NOVITUS Privacy Policy

1. The purpose of the privacy policy is to provide information on the processing of personal data by SIA "Novitus" (hereinafter - NOVITUS). The privacy policy applies to the processing of the personal data of NOVITUS customers, visitors, and cooperation partners.

Manager and contact information

2. The controller of personal data processing is Novitus, unified registration no. 40003939964, legal address in Riga, Stabu iela 17, LV-1011.

3. Novitus' contact information in matters related to personal data processing is info@novitus.lv. Using this contact information or contacting the NOVITUS legal address, you can ask a question about the processing of personal data. A request for the exercise of one's rights can be submitted in accordance with Clause 25 of the Privacy Policy.

Scope of application of the document

4. Personal data is any information about an identified or identifiable natural person. Definitions, explanations, and data categories of personal data are specified in Appendix No. 1.

5. The privacy policy is applied to ensure the protection of privacy and personal data in relation to:

- for natural persons – Customers who receive training, certification, and other services provided by NOVITUS (including potential, former, and existing ones), as well as third parties who, in connection with the provision of said services to a natural person (customer contacts, cooperation partners), receive or transfer Novitus any information.

• For visitors and callers of NOVITUS-maintained websites, learning environments, and social network profiles;

• For participants of NOVITUS marketing campaigns (hereinafter referred to as Clients)

6. The privacy policy applies to data processing regardless of the form and/or environment in which NOVITUS processes personal data: in IT systems, websites, in paper format, by telephone, or in the form of a video conference).

7. Additional, specific rules may be set for certain, specific types of data processing (for example, the use of cookies), which the Customer is informed about when NOVITUS obtains the relevant data.

Purposes of personal data processing

8. NOVITUS processes personal data for the following purposes:

• For the provision of training, certification, and other services provided by NOVITUS:

- for customer identification;

- for the preparation, conclusion, and proof of the conclusion of the contract;

- for the provision of services;

- providing a service on behalf of a third party (eg an employer) to perform

- providing a service on behalf of a third party (for example, an employer) in order to fulfill the requirements set by the third party, of which the Customer is informed and/or agrees (for example, for making a training video recording);

- to improve the quality of services, to develop new services;

- for promoting, advertising, and distributing the use of the service;

- for customer service;

- for consideration and processing of submissions and objections;

- for retaining customers, building loyalty, and measuring satisfaction;

- for settlement administration;

- for maintaining and improving the operation of the NOVITUS website;

- for ensuring and controlling compliance with the rules of educational projects.

      • For business planning and analytics:

- for statistics and business analysis;

- for planning and accounting;

- for efficiency measurement;

- for data quality assurance;

- for preparing reports;

- for customer surveys;

- within risk management activities.

      • To ensure the security of information, information systems related to the provision of training, and the company.

      • To fulfill the obligations stipulated in the normative acts, i.e. - for providing information to state administrative authorities;

      • For other specific purposes, about which the Customer is informed at the time he provides relevant data to NOVITUS

Legal basis for personal data processing

9. NOVITUS processes the Customer's personal data based on the following legal bases:

• for the conclusion and execution of the contract - to prepare and conclude a contract (written or oral) at the request of the Client and ensure its execution;

• for the fulfillment of regulatory acts – to fulfill the obligation specified in external regulatory acts binding on NOVITUS;

• in accordance with the consent of the Client - data subject;

• The legal (legitimate) interests of NOVITUS - to ensure the legitimate (legitimate) interests of NOVITUS as a merchant;

• to ensure the vital interests of the data subject or other natural person - to ensure the physical and property safety of NOVITUS employees and Customers.

10. The legitimate interests of NOVITUS are:

• perform commercial activities;

• provide training, certification, and other services;

• verify the identity of the Client before concluding the contract, certification, or training service;

• prevent unreasonable financial risks for your commercial activity;

• save customer applications and submissions for the provision of services, other applications and submissions, and notes about them, incl. which have been done orally, by calling the training center, on the website;

• send commercial offers to Customers for similar services that the Customer has used in the previous two years if the Customer has not refused to receive such messages;

• analyze the NOVITUS website and website, develop and implement their improvements;

• administer the Client's account on the NOVITUS website and learning environments;

• perform actions to retain customers;

• segment the Customer database for more efficient provision of services;

• develop and develop services;

• advertise their services;

• send other reports on the progress of the contract execution and events relevant to the execution of the contract, as well as conduct customer surveys about the services and their usage experience (NPS);

• prevent fraud;

• provide financial and business accounting and analytics;

• ensure effective company management processes and efficiency of service provision;

• ensure and improve the quality of services;

- administer both paid and unpaid payments;

- apply to state administration and operational institutions and to the court for the protection of their legal interests;

- inform the public about their activities.

Processing of personal data

11. NOVITUS takes care of Clients' privacy and personal data protection and respects Clients' rights to the legality of personal data processing in accordance with the current legislation - Regulation 2016/679 of the European Parliament and the Council of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and free movement of such data (Regulation), the Law on the Processing of Personal Data and other applicable laws in the field of privacy and data processing

12. NOVITUS processes the Customer's data, taking into account the appropriate legal basis and following the principles of data processing minimization and transparency.

13. In order to qualitatively and promptly ensure the performance of the contractual obligations concluded with the Client, NOVITUS may authorize its cooperation partners to perform separate service provision activities, such as engaging lecturers and the like. If, when performing these tasks, NOVITUS cooperation partners process the Customer's personal data held by NOVITUS, the respective NOVITUS cooperation partners are considered NOVITUS data processors and NOVITUS has the right to transfer to the cooperation partners the Client's personal data necessary for the performance of these activities to the extent necessary for the performance of these activities.

14. NOVITUS cooperation partners (in the capacity of personal data processor) will ensure the fulfillment of personal data processing and protection requirements in accordance with NOVITUS requirements and legislation, and will not use personal data for purposes other than fulfilling the obligations of the contract concluded with NOVITUS.

Protection of personal data

15. NOVITUS protects the Customer's data using modern technological capabilities, taking into account the existing privacy risks and the organizational, financial, and technical resources reasonably available to NOVITUS, including using the following security measures: • data encryption when transmitting data (SSL encryption); • firewalls; • intrusion detection programs; • other protective measures in accordance with current technical development opportunities.

Sources of personal data collection

16. NOVITUS obtains personal data from the following sources: • from the Client; • from websites and learning environments maintained by NOVITUS; • from NOVITUS cooperation partners.

Categories of recipients of personal data

17. NOVITUS does not disclose to third parties the Customer's personal data or any information obtained during the provision of services and the performance of the contract, except for:

- if the data must be transferred to the relevant third party within the framework of the concluded contract in order to perform a function necessary for the performance of the contract or delegated by law (for example, the Customer is studying using the co-financing of EU funds or for employer financing, or receives a certification service on behalf of a third party. In this case, the data will be transferred to the employer, the project holder, and/or the CFLA (Central Finance and Contracts Agency) according to the terms of the project and/or contract);
- if the Customer clearly and unequivocally agrees to the transfer of data;
- if it is provided in accordance with the procedures and to the extent specified in external regulatory acts;
- For the protection of the legitimate interests of NOVITUS in accordance with the procedure provided for in the regulatory acts, for example, by applying to the court or other state institutions against the person who has violated these legitimate interests.

Duration of storage of personal data

19. NOVITUS stores and processes the Customer's personal data as long as at least one of the following criteria exists:

- the contract concluded with the Customer is valid;
- as long as NOVITUS or the Client can exercise their legitimate interests in accordance with the procedures set forth in external regulatory acts;
- while one of the parties has a legal obligation to store data (for example, according to the Accounting Law, invoices issued to the company must be kept for at least 5 years, etc.);
- while the Client's consent to the relevant processing of personal data is valid (applies only to cases where there is no other legal basis for storing personal data).

20. After none of the legal grounds for data processing exist, the Customer's personal data is deleted.

Access to personal data and other Customer rights

21. NOVITUS provides the Client with all the information specified in the regulatory enactments in connection with the processing of his data, as well as ensures the implementation of all the rights of the data subject specified in the regulatory enactments.

22. The customer has the right to request NOVITUS access to his personal data, as well as request NOVITUS to supplement, correct, or delete it, issue a copy of the data, object to data processing, or request to limit data processing and ensure data portability.

23. NOVITUS fulfills the data subject's requests to the extent that they do not conflict with NOVITUS' obligations imposed by the current regulatory enactments, or do not conflict with the terms of the contract concluded between NOVITUS and the Customer.

24. The customer can submit a request for the exercise of his rights:

- in the form of electronic mail, signing with a secure electronic signature.

25. Upon receiving the Customer's request for the exercise of its rights, NOVITUS verifies the Customer's identity, evaluates the request, and fulfills it in accordance with regulatory enactments.

26. If the Customer wishes to receive information containing personal data, NOVITUS' response to the Customer is sent by mail to the contact address specified by the Customer in a registered letter or delivered personally, taking into account the method of receiving the response specified by the Customer.

27. In case of any Customer objections, the Customer has the right to contact NOVITUS using the NOVITUS contact information specified in this Privacy Policy. After receiving a complaint or objection, NOVITUS immediately ensures their consideration and elimination of possible deficiencies.

28. If the Customer is not satisfied with the actions performed by NOVITUS in the examination of objections or the elimination of possible deficiencies, the Customer has the right to apply to the supervisory authority - the State Data Inspectorate.

The customer's consent to data processing and the right to withdraw it

29. NOVITUS processes personal data in certain cases based on the Customer's consent (for example, for data analysis of service usage habits, receiving individually prepared advertisements, etc.).

30. The customer can give his consent to the processing of his personal data on the NOVITUS website (www.NOVITUS.lv), in the NOVITUS course evaluation questionnaire, or by writing to Novitus@Novitus.lv

31. The customer has the right to withdraw the consent given for data processing at any time in the same way in which it was given, that is on the NOVITUS website (www.NOVITUS.lv), in the NOVITUS course evaluation questionnaire, by writing to Novitus@Novitus.lv. In case of withdrawal of consent, further data processing based on previously given consent for the specific purpose will not be carried out in the future.

32. Withdrawal of consent does not affect the legality of data processing carried out at the time when the Client's consent was valid.

33. After withdrawing the Client's consent to data processing, NOVITUS has the right to process the Client's data, the processing of which has another legal basis.

Communication with the Client

34. NOVITUS communicates with the Customer using the contact information provided by the Customer (phone number, e-mail address).

35. NOVITUS communicates about the performance of service contractual obligations based on the concluded (written or oral) contract.

Commercial announcements

36. Communication about commercial announcements about NOVITUS and/or third-party services and other announcements not directly related to the provision of contracted services (e.g. Customer surveys) is carried out by NOVITUS in accordance

with the Customer's consent or based on its legitimate interests in cases where it is permitted by laws and regulations.

37. NOVITUS, based on the regulation of the Law on Information Society Services, has the right to send commercial notices to its clients by e-mail about similar services, without requiring the Client's consent, but providing the Client with the opportunity to refuse receiving such notices.

38. The customer can give his consent to receive commercial notifications from NOVITUS and/or its cooperation partners by e-mail, or in course evaluation questionnaires.

39. The consent given by the client to receive commercial notifications is valid until it is revoked (even after the termination of the service contract).

40. The customer can at any time refuse to receive further commercial notifications in one of the following ways:

   • by sending an e-mail to the address info@Novitus.lv;
   • using the automated option provided in the commercial communication to opt out of receiving further communications by clicking on the opt-out link at the end of the relevant commercial communication (e-mail).

41. Novitus stops sending commercial messages as soon as the Customer's request is processed.

Website visits and cookie processing

42. NOVITUS websites may use cookies. The rules for the use of cookies are available in the cookie policy.

43. The NOVITUS website may contain links to third-party websites that have their own terms of use and personal data protection, for which NOVITUS is not responsible.

Different rules

44. NOVITUS has the right to make additions to this Privacy Policy, making its current version available to the Customer in his user profile on the NOVITUS website, in the learning environment, as well as by posting it on the NOVITUS website www.Novitus.lv.

45. NOVITUS keeps the previous versions of the Document and they are available on the NOVITUS website www.Novitus.lv in the About us/ NOVITUS privacy policy section.

46. This version of the Privacy Policy enters into force on January 1, 2023.

Appendix No. 1

NOVITUS Privacy Policy for Customers Appendix "Data Categories"

No.	Data category	Examples*
1	Personal identification data	name, surname, personal code/ID, D.O.B, passport No./ID number, signature
2	Personal contact information	*Address, telephone number, e-mail address*
3	Customer contact data	*Name, surname, e-mail address, telephone number of contact person*
4	Customer data	Customer contact number, customer registration date, status
5	Supplier data	Supplier number, invoice information, address, bank account number
6	Service data	Name of course, educational program, certification test number/name, price, discount, discount expiration date
7	Service contract data	*Contract number, signature/approval date, type, annex number, annex date*
8	Transaction data	Transaction number, date, transaction name, type, status
9	CRM** Activity data	*Activity number, date, transaction name, type, status*
10	Communication data	*Incoming/outgoing communication type, number, date, registrant, content, channel, delivery status*
11	Billing data	Payment system account number, bank account number, invoice number, date, amount, method of invoice receipt, payment date, debt amount
12	Objection/Application data	Objection/application number, date of registration/resolution, type, description
13	Certification data	*Results of the assessment of the persons/clients knowledge (test results)*

14	Customer survey data	*Survey name, date of dispatch, date of response, survey questions and answers provided*
15	System access data	Usernames and passwords assigned to the customer
16	Photos and images	Photos from customer events, date of photo shooting
17	Video data	*Video from training, customer events, and video surveillance in certification centers*
18	Consent*** information	*Mark of the clients expressed consent by topic, date and time of consent, source*

* The examples do not include an exhaustive listing of the data falling within the relevant data category.

** CRM (Customer Relationship Management) - customer relationship management system

*** Consent - the client's freely, unequivocally expressed declaration of will, with which the client authorizes the processing of his personal data in accordance with the information provided by NOVITUS