# Information on Personal Data Processing in AS TREV-2 Grupp

(valid as of 25.05.2018)

Information on the processing of personal data has been compiled to meet the requirements for the controller in Article 12 of Regulation No. 2016/679 of the European Parliament and of the Council "Transparent information, communication and modalities for the exercise of the rights of the data subject" (hereinafter referred to as the General Regulation) and to notify natural persons about the principles of the processing of personal data.

# 1. What is the meaning of personal data and in which cases will AS TREV-2 Grupp (hereinafter referred to as "TREV-2") process personal data

- 1.1. Personal data means any information relating to an identified or identifiable natural person, i.e. a data subject; an identifiable natural person is a person who can be identified either directly or indirectly; 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;
- 1.2. The processing of personal data is an automated or unautomated procedure or a set of procedures done to personal data or a set of personal data, such as collecting, documenting, arranging, structuring, storing, adapting, and amending, making inquiries, reading, using, forwarding, spreading or making available in some other manner, combining or joining, limiting, deleting, or destroying.
- **1.3.** TREV-2 will process your personal data, if:
  - you visit our website;
  - you send us a letter containing personal data;
  - you contact our hotline;
  - you apply for work and/or practice at us;
  - you participate in questionnaires and/or surveys conducted by us;
  - the processing of personal data is based on legitimate grounds.

### 2. Principles of processing personal data

TREV-2 processes person data in accordance with the General Regulation, emanating from the following principles:

- in the processing pf personal data it is guaranteed that the processing is legal, just, and transparent for a data subject;
- the personal data are collected and processed purposefully and minimally;
- the personal data are correct and updated upon necessity;
- TREV-2 shall not disclose data to other persons, except in cases there is a legitimate ground to disclose the data;
- the personal data are stored for the prescribed time and deleted afterwards;
- we protect the personal data trusted to TREV-2 from unauthorised processing. In the processing of personal data, security measures are applied which prevent from unlawful access and accidental loss and destruction.

### 3. Rights of natural person

You have the following rights with regard to all the personal data TREV-2 has collected about you:

### **3.1.** The right to have access to your personal data

You have the right to receive a confirmation on the fact that the personal data concerning you are processed; and if they are, you have the right to request the latter to be disclosed to you. You will have to file a claim to have access to the information. We must be convinced of your identity when disclosing personal data. Therefore, you shall sign the claim either by hand or digitally. We will refuse to fulfil your request if fulfilling it would harm the rights of another person. We will notify you about refusal as soon as possible but no later than in one month as of the receipt of the

## **3.2.** The <u>right to receive information on the processing of your personal data</u>

In case we have collected data about you, you have the right to know what is the purpose of the collection, whom your personal data have been or will be disclosed to, how long the data are stored; and in case the data have not been collected from you personally, information on the source of the data.

#### **3.3.** The right to request the amendment of incorrect data

You have the right to request your data to be corrected and amended, if the data are faulty or incomplete. For this, you should submit us an application signed either by hand or digitally and add the evidence reasoning your application.

#### **3.4.** The right to file an objection

You have the right to file objections about the processing of your personal data. For this, you should submit us a reasoned application sighed either by hand or digitally.

## **3.5.** The right to withdraw from the consent of data processing

You have the right to withdraw from the consent to process personal data at any time.

## **3.6.** The right to request the limitation or termination of the processing of personal data

If there is no legitimate ground to process your personal data, you can demand the limitation, termination, or deletion of the use of data For this, you should submit us a reasoned application signed either by hand or digitally. We will delete personal data, if:

- a natural person withdraws their consent given to process data;
- the personal data are not needed any more for the purpose collected;
- there is no legitimate ground to process data;
- the personal data have been processed illegally;
- a legal obligation will have to be fulfilled.

If the personal data are not processed on legitimate grounds, which does not allow the data to be erased, the data will not be erased.

#### 4. Website visit

- **4.1.** The website of TREV-2 uses cookies. When visiting a website, the data collected and stored about a visitor shall be limited to the following:
  - the internet address of the computer or the computer network used (the IP address);
  - the name and address of the computer or the internet service provider of the network used:
  - visiting time (time, date, year);
  - information on which section of the website is used and what time is spent there.
- **4.2.** The IP-addresses shall not be connected with the information identifying a person. The collected data will be used for visit statistics to further develop the website and make it more comfortable for a visitor. The data will be stored for 1 year.
- **4.3.** The website user can delete cookies and change their storage. The privacy settings of the web browser need to be changed. However, blocking all the cookies can limit the usage possibilities of the website.

#### 5. Breaches of personal data processing

- **5.1.** TREV-2 documents all the breaches in connection with personal data, inter alia the circumstances of a breach, its impact, and measures applied. We will notify the Data Protection Inspectorate about the breach within 72 hours without an unreasonable delay if possible, except in case the breach does not present a likely danger to the rights and freedoms of a natural person.
- **5.2.** We will inform a data subject in case of a great danger to the rights and freedoms of the data subject.
- **5.3.** The Data Protection Inspectorate may conclude that informing the data subject is unnecessary.

#### 6. Additional Information

- **6.1.** Should you have proposals or questions about the processing of your personal data, please feel free to contact us: trev2@trev2.ee.
- **6.2.** Should you find your privacy rights to be violated, you have the right to file a complaint to the Data Protection Inspectorate.