

RIGAAPARTMENT.COM Ltd.
Reg. no. 40103508736
129 Gertrudes Street, Riga, LV-1009, Latvia

Privacy Policy

Valid from May 25th, 2018.

Out of concern for the protection of your privacy and personal data, including your rights to access the information, RIGAAPARTMENT.COM Ltd. (hereinafter – RIGAAPARTMENT) has developed this Privacy Policy in accordance with the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of private persons with regard to the processing of personal data and on the free movement of such data (hereinafter – Regulation).

This Privacy Policy goal is to give the RIGAAPARTMENT customer – the private person – information regarding the types of personal data, purposes of the processing, legal basis, as well as inform about private person rights as a data subject.

Personal data is any information that is directly or indirectly connected with private person (written, audio, video, electronic) which concerns the identified or identifiable private person, for example, name, surname, date of birth, home address, telephone number, e-mail address, photo, one or several economic factors characteristic of the private person, as well as other information that makes it possible to identify the private person (hereinafter – Personal Data).

This Privacy Policy is applied to the processing of Personal Data regardless of the way (form) in which the private person has given their Personal Data: on paper, orally, electronically or if they are obtained through video surveillance.

This Privacy Policy concerns the current, former and potential future customers (hereinafter – Customers) of RIGAAPARTMENT that are using/used/are planning to use RIGAAPARTMENT services or are visiting RIGAAPARTMENT rooms, apartments or hotel area, including conference rooms and the parking, as well as use the homepage <https://rigaapartment.com/> and RIGAAPARTMENT business page on social networks, for example, on Facebook, Twitter, LinkedIn.

1. Basic information about the administrator

Administrator: RIGAAPARTMENT.COM Ltd.

Reg. no. 40103508736

129 Gertrudes Street, Riga, LV-1009, Latvia

Telephone: +371 20060009

Goal of Personal Data processing: providing services connected with the accommodation in the hotel rooms and apartments, as well as providing third party services (taxi services, catering and culture events), administrating the payments, providing customer service, maintaining and improving homepage and business pages on the social networks.

2. Types of Personal Data and the purposes of their processing

RIGAAPARTMENT processes the following Customer Personal Data for the following purposes:

Purpose	Type of Personal Data
To provide services and communication with the Customer.	Name, surname, address, contact information, a personal identification document, information about the payment method, date of arriving and leaving, preferences.
For the purposes of financial accounting, for example bookkeeping.	History of reservation, details of the payment.
To develop RIGAAPARTMENT economic activity and to improve services and product quality, to promote services and marketing activities, including adapting the homepage functionality and commercial correspondence to the Customer habits.	Name, surname, contact information, gender, date of birth, information about habits, including information about homepage use and habits, IP address, information about geolocation, Personal Data processed with the help of the cookies.
To comply with the requirements of the law, including but not limited to provide information to public authorities, for example, National Police, Tax office and others.	The Personal Data specified in the laws. For example, the section 7 of the Law "On Accounting" states that the private person source document must include the following Personal Data – name and surname, personal identity number, address. Whereas the part 7 of section 11 in the Tourism Law obliges RIGAAPARTMENT to ensure that the accommodated foreigners personally complete and sign a declaration form and prove their identity by presenting a valid identification document. The declaration shall include the following information about the foreigner – name, surname, date of birth, nationality, type and country of residence, type, series, number, issuing country, expiration date of travel document, date, the date of arriving and leaving.
To store documents in an archive.	All Personal Data needed to fulfill the RIGAAPARTMENT obligations that are stated in the laws.
To pursue the legitimate interests of RIGAAPARTMENT and third parties in order to ensure the safety of RIGAAPARTMENT employees and Customers, as well as to prevent or detect crimes connected with the protection of the property.	Information about the Customer which was obtained through video surveillance in the RIGAAPARTMENT hotel common areas, including conference rooms and the parking – the image and actions of the person (appearance, behavior), the place of recording of the image of the person (area, location of the camera), time of the image of the person (date, time, beginning and end of the recording) when the person is in the video surveillance zone. Video surveillance is not carried out in places where the Customer expects high privacy level (in the toilet etc.).

3. The Personal Data processing Legal basis

RIGAAPARTMENT carries out the Personal Data processing if:

1) The Customer Personal Data processing is necessary for the contract issue and service completion (upon the purchase of a service provided by RIGAAPARTMENT by contract is considered to be concluded between RIGAAPARTMENT and the Customer). For example, data processing is necessary to book a room, as well as to register the Customer arriving and leaving, to process the payment for the Customer stay in the hotel, to draw up and issue a bill for RIGAAPARTMENT services. If the Customer does not provide to the RIGAAPARTMENT the Personal Data that are necessary for the contract issue, RIGAAPARTMENT will not be able to issue the contract and provide the service.

2) The Customer Personal Data processing is necessary for the execution of legal obligations that are stated in the laws and RIGAAPARTMENT concerns, for example, to ensure the information provision about the Customer to the public authorities, as well as to fulfill the obligation of accounting document management.

3) The Personal Data processing is necessary to pursue the legitimate interests of RIGAAPARTMENT or a third party, for example, to investigate cases where there are complaints about the provided service quality, to carry out inspections in order to improve service or to use video surveillance to protect the RIGAAPARTMENT property (prevent or detect theft, intentional destruction or damaging of property or other crimes regarding the property), as well as to provide evidence in the case of a crime, complaints and/or claims and obtain evidence for the insurance purposes.

4) The Customer has given consent to the Personal Data processing to develop RIGAAPARTMENT economic activity and improve service quality, to promote services and goods, and marketing activities, including adapting the homepage functionality and commercial correspondence to the Customer habits. For example, the Customer consent is needed to use Personal Data collected with the cookies at the homepage, send special offers e-mails or SMS.

5) The Personal Data processing is necessary to protect the vital interests, for example, preventing and/or detecting a crime with the help of CCTV video surveillance and ensuring the safety of RIGAAPARTMENT employees and the Customers that are present in the RIGAAPARTMENT rooms, apartments or hotel areas; the vital interests of the persons, as well as their health and life protection.

4. The Personal Data recipients

RIGAAPARTMENT may transfer the Customer Personal Data to the following Personal Data recipients, providing it is not in conflict with the applicable laws:

- bailiffs, notaries, law enforcement authorities, as well as public municipal authorities, including national safety authorities, prosecutor's office and courts upon their request or in order to bring, implement or defend legal claims and obtain evidence in present cases, as well as to the security staff;
- to persons connected to the functioning of the RIGAAPARTMENT company and business development, including but not limited to providers of data storage services, promotion and marketing, and other service providers which are connected to RIGAAPARTMENT

obligation fulfillment or in regards to orders of additional services; for example, catering undertakers may receive information about eating habits; taxis may receive the name and surname of the Customer, the flight number and arrival time; if the Customer has forgotten his/her personal belongings and RIGAAPARTMENT provides the mail and delivery service to the Customer, mail and delivery providers may receive the Customer name, surname, address. Information about the Customer may be transferred to the accounting and financial service providers, including but not limited to legal advisers, financial advisers and auditors, the providers of communication, information technology services, credit institutions (to process payments). In the previously mentioned cases RIGAAPARTMENT transfers or receives Customer Personal Data to and from third parties to the extent that is necessary to provide relevant service or action.

5. The extent and period of Personal Data processing

The Customer Personal Data is processed to the reasonable extent that is necessary, in compliance with the existing legislation. RIGAAPARTMENT will retain Customer Personal Data for the period stated in the law, as well as until the previously mentioned purposes of Personal Data processing have been achieved.

RIGAAPARTMENT processes Personal Data while at least one of the following criteria is met:

- 1) the contract between RIGAAPARTMENT and the Customer is in the process;
- 2) RIGAAPARTMENT or Customer can pursue their legitimate interests in accordance with the procedure prescribed in the existing laws (for example, submit objections or claims, bring or pursue legal proceedings);
- 3) RIGAAPARTMENT has the legal obligation to retain the Personal Data;
- 4) the Customer give permission and subscribe to the Personal Data processing, if there is no other legitimate reason for the Personal Data processing.

If none of the criteria mentioned in this section are met, the Personal Data is deleted.

Video surveillance records are retained for no longer than 30 days unless the video record shows possibly unlawful conduct or conduct that may help RIGAAPARTMENT or third parties protect the legal interests of these persons. In that case the relevant video record can be retained until the legal interests have been protected.

6. Transfer of the Personal Data outside the European Union

The Personal Data is not transferred outside the European Union.

7. The Customer rights regarding the Personal Data processing

- the right to access their personal data – the Customer has the right to receive information regarding the goal, legal basis and type of the processing of Personal Data, rectification, erasure or blocking of Personal Data, source of the Personal Data and other information in accordance with the laws;

- the right to rectify their personal data – the Customer has the right to demand the rectification of their personal data if the data is inappropriate, incomplete or incorrect;
- the right to object to data processing – the Customer has the right to submit objections in regard to the processing of their Personal Data if the use of the Personal Data is justified by marketing purposes, for example, to receive marketing offers;
- the right to withdraw consent – the Customer has the right to withdraw their consent to processing of personal data in cases where the Personal Data processing is justified by consent. In addition, the withdrawal does not affect and does not stop the personal data processing which is carried out in accordance with and/or is justified by another legal basis. To withdraw consent the Customer may use the contact information of the Controller that is given in this document. If the Customer withdraws consent, including the consent to the cookie use, RIGAAPARTMENT has the right to limit the functionality and extent of their services. In this case RIGAAPARTMENT will be unable to provide relevant services to the Customer if the Personal Data necessary for the provision of services and/or functionality will not be available to RIGAAPARTMENT due to the withdrawal.
- the right to be forgotten – the Customer has the right to demand the erasure of their personal data unless it is in conflict with legal requirements, for example, if the personal data is being processed on the basis of consent previously given by the Customer and the Customer has withdrawn their consent. This right is not in effect if the the erasure is demanded in regard to the personal data that is being processed in compliance with requirements of the law;
- the right to submit complaints – the Customer has the right to submit complaints about the processing of their personal data to RIGAAPARTMENT and National Data Protection Agency if the Customer believes that their personal data processing is against their rights as stated in the law;
- other rights that are determined in accordance with the GDP Regulation.

8. Personal Data automated processing

The Customer Personal Data may be processed to develop economic activity of the Administrator, to promote services and goods, and marketing activities, including adapting the homepage functionality and commercial correspondence to the Customer buying behavior. RIGAAPARTMENT can analyze the homepage visitor and use this data for personal Customer offers such as advertisements, services, discounts or opportunities to participate in certain campaigns that are consistent with their habits and interests.

9. Information about the Personal Data processing

The Customer may contact RIGAAPARTMENT in regards to personal data processing (with questions, giving consent of withdrawing it, using their rights and submitting complaints about the use of personal data) by sending their requests to the e-mail address elena@rigaapartment.com or by post to: 129 Gertrudes Street, Riga, LV-1009, Latvia with the subject “Personal Data processing”.