

CLT Factory Privacy Policy

CLT Factory SIA and each of our related corporations, affiliates, subsidiaries, and associated companies ("**CLT Factory**") take processing of personal data very seriously. CLT Factory ensures a reasonable and transparent processing of personal data in accordance with all applicable laws, including the European Union's General Data Protection Regulation ("**GDPR**"). CLT Factory protects personal data and the privacy of individuals within all areas of its business in accordance with the terms of this CLT Factory Privacy Policy ("**Privacy Policy**").

Personal data and data subject

For purpose of this Privacy Policy, "*personal data*" means any information relating to an identified or identifiable natural person (a "*data subject*"). An identifiable natural person is one who can be identified, directly or indirectly, e.g. by reference to a name, an identification number or online identifiers.

Personal data is generally categorized as either "*ordinary personal data*" or "*sensitive personal data*". Sensitive personal data is always confidential and includes racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, health, and sexual orientation. Ordinary personal data is partly confidential, includes information related to criminal offences and national identification numbers, information regarding a person's salary, pension, debt, application material, etc., and all other types of ordinary personal data, including name, customer number, (business) contact information such as email and telephone number, photos, IP-address, and other usage information collected via cookies.

This Privacy Policy applies to all personal data CLT Factory collects and processes about individuals, including but not limited to visitors, customers, suppliers, other stakeholders and users of CLT Factory's websites and services.

Data Controller

CLT Factory is the data controller ("*Data Controller*") of the personal data covered by this Privacy Policy.

Contact details:

CLT Factory SIA

reg. nr. 40203318226

Darba iela 1, Talsi, Talsu novads, LV-3201, Latvia

Website: <https://www.cltfactory.com/>

CLT Factory SIA may share personal data with each other, and related corporations, affiliates, subsidiaries, and associated companies ("*affiliates*"). In the event CLT Factory shares personal data with partner, the partner's and affiliates' use of such personal data is subject to this Privacy Policy.

All personal data transfers, including cross-border transfers between CLT Factory and affiliates are made in compliance with applicable law. More information on data transfers can be found in this Privacy Policy.

For any questions related to this Privacy Policy and processing of personal data, please contact the CLT Factory Team, at info@cltfactory.com

Legal grounds for processing of personal data

CLT Factory may process personal data if one of the following options applies:

- Individual/company has given prior consent to processing of his/her/its personal data for one or more specific purposes. Note: Under some legislation CLT Factory may be allowed to process personal data until an individual objects to such processing ("*opt-out*"), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of personal data is subject to European Data Protection law;
- Processing of data is necessary for the performance of a contract and/or for any pre-contractual obligations;

- Processing is necessary for compliance with any legal obligations;
- Processing of your personal data is necessary to establish, exercise or defend any legal claims;
- Processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in CLT Factory;
- Processing is necessary for the purposes of the legitimate interests pursued by CLT Factory or by a third party, if such interests are not considered to override individual/company interests or fundamental rights. Such legitimate interests may be CLT Factory's interests in developing, marketing and selling the products and providing services, pursuing and maintaining business relationship with customers, suppliers, distributors, partners and other business relations.

Upon request, CLT Factory will provide information to clarify the specific legal basis that applies to the processing, and in particular whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Consent and withdrawal of consent. To the extent that CLT Factory's processing activities are based on the data subject's consent, the data subject maintains the right to withdraw his/her/its consent at any time. If data subject withdraws his/her/its consent, CLT Factory will cease processing of the data subject's personal data, unless and to the extent that continued processing is permitted or required according to the applicable personal data legislation or other applicable law. If the data subject withdraws his/her/its consent, it will not affect the lawfulness of processing conducted prior to the withdrawal.

Where personal data is processed for a public interest, in the exercise of an official authority vested in CLT Factory or for the purpose of the legitimate interests pursued by CLT Factory, an individual may object to such processing by providing a ground related to the individual's particular situation to justify the objection. However, if personal data is processed for direct marketing purposes, an individual can object to such processing at any time without providing any justification by contacting the CLT Factory Team.

Notice of statutory or required processing. In cases where CLT Factory processes personal data based on a legal obligation or a requirement under a contract or a requirement that must be met in order to enter into a contract, the customer is obliged to provide CLT Factory with the information so that CLT Factory can maintain the customer relationship, fulfil the contract and invoice for our services, etc. If the customer does not wish to provide CLT Factory with the information CLT Factory needs to comply with contractual and/or statutory obligations, the consequence may be that CLT Factory is unable to establish or continue the business relationship.

Individuals are not obliged to provide CLT Factory with personal data in all cases, for example, for use in CLT Factory marketing and newsletter distribution. However, in such instances, the individuals will not be able to receive marketing materials and newsletters from CLT Factory.

The types of and purpose for the collection of personal data

CLT Factory collects and processes personal data, including sensitive data (if any) only for specified, explicit and legitimate purposes relevant for the business of CLT Factory. The purpose of the collection and processing of personal data also depends on the type of data subjects.

Employment. CLT Factory collects and processes personal data, including sensitive personal data (if any) of applicants, candidates and employees (if any) for employment purposes and in accordance with legal requirements.

Visitors. CLT Factory collects and processes personal data of visitors including name, title (if applicable) and contact details for security reasons.

CLT Factory's website users. CLT Factory may collect by itself or through third parties personal data of website users, which may include: cookies, usage data, name, contact details, and company information, if applicable. The data is collected and processed for marketing, advertising, and analytics purposes, and also for contacting the website users, managing contacts and sending messages, remarketing and behavioral targeting.

For operation and maintenance purposes, CLT Factory and any third-party service providers may collect files that record a user's interaction with the website. Such personal data is obtained through consent by the website users and collected automatically on CLT Factory's websites.

CLT Factory's websites do not support "Do Not Track" requests. To determine whether any of CLT Factory's third-party service providers honor "Do Not Track" requests, please read the providers' respective privacy policies.

Users are responsible for any third-party personal data obtained, published or shared through the websites and confirm that they have the third party's consent to provide such personal data to CLT Factory (if applicable).

Cookies. Any use of cookies – or other tracking tools – by the website and/or by the owners of third-party services used by the website serves the purpose of providing the services required by the user, in addition to any other purposes described in this Privacy Policy and the Cookie Policy.

CLT Factory uses cookies to understand and save user preferences for future visits and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. CLT Factory may contract with third-party service providers to assist in better understanding CLT Factory' websites visitors. These service providers are not permitted to use the information collected on CLT Factory' behalf except to help conduct and improve CLT Factory' business.

More details related to cookie notice please find in the Cookie Policy.

Marketing. CLT Factory collects and processes personal data (including name and contact details) about current and new customers, business partners, suppliers, including third-party service providers, distributors, leads and individuals, website users and on individuals who have signed up for CLT Factory' newsletters or other electronical marketing materials, as well as in some cases for the following purposes: analytics, contacting, managing contacts and sending messages, remarketing and behavioral targeting, advertising, and exhibitions. Such personal data is collected and processed under the *marketing consent*. The CLT Factory Team must ensure that marketing consent is obtained before collecting and processing such personal data.

CLT Factory may use third parties as a service provider to send out marketing information on its behalf in accordance with applicable legal requirements.

Contracts, orders, and other agreements. In connection with its sales and transactions, CLT Factory collects and processes personal data, including the name, contact details, delivery details, correspondence, and payment details necessary for conducting business and to comply with export compliance regulations and other legal due diligence obligations.

Accounting and Finance. CLT Factory collects personal data for accounting and financial purposes in accordance with applicable requirements. CLT Factory may use third parties as a service provider.

Legal action. In case of a dispute, CLT Factory may retain personal information necessary for its legitimate interest to ensure that CLT Factory can properly bring or defend legal claims in court or during the stages leading to possible legal action. CLT Factory may need to share this information with third parties such as insurance and/or legal advisers and CLT Factory may also be required to reveal personal data upon request of public authorities.

Whistleblowing system. CLT Factory respects confidentiality of whistle-blowers and a channel in place for such reporting. CLT Factory collects and processes personal data for the purpose of conducting investigations, and to take remedial or legal actions in accordance with legal requirements and this Privacy Policy.

Place and data transfer

CLT Factory ensures that: (i) the personal data is transferred to countries recognized as offering an equivalent level of protection; or (ii) the transfer is made pursuant to appropriate safeguards that require the recipient to treat the personal data in a manner that is essentially equivalent to legal requirements.

Specific rules apply when CLT Factory transfers Personal Data from the EU/EEA to third countries or international organizations. When transferring personal data to third countries or international organizations, CLT Factory is obligated to establish appropriate safeguards prior to the transfer, which in practice are established by entering the European Commission's Standard Contractual Clauses ("EU SCCs") or by collecting consent from the data subject (Art. 49(1)(a) GDPR).

CLT Factory may use electronic communications service providers or share data with partners based outside of EU, including countries where the legal regime for protection of personal data might not be as sufficient as within the EU.

In accordance with the GDPR, CLT Factory has concluded Data Processing Agreement (DPA) and/or Joint Data Controller Agreement (JDCA) and/or agreements with Standard Contractual Clauses (SCCs) with external parties and affiliated companies, as applicable.

Retention period

Personal data collected by CLT Factory shall be processed and stored for as long as required by the purpose for which the personal data has been collected. CLT Factory may be allowed to retain personal data for a longer period if CLT Factory has obtained valid consent to the processing activity as long as such consent is not withdrawn. Furthermore, CLT Factory may be obliged to retain the personal data for a longer period, whenever required to do so for the performance of a legal obligation or to establish, exercise or defend a legal claim.

Once the retention period expires, personal data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be accommodated after expiration of the retention period.

Individuals' rights

Where legally required, CLT Factory shall inform individuals of the purpose of processing their personal data, rights to have their personal data rectified, deleted or blocked, and the identity of the company responsible for the collection and process their personal data. In all other cases, users may inquire with CLT Factory Team to find out which rights apply to them.

Individuals have the following rights:

Withdrawal of consent - the right at any time to withdraw previously given consent to the processing of his/her/its personal data.

Object to processing of personal data - the right to object to the processing of personal data if such processing is carried out on a legal basis other than consent. Further details are provided in the relevant section of this Privacy Policy.

Access to personal data - the right to learn if personal data is being processed by CLT Factory, obtain disclosure regarding certain aspects of the processing and obtain a copy of the data undergoing processing.

Verify and seek rectification - the right to verify the accuracy of his/her/its personal data and ask for it to be updated or corrected.

Restrict the processing of personal data - the right, under certain circumstances, to restrict the processing of his/her/its personal data. In this case, CLT Factory will not process mentioned personal data for any purpose other than storing it.

Deleted personal data or otherwise removed - the right, under certain circumstances, to obtain the erasure of his/her/its personal data from CLT Factory.

Have personal data transferred to another data controller - the right, under certain circumstances, to have personal data transmitted to another controller without any hindrance.

Lodge a complaint - the right to bring a claim before his/her/its competent data protection authority.

Training

To prevent any violation of applicable law, regulations and corporate standards, CLT Factory organizes formalized GDPR training for its employees in accordance with a corporate training plan.

Ongoing Audit & Monitoring

Through a combination of external and internal controls, ongoing audit and monitoring, CLT Factory seeks to maintain secure processing of data and prevent data loss.

Reporting system and contact details

In case of questions and/or possible violations of this Privacy Policy, please contact the CLT Factory Team at the e-mail: info@cltfactory.com

Any request can be exercised free of charge and will be addressed as expeditiously as possible and always within one (1) month or sooner, if required by applicable law.

Changes to this Privacy Policy

CLT Factory reserves the right to amend this Privacy Policy. The latest edition will always be available at our website, and we strongly recommend that you monitor and become familiar with our Privacy Policy.