

Regulation of AS SKINEST GRUPP on the Protection of Personal Data of Partners, Clients and Third Parties

Approval date: 25/05/2018

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Date of the document preparation: 25/05/2018, document version:

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General provisions

This Regulation of AS SKINEST GRUPP concern for the protection of personal data of partners, clients and third parties (hereinafter – the Regulation) is an integral part of the AS SKINEST GRUPP concern Personal Data Policy. This Regulation defines the basic principles for the collection and processing of personal data of partners, customers and third parties with whom AS SKINEST GRUPP or its affiliated companies have a contractual relationship or in the case of contacting representatives or employees of customers, partners or third parties without having a contractual relationship, as well as in case of requests from representatives, employees of clients, partners or third parties. This Regulation also determines the storage of documents containing personal data and the destruction of documents containing personal data.

This Regulation applies to all operations performed by AS SKINEST GRUPP (hereinafter referred to as the Company) and its affiliated companies with personal data using automation tools or without using them, unless the affiliated company has its own personal data processing policy. Each affiliated company collects and processes personal data independently of other related entities and is the responsible processor. The exchange of collected data between related companies belonging to AS SKINEST GRUPP is not excluded.

This Regulation is subject to updating in case of amendments to the legislation on personal data of the European Union or the Estonian State, as well as in case of amendments to the recommendations of the Data Protection Inspectorate.

This Policy defines that all employees of the Company refer to employees of partner organizations, employees of clients – legal entities, members of governing bodies, officials and/or other representatives as representatives of the relevant organization, and not to as private persons, except in case of the Company's relationship with such person as a private person.

Personal data subjects

In the context of this Regulation, clients, partners and other third parties are considered to be natural or legal entities with whom the Company has a partnership or other contractual relations, also in case of the absence of contractual relations, persons with whom the Company has direct contact, for example, in case of requests, communication with potential clients or representatives of the authorities.

This Regulation does not apply to employees who perform their duties as employees on the basis of an employment contract, including contractors who are natural entities, acting on the basis of a contract of hiring work, a contract of agency or members of the governing bodies (general managers, members of the board, and member of the council).

Categories of personal data and collection of personal data

The Company collects and processes personal data received directly from the data subject, from the organization that the data subject represents or is an employee of such an organization. The Company also collects personal data obtained from external sources, such as public and private legal registers and databases, as well as from other legal sources of information.

The main categories of personal data that the Company collects are:

- identification data, for example, name, surname, personal identification number, date of birth, data of an identity document (for example, a copy of a passport, ID card, driver's license);
- contact information, for example, an address, telephone number, e-mail;
- data on relations with legal entities, for example, data on the position in the represented legal entity;
- professional data, for example, education or career;
- data obtained and/or compiled during the fulfillment of an obligation arising from the law, for example, data received from tax administration institutions, courts;
- data obtained during communication, for example, video and/or audio recordings, collected when the subject visits the premises of the Company, when communicating by telephone, e-mail, messages and other means of communication, for example, social networks, applications of electronic devices;
- other data, the collection of which is required for the conclusion and execution of contracts or for the collection of which the Company has a legitimate interest or in other circumstances.

Objectives and rationale for data processing

The Company processes personal data of entities mainly for:

- general management of relations with customers, partners and third parties, providing and administering access to the Company's products and services;
- the conclusion and execution of contracts, as well as for the execution of pre-contractual relations;
- the performance of legal duties;
- the protection of the interests of a partner or the Company (including in proving business transactions, other commercial communications), the protection of legal requirements, their implementation and execution;
- internal training or quality assurance of goods and services;

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- the provision of additional services, offering of goods and services, conduction of surveys, market analysis and statistics collection;
- issuing invitations for visas.

Personal data recipients

Personal data may be transferred to:

- the public institutions (e.g. tax authorities, supervisory institutions);
- legal entities belonging to AS SKINEST GRUPP concern;
- third parties involved in the execution of trade transactions or other business processes (for example, logistics and courier organizations in the case of documents sending);
- auditors, legal advisers, financial advisers, accountants, supervisors or other operators or data processors authorized by the Company;
- persons vouching for the proper fulfillment of the obligations of the client or partner to the Company;
- other persons associated with the provision of the Company's services, including, but not limited to providers of archiving services, mail, e-mail.

The period of processing and storage of personal data

Personal data is processed within the required period. The period of processing and storage of personal data may be based on the concluded contract, legal interests or applicable legal acts.

Rights

If you believe that this Regulation limits or violates your rights and/or interests, you can contact the Company by e-mail info@skineest.ee in order to resolve the problem. You can also file a claim with the Data Protection Inspectorate of the Republic of Estonia.

The Company has the right to unilaterally amend this Regulation at any time.

The Company may modify and supplement the collected and processed personal data and goals at its discretion and taking into account the current legislation.