

Conditions of processing personal data when entering the territory of BLRT Group enterprises in Estonia

1. General Provisions

1.1 This document (hereinafter referred to as The Conditions) defines the policy of the enterprises of the BLRT Group (hereinafter referred to as the Group) regarding the processing of personal data when **entering the territory** of the Group in Estonia.

1.2 On personal data processing the Group adheres to the requirements of the legislation of the Republic of Estonia and the European Union, in particular, the Personal Data Protection Act and the General Data Protection Regulation of the European Union (hereinafter referred to as the Regulation).

2. Co-controllers

The public limited company BLRT Grupp AS, registration number 10068499, located at Kopli str.103, 11712 Tallinn and other enterprises of the BLRT Group are co-controllers of personal data.

3. Definitions

The following definitions applied in the present Conditions:

Personal data - any information relating to an identified or identifiable natural person ('data subject') who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data etc.

Data subject - a natural person in a contractual relationship with a Group enterprise on the basis of an employment contract, tender contract, board member contract, seafarer's contract of employment, civil law contract etc., natural person as counterparty, representative or employee of counterparty – legal person, employee and representative of partner enterprise; natural person as a guest of the Group enterprise.

Processing of personal data - any operation or set of operations which is performed on personal data, such as collection, recording, storage, structuring, alteration, consultation, use, erasure or destruction;

Controller - a legal person of BLRT Group, which alone or jointly with others determines the purposes and means of the processing of personal data;

Co-controllers – a legal persons of the BLRT Group, which jointly determine the purposes and means of the processing of personal data;

Processor - a legal person of the BLRT Group, which processes personal data on behalf of the controller.

4. Data types and sources

The Group processes the following personal data received directly from data subjects:

- name, surname, personal identification code, information on citizenship, number of identification document;
- registration number of a vehicle;
- other data necessary to keep to the terms of legislation.

5. Purposes for processing of personal data

Based on a justified interest, personal data is collected and processed to:

- provide data subjects with access to the place of course of duty and discharge of contractual obligations,
- ensure security on the territory of the Group,
- ensure safety of the property of the Group,
- comply with the requirements of the actual legislation, in particular, the International Ship and Port Facility Security Code (ISPS Code).

6. Transfer of personal data

Personal data obtained to ensure access to the territory of the Group is not a subject to transfer to third parties.

7. Data subject rights

The data subject has the right to:

- make decision about transfer of his/her personal data to the controller;
- withdraw consent for the processing of personal data;
- alter his/her personal data if it is incomplete, outdated or inaccurate;
- demand erasure of personal data;
- receive information regarding the processing of personal data, including in a structured format.

8. Storage of personal data

8.1 The personal data of data subjects are stored no longer than required by the purpose of their processing, and are subject to destruction upon achievement of these purposes or in case of loss of the need to achieve them.

8.2 The personal data is processed only with the consent of data subject, unless otherwise provided by law.

9. Exercise of data subject rights

9.1 Inquiries concerning the processing of personal data as well as applications made in electronic form regarding the exercise of any of the rights specified in clause 7 should be signed digitally and forwarded to the e-mail address personal@blrt.ee.

9.2 Inquiries and applications prepared on paper (hereinafter referred to as The Inquiry) should be submitted to the Group's head office located at Kopli str. 103, 11712, Tallinn. Inquiry and application can be accepted from the data subject or his/her assignee.

9.3 The Group provides an answer to inquiry within one month after receiving the inquiry. If necessary, this period can be extended for another two months due to the complex nature or the large number of inquiries.

9.4 The Group has the right to ignore the inquiry if it is not possible to identify the person who submitted it.

9.5 The data subject has the right to file a complaint with the Data Protection Inspectorate or a court if he or she finds that his or her rights have been violated during the processing of his or her personal data. The contact details of the Data Protection Inspectorate are available on the website of the Inspectorate <https://www.aki.ee>.

10. Other conditions

10.1 The Group has the right to amend the personal data processing conditions.

10.2 The present Conditions enter into force 10.12.2020.