

**SIA SPRING PR & COMMUNICATIONS
PRIVACY POLICY**

1. Information about the Controller

Our company name is **SIA SPRING PR & COMMUNICATIONS**, registration number 40103941537, with its registered address at Kāpu iela 2, Rāmava, LV-2111, Latvia.

2. Contact information for personal data protection matters

If you have any questions regarding this Privacy Policy or the processing of your personal data, you may contact us by email at: ask@springchanges.com

3. General description of our personal data processing activities

This notice describes how we process the personal data of our clients, client representatives/contact persons, lottery and prize draw participants, business partners, website visitors, and other individuals whose data may come into our possession in the course of our business activities.

We assume that before using our website or becoming our client, you have read this notice and accepted its terms. This is the current version of the notice. We reserve the right to amend and update this notice as necessary.

The purpose of this notice is to provide a general overview of our personal data processing activities and purposes. However, please note that additional information regarding the processing of your personal data may also be provided in other documents (for example, service agreements, cooperation agreements, lottery rules, and cookie policies).

Please be advised that the personal data processing provisions contained in this notice apply only to the processing of personal data relating to natural persons.

We recognize that personal data is valuable to you and will process it in accordance with confidentiality requirements while ensuring the security of the personal data in our possession.

4. For what purposes do we process your personal data and what is the legal basis for processing?

We process your personal data only for predefined legitimate purposes, including:

a) Commencement and provision of services, and fulfilment of contractual obligations

For this purpose, we may need to identify you, ensure accurate calculation and processing of payments, communicate with you regarding the provision of services and/or performance of contracts (including issuing invoices), recover outstanding payments where necessary, and comply with legal obligations such as accounting and archiving requirements.

For these purposes, we may need to process at least the following categories of personal data: identification data; contact information, billing and payment-related information, financial information.

The primary legal bases relied upon for achieving these purposes are:

- The conclusion and performance of a contract with the data subject (Article 6(1)(b) of the General Data Protection Regulation¹ (GDPR));
- Compliance with a legal obligation (Article 6(1)(c) of the GDPR);
- The legitimate interests of the controller (Article 6(1)(f) of the GDPR), for example, identifying you as a contact person of a client and/or business partner and ensuring communication with you.

b) Marketing activities and research

For this purpose, we may send you commercial communications, facilitate your participation in lotteries and prize draws organized by us, involve you in research activities, and publish materials from public events organized by us.

For these purposes, we may process: identification data; contact information; opinions expressed by you.

The primary legal bases relied upon for achieving these purposes are:

- The data subject's consent (Article 6(1)(a) of the General Data Protection Regulation (GDPR));
- The conclusion and performance of a contract with the data subject (Article 6(1)(b) of the GDPR);
- The legitimate interests of the controller (Article 6(1)(f) of the GDPR), for example, maintaining communication and sending commercial communications regarding services similar to those that have already been provided to you.

c) Security, protection of property interests, and other legitimate interests

For these purposes, we may need to retain personal data to demonstrate compliance with our obligations, engage data processors and service providers, disclose information to courts and public authorities when necessary, maintain and improve technical systems and IT infrastructure, use technical and organizational solutions that may involve personal data (such as cookies), and exercise rights granted under applicable laws to protect our legitimate interests.

For these purposes, we may process: identification data; information about services provided and received; payment information, research-related information, other data as necessary.

The primary legal basis is:

- Legitimate interests of the controller (Article 6(1)(f) GDPR), including payment processing, preservation of evidence, and debt recovery.

5. Who may access your personal data?

We take appropriate measures to ensure that your personal data is processed in accordance with applicable laws and that unauthorized third parties do not gain access to it.

Where necessary, access to your personal data may be granted to:

¹ 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).

1. Our employees or authorized persons who require it to perform their duties;
2. Data processors, within the scope necessary for providing their services;
3. State and municipal authorities where required by law;
4. Third parties, provided that a valid legal basis exists for such disclosure.

6. Which data processors do we use?

We take appropriate measures to ensure the lawful processing, protection, and transfer of personal data to processors. We carefully select our data processors and assess both the necessity of data transfers and the volume of data transferred. Any transfer is carried out in accordance with confidentiality and security requirements.

7. Are your personal data transferred outside the European Union (EU) or European Economic Area (EEA)?

We do not transfer personal data to countries outside the European Union or the European Economic Area.

8. How long do we retain your personal data?

Your personal data is retained only for as long as necessary to achieve the relevant processing purposes and in accordance with applicable legal requirements.

When determining retention periods, we consider legal requirements, contractual obligations, your instructions (for example, where consent has been provided), and our legitimate interests. When your personal data is no longer required for the intended purposes, we will delete or destroy it.

Below we set out the most common retention periods for personal data:

- Personal data required for the performance of contractual obligations will be retained until the contract has been fulfilled and any other applicable retention periods have expired (see below);
- Personal data that must be retained to comply with legal requirements will be stored for the periods prescribed by the applicable laws and regulations. For example, the Accounting Law provides that supporting documents must be retained until the date on which they are no longer required to identify the commencement and trace the course of each business transaction, but for no less than five (5) years;
- Personal data retained to demonstrate the fulfilment of our obligations will be stored for the duration of the applicable statutory limitation periods, in accordance with the limitation periods established by law, including 10 years under the Civil Law, 3 years under the Commercial Law, and any other applicable limitation periods, taking into account the deadlines for bringing claims as prescribed by the Civil Procedure Law.

9. What are your rights as a data subject?

Updating Personal Data

If any of the personal data you have provided to us changes (such as your personal identification number, address, telephone number, or email address), please inform us so that we can maintain accurate records and fulfil the relevant processing purposes.

Right of Access and Rectification to Data

Under the GDPR, you have the right to access your personal data; request correction of inaccurate data; request deletion of your data; restrict processing; object to processing; exercise your right to data portability, where applicable.

Upon receiving your request, we will respond within the time limits established by law (normally within one month unless the request is particularly complex) and, where appropriate, correct or delete your personal data.

You may obtain information about the personal data we hold about you or exercise your other rights as a data subject in one of the following ways:

- By submitting a written request and sending it by post to the address specified in Section 1 of this Privacy Policy;
- By submitting a written request and sending it to our email address: ask@springchanges.com. It is recommended that the request be signed with a secure electronic signature.

Upon receiving your request, we will assess its content and our ability to verify your identity. Depending on the circumstances, we reserve the right to request additional identification from you in order to ensure the security of your personal data and to disclose such data only to the appropriate individual.

Withdrawal of Consent

If the processing of your personal data is based on your consent, you have the right to withdraw that consent at any time. Upon withdrawal, we will no longer process your personal data for the purpose for which it was processed on the basis of your consent.

However, please note that withdrawing your consent does not affect the lawfulness of any processing that is required to comply with legal obligations, is based on a contract, our legitimate interests, or any other lawful basis for processing established by applicable legislation.

You also have the right to object to the processing of your personal data where such processing is based on legitimate interests or is carried out for marketing purposes (for example, sending commercial communications or administering prize draws and competitions).

10. Where can you submit a complaint regarding personal data processing?

If you have any questions or concerns regarding our processing of your personal data, we encourage you to contact us first.

However, if you believe that we have been unable to resolve the issue between us and that we are infringing your rights relating to the protection of your personal data, you have the right to lodge a complaint with the Data State Inspectorate.

11. Why do you need to provide us with your personal data?

Primarily, we collect your information in order to fulfill our contractual obligations, comply with legal requirements that are binding upon us, and pursue our legitimate interests. In such cases, obtaining certain information is necessary to achieve the relevant purposes. Therefore, failure to provide such information may prevent the establishment of a business relationship or the performance of a contract. Where the data is not mandatory, but providing it could help us improve our services or offer you more favorable contractual terms and/or offers, we will indicate at the time of collection that providing such data is voluntary.

12. How do we obtain your personal data?

We may obtain your personal data in one of the following ways:

- During the process of entering into a contract with you, by obtaining the data directly from you;
- If a contract is concluded with a third party and that party has designated you as a contact person;
- Directly from you when you submit applications, requests, emails, or contact us by telephone;
- Directly from you when you participate in lotteries, prize draws, or research projects organized by us;
- Through our website by using cookies.

13. Are your personal data used for automated decision-making?

We do not use your personal data for automated decision-making.