

## Attachment 1 to the Internal Notifications Regulation - Information clause

### **Information clause in relation to the processing of data in the breach reporting system.**

In fulfilment of the information obligation under the General Data Protection Regulation of the European Parliament and of the Council (GDPR), we inform you that:

The personal data we process has been received directly from the data subject (if the breach report has not been made anonymously) or the data has been provided to us by breach reporting individual (reporting individual's data, witnesses).

### **Controller**

The controller of your personal data is SIA TZMO Latvija, Rankas iela 15, Rīga, LV-1005, Latvija.

### **Data Protection Officer**

In all matters concerning the processing of personal data and the exercise of rights arising from data processing, you can contact the Data Protection Officer appointed by the controller, Mr. Elvijs Zarins:

- phone: +371 29429389
- e-mail: [elvijs.zarins@tzmo-global.com](mailto:elvijs.zarins@tzmo-global.com)
- in writing to the address of the administrator's registered office.

### **Purpose, legal basis of processing and duration of storage**

Your personal data will be processed on a purpose-dependent legal basis:

1. In order to analyse the breach report received, based on the Controller's legitimate interest to be able to verify the information received and to carry out an internal investigation (Article 6(1)(f) of the GDPR), for the duration of this analysis and thereafter:
  - a. when we process the data only to verify the breach report but do not investigate and report externally to the authorities due to lack of grounds, then we process the data for one year after completion of internal verification,
  - b. when we process data for the purpose of carrying out an internal investigation, but this does not involve proceedings before an authority, in which case we process for the duration of the investigation/verification, but for a minimum of one year,
  - c. when we process in connection with proceedings before authorities (e.g. law enforcement) - until such proceedings have become final.
2. For the purpose of maintaining the Breach internal reports register - data will be processed to the extent necessary to comply with legal obligations for a period of 5 years from the completion of the analysis of the breach report and entry in the register (Article 6(1)(c) of the RODO).
3. For the purpose of possibly establishing, asserting or defending against claims - for the duration of the proceedings and the limitation period for potential claims (Article 6(1)(f) RODO).

### **Recipients of personal data**

The Controller ensures the confidentiality of your data in connection with the application received. Therefore, data may be disclosed only to entities authorised to do so under the provisions of law.

The intended recipients of your personal data are:

- entities comprising the TZMO Group in the scope of matters concerning them,
- postal or courier companies,
- entities operating IT systems and providing IT services,

- entities providing advisory, consulting, audit, tax and accounting services,
- in case of data processing in connection with proceedings before authorities: law enforcement bodies, courts, government administration bodies, local authorities, state agencies, public institutions.

### **Rights of data subjects**

You have the right to withdraw your consent to the processing of personal data in the case of personal data processed with your consent (withdrawal of consent does not affect the legality of the processing performed on the basis of your consent before its withdrawal), the right to demand access to your data, including obtaining a copy thereof, rectification (amendment), transfer of the data provided. You also have the right to demand erasure, restriction of processing and the right to object to the processing of your personal data, but only if further processing is not necessary for the fulfilment of a legal obligation by the Controller and there are no other overriding legal grounds for processing.

You also have the right to lodge a complaint with the President of the Office for Personal Data Protection (uodo.gov.pl) if you consider that the processing of your personal data violates the provisions of the GDPR.

### **Information on data requirements**

The provision of personal data by the person reporting the breach, in particular name, surname, contact details, is voluntary. The data of persons covered by the breach report (the person possibly committing the breach, a witness) may be disclosed to e.g. law enforcement agencies, courts, government administration bodies, etc. regardless of whether the person agrees to it. The above-mentioned entities may, in cases determined by the law, request the Controller to provide personal data for the needs of proceedings conducted within their respective areas of competence, and the Controller shall be legally obliged to provide such data to them.

### **Information about intentions to transfer data outside the European Economic Area**

Personal data will not be transferred to a third country or international organisation.

### **Profiling and automated decision-making**

Personal data will not be subject to automated decision-making or profiling.