## **General provisions**

- 1.1. This Privacy Policy describes how *SIA "Altes," registration no.: 45403042897, legal address: Vienības gatve 87e, Riga, Latvia, LV-1004* (hereinafter referred to as the "Data Controller"), collects, processes, and stores personal data obtained from its clients and website visitors at drflex.eu (hereinafter referred to as the "Data Subject" or "You").
- 1.2. Personal data refers to any information relating to an identified or identifiable natural person, ie, the Data Subject. Processing refers to any operation performed on personal data, such as collection, recording, modification, use, access, deletion, or destruction.
- 1.3. The Data Controller adheres to the principles of data processing prescribed by law and ensures that personal data is processed in compliance with applicable legal regulations.

## Collection, processing and storage of personal data

- 2.1. The Data Controller collects, processes and stores personal data primarily through the online store website and through email communication.
- 2.2. By visiting and using the services provided in the online store, you agree that all information you provide will be used and managed in accordance with the purposes set out in this Privacy Policy.
- 2.3. The data subject is responsible for ensuring that the personal data submitted is accurate, complete, and up-to-date. Intentionally providing false information will be considered a violation of this Privacy Policy. The data subject must promptly notify the data controller of any changes to the personal data submitted.
- 2.4 The data controller shall not be liable for any damage caused to the data subject or third parties as a result of the transmission of inaccurate personal data.

### Processing of personal customer data

- 3.1 The data controller may process the following personal data:
- 3.1.1. First name, last name
- 3.1.2. Date of birth
- 3.1.3. Contact details (email address and/or telephone number)
- 3.1.4. Transaction data (purchased goods, delivery address, price, payment information, etc.)

- 3.1.5. Any other information provided while using the website services or products or submitted when contacting us.
- 3.2. In addition to the above-mentioned data, the Data Controller has the right to verify the accuracy of the data provided using publicly available registers.
- 3.3. The legal basis for the processing of personal data is Article 6(1) of the General Data Protection Regulation (GDPR), including:
- a) The data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) The processing is necessary for compliance with a legal obligation to which the data controller is subject;
- f) The processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.
- 3.4. The data controller shall store and process the personal data of the data subject as long as at least one of the following criteria is met:
- 3.4.1. The personal data are necessary for the purposes for which they were collected;
- 3.4.2. The data controller and/or the data subject may pursue legitimate interests in accordance with applicable external regulations, e.g., to raise objections, assert claims, or initiate legal proceedings;
- 3.4.3. There is a legal obligation to retain the data, for example, pursuant to the Accounting Act;
- 3.4.4. As long as the data subject has given their consent to process the personal data in question, unless there is another legal basis for the processing.
- Once the conditions specified in this section no longer apply, the retention period for the data subject's personal data will also end. All relevant personal data will be irrevocably deleted or anonymized from computer systems, electronic and/or paper-based documents.
- 3.5. In order to fulfill its obligations to you, the Data Controller has the right to transfer your personal data to business partners and data processors who process data on our behalf, such as accountants, courier services, and other service providers. The Data Processor becomes the Data Controller during such processing.

Payment processing is carried out via the Stripe and PayPal platforms. Therefore, our company transfers the personal data required to process the payment to the operators of these platforms (Stripe and PayPal).

Upon request, we may disclose your personal information to government authorities and law enforcement agencies to protect our legal interests, including the preparation, filing and defense of legal claims, if necessary.

# Rights of the data subject

- 4.1. According to the General Data Protection Regulation (GDPR) and the laws of the Republic of Latvia, you have the following rights:
- 4.1.1. **Access to your personal data** You have the right to obtain information about how your personal data is processed, to request a copy of your personal data in electronic format and to transmit this data to another controller (data portability).
- 4.1.2. **Request rectification** You have the right to request the rectification of incorrect, inaccurate or incomplete personal data.
- 4.1.3 **Request erasure** You have the right to request the erasure of your personal data ("right to be forgotten"), except in cases where the law requires the data to be retained.
- 4.1.4. **Withdraw consent** You have the right to withdraw your previously given consent to the processing of your personal data.
- 4.1.5. **Request restriction of data processing** You have the right to request a temporary suspension of the processing of your personal data.
- 4.1.6. **Filing a complaint** You have the right to lodge a complaint with the Latvian Data Protection Inspectorate (Datu valsts inspekcija).

You can submit a request to exercise your rights by filling out a form in person at Brīvības gatve 403, Riga, Latvia, LV-1024 or by sending a request electronically by email to Customer Support at <a href="mailto:hello@drflex.eu">hello@drflex.eu</a>.

#### **Final provisions**

5.1 This Privacy Policy has been prepared in accordance with 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, repealing Directive 95/46/EC (General Data Protection Regulation, GDPR), as well as the applicable laws of the Republic of Latvia and the European Union.

5.2. The Data Controller reserves the right to modify or amend this Privacy Policy at any time without prior notice. Changes will take effect upon posting on the **drflex.eu** website .