

ONLINE MEDIA PRIVACY POLICY

WE CARE ABOUT YOUR PRIVACY

Your trust is important to us. Our aim is that you feel safe when you share your personal data with us. Personal data is any information that can be used to identify an individual.

We take appropriate measures to ensure that your personal data always is safe with us and that the processing of your personal data is compliant with present data protection laws, our internal policies, guidelines and routines. We have also assigned a Data protection officer whose task is to monitor that we follow these laws, guidelines and routines.

It is important for us to be transparent with how we handle your personal data. In this Privacy Policy we therefore describe how and where we process personal data **in the context of our use of online media.**

With the term “online media”, we mean social media platforms, news portals, streaming services, online forums and other digital platforms where we are present.

WHICH CATEGORIES OF PERSONAL DATA DO WE COLLECT AND WHY

- **Management of our online media accounts**

We operate accounts on online media to publish latest news, promote our brand, and engage with users. When you interact with our online media content (e.g., by liking, commenting, or messaging), we may process your personal data.

Where appropriate, we may communicate with you, incl. reply to your comments or requests via the online media platform and share your content, e.g., if you have tagged us on our online media accounts.

In order to create our online media accounts (pages), we cooperate with online media platform providers.

Categories of personal data	<ul style="list-style-type: none">• Identity information• Audio-visual material• User generated personal data• Information about situation• Communication data• Editorial content• Location information (e.g., LinkedIn)• Company information (e.g., LinkedIn)• Employment information (e.g., LinkedIn)• Competence data (e.g., LinkedIn)• Additional information might be processed depending on the platform functionality or your interaction
Legal basis	Our legitimate interests to manage our online media accounts and interact with online media users
Retention period	In general, content of online media accounts is maintained by each provider of the particular online media platform in according to its privacy policy.

	<p>User-generated content in our online media accounts can be deleted immediately by us in specific cases, e.g., in case content becomes outdated or user interactions, e.g., comments do not comply with requirements of online media account or applicable laws.</p> <p>Our posts that contain information covered by other our privacy policies will be deleted in accordance with the retention periods set forth therein, e.g., Event privacy policy, Privacy policy on use of audio-visual material, Lottery, games and/or contest privacy policy, Complaint and/or inquiry privacy policy.</p> <p>Other our posts containing personal data will be deleted from online media accounts 2 (two) years after publication.</p> <p>Depending on the functionality provided by the particular online media platform, deletion of content may result in the deletion of content-related information such as comments, likes etc. about the particular post.</p>
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- **Targeted advertising in online media**

We use online media to roll out advertising and drive traffic to our websites or otherwise promote our products or services. It helps us to reach audiences and provide relevant information. For advertising management, placement and publishing we can use advertising platforms and tools provided by global platforms providers and also local and regional platforms.

In order to remind about our brand and its values and provide more relevant offers and services that could be more attractive to online media users, we carry out the following processing:

- We use anonymous target group definitions (segments) provided by online media platform providers to carry out advertising. These target group definitions (segments) are based on general description, e.g., gender, age, location, device type – mobile or desktop, potential interests and we do not have access to such personal data itself. Ads themselves to users are provided by online media platform providers.

Categories of personal data	<p>The following categories of personal data might be processed by the particular provider creating these segments:</p> <ul style="list-style-type: none"> • Demographic data • User generated personal data • Connection data • Location information
Legal basis	Our legitimate interests - to roll out advertising in online media
Retention period	Retention period for personal data processed by online media is determined by the relevant online media platform providers according to their privacy policy.

- **Statistics concerning online media accounts and targeted advertising in online media**

In order to evaluate effectiveness of online media where content created by us is published, we receive aggregate statistics based on personal data processed by online media platform providers. Statistics support us in improving our marketing activities and let us learn more about users' interactions with our content.

In order to make better decisions on how to deliver relevant information to users, we carry out the following processing:

- Receive and use aggregate statistics created by the relevant providers in relation to our online media accounts, e.g., so called insights regarding interactions, incl. visits to and usage of our online media accounts.
- Receive and use aggregate statistics created by online media providers in relation to interactions with our ads placed on their platforms.
- Receive and use aggregate statistics created by online media platform providers that contains information necessary for billing purposes - exchange of invoices between us and the relevant providers in relation to our content, incl. ads placed on online media platforms.

In order to receive and manage aggregate statistics we use various tools provided by global platforms providers and also local and regional platforms.

Categories of personal data	<p>We do not have access to personal data and only providers of online media, platforms collect and process personal data for statistical purpose.</p> <p>The following categories of personal data can be in the scope of this purpose (depending on statistics provided by the particular provider):</p> <ul style="list-style-type: none"> • Demographic data • User generated personal data • Connection data • Location information • Company information (e.g., LinkedIn) • Employment information (e.g., LinkedIn)
Legal basis	Our legitimate interests to evaluate effectiveness of our content in online media.
Retention period	<p>Aggregate statistics received by us from online media platform providers are deleted when no longer needed for the purpose mentioned above. Aggregate statistics does not contain personal data.</p> <p>Retention period for personal data processed by online media platform providers for statistical purpose is determined by the relevant providers according to their privacy policy.</p>

- **Brand analysis**

For the purposes of analysing publicly available editorial and online media content to create insights about brand mentions, overall sentiment, public trends and improve our services, we may process personal data that you have made publicly available online. We do not intend to identify you or use your personal data beyond what is necessary to generate insights.

Categories of personal data	<p>The following categories of personal data might be processed:</p> <ul style="list-style-type: none"> • Identity information • Demographic data • User generated personal data • Audio-visual material • Company information • Location information • Information about situation
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Legal basis	Our legitimate interests to improve our services based on data-driven insights.
Retention period	Up to 13 months. Retention of personal data used for insight creation is subject to online media platform providers and other companies' (who act as separate data controller) retention policies.

- **Administration of lotteries, games and contests**

We process information about you as a user, if you want to participate in online media activities organised by us. Such data processing may include access to a list of participants, selection of winners and delivery of prizes. More details are covered by our [Lottery, games and/or contest privacy policy](#).

- **Management of customer complaints**

We process your personal data in order to handle your inquiries and complaints. For more information on how we process your personal data with regards to inquiry and complaint handling, please see our [Complaint and/or inquiry privacy policy](#).

FROM WHICH SOURCES DO WE COLLECT PERSONAL DATA

- **Yourself**

We have access to personal data you provide us directly, e.g., when you participate in activities organized by us in our online media accounts, or when you write comments, send us requests or messages in our online media accounts or otherwise interact with our online media accounts, e.g., if you tag our name or like or share content available on our online media accounts.

- **Our online media accounts**

We have access to information available on or linked to our online media accounts, incl. data generated by the particular online media platform functionality, e.g., cases when other online media account users interact with you in our online media accounts, e.g., share, like, comment, incl. cases when your name is tagged in comments under our posts.

- **Online media platform providers**

Online media, incl. social media platform providers, based on your personal data processed on their platforms, create anonymous target group definitions (segments), aggregated statistics. We do not have access to such personal data and data that we have do not allow us to identify specific users.

- **Cooperation partners**

We may receive personal data from cooperation partners who act as separate data controllers. These partners collect and process publicly available information on online media platforms and provide it to Rimi for further processing as described in this privacy policy.

SHARING OF PERSONAL DATA

- **Service providers**

We might share your personal data with companies that provide services to us, such as:

- marketing communications agencies that help us cooperate with online media to plan, deploy and measure our marketing, incl. advertising activities more efficiently and provide us with support for our online media account administration;
- providers of visual content design services;
- information system development and maintenance services;
- web/ mobile application development and maintenance services.

These companies can only process your personal data according to our instructions and not use them for other purposes. They are also required by law and our cooperation agreement to protect your personal data.

- **Online media platform providers**

Online media may have access to data concerning your activities on their platforms, e.g., when you comment or otherwise interact with our ads or other content available on their online media platforms.

- **External advisors and insurance companies**

If it is necessary for the protection of our company's rights and interests, we might transfer your personal data to insurance companies or external advisors, e.g., auditors, law firms or other independent advisors who act as separate data controllers and whose activities are regulated by law.

- **Group companies**

We may share your personal data with relevant RIMI Baltic group companies, if it is necessary for pursuit of our legitimate interests or if it is necessary for achieving defined purposes.

- **Law enforcement authorities, state and local government institutions**

To fulfil our legal obligation we may transfer your personal data to law enforcement authorities, state and local government institutions upon their request. We may also transfer your personal data to law enforcement authorities, state and local government institutions in order to meet our legitimate interest in establishing, claiming and defending legal claims.

WHERE DO WE PROCESS YOUR PERSONAL DATA

We always aim to process your personal data within the EU/EEA.

However, when you are using online media accounts, personal data might also be transferred and processed by the relevant online media platform providers in a country outside the EU/EEA.

If your personal data is transferred to countries outside the EU/EEA, the respective online media platform provider is responsible for provision of appropriate guarantees, for example by concluding the Standard Contractual Clauses issued by the European Commission to ensure that the transfer of data takes place with the same level of data protection that corresponds to the General Data Protection Regulation. More information about personal data processing by online media platform providers available in their privacy policy.

YOUR RIGHTS

Data protection laws give you a number of rights with regards to the processing of your personal data. However, your rights can be exercised only if we actually process your personal data, e.g., you directly contact us or otherwise provide your data to us on our online media accounts. In several other cases we only have access to aggregate statistics or anonymous data that do not allow the identification of you as a data subject.

When you visit online media platform the respective provider sets the data protection obligations towards you as a user and is the contact person for you. Such providers have direct access to your personal data processed

on their platforms. You can exercise your data subject rights through online media platforms providers, privacy settings or by reaching out directly to them.

- **Access to personal data**

You are entitled to request confirmation from us if we process personal data relating to you, and in such cases request access to the personal data we are processing about you.

In order to exercise the aforementioned rights, you can write a submission to us.

- **Rectification of personal data**

Furthermore, if you believe that information about you is incorrect or incomplete, you have the right to correct it yourself or ask us to do it.

In order to exercise the aforementioned rights, you can write a submission to us.

- **Withdrawal of consent**

To the extent that we process your personal data based on your consent, you are entitled to, at any time, withdraw your consent to the personal data processing.

- **Objection against processing for direct marketing purposes**

You also have the right to object to your personal data processing for direct marketing purposes at any time.

In relation to our ads that are published by online media platform providers, you can use platform settings provided by the particular online media platform provider. For instance, based on the available functionality, you can choose to stop seeing the respective ad or choose to get more information about the particular ad and reasons why you have seen it, or you can choose to contact platform provider directly.

We do not receive information about users who have received our ads as our ads are placed by platform providers based on their terms and conditions.

- **Objection against processing based on a legitimate interest**

You are entitled to object to personal data processing based on our legitimate interests. However, we will continue to process your data, even if you have objected to it, if we have compelling motivated reasons for continuing to process data.

If you wish to object to particular data processing over which we have an influence, please provide a written request to us

If you wish to assert your right of objection against the particular online media platform, this latter must be contacted directly.

- **Erasure**

Under certain circumstances, you have rights to ask us to delete your personal data. However, this does not apply if we are required by law to keep the data or the data are necessary for us to establish, exercise or defend legal claims.

To carry out the mentioned right, please provide a written submission to us.

- **Restriction of processing**

Under certain circumstances, you are also entitled to restrict the processing of your personal data.

To carry out the mentioned right, please provide a written submission to us.

- **Data portability**

Finally, you have the right to receive or transmit your personal data further to another data controller (“data portability”). This right solely covers only data what you have provided to us based on you consent or on a contract and where processing is carried out by automated means.

To carry out the mentioned right, please, provide a written submission to us.

WHO DO YOU CONTACT IF YOU HAVE QUESTIONS

If you have any questions about the processing of your personal data, please feel free to contact us.

If you are not satisfied with the response you received, you are entitled to file a complaint with the relevant Data Protection Authority: Latvia: <https://www.dvi.gov.lv/>, Eesti: <https://www.aki.ee/>, Lietuva: <https://vdai.lrv.lt/>.

- **Contact details of company in charge of handling your personal data**

In relation to posts in Rimi Baltic Group LinkedIn account, please contact SIA Rimi Baltic. In relation to **our** other **activities** in online media please contact SIA Rimi Latvia.

SIA Rimi Baltic, reg. No. 40003592957,

Legal address: 161 A. Deglava iela, Riga, Latvia, LV 1021

Contact details of Customer service: phone number: +371 8 000 0180, email: info.lv@rimibaltic.com

SIA Rimi Latvia, reg. No. 40003053029,

Legal address: 161 A. Deglava iela, Riga, Latvia, LV 1021

Contact details of Customer service: phone number: +371 8 000 0180, email: info.lv@rimibaltic.com

In relation to **activities carried out by online media platform providers**, please take into account that also privacy policies of those platforms providers are applicable to users who interact with their platforms and you as a user of the particular platform have rights to contact directly the relevant platform providers. We cooperate with online media platform providers to manage our online media accounts, place targeted advertising and receive statistics, and we and the particular platform provider, in certain cases, can therefore be considered also as joint controllers. Online media platform providers act also as separate and independent controllers according to their own privacy policy upon whom we however have no influence.

Please take into account that we do not assume liability for the third-party activities and contents, incl. links that could be available from online media accounts operated by other users. It is the responsibility of the author publishing the relevant information.

- **Contact details of the Data Protection Officer**

Email: RimiDPO@rimibaltic.com

You also can contact our Data protection officer by sending a letter to us at the above-mentioned address and addressing it to the Data protection officer.

CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. The latest version of this Privacy Policy is available on our website.