

INFORMATION REGARDING PROCESSING OF PERSONAL DATA IN ONLINE MEDIA

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 information text, we therefore describe how and where we process personal data **in the context of online media used by us**.

With the term online media, we mean our social media accounts and our online advertising, incl. in social media and news portals.

WHICH CATEGORIES OF PERSONAL DATA DO WE COLLECT AND WHY

- **Management of social media accounts**

We take an active role in social media and in this regard may process personal data of you as a social media user. We process personal data in order to publish the latest news about our activities and products, present our brand, communicate with you as a user and respond to your interactions, comments or requests received in social media accounts operated by us.

In order to interact with you as a user of our social media accounts, we may carry out the following processing:

- We create and publish editorial content, e.g., about products offered by us or events organised by us. It may also include, e.g., interviews with our employees and other individuals cooperating with us.
- We read, reply and, depending on the functionality of the platform, interact in different ways with comments, posts etc. that may also contain pictures or videos entered by users, requests and other user interactions, e.g., emojis, likes and shares. It may also include access to profile information published by you as a user if you interact with our social media account. Where appropriate, we may communicate with you, incl. reply to your comments or requests via the social media platform and share your content, e.g., if you have tagged us, on our social media accounts, if this is a function of the social media platform. Individual requests received via our social media accounts are processed according to our Complaint and/or inquiry [privacy policy](#).
- We process information about you as a user, if you want to participate in social 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](#).

In order to create our social media accounts (pages), we cooperate with social media platform providers. More information is available in the annex below: "Social media accounts operated by us".

Categories of personal data	Depending on the functionality of social media accounts and contents made public by social media users, in the context of the management of social media accounts we may process: <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)
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	<ul style="list-style-type: none"> Additional information might be processed depending on the platform functionality or user's interaction.
Legal basis	Our legitimate interests to manage our social media accounts and interact with users of our social media accounts
Retention period	<p>In general, content of social media accounts is maintained by each provider of the particular social media platform in according to social media platform provider's privacy policy.</p> <p>User-generated content in our social 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 social 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. Other our posts containing personal data will be deleted from social media accounts 2 (two) years after publication.</p> <p>Depending on the functionality provided by the particular social media platform provider, deletion of content may result in the deletion of content-related information such as comments, likes etc. about the particular post.</p>

- Targeted advertising in online media**

We use online media, incl. social media platforms 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, incl. social media platforms 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, incl. social 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, incl. social media platform providers.

Categories of personal data	<p>The following categories of personal data can be in the scope (depending on anonymous target group definitions (segments) provided by the particular provider):</p> <ul style="list-style-type: none"> Demographic data User generated personal data Connection data Location information
Legal basis	<p>Our legitimate interests - to roll out advertising in online media, incl. social media</p> <p>Legal basis for data processed by platform providers is set according to their privacy policy.</p>

Retention period	Retention period for personal data processed by online media, incl. social media platform providers is determined by the relevant providers according to their privacy policy.
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For targeted advertising purpose we may also use information about visits or interactions on our own website(s). We can use marketing cookies, incl. other technologies for this purpose. We obtain the consent in advance with the help of a consent banner. For more information about cookies, please see our [cookie privacy policy](#).

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

In order to evaluate effectiveness of online media, incl. social media platforms where content created by us is published, we receive aggregate statistics based on personal data processed by online media, incl. social 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 social media accounts, e.g., so called insights regarding interactions, incl. visits to and usage of our social 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, inc. social 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, inc. social 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, incl. social 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 online media, incl. social media platforms and our content.
Retention period	<p>Aggregate statistics received by us from online media, incl. social 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, incl. social media platform providers, for statistical purpose is determined by the relevant providers according to their privacy policy.</p>

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 social media accounts, or when you write comments, send us requests or messages in our social media accounts or otherwise interact with our social media accounts, e.g., if you tag our name or like or share content available on our social media accounts.

- **Information available on our social media accounts**

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

- **Information provided by online media, incl. social 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.

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 social media accounts administration;
- 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, incl. social media service providers**

Online media, incl. social media service providers, 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, incl. social 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. For example, if you send a request related to other RIMI group company to our social media account, the relevant company may be involved in the review of such information in order to provide you with support in solving a specific issue.

- **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, incl. our social media accounts, personal data might also be transferred and processed by the relevant online media, incl. social 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, incl. social 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, incl. social media providers, available in their privacy policy.

FOR HOW LONG ARE MY PERSONAL DATA STORED?

We will erase or de-identify your personal data if it is no longer required in order to comply with the original purpose of storage, and provided that no legal retention periods, e.g., answering of your messages or requests and no legal retention periods, e.g., under law require a longer storage term for data.

For more detailed information about retention periods for specific purposes, please see the section above: “Which categories of personal data do we collect and why”.

Retention period of your data stored by online media, incl. social media platform providers, as separate controllers is set according to privacy policies of the particular platform provider.

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 social media accounts. In several other cases we only have access to aggregate statistics or anonymous target group definitions (segments) provided by platform providers that do not allow the identification of you as a data subject.

When you visit online media, incl. our social media accounts, the respective provider sets the data protection obligations towards you as a user and is the contact person for your rights. Such providers have direct access to your personal data processed on their platforms. You can exercise your data subject rights through online media, incl. social 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 or to our Data Protection Officer.

- **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 or to our Data Protection Officer.

- **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. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

For instance, in relation to cookies set on our website(s), you can change your cookie preferences at any time by clicking the "Cookie Settings" button at the bottom of our website(s).

- **Objection against processing for direct marketing**

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

In relation to our ads that are published by online media, incl. social media platform providers, you can use platform settings provided by the particular online media, incl. social 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 or to our Data protection officer. We will then investigate your objection to the processing of your data as it relates to us.

If you wish to assert your right of objection against the particular online media, incl. social 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 or to our Data Protection Officer.

- **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 or to our Data Protection Officer.

- **Data portability**

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 or to our Data Protection Officer.

WHO DO I CONTACT IF I HAVE ANY 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 Data Protection Authority.

- **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, incl. social media accounts, please contact SIA Rimi Latvia. Contact details are mentioned below.

In relation to **activities carried out by online media, incl. social 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, incl. social media platform providers to manage our social 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. However, we do not have all information about your activities, incl. your interactions with our posts or advertising, because data you enter on our social media accounts, e.g., your name, comments etc., are published and our ads are placed by online media, incl. social media platform providers.

Such data processing carried out by platform providers may be based also on the previous cooperation between the particular provider and you as a user, e.g., if you have an account on the respective social media platform. Platform providers determine legal basis for such data processing and it could also include usage of their cookies and other tracking tools. Depending on the functionality of the platform, personal data may be processed irrespective of whether you as a user is registered or logged in on the particular platform account or not. Online media, incl. social media platform providers, act also as separate and independent controllers according to their own privacy policy upon whom we however have no influence. We receive aggregate statistics and anonymous target group definitions (segments) prepared by the relevant providers and we have no information about exactly how data is collected, used and further processed by platform providers and their cooperation partners.

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

- **Our contact details**

SIA Rimi Latvia, reg. No. 40003053029
Legal address: 161 A. Deglava iela, Riga, Latvia, LV 1021
Phone number: +371 67045409
Email: info.lv@rimibaltic.com

SIA Rimi Baltic, reg. No. 40003592957
Legal address: 161 A. Deglava iela, Riga, Latvia, LV 1021
Phone number: +371 67045525
Email: info@rimibaltic.com

- **Contact details of Customer service**

Phone number: + 371 80000180
Email: info.lv@rimibaltic.com

- **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.

ANNEX - SOCIAL MEDIA ACCOUNTS OPERATED BY US

	Providers	Social media accounts operated by us	Privacy policy & privacy settings provided by providers
Meta Platforms Ireland Limited, Serpentine Avenue, Block J, Dublin 4 Ireland	Facebook (Messenger)	Rimi Latvija Mans Rimi (location) linked to Rimi Latvija Rimi Bērnem Tirdzniecības centrs "Tobago" Tirdzniecības centrs "VIVO centrs" Tirdzniecības centrs "Ostmaļa" Tirdzniecības centrs "Aleja" Tirdzniecības centrs Valmiera	Privacy policy https://www.facebook.com/about/privacy Information about Page Insights (joint controllers) https://www.facebook.com/legal/terms/page_controller_addendum Privacy settings management https://www.facebook.com/help/android-app/193677450678703
Meta Platforms Ireland Limited, Serpentine Avenue, Block J, Dublin 4 Ireland	Instagram	rimi.latvija	Privacy policy https://privacycenter.instagram.com/policy/ Information about Page Insights (joint controllers) https://www.facebook.com/legal/terms/page_controller_addendum Privacy settings management https://privacycenter.instagram.com/
Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland	Twitter	@RimiLatvija	Privacy policy https://twitter.com/en/privacy Privacy settings management https://twitter.com/settings/account Additional information about data processing https://help.twitter.com/en/rules-and-policies/data-processing-legal-bases
TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland	TikTok	Rimi Latvija – rimi.latvija	Privacy Policy https://www.tiktok.com/legal/page/eea/privacy-policy/en incl. privacy settings management in the section "Your rights and choices" https://www.tiktok.com/legal/page/eea/privacy-policy/en Information about joint controllers https://ads.tiktok.com/i18n/official/policy/jurisdiction-specific-terms
Google Ireland Ltd., Gordon	YouTube	Rimi Latvija - @RimiLatvija1	Privacy policy https://policies.google.com/privacy?hl=en-GB

House
Barrow St
Dublin 4
Ireland,

Google
Ireland Ltd.,
Gordon
House
Barrow St
Dublin 4
Ireland,

LinkedIn
Ireland
Unlimited
Company,
Wilton
Plaza,
Wilton
Place,
Dublin 2,
Ireland

SIA
"Draugiem"
Ojara
Vaciesa iela
6B, Riga,
Latvia

Google Maps
(may also
appear in
google search
results)

LinkedIn Rimi Baltic Group

Draugiem.lv Rimi Latvija

Privacy settings management
https://www.youtube.com/intl/ALL_lv/howyoutubeworks/user-settings/privacy/

Privacy policy
<https://policies.google.com/privacy?hl=en>
Privacy settings management
<https://support.google.com/maps/answer/9514690?hl=en&co=GENIE.Platform%3DAndroid>

Privacy policy
[LinkedIn Privacy Policy](#)
Privacy settings management
<https://www.linkedin.com/help/linkedin/answer/a1338877/understanding-your-privacy-settings?lang=en>

Page Insights Joint Controller Addendum (joint controllers)
[Page Insights Joint Controller Addendum \(linkedin.com\)](#)

Privacy policy
<https://www.draugiem.lv/register/>
incl. privacy settings managements in the section5
<https://www.draugiem.lv/register/>