

PRIVACY TERMS

It is important for ViaFreedom OÜ (hereinafter **ViaFreedom** or **we**) that our clients (hereinafter also **You**) would feel safe and well with us. Hence, we will take care that your personal data is protected by us.

The aim of these Privacy Terms is to help you to understand how and for which purposes we collect and use your personal data as well as what are your rights in relation to your personal data.

These Privacy Terms are applicable to you if you are our contractual client, use our services without specific contract, subscribe to our newsletter or have expressed interest to receive our offers as well as when you have submitted an information request via our website.

1. The controller of personal data

Company: ViaFreedom OÜ
Reg. nr: 14808303
Address: Mustamäe tee 106-52, 12917 Tallinn
E-mail: info@viafreedom.ee

2. What type of personal data do we process?

Which personal data is used by us depends on what data you disclose us. Certain data is required so that we would be able to provide you our services and to conclude an agreement with you – such data is marked with an asterisk (*) as mandatory both at paper and web forms.

Depending on the above circumstances we may collect and process the following personal data:

<u>Personal data</u>	first name and family name, date of birth, child's name and date of birth;
Contact data	phone number, e-mail address, residential address, correspondence language;
<u>Service data</u>	the data which reveals your activities in using our services, e.g. your purchases of goods and services from ViaFreedom, information concerning potential breaches of the contracts concluded with us, etc.

3. For what purposes and upon which legal basis do we process your personal data?

There are different purposes for processing personal data and each processing activity must rely on one of the legal basis. ViaFreedom processes your personal data relying on the following legal basis:

3.1. Processing of data which is required for performance of contract

We process data relying on this legal basis if it is necessary for performance of the contract concluded with you or for taking measures required prior to signing the contract at your request.

3.2. Processing of data which is required for performance of legal obligations of ViaFreedom

In some cases, we need to process your personal data because we are obliged to do so under applicable laws. If the data processing is required by law, neither we nor you can influence the processing of such data.

3.3. Processing of data which is based on the legitimate interest of ViaFreedom

A legitimate interest means that we do not directly need to process your data to fulfil contractual obligations nor our legal obligations, but the processing is still necessary. The processing may be needed to develop our services and products making them better for you; to protect our property, clients and employees by using surveillance cameras; to make business decisions by compiling statistics. As under the legitimate interest we are not obligated to process your data by law or for

performance of our contractual obligations but we also do not request your permission for the processing – we give you the right to ask for explanations as well as to present objections, if you consider that processing of your data for the purposes given in below table breaches your rights.

3.4. Processing of data based on your consent

We may under certain circumstances need your consent for processing your personal data – for example for sending you direct marketing messages or in other cases where we do not have other legal basis for processing but still want to process your data.

You always have the right to withdraw you consent (each separately as well as all jointly) given to us by sending us a corresponding message to the e-mail address info@viafreedom.ee. If you withdraw Your consent, we will stop processing your data for the purposes for which the consent was granted.

You may always prohibit the direct marketing offers and messages to your e-mail and/or phone by sending us respective e-mail to the e-mail address info@viafreedom.ee by clicking the [unsubscribe](#) link at the bottom of each message.

4. Who else may processes your data in addition to ViaFreedom?

If it is necessary for achieving the purposes of processing of your personal data we may share your data with the following persons:

- Persons providing services to us: Your data may be accessible to persons providing the following services to us: business software provider, IT management and maintenance service provider, mail server provider, auditor, lawyers, data analysis software developer, collection service provider.
- Public authorities and state institutions: (e.g. police, courts, Data Protection Inspectorate): we will only disclose your data when we are legally obliged to do it.

If we share your data with the above-mentioned persons, we ensure the protection of your personal data through conclusion of data protection agreement with the above-referred persons (except for the public authorities and state institutions).

We do not store or transfer your data outside the European Economic Area.

5. How long do we retain your personal data?

Your personal data is for as long as required by law or as necessary to fulfil the data processing purposes described in this privacy notice. Below are some examples of data retention periods:

Retention period	Examples
6 months	Data concerning people who have requested an offer or made other inquiries but with whom no client contract exists.
3 years (after expiry or termination of contract)	Client contract and service data to protect us against potential claims or to file a claim for protecting ourselves and our own rights.
7 years (after expiry or termination of contract)	Accounting base documents (e.g. client's agreement and invoices).
Until withdrawal of consent for processing	Data processing of which is based upon your consent – e.g. direct marketing offers or messages by e-mail or SMS.

You can obtain more specific information on retention of your personal data by making a corresponding query to info@viafreedom.ee.

6. Security of your personal data

ViaFreedom has established necessary organizational, physical and technical security measures to protect your personal data. Some examples of the measures we use:

Physical measures – paper-based documents containing personal data are stored in locked rooms and cabinets to which only certain employees have access for fulfilling their job duties; data processing rooms and IT-systems are sufficiently protected against fire, overheating, water, current instability and power outages.

Technical measures – all employee work computers are password protected; it is ensured that especially vulnerable systems (e.g. laptops, smartphones) are sufficiently protected (using encryption or other means).

Organizational means – all IT system users are assigned roles and profiles; it is ensured that access rights are deleted when an employee leaves ViaFreedom; it is ensured that there is no access from publicly used rooms to rooms where personal data is being processed.

In case we use external companies for providing services, which include data processing, we conclude data protection agreements with such service providers obligating them to: a) take appropriate measures to ensure confidentiality and security of the personal and b) process personal data in accordance with the applicable legal requirements.

7. Your rights concerning your personal data

Right to access – You have the right to know which data we hold about you, for what purposes we process your data; to whom we disclose the data, how long the data is retained; what are your rights concerning restricting, correcting, deleting and processing data.

Right to rectification – You have the right to demand correction of your personal data in case it is inaccurate or incomplete.

Right to deletion of personal data – You have the right under certain conditions to request the deletion of your personal data, foremost if we no longer need the data, you withdraw your consent granted for processing of your personal data or in case we have processed your data illegally.

Right to restrict processing – You have the right under certain circumstances to forbid or restrict the processing of your personal data for a certain period (e.g. if you have objected to data processing).

Right to object – You have the right to object to such data processing which is based on ViaFreedom’s legitimate interest incl. profiling based on our legitimate interest. We shall stop processing your personal data when you present an objection, unless we can demonstrate compelling legitimate grounds for the processing or processing is needed for the establishment, exercise or defense of legal claims. You also have the right to object at any time to processing of your personal data concerning for direct marketing. Upon receiving such objection we shall stop processing your personal data for direct marketing.

Right to data portability – In case processing the personal data is based on your consent or on a contract between us and data is processed automatically, you have the right to access data concerning you which you have given to us in a structured, generally usable and in machine readable form. You also have the right to demand that ViaFreedom transfers such data directly to another service provider if that is technically possible (that means the other service provider is capable of receiving the data in the forwarded format).

If you want to use any of the abovementioned rights, please contact us using the e-mail address info@viafreedom.ee. In order to respond to your inquiry, we must first authenticate you to avoid granting information to unauthorized persons. We will respond to your inquiries within 30 days.

8. The right to submit a complaint to the Data Protection Inspectorate and the court

We respect your privacy and wish that processing your personal data by us would be understandable and transparent. For that we have also drafted these Privacy Terms. Should you need further

information about processing your personal data or exercising your rights, please contact us at e-mail address info@viafreedom.ee.

If you believe that processing of your personal data violates the General Data Protection Regulation requirements, you have the right to turn to the Data Protection Inspectorate and the courts to protect your rights and interests.

9. Final provisions

ViaFreedom will from time to time review the Privacy Terms for updating purposes, especially upon change of legal regulations and changes in our processing activities. Updated version of these Privacy Terms is always available at our website.