

DATA PROTECTION POLICY

of the private limited company Kinema

The private limited company Kinema (hereinafter referred to as '**we**' or '**us**') values integrity, accuracy, keeping promises, and high quality. We also observe the same principles in processing personal data.

This data protection policy provides a more detailed overview of the principles of the processing of personal data and data protection applied by us.

Our contact information:

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Who are our customers?

Our customers are the legal as well as natural persons who wish to purchase and/or have purchased our products and/or services. The majority of our customers are legal persons.

In order to sell products and provide services, we process the personal data of our customers and the representatives of our customers ('**you**') on a daily basis.

In which role do we process personal data and where do we obtain personal data from?

We process personal data as a data controller as well as a data processor. As a data controller, we decide on the purposes of processing personal data and the tools used for this purpose; as a data processor, we process personal data based on written instructions issued by the data controller.

As a data controller, we obtain personal data directly from you when you contact us with the wish to purchase our products or order our service or when you visit our website.

As a data processor, we obtain personal data from our contractual partner, under whose written instructions your personal data are processed by us.

Which personal data do we process?

We process the following personal data, among others:

1. **personal information**, such as your first name, surname;
2. **contact details**, such as your e-mail address, telephone number, language of communication;
3. **details of the contact persons of customers who are legal persons**, such as your name, job position, communication language;
4. **the details which are related to purchasing our product and/or using our services**, such as information about purchased products, information about using services, reclamations;
5. **information about the feedback provided to us**, such as information about your satisfaction or your comments about our products and services;
6. **payment and financial information**, such as your account number, payment card details, information about the chosen payment method, and payment behaviour (incl. delayed payments);
7. **subscription/non-subscription** to our newsletters;
8. **information about participation in campaigns**, e.g. participation information and prizes won;
9. **communication data**, such as data collected by e-mail, data collected through social media, data transmitted by text messages, etc.;
10. information about **cookies** (see the separate cookie policy).

For which purposes and on which legal grounds do we process personal data?

We process personal data for the following purposes:

- (1) in connection with providing services, incl. for processing your inquiries and requests;
- (2) for pre-contractual negotiations;
- (3) to exercise our legal rights and fulfil our legal obligations, to fulfil our accounting-related obligations;
- (4) for processing online inquiries, for sending newsletters;
- (5) for advertising our services, incl. for sending our newsletter to the customers.

We process personal data in compliance with the legislation applicable in the Republic of Estonia.

We mainly process personal data to perform the service contracts concluded with you (subsections (1), (2), and (4)). We also process personal data to fulfil our legal obligations (subsection (3)), based on your consent (subsection (4)), and based on legitimate interest (subsection (5)).

Which values and principles do we value in connection with personal data?

We set reasonable purposes for processing personal data and only process personal data for these purposes.

We treat personal data with care; we respect your right to protect your personal data.

We process personal data lawfully and in the minimum required extent.

We implement various, incl. physical, technical, and organisational, measures for the protection of personal data and to alleviate risks.

We constantly analyse the risks accompanying the processing of personal data and keep the risks under reasonable control.

We retain personal data for only as long as it is required based on applicable legislation or a contractual obligation or for our business operations. When the data are no longer required, we delete the personal data permanently.

We invest in our employees to make sure that they are acquainted with our data protection policy and follow it.

What are your personal data-related rights?

Pursuant to the General Data Protection Regulation, you have the following personal data-related rights:

- (1) **The right of access to personal data** – you have the right to know which personal data about you we retain and how the data are processed.
- (2) **The right to rectification of personal data** – you have the right to request the rectification of incomplete, missing, or inaccurate personal data.
- (3) **The right to withdraw your consent to processing of personal data** – if your personal data are processed based on your consent, you have the right to withdraw the consent.
- (4) **The right to erasure of personal data ('the right to be forgotten')** – you have the right to request us to erase your personal data. In certain cases, we may reject the request.
- (5) **The right to restriction of processing** – in certain cases, you have the right to prohibit or restrict processing of your personal data for a certain period of time (e.g. if you have filed an objection against the processing of your personal data).
- (6) **The right to object** – you have the right to file to us objections against the processing of your personal data and any objections concerning the processing of personal data for the purposes of direct marketing are responded to immediately.
- (7) **The right to data portability** – if your personal data are processed based on your consent and if the personal data are processed by automated means, you have the

right to receive the personal data concerning you which you have provided to us as the data controller in a structured, commonly used, and machine-readable format.

- (8) **Automated decision-making (incl. profiling)** – if we have notified you that we use automated decision-making (incl. profiling) which results in legal consequences concerning you or has a significant impact on you, you may request for the automated decision not to be made solely based on automated processing.
- (9) **Submission of complaints.** You have the right to file complaints with the Estonian Data Protection Inspectorate about us in connection with the processing of personal data (www.aki.ee).

If you have any questions or requests concerning personal data, please contact us (info@kinema.eu). We take all requests received from you seriously.

To whom and under which conditions do we disclose your personal data?

We maintain the confidentiality of your personal data and only disclose the personal data if the respective obligation arises from legislation.

We disclose personal data to our data processors, with whom we have previously entered into data processing agreements to ensure that personal data are used for the intended purpose.

As a rule, we process personal data within the European Economic Area (EU countries plus Norway, Iceland, and Lichtenstein). If we need to transfer personal data outside of the European Economic Area, the data are transmitted pursuant to the requirements laid down with the General Data Protection Regulation.

How long do we retain your personal data?

We retain your personal data as long as we are required or permitted pursuant to the law or as long as is needed in the interests of our business operations.

We retain the personal data processed to fulfil a legal obligation until the expiry of the respective legal obligations (e.g. the Accounting Act lays down the obligation to retain data for 7 years). The personal data which are related to performing a contract or a dispute are retained until the expiry of the respective claim.

After the expiry of the period of retention of personal data, we delete the personal data permanently.

What to do in the event of a personal data-related breach?

If you are aware of a personal data-related breach or a risk of such breach, please notify us immediately by e-mailing info@kinema.eu We take security of personal data very seriously and immediately respond to any potential breaches.