

Privacy Policy

Shopping in the e-shop of Laima Chocolate Museum <https://www.laimasokoladesmuzejs.lv> and using www.es.laima.lv (hereinafter – Laima Chocolate Museum E-shop) is not possible without processing your personal data. We will only process your personal data if you choose to provide us with your personal data. If you do not want to provide us with your personal data or if you do not consent to processing of personal data as described in this Privacy Policy, we will not be able to provide you the services offered by the Laima Chocolate Museum E-shop, you will not be able to make purchases and/or your registration at the Laima Chocolate Museum E-shop will not be confirmed, and the information you provided will not be saved to any of our systems. It is your responsibility to provide only correct data and only your own data. The Laima Chocolate Museum E-shop does not assume liability for incorrect and/or inadequately provided personal data. If you have provided the data of another person, then in case of any claims we shall be entitled to submit a subrogation claim against you.

We inform you that we reserve the right to amend this Privacy Policy if necessary, and that its current version which you are obliged to get acquainted with is available on the website of the Laima Chocolate Museum.

Upon registration in the Laima Chocolate Museum E-shop or upon purchasing without registration, you must accept the terms of use of the website, as well as the Laima Chocolate Museum's internal rules, which means that you have agreed to the agreement and this consent confirms the conclusion of the agreement, and you must also confirm that you have read this Privacy Policy.

What is personal data?

It is any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

To whom will you entrust your personal data or who will be the controller and processor of your personal data?

When you make a purchase or register on the Laima Chocolate Museum E-shop, you will entrust your data to the limited liability company Orkla Latvija, registration no. 40103217882, registered address: Miera iela 22, Riga, LV-1001, hereinafter – the Company. The Company is the controller of your personal data, and it will process personal data only in accordance with this Privacy Policy and take care of the security of data processing. We confirm that your personal data will be processed in accordance with the requirements of laws and regulations.

If necessary for ensuring specific functions of Laima Chocolate Museum E-shop and execution of orders, the Company may transfer your personal data to a data processor so it can perform specific actions (for example, organize the delivery of goods) on behalf of the Company. We confirm that personal data processing agreements have been concluded with all our personal data processors in

accordance with the requirements of laws and regulations, and that all technical security requirements have been complied with in order to ensure a high level of protection for your personal data.

What is personal data and why will we process it?

Your profile If you decide to create a profile and register in the Laima Chocolate Museum E-shop, we have to process your personal data in order for you to do so.

Personal data necessary for registration and the creation and management of your profile:

Categories of personal data	Legal basis	Duration of storage
Your name, e-mail address, and phone number.	For the conclusion and performance of the agreement to which you are a contracting party, as well as for the protection of our legitimate interests.	The entire period until you delete the profile. We may also store your profile data for a longer period of time, until the claims that may arise from contractual obligations expire, and, if necessary, so that we can defend our legitimate interests against any claims or complaints brought against us.

Administering your profile

In order for us to administer your profile, if you have decided to create one, we process the following personal data:

Categories of data	Legal basis for the processing of data	Duration of data processing
Data provided during your registration, profile login data, profile activity, including technical browsing data (IP address, technical information of login and browsing).	Agreement concluded by you and the profile you have created to fulfill your contractual obligations, and for the protection of our legitimate interests.	For as long as you are using the profile. We may also store personal data for a longer period of time if this is necessary for defence against claims or complaints brought against us.

Administering your purchases

For you to be able to place orders in the Laima Chocolate Museum E-shop with or without creating a profile, or for us to make a refund to you in accordance with the terms of the agreement, for us to prepare accounting justification documents, such as invoices, waybills of goods, etc., to organize the delivery of the goods and services ordered, as well as to perform and/or provide other activities/functions related to the transactions.

Categories of data	Legal basis for the processing of data	Duration of data processing
Your name, e-mail address, telephone number, and delivery address, depending on the chosen type of delivery (for delivery of goods by courier, the delivery address of the shipment is required, but for parcel delivery, the parcel machine address is required), names of goods and services, quantities, purchase prices and discounts granted, method of payment for purchases and payment information, including bank account number, bank card number, bank card holder.	Agreement concluded by you and/or the profile you have created to fulfill your contractual obligations, as well as for the protection of our legitimate interests and fulfilling the arising legal obligations that apply to the Company.	Accounting justification documents – 5 years after the date of the purchase operation and signing of the waybill of goods. We may also retain the agreement concluded with you and the accounting justification documents proving the transaction for a longer period of time, for as long as the claims that may arise from the contractual obligations expire; if necessary, this allows us to defend our legitimate interests against claims or complaints brought against us.

Provision of offers and information

In the Laima Chocolate Museum E-shop your consent will be asked to receive news and offers by e-mail and/or to your phone number in the form of an SMS. In order to express your wish and consent to receive news and offers, you will have to click on the correspondingly marked fields when you register or make a payment without registration in the Laima Chocolate Museum E-shop. If you do not want us to send you offers and/or news, you may choose to not give consent, or, if you have given your consent to receive offers and/or news, you may opt out or change the way you receive notifications (channels) at any time. Your refusal to receive offers and news will not impede your use of the services and the fulfillment of the obligations arising from the concluded agreement.

Categories of data	Legal basis for the processing of data	Duration of data processing
Your name, e-mail address, and phone number.	Your consent to receive offers and information about current news, as well as the protection of our legitimate interests.	For as long as your consent to receive offers and news from us is valid. We may also store consent obtained from you and proof of it for a longer period of time, if it is necessary for defence against claims or complaints brought against us.

Statistics, market, and research of our customers' behaviour

We are constantly working to make the range of our goods, services, and discounts as suitable as possible for the needs our customers, including you. We use automated data analysis to conduct statistical, market, and customer behaviour research, as well as to prepare the reports necessary for our business. During the analysis, we use non-personalized data and we do not process your name, contact information, or other information that identifies you. Data analysis for the purpose of statistics, market, and customer behaviour research (purchase data) helps us make important business decisions about the needs of our customers, the creation of an appropriate product range, pricing, etc. The analysis of this data does not affect your legitimate interests or similar interests, nor does it affect the future fulfillment of services and the obligations arising from your agreement.

Categories of data	Legal basis for the processing of data	Duration of data processing
Address, method of delivery, purchase details (including date and time of purchase, product names, quantities, total purchase price, amount of discounts granted).	Our legitimate interests are to analyze purchase data in a specific region identified by customer addresses and to prepare reports necessary for our business in order to evaluate our business and create benefits for you as a customer and for the Company's business.	5 calendar years from the moment when the order is placed

Handling customer requests, complaints, enquiries, and feedback

We will use your personal data to respond to your requests, complaints, and enquiries and to administer your feedback, hereinafter – the Request. We use your data only for the purposes of properly and objectively reviewing your Request, providing you with the necessary information, answering your questions, resolving your requests or claims (complaints). We may analyze the data of your feedback to improve our operations and the quality of the services provided to you, taking into account your opinion and suggestions.

Categories of data	Legal basis for the processing of data	Duration of data processing
Identification and contact information provided by you: name, telephone number, e-mail address. Content of your Request: the related event, its circumstances, date, place, your request, claim or feedback, product, other	Fulfillment of our legal obligations to review and respond to your requests, as well as our legitimate interest to evaluate your customer feedback in order to improve the quality of our operations and services provided to you,	Up to 12 months. We may also store your requests regarding the products for a longer period of time, until the claims that may arise from agreements of the purchase of goods expire, and, if necessary, so that we can defend our legitimate interests

information provided in the Request; Other documents and (or) data submitted together with the Request: for example, data of the invoice/waybill of goods, photographs of the goods.	and the protection of our legitimate interests.	against any claims or complaints brought against us.
---	---	--

How long do we process and store your data?

We process and store your Request and related data while we review the Request, provide you with a response, and execute the decisions made, and then for up to 6 (six) months after the Request is resolved, but not a shorter period than:

- requests in electronic form by e-mail – no longer than 6 months;
- complaints – for 12 months;

If a legal dispute is initiated in relation to the Request or there is a possibility of such a dispute, we may store your data for a longer period until the statutory limitation period for filing a complaint or claim expires and (or) the final decision enters into force.

Upon the expiry of the data processing and storage period as provided in this Privacy Policy, we shall safely and reliably destroy the documents containing your personal data.

From what sources do we obtain and collect your personal data?

Your data may be processed on one or more of the legal bases indicated in this Privacy Policy.

We obtain almost all of your personal data only from you. You submit the data directly to us upon registration in the Laima Chocolate Museum E-shop, and you submit the purchase data when using the services.

We also obtain your data directly from you when you submit a Request in any way you choose: by sending an e-mail to our e-mail address or by submitting a written request to us in paper form.

When we need to obtain additional information or investigate significant circumstances in order to process your Request properly and objectively, we may link your Request data to data already collected or the data collected during the processing of your Request – for example, we may review your purchase transaction data, your profile usage history, we can interview our employees, etc.

How do we store and destroy data?

Upon the expiry of the data processing and storage period as provided in this Privacy Policy (except in cases described below), we will destroy your data in a secure manner; however, in cases set out in the Privacy Policy we will reliably and irrevocably anonymise them as soon as possible, within a time period reasonable and justified for such actions.

Your personal data may be stored for longer than specified in this policy only if any of the following conditions apply:

- it is necessary for us to be able to defend ourselves against claims or complaints and to be able to exercise our rights;
- the storage period of personal data is determined in or arises from the laws and regulations of the Republic of Latvia and the European Union;
- there is reasonable suspicion of illegal conduct, which is being investigated;
- your data is necessary for proper handling of a dispute or complaint;
- it is necessary to provide a backup copy and for other similar purposes;
- other grounds set forth in laws and regulations apply.

Where such conditions apply, the information containing personal data will be stored until the relevant proceedings (criminal proceedings, administrative violation proceedings, completion of administrative proceedings) are transferred to the law enforcement authority or until the date when the final decision enters into force.

In which cases and to which recipients of personal data do we disclose your data, and in which territory do we process your personal data?

We may transfer your data to the processors of personal data, i.e. to parties that help us to perform and administer the provision of services. Such persons may include persons assisting us in the delivery of goods, IT database software vendors, database administration service providers, service providers providing data centres, maintenance and cloud services, and so on. In any case, we provide data processors with only as much data as is necessary to perform a specific task or provide a specific service. Our affiliated data processors may only process your personal data on our instructions and they may not use them for other purposes or transfer them to other parties without our consent. In addition, they must ensure the protection of your data in accordance with applicable laws and regulations and in accordance with the written data processing agreement concluded with us.

If the event described in the Request is recognized as an insured event, we will transfer your Request and data to the insurance company(-ies) in which we have insured our civil liability or property, or which provide other insurance coverage related to the event mentioned in your Request. Insurance companies act as independent/separate data controllers and process your data in accordance with the insurance company's terms and conditions.

Data may also be transferred to competent/supervisory public, municipal, or law enforcement authorities, such as the police, prosecutor's office, court, or monitoring/supervisory authorities, but only at their reasonable request or only if required under applicable laws or regulations, or in the cases and in accordance with the procedures specified in the laws and regulations, in order to ensure the security of the state, municipal, or law enforcement authorities and/or our rights, the safety of our customers, employees, and IT resources, to file and defend legal claims, etc.

In order to provide IT solutions we may also transfer your data to legal entities – data processors – located outside the European Union and/or the European Economic Area. We confirm that in this case your personal data will be sent to data processors only in those countries where the legal framework and level of personal data protection comply with the so-called adequacy decisions of the European Commission, which confirm that the respective country ensures adequate protection of personal data.

What are your rights and how can you exercise them?

We have provided information regarding your specific rights in relation to the processing of personal data and the ways in which you can exercise them in this Policy, and we invite you to read it carefully:

The right to access your personal data controlled by us

You have the right to receive our confirmation as to whether we process your personal data, as well as the right to access your personal data processed by us and information about the purposes of data processing, categories of data processed, categories of data recipients, data-processing period, data sources, automated decision-making, including profiling, as well as their importance and consequences in relation to you.

We provide most of this information in this Privacy Policy and we believe it will be useful to you.

As a registered user of the Laima Chocolate Museum E-shop, you can at any time see what personal data we process in your user profile (you can, for example, check the personal data submitted by you, update the information, consents given by you, etc.), receive invoices issued to you for the last 12 months.

If you are not a registered Laima Chocolate Museum E-shop user, or if the information provided in this Privacy Policy or in your user profile in the Laima Chocolate Museum E-shop is not sufficient for you, or if you wish to receive a purchase operation history for a period that exceeds 12 months, you can always contact us in the ways described in this Privacy Policy.

Right to rectify personal data

If the data provided at the time of your registration have changed or if you see that the information we process about you is inaccurate or incorrect, you have the right to request that this information is changed, clarified, or corrected by contacting us in the ways described in this Privacy Policy or you can correct (update) your data on your profile in the Laima Chocolate Museum E-shop. We remind you that you are responsible for the accuracy of your data.

Right to withdraw consent

In cases where we process your data on the basis of your consent, you have the right to withdraw your consent at any time, and it will be grounds for terminating the processing of the relevant data.

Revocation of consent shall not affect the lawfulness of processing which is based on the consent before revocation.

For example, you can withdraw your consent to receive offers and news from the Laima Chocolate Museum at any time. Withdrawal of these consents will not limit your ability to continue using the services and fulfill the obligations of the concluded agreement, but it will mean that we will not be able to provide personalized offers and news and you will not be able to receive them.

You may correct (withdraw or give) your consents by submitting a duly updated registration information for the consents given, by changing the terms of consent in your registered user profile or, if you do not have a user profile, by contacting us in the ways described in this Privacy Policy. When your consent is withdrawn, we will stop processing data on the basis of consent and, in cases specified in the Privacy Policy, we will faithfully and irrevocably delete or anonymize the data.

We may also store consent obtained from you and proof of it for a longer period of time if it is necessary for defence of our legitimate interests against any claims or complaints raised against us.

Right to file a complaint

If you believe that our processing of your personal data violates data processing/protection legislation, we kindly ask you to first contact us directly. We believe that we will be able to eliminate all your doubts, satisfy requests, and correct mistakes we have made, if any. If you are not satisfied with the solutions we offer, or if, in your opinion, we do not take the actions necessary in relation to your request, you have the right to submit a complaint to the supervisory authority, which, in the Republic of Latvia, is the Data State Inspectorate.

The right to object to the processing of data on the basis of our legitimate interests

You have the right to object to the processing of personal data on the basis of our legitimate interests. However, given the purpose of the service and the balance of legitimate interests of both parties (you as data subject and us – as data controller), your objections may mean that, if we stop processing your personal data on the basis of our legitimate interest, we will not be able to provide you the opportunity to continue using the services, and the agreement concluded will be terminated. If you wish to exercise the rights set out in this section, please submit a written request to the administration of the Laima Chocolate Museum, whose contact details are indicated in this Privacy Policy.

Right to delete data (right to be forgotten)

In certain circumstances referred to in the data processing legislation (for example, if personal data are processed unlawfully, if the legal basis of the data processing expires, if personal data are no longer necessary for the purposes for which they were collected or otherwise processed, etc.), you have the right to delete your user profile, if any, thus deleting your personal data, or you can ask us to delete your personal data. If you would like your purchase history to be deleted, you must submit a request to us, regardless of whether you are a profile user or make purchases without registering a profile. If you wish to exercise this right, please submit a written request to the museum administration, whose contact details are provided in this Privacy Policy. In addition, we

inform you that the user data registered in the profile of your Laima Chocolate Museum E-shop will be deleted without a separate request from you, but the rest of the data will be deleted or securely anonymized if you stop using the services of Laima Chocolate Museum E-shop and 5 (five) years have passed since your last activity as a registered user in the Laima Chocolate Museum E-shop.

The right to restrict data processing

In certain circumstances mentioned in the data processing legislation (if personal data is processed illegally, you dispute the accuracy of the data, you file objections to the processing of data on the basis of the protection of our legitimate interests, etc.), you also have the right to restrict your data processing. However, we should note that due to the limitation of data processing and for the duration of this limitation, we may not be able to provide you with services and fulfill your contractual obligations. If you want to use the rights indicated in this section, please submit a written request to muzejs@laima.lv.

The right to data portability

You have the right to transfer data processed by us, in accordance with your consent and by automated means, to another data controller. If you wish to exercise the rights to data portability, please submit a written request to the administration of the Laima Chocolate Museum, whose contact details are indicated in this Privacy Policy.

How do we review and process your requests?

To protect our customers' data from unauthorized disclosure, we will need to verify your identity upon receiving your request to provide you with your data or the exercise of your other rights. For this purpose, we may ask you to indicate the current data registered in your Laima Chocolate Museum E-shop profile (for example, name, e-mail address, or telephone number), then we will compare whether the data you provided match the relevant data of the registered user. In addition, during this review we will compare whether the request e-mail matches the one registered in the profile, thus performing the authorization. If the verification procedure fails (for example, the data you provided does not match the data provided in the user profile registered in the Laima Chocolate Museum E-shop or you do not authorize yourself after receiving a text message or an e-mail notification), we will be forced to find that you are not the data subject of the relevant data, and we will have to reject your request.

Upon receipt of your request for the exercise of any of your rights and the successful completion of the abovementioned verification procedure, we undertake to provide you with information in accordance with your request without delay, but in any case no later than within one month after receiving your request and completing the verification procedure. Taking into account the complexity and number of requests, we have the right to extend the one-month period for another two months, informing you before the end of the first month and stating the reasons for such an extension.

If your request is submitted by electronic means, we will also provide an answer by electronic means, unless this is impossible (for example, due to the large amount of information) or you ask for an answer in another way.

We will refuse to satisfy your request for a reply containing the motivation if circumstances for doing such are set forth in the laws and regulations, by informing you in writing in cases where we are unable to provide you with information.

How can you contact us?

- by e-mail, to the e-mail address: muzejs@laima.lv

- for information, by calling: +371 66154777

- address for correspondence: Miera iela 22, Riga, LV-1001, address the letter to: SIA Orkla Latvija, Laima Chocolate Museum

How safe is your data?

The safety of your personal data is our priority. We use appropriate organizational and technical measures to ensure the continued security of your personal data and the compliance of data processing with the requirements of personal data protection legislation and our internal policy. We consistently adhere to the principle of minimizing personal data and we do not aggregate data that we do not need for achieving the purposes set out in this Privacy Policy. We use a variety of personal data protection and security technologies and procedures to protect your personal information from unauthorized access, use, or disclosure. Our business partners are carefully selected and we require them to use appropriate measures to protect the confidentiality of personal data and to ensure the security of your personal information. However, complete security cannot be guaranteed in the transmission of your information to us via the Internet or mobile communications; any transfer of your information to us in the abovementioned ways is at your own risk.

Cookies

We use cookies (small information files sent to your computer or other device (such as a mobile phone) when you visit our website, then stored in your browser). For more information about cookies, the use of cookies, and opting out, see the Cookie Policy.

Application of the privacy policy

The policy does not apply to other services provided by us or companies in our group.

On behalf of SIA Orkla Latvija

Chairman of the Board

Toms Didrihsons

Board Member

Līga Abramoviča