



APPROVED:
"Wellman Logistics" Ltd.
Meeting of the Board on 24.05.2018. (minutes No.x3)

VALID FROM: 25.05.2018.
Version 1.0 (initial edition)

"Wellman Logistics" Ltd.

PRIVACY POLICY

Riga, 2018

Contents

1. Policy, entry into force and amendments	2
2. Privacy and processing of personal data	3
3. Personal data, mainly processed by <i>Wellman</i>	3
4. Purpose, basis and storage period of personal data processing	5
5. Processing of Personal Data - transfer and receipt to Third Parties, Group companies.....	6
6. Profiling, automatic decision making	7
7. Person's rights as a data subject	8

1. Policy, entry into force and amendments

- 1.1. This *Wellman** Privacy Policy (hereinafter - the Policy) comes into force on 25.05.2018 and is available on Wellman website on the internet at www.wellman.lv.
**Wellman* means each of these companies separately: "Wellmann Logistics" Ltd., registration number 50003997841, legal and office address: Krasta street 3 k-1, Salaspils, Salaspils county, LV-2169, Latvia; "3PL worldwide solutions" Ltd., registration number 50103785141, legal and office address: Krasta street 3 k-1, Salaspils, Salaspils county, LV-2169, Latvia; "Wellman Factoring" Ltd., registration number 40203028984, Krasta street 3 k-1, Salaspils, Salaspils county, LV-2169, Latvia, which is a part of Wellman OU, <https://www.inforegister.ee/en/10093020-WELLMAN-OU> Group (hereinafter - the Group).
- 1.2. The Policy outlines the basic principles and basic rules for personal data* processing* and protection. More detailed rules may be set out in *Wellman's* service contracts with customers and other partners and persons, as well as in other documents related to services* provided by Wellman and its operations. The services provided by *Wellman* (such as warehousing services and transport services) and related or additional services are understood by the **Services**.
***personal data** - any direct or indirect information relating to an identified or identifiable natural person, whose data is processed by *Wellman*. An identifiable person is a person who can be identified directly or indirectly, in particular by referring to an identifier, such as the name, surname, identification number of the person (e.g. personal identification number, date of birth), location data, online identifier or one or more of the above mentioned physical person's physical, physiological, genetic, mental, economic, cultural or social identity factors.
***Processing** - any activity or set of activities with personal data or personal data sets, carried out with or without automated means such as collection, registration, organization, structuring, storage, adaptation or modification, recovery, viewing, use, disclosure, transmission of distributing, or otherwise making them available; matching or combining, limiting, erasing or destroying.
- 1.3. Processing of personal data and its rules in the Policy apply to the processing of personal data of a natural person. The Policy does not apply to a legal entity, but

refers to a natural person related to this legal entity, such as an official, representative or an employee.

- 1.4. *Wellman* is entitled to unilaterally amend the Policy at any time due to changes in *Wellman's* operations or regulatory laws, standards and requirements that are binding on *Wellman's* operations and the provision of services. *Wellman* shall notify on amendments to the Policy in the website on the Internet or in any other manner, in accordance with the agreement with the customer, no later than 30 (thirty) calendar days before the entry into force of the amendments in the Policy.

2. Privacy and processing of personal data

- 2.1. A person or a customer, contacting *Wellman* by a phone, e-mail, for example, wellman@welmann.lv or any other of *Wellman's* e-mail address, or using other direct or remote communication channels, including contact forms, in which the data can be entered remotely, the person discloses their personal data (for example, given name, surname, company name). *Wellman* uses this information and personal data provided to process the received request. *Wellman* does not process and respond to anonymous requests, suggestions, complaints, letters, etc.
- 2.2. *Wellman* carries out the processing of personal data prior to the conclusion of a service or other type of contract with a customer by entering into a contract, during the term of the contract, including the provision of services, and the execution of contractual obligations. *Wellman* can process personal data also for defending its legitimate interests, such as debt recovery and recovery, as well as in case of cession, video monitoring (for personal and property security).
- 2.3. *Wellman* may process personal data, receiving it from the person, customer, its contractual or legal representative, employee, and other public registers, or other Third Parties* or Groups.
Third Party* - a legal or natural person other than *Wellman*, the Group or a customer.
- 2.4. *Wellman* ensures the confidentiality of personal data, protects against unauthorized access, unlawful processing - disclosure, accidental alteration (modification, amending), loss or destruction through organizational and technical measures in accordance with the requirements of regulatory enactments.

3. Personal data, mainly processed by *Wellman*

- 3.1. *Wellman* mainly, but not only processes the following **personal data**:
 - *Personal data and other information* - which *Wellman* processes when performing
 - rules and regulations governing the operation and provision of services of *Wellman*, requirements of EU regulations, international agreements and conventions binding to the Republic of Latvia that regulate warehouse activities and provision of services (including warehouse technology and equipment); requirements of regulatory enactments for the storage of various categories of goods (excisable goods, clothing and footwear,

- cosmetics and perfumery, pharmaceuticals, including medicines), movement of goods (sending, receiving), cargo transportation;
- obligations imposed by the competent authorities and other documents binding to Wellman;
- requests for information (investigating authorities, tax administration authorities, requests from supervising institutions, authorities, other competent authorities).
- Personal data and other information for providing *Wellman* services:
 - Warehouse services and other related services (personal identification data - person's name, surname, personal identity number, date of birth; declared place of residence; contact address; delivery address; phone number; e-mail address; communication language; other means of communication;
 - Transport services and related services (personal identification data - person's name, surname, personal identity number, date of birth, declared place of residence; contact address, delivery

address, telephone number, e-mail address, language of communication, other means of communication)

- Service monitoring data and information related to the service
 - applications submitted and used;
 - existing service contracts
 - terminated contracts and their history; information on cooperation during the contract period;
 - performance of the service contracts and their quality (execution, inadequate execution, non-fulfillment);
 - fees for services and their execution;
 - information on credit liabilities; debt obligations; their historical data (factoring or other lendings (including payment, deferred payments, post-payment) in related cases));
 - expressed interest in services;
 - submitted applications, complaints, claims and suggestions
- Communication and attendance data collected and processed:
 - video surveillance (visual data) by visiting *Wellman* at its legal and office address, as well as at the address and location of the service;
 - data related to the design and provision of restricted access in connection with the provision and use of warehouse services
 - visiting *Wellman* at its legal and office address, as well as at the address and location of the service;
 - contacting *Wellman* by using any communication channel (e.g. face-to-face, remotely, including phone, email, using authorized self-service systems, online systems, etc.);
 - visiting *Wellman's* website on the Internet and any of its web sites (cookies)
- Satisfaction data:
 - Satisfaction data, including customer surveys and other surveys.

Wellman may process other personal data if necessary for the purpose of concluding and fulfilling a service or cooperation agreement, as well as meeting the regulatory requirements, *Wellman's* operations, risk management, legal and economic interests.

4. Purpose, basis and storage period of personal data processing

4.1. Purpose

- 4.1.1. *Wellman* processes and stores personal data for the purpose for which they were collected, obtained and used.
- 4.1.2. *Wellman* handles personal data:
 - 4.1.2.1. in order to fulfill its activities, provision of services and requirements of regulations of the regulatory enactments regulating activities (including the provisions of the *Commercial Law of the Republic of Latvia, the Civil Law, the Law "On Accounting", the Law "On Taxes and Duties"*, as well as the *Customs Law, Postal Law*, etc., other binding documents, instructions, orders, and other documents from competent authorities binding to *Wellman*) as well as for other purposes mentioned in the Policy and between contracts concluded between *Wellman* and the customer.
 - 4.1.2.2. for conclusion, execution and supervision of services or co-operation agreements;
 - 4.1.2.3. for the protection of legitimate interests of *Wellman*, for the prevention of loss and possible illegitimate actions, for the protection of personal data, warehouses, goods, information systems and for the maintenance of security,

for the security of persons (such as visitors, potential clients) and third parties (including video surveillance), for the recovery of debts, in case of cession. Due to these purposes, Wellman can use *Wellman's* accepted personal data processors, required to perform data processing in accordance with the requirements of the regulatory enactments, including what is necessary with regard to data security measures.

4.1.2.4. for marketing purposes, after receiving a person's or customer's approval in connection with the aims, mentioned in the Policy, *Wellman* has the right to update and renew the personal data of a client or a co-operation partner, related to the to the provision of services. *Wellman* is entitled to create and maintain personal data lists, to determine and to charge fees that are due to *Wellman* under service or other contracts.

4.2. Base

- **The Law.** *Wellman* is entitled to and performs the processing of personal data on the bases of the law (the list of the regulatory enactment is stated in clause 4.1.2.1) in order to meet their claims and *Wellman's* obligations under laws and other regulatory enactments, as well as to exercise the rights that are stipulated to *Wellman* by the law. If the processing of personal data results from the law, *Wellman* will not require the consent of a person or a customer for such personal data processing.
- **Contract.** *Wellman* processes personal data for the conclusion of a contract, the execution of the obligations between the contractual parties, and the provision and performance of *Wellman's* activities within the framework of the service agreement. *Wellman* is entitled to transfer and receive personal data to Third Parties, specified in Section 5 of the Policy, and to any Group's company.
- **Legitimate interest.** *Wellman* handles a person's or customer's personal data for the protection of legitimate interests, monitoring and security of provided services, and to provide *Wellman's* evidence for communication (such as video surveillance) to prevent the potential use of *Wellman's* services for dishonest and unlawful purposes within *Wellman's* legitimate interests, as well as to perform inspections and investigations in this context.
- **Consent.** *Wellman*, with the consent of a person or a customer, processes personal data for marketing purposes, including for marketing campaigns and their implementation, for the promotion of *Wellman* and Group services, for the development and to transfer of personalized offers. In this regard, *Wellman* is entitled to process, including to transfer and to receive, personal data to Third Parties and to the Group Companies, specified in clause 5 of this Policy.

4.3. Storage and deletion

4.3.1. *Wellman* stores personal data within the deadlines and order, specified in regulatory enactments, and as well, the storage period of personal data can be specified in service and cooperation agreements and other related documents.

4.3.2. After the expiration of the term or the purpose of personal data storage, *Wellman* erases personal data. *Wellman* is entitled, in certain cases, to establish a new purpose for certain personal data, if it is reasonably necessary (for example, to comply with regulatory requirements or to protect legitimate interests).

5. Processing of Personal Data - transfer and receipt to Third Parties, Group companies

5.1. *Wellman* may transfer personal data to a Third Party in order to comply with *Wellman's* binding laws and regulations, as well as the execution of the service,

- cooperation, etc. contracts, to ensure the provision of the services and operation and for the fulfillment of the customer's assignment (authorization).
- 5.2. *Wellman* processes personal data that is available in public and private registers, databases in public sources and websites, or received from a Third Party / Group company and submitted to *Wellman*, subject to regulatory enactments, binding to a Third Party.
 - 5.3. In order to fulfill *Wellman*'s obligations, established in regulatory enactments, *Wellman* may receive and transfer personal data in the cases and according to the procedures, specified in regulatory enactments:
 - 5.3.1. competent authorities (for example, the State Agency of Medicines, the Health Inspectorate, the Food Veterinary Service)
 - 5.3.2. local and foreign tax administration authorities for tax administration purposes;
 - 5.3.3. tax and other competent authorities for filing of financial statements, including for the purposes of the consolidated report;
 - 5.3.4. State public registers (e.g., Commercial Register, Register of Debtors, etc.), including in the event of improper performance or non-performance of liabilities towards *Wellman*;
 - 5.3.5. Group companies.
 - 5.4. For the performance of service contracts and ensure the provision of services, to ensure the performance of the cooperation agreement, as well as to ensure the operation of *Wellman*, *Wellman* can receive, transfer and process personal data:
 - 5.4.1. to the post office and postal service providers in order to provide the sending and receiving of shipment and correspondence with a customer / its trustee or representative;
 - 5.4.2. cooperation partners – to ensure services;
 - 5.4.3. credit institutions and financial institutions in accordance with the requirements of regulatory enactments;
 - 5.4.4. legal and other consultants;
 - 5.4.5. archiving purposes and to ensure *Wellman's* main business;
 - 5.4.6. to a person - creditor, in the event, if *Wellman's* claim rights are assigned to such a person in connection with the takeover of the service contract;
 - 5.4.7. Group companies.
 - 5.4.8. The Customer hereby is informed and agrees that:
 - 5.4.8.1. for performance of the statutory obligations, or to ensure the performance of a service contract, *Wellman* may need to transfer personal data to a Third Party or a Group company, participating in the provision of the service.
 - 5.4.8.2. The third person may be registered and operate outside the EU or the EEA, which the European Commission has not included in the list of countries where the protection of personal data is sufficient). Thus, the customer is aware that *Wellman* cannot ensure that personal data is processed in accordance with equivalent requirements in force in the EU or in another country in which the protection of personal data is sufficient in accordance with EU requirements;
 - 5.5. More information on Third Parties - the key partners through which *Wellman* ensures the provision of the service and to whom personal data may be transmitted, as well as with the Group companies, can be found on the *Wellman* website.

6. Profiling, automatic decision making

- 6.1. *Wellman* can process personal data for profiling purposes, which is an automatic processing of personal data, used to evaluate and analyze a customer's individual

characteristics. *Wellman* uses profiling for analysis, risk management and preparation of various reports.

7. Person's rights as a data subject

- 7.1. A person or a customer is entitled to gain insight into the personal data that *Wellman* handles, for what purposes they are used and obtained, what are their storage periods and who are the recipients of this personal data, in compliance with the restrictions, specified in the regulatory enactments. A person may obtain for himself the personal data, which he/her has submitted and that *Wellman* is handling on the basis of the consent or agreement of the person.
- 7.2. A person and a customer has the right at any time to withdraw the consent, given for the processing of personal data, based on legitimate interest, as well as for marketing purposes, including profiling done for this purpose.
- 7.3. A person or a customer may request *Wellman* to correct personal data, if such data has been amended or is otherwise inaccurate, unless it is prohibited or restricted by applicable laws and regulations and *Wellman* has the right to process personal data.
- 7.4. A person or a customer may at any time request *Wellman* to stop the processing of personal data, except in cases when such processing of personal data is the right of *Wellman* and if the data processing obligations derive from regulatory enactments or are necessary to enable *Wellman* to execute or enforce a service contract and ensure the operation.
- 7.5. The rights of a customer or a person can be restricted in relation to the processing of personal data and the acquisition of information in the cases, specified in regulatory enactments, as well as for the protection of the confidentiality and legal interests of Third Parties or Group companies, and in connection with *Wellman's* business specifics and industry practices. A person or a customer is not entitled to receive information on technological solutions and issues, security and internal control systems, internal processes and other internal operating issues, and business secrets.
- 7.6. In connection with personal data processing, withdrawal of consent, requests, the exercise of the rights of the data subject and complaints concerning the processing of personal data, a person may contact *Wellman* by sending a respective request to wellman@wellman.lv or Krasta street 3 k-1, Salaspils, Salaspils parish, LV-2169, Latvia, with the indication *Data Protection*. *Wellman* provides an answer to identifiable applications, requests, etc.; requests are processed as soon as possible, but not later than within one month from the date of receipt of the application.