

Confidentiality Politics

These confidentiality politics are subject to person's data processing, compiling, management and storing which SIA "Fitsypro", reg. Nr. 40203120888, juridicial address Albert Street 1 – 17, Riga, LV – 1010, henceforth referred to as – "Lessor", has received from a physical person, henceforth referred to as – "Renter", who, using the FIQSY mobile application (henceforth referred to as – "App"), has provided the Lessor Renter's own personal data for the purpose of receiving services.

Personal data, for the purpose of these confidentiality politics application, refers to any information that alludes to Renter as an identifiable person or Renter's personal identity.

1. Agreeing to person's data processing, compiling, management and storing

Renter, with specifying information, including personal data, into the App for the purpose of receiving Lessor's services, agrees and accepts that Lessor can process, compile, manage and/or store said personal data in accordance with these confidentiality politics.

Renter, with providing Renter's agreement to Lessor for the purpose of processing, compiling, management and storing, keeps the rights to Renter's personal data that is provided to Lessor to be subject to editing and deleting. Renter has the rights to, at any moment, withdraw the given agreement to data processing with sending a written demand to Lessor. Renter's agreement is considered as received when Renter has approved and read the Confidentiality Politics on the App. Based on other legal basis, Renter's withdrawal of agreement can't stop data processing done by Lessor.

2. Person's data

With establishing legal relationship with Lessor, Renter agrees that Renter's further mentioned data is gathered, processed and managed for the purpose of Renter's identification: name, surname, mobile number, website URL, IP address, geographical location; registration date and time, browser used, email address, home address, electronic device data from which the App is being used, credit card data, including credit card number, date of issue, date of expiry, CVV, credit card issuer and other personal data provided by Renter.

Lessor gathers, processes, compiles, manages and/or stores Renter's data which have been received during installing and using the App. Renter's data, with regard to the location of Renter, are being received and processed only with Renter activating the App. Receival of geographical location is stopped with Renter closing App.

3. The goal of processing person's data

The goals of processing Renter's data are:

- Lessor to be able to provide services,
- communicating with Renter,
- for the purpose of providing App user safety,
- to prevent, detect and investigate any actions that are prohibited, illegal or don't comply with ethical practices, including controlling, recognising and preventing any criminal transactions, including transactions related to Renter's property, detecting fraudulent forms of payment and objective investigation of incidents,
- to warn Renters about any changes to Regulations,
- to inform Renter about special offers,
- to personalise and improve services,
- to protect Lessor's services and reputation.

4. Legal basis of processing person's data

Lessor processes Renter's personal data based on these legal basis:

- to form and execute legal relationships – in order to provide rental services after Renter's request;
- for the enforcement of regulatory enactments – in order to execute Lessor-binding obligations in the external regulatory enactments;
- in accordance to Renter's – data subject's – agreement;
- legitimate interests – in order to realise existing relationship between Lessor and Renter or to realise legitimate interests, that arise from the law, of the Lessor.

Lessor's legitimate interests are to: execute commercial activities; provide rental services; check Renter's identity before providing services; ensure fulfilment of obligations; prevent any unreasonable financial risks to Lessor's business, including performing credit assessments before and during service use; save Renter's notes on application of services, other applications, complaints or claims; conduct negotiations with Renter's application about service functioning provision, upkeep, transactions in order to execute service quality control; conduct negotiations, if there is need, with Renter's application in order to organise services that meet contractual obligations; send out warnings about any service provision and information about any other important ongoing; administrate Renter's user account on App; advertise Lessor's services; provide corporate governance, financial and business accounting and analytics; ensure and improve quality of services; administer made transactions; administer neglected transactions; appeal to the state administration and operational institutions and the court in order to protect Lessor's legal interests.

5. Person's data processing and protection

Lessor processes and protects Renter's data using modern technology and organisational, financial and technical resources that are available to Lessor.

6. Person's data holder

Person's data holder is SIA "Fitsypro", reg. Nr. 40203120888, juridicial address Albert Street 1 – 17, Riga, LV – 1010 (the Lessor).

Lessor's contact information, which is meant for person's data processing related questions, is: datuaizsardziba@fiqsy.com or Alberta Street 1 – 17, Riga, LV – 1010.

7. Person's data receiver categories

Lessor doesn't expose Renter's personal data, or any other information that is received during provision of services, to any third parties with the exception of:

- if the concerned third party has to receive person's data because of regulations set in a contract signed with Lessor for the purpose of providing a necessary function in order to fulfil services provided to Renters (for example, bank — for the purpose of conducting transactions; information technology company — for the purpose of processing Client's data; accounting service provider — for the purpose of processing payment information etc.);
- in accordance with Client's clear and unambiguous agreement;
- in accordance with procedures specified in regulatory enactments of Latvian Republic to people who have legally made a request to the Lessor and who have legal grounds to request Renter's personal data from Lessor;

- to protect Lessor's legitimate interests, including, but not just, addressing court or other state institutions against a person, who has violated Lessor's legitimate interests;

- to develop special offers tailored to Customer's interests and to improve the performance of the App.

8. Data storing

Lessor stores personal data as long as Renter's user account is active. If Renter's user account is closed, personal data is deleted from databases, with the exception of situations where this kind of data is needed to be stored for the purpose of accounting, resolving disputes or fraudulent activity prevention in this order:

- Conversation recording with the Renter – deleted 6 months after conversation recording date

- Data about services provided to the Renter – deleted 5 years after last provided service day

- History of rides – deleted 5 years after the last ride

- In case of suspicion of criminal offences, attempted frauds or false information – personal data is deleted 10 years after last provided service day

- In case of any disputes that relate to transactions, data will be kept as long as the claim is satisfied or dispute claim term expires.

9. Renter's rights to access Person's data

Renter has the right to receive information that is established in regulatory enactments and is related to Renter's data processing with submitting a written request to the Lessor.

Renter has the rights to demand Lessor the access to Renter's own personal data as well as the right to demand Lessor to improve, edit or delete data, or demand for processing restrictions, or has the rights to object against Renter's data processing.

To exercise these rights, Renter has to submit a written request to the Lessor. After receiving said written request, the Lessor will verify Renter's identity, evaluate request and execute it in accordance with Latvian Republic regulatory enactments. Lessor will then send a written answer to the address mentioned in Renter's written request or to address that has been specified by Renter and is available to the Lessor.

10. Communication with Renter

To communicate with Renter, the Lessor will use Renter's specified contact information: mobile number, email address.

11. Amendments to confidentiality politics

Lessor has the rights to make unilateral amendments to confidentiality politics. Lessor needs to inform Renter about amendments done to confidentiality politics. Current confidentiality politics are available on the App.

This confidentiality politics version comes into force on 28th of March, 2019.

SIA "Fitsypro" Member of Board Māris Avotiņš