



## **LMT PRIVACY POLICY**

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## **1. General terms and conditions**

- 1.1. As one of the most notable innovation leaders in Latvia Latvijas Mobilais Telefons LLC (hereinafter, the LMT or we), strives to provide new and advanced services that comply with the latest standards. LMT takes great care not only of the convenience and functionality of our services, but also of the protection of privacy. We allocate resources and make sure that your personal data are protected on daily basis.
- 1.2. The purpose of this policy is to inform and explain how the LMT protects and cares for the personal data in its possession, namely, to help to understand how and for what purposes the data are processed, and to inform about the rights and obligations of data subjects.
- 1.3. The LMT processes personal data pursuant to the applicable law of the Republic of Latvia, binding rules and regulations of regulatory bodies, and follows the latest best practices.
- 1.4. This Privacy Policy applies to any data subject, whose personal data are processed by the LMT. For matters related to labor relations, we have prepared a separate binding document that can be consulted during the respective stage.
- 1.5. This Privacy Policy does not apply to data processing measures of other operators, including, when you visit their homepages or use their services via the LMT network. In these cases we invite you to read the personal data protection guarantees provided by the respective operators.
- 1.6. We have made this Privacy Policy as simple as possible, however, you should study the following concepts:
  - 1.6.1. Personal data: any information that directly or indirectly applies to an individual.
  - 1.6.2. Anonymized data: information that cannot be linked with an individual as all elements identifying the respective person have been removed from his/her dataset.
  - 1.6.3. Profiling: any automated processing of personal data, namely, use of summary or individual personal data to evaluate specific personal aspects related to an individual.
  - 1.6.4. Services: any services or goods that LMT offers/provides online, remotely or in person.

## **2. How LMT receives personal data**

- 2.1. Information that we receive about a person depends on the content of a transaction, including the requested or received service. We also acquire information provided to us during any type of cooperation.
- 2.2. We can receive personal data in several ways, for example:
  - 2.2.1. A data subject provides his/her personal data to the LMT, namely, the data subject or its authorized representative has contacted or cooperated with the LMT, for example, by signing an agreement, using LMT services, signing up to new services, requesting information or submitting a specific question or request, visiting LMT Customer Service Centers, contacting us via LMT information channels, including social media, participating in LMT events or supported activities, as well as competitions, lotteries or surveys.
  - 2.2.2. The data are created, when LMT services or network is used, for example, by making calls, visiting or using the LMT homepage and apps. E.g., when electronic services are used, electronic communications metadata are created.
  - 2.2.3. The LMT may also receive data from other sources, for example, if you have requested communication with the LMT via other service providers or cooperation partners or if you participate in any LMT events, during which photos may be taken or videos recorded (with advance notice). Furthermore, LMT may receive data of authorized parties or contacts acting for a specific purpose from cooperation partners.
  - 2.2.4. To meet statutory requirements, ensure long-term cooperation and management of credit risks, the LMT may also need to request data from public registers, including credit data and debtors databases.
  - 2.2.5. Assessment of creditworthiness is important for the provision of services related to financial support, lending or credit risk. It allows to ensure that the respective individual is able to honor his/her liabilities and that the finances are managed properly.
  - 2.2.6. When you visit our homepage, cookies may be used: you will be informed accordingly during your visit. See Section 8 of this policy for detailed information about cookies.

### **3. What personal data LMT receives**

- 3.1. Types of personal data may vary depending on the services used or cooperation established. Generally, we classify personal data as follows:
- 3.1.1. Basic personal data. Data identifying persons, including, *inter alia*, contact and communication data, consent data, services and authorization data, payment, credit history and debt recovery data, SIM card and device data, personal visual data (photos, videos, etc.), data from personal documents, etc.
  - 3.1.2. Transmitted content. Content transmitted for the purposes of specific services, including, *inter alia*, voice, video, and digital content, etc. For example, to provide the Smart TV service, the LMT may need to process content data to ensure service continuity.
  - 3.1.3. Children's data. Data of underage persons. We process children's data only in specific circumstances, for example, if it is related to a specific transaction, including for a parent or a legal guardian, as well as in cases, when it is required and allowed by the law. If processing of this data is really needed, the LMT focusses on ensuring that the processing is compliant.
  - 3.1.4. Traffic data (electronic communications metadata). Data processed to transfer information in an electronic communications network or to prepare invoices and record payments (except the content of the transmitted information) that allows to identify a specific individual as a data subject.
  - 3.1.5. Location data (electronic communications metadata). Data processed in an electronic communications network or by means of electronic communications services that point to the location of the electronic communications services end device, including the location of the end device (address), access point address, GPS, Wi-Fi, etc. This category also includes location data, which, for example, are used to provide additional services.

### **4. How LMT uses personal data**

- 4.1. The LMT processes personal data to provide services, ensure effective servicing, cooperation, events and other social and business activities related to LMT operations.
- 4.2. For security reasons, to avoid repeated identification of persons, we prefer processing of anonymized data. However, due to the nature of the provided service or event, quite often we need to process personal data of identifiable persons.
- 4.3. LMT performs automated processing of personal data. It allows to review requests or issues faster, for example, provide information to individuals about services available to them or the possibility to customize these services to specific interests and needs. In addition to the above, automated processing of data allows to provide an answer quickly, which otherwise should have been done manually and required much more time.
- 4.4. When creditworthiness of individuals is checked for the purposes of specific services or in cases when the customer has requested to extend the payment deadline, individual automated processing of data may take place to verify the ability of a data subject to honor his/her financial commitments. The LMT may request information from external databases (including credit data and debtor databases). If the LMT has any doubts about the ability of a data subject to honor his/her financial liabilities, some services may be refused fully or partially. However, the respective person may still provide information that serves as a proof of his/her creditworthiness and is related to the chosen service to the LMT in other ways.
- 4.5. We make automated individual decisions, only if the data subject has agreed to that or on contractual grounds (to complete a transaction). In some cases we may do that on the grounds of a legitimate interest, if that is allowed by the applicable law.
- 4.6. LMT also performs profiling. To better understand customer needs and develop services that meet their needs and interests, the LMT may take into account, for example, previous cooperation, including duration, value and content of agreements, payments made by customers, information about their needs and requirements, etc. It allows to prepare customized solutions, including in cases, when the cooperation has been long-lasting and it is necessary to reach a compromise to solve a non-standard situation. Profiling used for the purposes of direct marketing allows us to make the most suitable offers. However, we respect data subject's right to request discontinuation of such processing of data (when he/she withdraws consent) or object to processing of data for the above purpose (when it is done on the grounds of a legitimate interest).

- 4.7. The profiling is carried out pursuant to the law. The grounds of profiling may include a consent given by an individual or in some cases the legitimate interest of LMT, or other statutory grounds.
- 4.8. Any data subject may ask the LMT to review its automated individual decisions, including decisions made during the profiling process. The data subject may also ask to review such automated individual decisions and to involve LMT experts in the said review, when the customer was refused a service due to insufficient creditworthiness. Thus, if you believe that any information that may change such decision may have not been available to the LMT, we invite you to provide this information at any LMT Customer Service Centre or by contacting us via any of our information channels.
- 4.9. To facilitate the development of services or perform other assessments, the LMT compiles statistical data.
- 4.10. The LMT processes personal data only for specific and required purposes and by relying on specific legal grounds, including its legitimate interests, for example:
- 4.10.1. Quality control of services and customer surveys. This purpose covers activities that should be performed to ensure the quality of services, including by monitoring the network performance, carrying out surveys about service quality (for example, questionnaires, service calls), etc. For example, when a customer contacts the LMT by phone the customer is informed that for the quality assurance purposes the conversation will be recorded; we process the data pursuant to the law and contract (transaction).
- 4.10.2. Answering and satisfying received requests. This purpose covers communication between the LMT and the respective data subject, including about any submitted requests, applications or other contacts (including by mail, e-mail, etc.). We process data pursuant to the law and the contract (transaction), including the submitted request.
- 4.10.3. Provision of services and performance of a contract. This purpose covers provision of services and performance of the signed contracts (transactions). To ensure the best customer experience and full enjoyment of LMT services, the LMT may contact a customer. For example, send an informative message to a customer by a text message or e-mail, make a service call or print a message on an invoice, etc. by carefully selecting the best communication channel in each such case. We process data pursuant to the law and the contract (transaction).
- 4.10.4. Administration of payments. This purpose covers any activities related to settlement of payments with the respective person. We process data pursuant to the law and the contract (transaction).
- 4.10.5. Entry into agreements/amendments thereto. This purpose covers new requests concerning a current or a new transaction, including for services, for example, in the online store, at Customer Service Centers, or by any means of submitting a request. We process data pursuant to the law and the contract (transaction).
- 4.10.6. Recovery of debts. This purpose covers debt recovery activities, incl. to receive, save and process any data needed for this purpose, as well as to provide and place information about a debt or a person (including personal data) in duly registered debtor and credit data (credit history) databases, and to save and provide to third parties transaction data and any information that has been submitted, transferred or sent to an operator (including personal data) to ensure completion of transactions, as well as in cases when a person has failed to duly discharge his/her liabilities. We process data pursuant to the law, a contract (transaction) and a legitimate interest.
- 4.10.7. Management of offers of the operator and third parties (cooperation partners). This purpose covers any measures performed to provide information about services, including during direct marketing activities. For example, an informative message may be sent to a customer by e-mail or any other communication channel carefully selected in each such case. We process data on the grounds of a legitimate interest and consent from the respective data subject.
- 4.10.8. Fraud prevention and/or evaluation of credit risks. This purpose includes protection of lawful interests and meeting of contractual and statutory liabilities. This purpose covers processing of data, incl. before entry into transactions and during them, which may include activities related to processing of information to prevent fraud and evaluate credit risks. We process data on the grounds of a legitimate interest and consent from the respective data subject, as well as pursuant to the law or a contract (transaction).

4.10.9. Compliance with applicable law. This purpose concerns the statutory basis for the processing of personal data, for example, in accounting, taxation, etc. pursuant to the Electronic Communications Law, the Civil Law, the Commercial Law, the Law on Taxes and Duties, the Law on Accounting, etc.

4.10.10. Safety of operator's infrastructure, services, information, employees, customers and visitors, prevention of illegitimate or other threats, contribution to investigation of crimes in operator's facilities and their vicinity, including the network and information systems. This purpose covers measures performed by physical and logical means of protection, including by video surveillance, systems of access cards and passes and other technical and organizational measures to ensure protection against the threat of physical impact, as well as protection by means of logical protection. We process data pursuant to the law, a contract and a legitimate interest.

4.10.11. Organizational management of the operator (including record keeping; records of processes, services, information systems and persons; uninterrupted continuity and social responsibility). This purpose covers integrated management measures, incl. according to nationally and globally recognized corporate management principles by ensuring traceability, control and improvement of internal processes We process data pursuant to the law and a legitimate interest.

4.10.12. Accounting/financial and tax administration. This purpose covers accounting, taxation, payments, etc. We process data pursuant to the law and the contract (transaction).

4.10.13. Statistics and analytics of processes, services, information systems and network data to determine correlations and trends to develop and improve the above. This purpose covers processing of personal data at the disposal of LMT to evaluate sales results of services to develop and improve them, as well as the processes, systems and the network, and to determine company goals and development directions. We process data on the grounds of a legitimate interest.

4.10.14. Provision of customer service during the life cycle, including for the improvement of customer satisfaction and loyalty. This purpose covers processing of personal data to improve cooperation, increase loyalty and maintain satisfaction levels (loyalty calls, service calls to improve experience, information about needs and wishes, information about satisfaction levels). We process data on the grounds of a legitimate interest.

4.10.15. Processing of personal data for internal administration in the LMT group. This purpose covers processing of personal data within the group for administrative purposes, e.g. to prevent conflicts of interest or unlawful transactions We process data on the grounds of a legitimate interest.

4.11. In any of the above cases the LMT processes personal data only to the extent allowed by the respective purpose.

## **5. How LMT protects personal data**

To protect interests of individuals, we keep developing our security processes and measures. These measures include protection of personnel, information and technical resources, IT infrastructure, internal and public networks, and LMT facilities. During the implementation of these measures we ensure adequate protection of information to prevent unauthorized access to personal data.

## **6. To whom LMT may provide personal data**

6.1. Exchange of personal data may be needed in some cases, when there is a specific purpose, for example, the LMT may need to provide personal data to the following categories of recipients:

6.1.1. LMT group companies. The LMT group consists of LMT and LMT Retail & Logistics SIA. As LMT group considers security of personal data a priority, we take great care to ensure that business processes take place according to the statutory requirements.

6.1.2. Cooperation partners. Companies that have cooperation agreements and mutual commitments with LMT group (for example, insurance of equipment). This includes the following purposes: to provide services (including direct and remote sales assistants and agents, installers of equipment, repairs of equipment, etc.), ensure deliveries (including printing of invoices, delivery of packages and agreements, etc., incl. couriers, postal service providers, etc.), control the quality of services (including surveyors, etc.), ensure protection and security (cooperation partners that provide support to ensure the protection and safety of employees, customers, visitors, facilities and infrastructure of LMT group, as well as to

prevent fraudulent, unlawful or other threats or interferences in the interests of LMT group, including, security services, providers of legal assistance, etc.), and to ensure management and administration (cooperation partners for the management and smooth running of organizational, financial management and accounting processes of LMT group, including auditors, event organizers, etc.), to comply with a power of attorney issued to an authorized representative, as well as another electronic communications operator if the customer has chosen to keep his/her number.

- 6.1.3. Companies/organisations that recover debts. This includes debt recovery companies, credit data and credit rating agencies, court bailiffs, administrators and other parties to a debt recovery process.
- 6.1.4. Supervisory bodies. For example, market supervision bodies, law enforcement agencies, incl. for the purposes of protecting the lawful interests of LMT, e.g. by bringing an action at the court, and search and rescue services as described in the law.
- 6.1.5. Third parties. For example, individuals or legal entities, public bodies, agencies or structures, which are not data subjects, controllers or processors.
- 6.2. In addition to the above, there may be cases, when we transfer personal data to other persons due to transfer of companies, mergers, acquisitions, sale of LMT assets, transfer of services to a different operator, etc.
- 6.3. We also process anonymized data that are not linked to a specific individual and do not allow to identify a data subject. These data may be used for other purposes and transferred to other persons.
- 6.4. The LMT ensures the confidentiality of personal data by implementing security measures according to the law.
- 6.5. LMT processes personal data in the European Union and the European Economic Area, but in some cases may transfer them for processing in third countries. In such cases, the personal data may be transferred by relying on specific legal grounds and only for specific and necessary purposes (for example, for providing a service and performing a contract) and by taking appropriate measures to ensure an adequate level of protection for individuals. For example, according to the EU Commission decision the third country in which the partner is located ensures a sufficient level of protection, the partner has provided appropriate guarantees and has binding company rules, appropriate standard data protection clauses or other approved rules and regulations, codes of conduct, certification mechanisms, etc. A data subject may receive more information on the transfer of personal data to third countries by contacting the LMT.

## **7. How long LMT keeps data**

- 7.1. Personal data are stored only as long as it is necessary for a specific purpose to meet obligations and comply with the statutory data processing requirements. For example, as long as the LMT may protect its lawful interests according to the applicable law (including by lodging objections and complaints or bringing an action at a court before the expiry of a limitation period), or as long as one of the parties has a legal obligation to keep the data (for example, store service invoices for 5 years pursuant to the Law on Accounting), and as long as a customer has consented to the respective processing of personal data; video surveillance data are usually stored for 30 days. When these circumstances expire (deadline), Customer's personal data are deleted.
- 7.2. Limitations are not directly applicable to anonymized data, but we still store only as much data as are needed and only as long as is needed.

## **8. How LMT uses cookies**

- 8.1. Like other homepages, LMT page may use cookies.
- 8.2. Cookies allow to adapt the LMT homepage to visitor needs and to make it more user friendly (including by relying on aggregated statistical data without directly identifying the user of the end device). Also, cookies allow to individually address a visitor of the LMT website if the visitor has given his/her consent. For detailed information about cookies see the LMT Cookies Policy on <https://www.lmt.lv>.
- 8.3. Unless the law provides otherwise, a data subject shall have a right to refuse further processing of his/her personal data at any time, but we may not be able to continue the respective service to the same extent as before, especially if the said data are technically significant.

## **9. Rights and obligations of a data subject**

### 9.1. A data subject shall have the following rights:

- 9.1.1. Study information that the LMT stores about him/her to the extent it does not contravene the law and does not unreasonably interfere with the rights of other persons. This information can be received in any way supported by the LMT that allows to verify the identity of a person, including, *inter alia*, in person at an LMT Customer Service Centre, or by contacting the LMT via <https://mans.lmt.lv/> (insofar as it is possible).
- 9.1.2. Request access to his/her data, as well as their correction or, if necessary, modification, or deletion (right to be forgotten); restrict the processing of his/her data or object to such processing pursuant to the law; enjoy the right of portability. Please note that in case of correction, deletion, restriction, termination or portability, services/processes may be partially or fully and permanently suspended. If you choose to receive information about yourself remotely or indirectly, for example, by mail, e-mail, via another recipient, etc., you shall be responsible for the safety of the above means of delivery, as well as the conduct of the person, who acts as your representative.
- 9.1.3. Request a copy of the data being processed, if it does not interfere with the rights and freedoms of other parties. Please note that the LMT shall have a right to ask for a reasonable fee (based on administrative costs) for all additional copies of such data.
- 9.1.4. Withdraw any previous consents at any time in an easy and convenient manner. Consenting and withdrawing are voluntary and do not impose any additional obligations. However, if you decide to withdraw any previous consents, please note that the processing of data related to the respective consent shall be suspended and that the previous functionality may not be available fully. For example, if you withdraw your consent to latest news, you will not receive any news or information about other developments. It is important to remember that such withdrawals will not affect the lawfulness of processing completed before them.
- 9.1.5. At any time and free of charge object to the processing of his/her data for direct marketing purposes, including the profiling, to the extent such processing is related to direct marketing (irrespective if such processing is primary or secondary processing).
- 9.1.6. Contact the LMT and market surveillance bodies concerning data processing issues. If you require assistance to receive more information about this Privacy Policy, aspects of processing or the applicable data protection law, please contact the LMT for us to carefully review your questions and provide an answer. In any case, an individual may always submit a complaint to the Data State Inspectorate (data protection supervisor of Latvia).

9.2. LMT shall review any and all requests of data subjects related to the above rights free of charge. Review of a request may be declined or made subject to a reasonable fee, if it is clearly ungrounded or excessive, or if the law prescribes such fee. A request may be submitted at any time and at any LMT Customer Service Centre or remotely, if you can identify yourself as the respective data subject and if it is possible to verify the nature and grounds of the request.

### 9.3. A data subject shall have the following obligations:

- 9.3.1. Inform the LMT about changes in the provided data within a reasonable period of time. LMT believes that it is important to hold accurate and updated information.
- 9.3.2. Provide additional information, if needed. During communication or cooperation we may ask additional information to verify that the said activities take place with a specific individual. This is needed to protect the data of the respective individual and other persons ensuring that the said person is the personal data subject and that any information disclosed during such communication and/or cooperation is made available only to this specific person and does not interfere with the rights of other persons. For example, when an individual wants to find out information about him/her by sending a request to the LMT. In this case it is important for the LMT to make sure that this specific person has signed and submitted the request. We may ask to provide additional identifying information. However, if the requested additional information is not provided and/or if the LMT has any doubts about the identity of the applicant, to protect personal data (not to disclose them to any third parties) we may delay the review of the request until we are sure that the respective person has asked for the said data.
- 9.3.3. Study this Privacy Policy before our cooperation, and provide it to any person, who is related to the respective data subject and whose interests may be consequently affected during processing of personal data of the data subject. This Privacy Policy is an integral part of any services provided by the



LMT. The LMT expects that any data provided to it will not interfere with the interests of other parties. If the applicable conditions allow an individual to grant access or to use his/her services together with another person, this individual shall be responsible for informing the said person about processing of data during such processes and the related liabilities. If the data directly relate to another person (the data subject has changed), the respective individual shall inform us promptly. Until individuals are fully identified, the data shall be attributed to the respective individual as a data subject.

#### **10. How to find out about changes in this Privacy Policy**

As we continue to improve and develop our operations, it is possible that we may amend or revise this Privacy Policy from time to time. Thus, we invite you to read the latest version of this Privacy Policy on regular basis. It is available via the LMT communication channels, at LMT Customer Service Centers and on our homepage [www.lmt.lv](http://www.lmt.lv). When we make any changes to this policy, we will inform about that via the LMT homepage. If the changes are significant, information may be provided via additional channels, for example, on the self-service site.

#### **11. How to contact LMT**

11.1. If you have any questions or concerns regarding this Privacy Policy or processing of personal data, please contact the LMT or its Data Protection Officer by calling or writing to the number or e-mail below.

11.2. Latvijas Mobilais Telefons LLC, Ropažu iela 6, Rīga, LV-1039

11.3. LMT 24 hour toll-free information hotline: **8076 8076**

11.4. LMT 24 hour information hotline for calls from abroad — +371 2931 9911  
(free of charge from the European Economic Area)

11.5. e-mail: [info@lmt.lv](mailto:info@lmt.lv)

11.6. Fax: 6777 3707

11.7. Text messaged to LMT Contact Centre: 8076 8076

11.8. Data Protection Officer: [personasdati@lmt.lv](mailto:personasdati@lmt.lv)

11.9. If this Privacy Policy has been translated in other languages, the Latvian version shall prevail if any contradictions arise.

#### **12. How to contact the Data State Inspectorate**

The LMT will ensure compliance of data processing and protection requirements with the strictest statutory standards, and if any objections are raised, the LMT will take all appropriate steps to find a solution. However, if data subject believes that it has failed, the data subject may approach the Data State Inspectorate at Blaumaņa iela 11/13-15, Rīga, LV-1011. For more information, see: [www.dvi.gov.lv](http://www.dvi.gov.lv).

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