controllers for communication on all personal data processing and protection issues is as follows:

- Postal address - 4 Malduguņi Street, Mārupe, Mārupe district, LV-2167, Latvia;
- e-mail address – info@apf.lv;
- telephone +371 20 017 455

DEFINITIONS

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/EC (General Data Protection Regulation).

You – You as a natural person whose Personal Data we process.

Controller– APF Group company JSC "APF Holdings" and its directly controlled subsidiaries.

Processing – any activity performed with Personal Data (including its collection, recording, registration, storage, viewing, use, amendment, provision of access, request, transfer, etc.).

Personal data – any information that applies or could apply to you, such as your name, surname, personal identification number, address, telephone number, e-mail address.

Consent - any freely and consciously given confirmation by which you agree to the Processing of your Personal Data for a specific purpose.

When does this Privacy policy apply?

The purpose of this Privacy policy is to inform you as clearly and comprehensibly as possible about how and why the Controller uses your personal information.

It is important for the Controller to ensure a transparent and transparent process when processing your Personal data, therefore, appropriate measures are taken to ensure that your Personal data are protected and that the processing of your Personal data takes place in accordance with applicable data protection laws and the Controller's internal procedures and policies.

The current version of the Privacy Policy will be available on the website www.apf.lv

The Controller has the right to make changes to this Privacy Policy at any time.

The Controller can use the personal data you provide for the following purposes:

- for the preparation, conclusion and administration of the contract, including accounting and storage;
- identification of politically significant persons in order to fulfill the requirements of the regulatory framework in accordance with the Law on the prevention of money laundering and financing of Terrorism and proliferation;
- for the ensuring the personnel management processes: for the organization and provision of the personnel requirement process, for the establishment of employment legal relations, etc.;
- for effective provision of the company's management process;
- for business planning, execution and analytics;
- informing the society about its activities;
- for consideration and processing of applications;
- for sending news;
- to ensure security, including video surveillance: The Controller may conduct video surveillance while processing your Personal Data when you are on the Controller's premises, in order to guarantee safety and ensure the protection of the property. Warning signs about video surveillance have been installed in places where video surveillance is carried out;
- for website maintenance and performance improvement;

- for information exchange in social networks.

What is the legal basis for processing Personal Data?

The Controller processes personal data on the following legal bases:

- for the fulfilment of a legal obligation determined by a regulatory act;
- to ensure legitimate interest;
- for concluding or executing a contract;
- based on your consent;
- for the protection of the vital interests of the person, including the protection of health and life;
- Controller's legitimate interest in property protection;
- processing of Personal data can be done through social networks. Such public accounts are available on Facebook, Instagram, LinkedIn and Youtube.

Who receives your Personal Data?

Your Personal Data is transferred:

- APF group companies;
- Cooperation partners - service providers and cooperation partners related to the provision of the Controller's services and which the Controller has carefully evaluated before starting cooperation (for example, audit companies, legal, information technology service providers). The Controller evaluates whether cooperation partners (Personal data processors) apply appropriate security measures so that the processing of your Personal Data takes place in accordance with the Controller's tasks, commands, instructions and regulatory requirements. These companies are not entitled to use your Personal Data for any other purposes;
- Law enforcement authorities, state and local governments, as well as supervisory authorities - to fulfil the requirements established by law (e.g. courts, police, prosecutor's office, State Revenue Service, Data State Inspectorate, etc.), based on written requests or legally binding obligations of the Controller;
- Your Personal Data is not processed in countries located outside the territory of the European Union (EU) and the European Economic Area (EEA). Personal data may be sent outside the EU/EEA only if it is possible to ensure the relevant protection measures of the Regulation and there is a legal basis for such transfer, or for the fulfilment of a legal obligation, the conclusion of a contract or the fulfilment of a contract based on your consent.

From what sources Controller obtains and collects your Personal data?

One or more of the legal bases specified in this Privacy policy may apply to the processing of your data.

The Controller obtains almost all of your Personal data only from you.

The Controller obtains your data directly from you also when you contact the Controller in the form of an electronic document via e-mail, by phone, using social media accounts, or in the form of a paper document via the mail or in person (namely, when receiving and examining submitted questions, proposals and complaints, suggestions).

Personal data is also obtained by recording visual data with the Controller's security video cameras.

Personal data is also obtained from other external sources such as public and private registers (e.g. Lursoft) and publicly available sources such as media sources.

Does the Controller use cookies?

Yes, the Controller uses cookies to improve website functionality and user experience.

Cookies policy available on www.apf.lv

Receiving news

If you have applied for and agreed to receive news, the Controller sends you news to the e-mail address you specified. News is, for example, information about prepared reports, current events, offers. Your personal data related to sending news are processed only by the Controller and our cooperation partners who provide IT infrastructures and e-mail sending platforms. The minimum required amount of personal data is transferred to cooperation partners. Your personal data is processed for this purpose until you withdraw your consent to receive news. If you no longer wish to receive such news, you have the option to opt out of further use of your email address for sending news in each news e-mail you receive. Information about the withdrawal of consent will be stored in order to properly fulfil your request not to send news. The Controller stops sending news as soon as your request is processed. However, please note that the processing of the request depends on the technological possibilities to fulfil your request, which may take up to five days.

How long does the Controller store Personal Data?

Personal data is stored for as long as it is necessary for the specific purpose or purposes for which the Personal data was collected.

The Controller will store Personal data collected while preparing to enter into a contract with you or executing such a contract at least until the expiration of this contract. In addition, in order to protect its legitimate interests, the Controller may store the data for ten (10) years after the termination of the contract.

Applicable laws (for example, laws establishing obligations related to the prevention of money laundering and the financing of terrorism and proliferation) may require the Controller to store

your Personal Data for a certain period of time, in this case the Controller will always comply with the relevant requirements.

How does the Controller protect my Personal Data?

In order to protect your Personal Data from unauthorized access, illegal processing or disclosure, accidental loss, modification or destruction, the Controller uses appropriate measures that comply with applicable laws. These measures include technical measures such as selecting and configuring suitable computer systems, ensuring adequate connections and protecting data and files, as well as organizational measures such as restricting access to these systems, files and assets, carefully selecting and monitoring hosting and other IT service providers, as well as ongoing training of the Controller's employees.

Your rights regarding the processing of Personal Data

You, as a data subject, have certain rights in accordance with data protection legislation regarding the processing of Personal data by the Controller.

You have the right to request access to your Personal data held by the Controller. However, before providing such information, the Controller must verify your identity.

You have the right to object to the processing of Personal data, withdraw consent, request the deletion or correction of Your Personal data, as well as the right to data portability.

If you wish to request access to your data, delete or correct data, object to the processing of Personal data or exercise your right to data portability, please contact the Controller.

If you browse the web and do not want your personal data to be processed using cookie services when you visit the Controller's website, we recommend that you activate the private browsing mode in your browser.

You have the right to submit a complaint with the data protection authority regarding the processing of your Personal data.

Questions about personal data protection

If you have questions about the protection of personal data or are interested in how the Controller processes your Personal Data, please inform the Controller by sending a letter to:

- Postal address - 4 Malduguņu Street, Mārupe, Mārupe district, LV-2167, Latvia;
- e-mail address – info@apf.lv;

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