



SIA Tet
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Tet group Customer's Contact Person and Event Visitor Data-processing Rules

Document objective

1. The Tet group customer's contact person and event visitor data-processing rules (hereinafter – Document) aim to establish the procedures for information processing of a contact person (hereinafter – contact person) of a legal person, a customer of the Tet group company, in compliance with purpose, scope, protection and processing period, during which the contact person's data are being processed, and to inform the contact person of these during data acquisition and processing of the contact person's data.

Data Processing

2. Personal data of a contact person to the company's own contact persons are processed by the following Tet group company:
 - Latvian limited liability company "SIA Tet" (hereinafter – Tet), Reg. No. 40003052786, legal address: Riga, Dzirnavu Street 105, LV-1011;
 - Latvian Limited Liability Company "SIA T2T", Reg. No. 40003016728, legal address: Riga, Pērses Street 8, LV-1011;
 - Latvian Limited Liability Company "SIA Baltijas datoru akadēmija", Reg. No. 50003138501, legal address: Riga, Tallinas Street 4, LV-1001;
 - Latvian Limited Liability Company "SIA Citrus Solutions", Reg. No. 50003752271, legal address: Riga, Dzirnavu Street 105, LV-1011;
 - Latvian Limited Liability Company "SIA Helio Media", Reg. No. 40103360903, legal address: Riga, Dzirnavu Street 105, LV-1011.
 - Latvian Limited Liability Company "SIA Data Experts", Reg. No. 43603083353, legal address: Riga, Dzirnavu Street 105, LV-1011.

Scope of Application of the Document

3. This document relates only to the cases where contact person's data shall be processed in connection with the execution of a transaction or agreement of a client (a legal person), who submitted the data for the representation of his (of the legal person) interests in the respective scope and within the respective period.
4. As regards the data of contact persons, the provisions of the General Data Protection Regulation are not applied. Tet group companies interpret the contact persons' data as sensitive business information and business secrets, and simultaneously provide for their protection and processing, taking into account, inter alia, the regulations stipulating also privacy protection.
5. Data categories, which may be at the disposal of Tet group company in respect of a contact person: Nr.

No.	Data categories	Examples*
1	Contact person's identification data	First name, last name, personal identification number/ID, date of birth, passport No. /ID No., personal signature
2	Contact details of the contact person	Address, telephone number, e-mail address
3	Photos and pictures	Photos from customer events, photo-shooting date
4	Video data	Videos from customer events, video surveillance Tet Group objects, recording date
5	Phone conversation record data	Customer service phone conversation records, date and time
6	Communication data	Incoming/outgoing communication type, number, date, content, channel, the delivery status
7	Customer survey data	survey title, date of sending, date of reply, survey questions and answers given

*This is not an exhaustive list of data included in a certain data category

6. The document applies to data processing, irrespective of the form and/or settings, where such personal data of the contact person is found, and irrespective of the corporate systems or the paper form these are being processed.

Purposes of Data Processing

7. Tet group company processes personal data for the following purposes:
- Provision of services and selling of goods:
 - o identification of the contact person;
 - o preparation and conclusion of a contract;
 - o supply and delivery of goods and services (performance of contractual obligations);
 - o provision/maintenance of services;
 - o improvement of goods and services, development of new goods and services;
 - o advertising and distribution of services or commercial purposes;
 - o handling and processing objections;
 - o client retention, promotion of loyalty, satisfaction measurements;
 - o administration of settlements.
 - Business planning and analysis:
 - o statistics and business analysis;
 - o planning and accounting;
 - o measuring efficiency;
 - o data quality assurance;
 - o preparation of reports;
 - o client surveys.

Legal Basis for Data Processing

8. Tet group companies process the personal data of contact persons:
- conclusion and execution of a contract — to enter into a contract following the client's application and to ensure its execution;
 - for the execution of laws and regulations – to fulfil a binding obligation imposed on the Tet group company by an external legal act.
 - in lawful (legitimate) interests – to realise the lawful (legitimate) interests arising out of existing liabilities or a contract concluded between Tet and the client, or such interests of a Tet group company arising out of law.
9. The lawful (legitimate) interests of Tet group are:
- to carry out commercial activities;
 - to provide electronic communications and other services;
 - to verify the identity of a client's contact person before the conclusion of a contract and during contract execution;
 - to ensure the fulfilment of contractual obligations;
 - *lerobežotas pieejamības ārēja informācija*
 - to prevent undue financial risks to its commercial activities;
 - to store the client's contact person's applications and submissions for purchase of goods and provision of services, other applications and submissions, notes on them.
 - to analyse the operation of Tet group company's services, to develop and implement improvements;
 - to administrate a client's account;
 - to carry out activities for the retention of clients;
 - to maintain a database of client's contact persons for more efficient provision of services;
 - to develop and improve goods and services;
 - to advertise goods and services by sending commercial communications (incl. invitations);
 - to send other notification on the progress of the execution of the contract and events relevant to the execution of the contract, and to conduct client NPS surveys on goods and services and their experience of use (NPS);
 - to ensure the maintenance and development of electronic communications networks;
 - to maintain and develop communication network;
 - to monitor the operation of the communications network, in order to establish technical issues, as well as unlawful activities and to prevent these;
 - to prevent fraud;
 - to ensure corporate management, financial and business accounting and analysis;
 - to ensure the effective governance of the company;
 - to ensure the efficiency of the supply of services and the sale and delivery of goods;
 - to ensure and improve the quality of services;
 - to administer payments;

- to administer outstanding payments;
 - to apply to state administration institutions and institutions of operational activities and court for the protection of its legal interests.
10. Tet group companies organise various events (for example, TechBreakfasts, conferences, seminars, customer loyalty events, etc.).
 11. With his/her registration, the event visitor confirms that he/she has been informed and accepts that the Tet group company in charge of the event organisation shall process personal data of visitors – name, surname, e-mail address, contact phone, title of the job position, visitor's employer, address, personal identification document (passport or ID card) – aiming to:
 - to register visitor's participation in this event;
 - to identify visitor as a registered participant;
 - to send the visitor a certificate of attendance;
 - to contact with the visitor in order to obtain feedback about the event.
 12. At the venue, photos may be taken (for example, at conferences, seminars). In such cases, the photos may be uploaded to Tet group's internal information resources, as well as published on social networks to promote the respective activity.
 13. Objecting to the processing of personal data listed above results in failure to register the visitor for events organised by Tet group companies.

Personal data processing and protection

14. Tet group company processes and protects contact persons' data through the use of modern technologies, taking into account existing commercial confidentiality protection and privacy risks and the organizational, financial and technical resources reasonably available to a Tet group company.
15. For the high-quality and fast execution of the contractual obligations arising out of the contract concluded with the client, the Tet group companies may authorise other Tet group companies, its cooperation partners to perform individual deliveries of goods and activities for provision of services, such as service deployment works, billing, and the like. If, when carrying out these tasks, Tet group companies or cooperation partners process contact persons' data at the disposal of Tet group company, they shall have the right to transfer to Tet group companies and cooperation partners contact persons' data relevant to carry out these activities to the extent necessary to carry out these activities.
16. Tet group companies and their cooperation partners will meet data processing and protection requirements in accordance with Tet group company requirements and legal acts and will not use personal data for purposes other than to fulfil the client's contract obligations on behalf of Tet group company.

Categories of Data Recipients

17. Tet group company shall not disclose contact person's personal data to any third parties, with the exception of:
 - If data shall be transferred to the third party under a contract concluded to carry out a function relevant for the contract fulfilment or a statutory delegated function;
 - in cases stipulated by external legal acts for the protection of legitimate interests of a Tet group company.

Third-country subject access to data

18. In some cases, subject to statutory requirements, contact persons' data of Tet group company is accessed in third countries (i.e., countries outside the European Union and the European Economic Area) by developers or service providers (within the meaning of the Regulation – transmission to third countries).
19. In such cases, Tet group company provides for statutory required procedures to ensure the level of personal data processing and protection equivalent to the level set forth by the Regulation.

Data Processing and Storage Period

20. Tet group company shall keep and process the contact person's data, as long as at least one of the following criteria exists:
 - as long as the contract entered into with the client is valid;
 - while one of the parties has a legal obligation to store the data;
 - as long as the client has not informed of the replacement of its contact person or its responsibilities.
21. After the date on which those conditions cease, the personal data of the client's contact person are deleted.

Communication with the client's contact:

22. Tet group company communicates with the client's contact person by use of the information specified by the client or the information specified by the client's contact person.

23. Communication regarding the fulfilment of obligations arising out of a service contract is carried out by a Tet group company on the grounds of a concluded contract (e.g., co-ordination of delivery time of a service or remedy of service damages, information on invoices, scheduled works, communication interruptions, changes in services, etc.).
24. In case of queries, the client's contact person is entitled to contact the registered office of a Tet group company or to e-mail to the company's informative e-mail:
- Latvian limited liability company "SIA Tet" – tet@tet.lv
 - Latvian Limited Liability Company "SIA T2T" – t2t@t2t.lv
 - Latvian Limited Liability Company "SIA Citrus Solutions" – info@citrus.lv
 - Latvian Limited Liability Company "SIA Baltijas datoru akadēmija" – bda@bda.lv
 - Latvian Limited Liability Company "SIA Helio Media" – Kaspars.Ozolins@lattelecom.lv
 - Latvian Limited Liability Company "SIA Data Experts" – info@dataexperts.lv