

# PRIVACY POLICY

We, LLC “Nāre” - developer of residential project in Riga city center *Felicity Apartments*, are aware that by visiting *Felicity* website and transferring your personal data, for example: name, surname, date of birth, e-mail address, phone number, you trust us your private data.

Your, being *Felicity Apartments* website visitor and client, privacy provision is very important to us. That is why *Felicity Apartments* performs all the required measures to ensure that your personal data, which are given to us, is safe. It is protected and processed following the valid normative acts referred to the personal data processing.

We wish to inform you that *Felicity Apartments* personal data processing is implemented in cooperation with the personal data processing joint manager - LLC “Domuss” (Reg. No. 40003312536). LLC “Domuss” and LLC “Nāre” are the companies established by the USA investment fund group NCH, which have concluded administration contract, basing on which, LLC “Domuss” performs administration of LLC “Nāre” and economical activity in its name.

Following the above, we wish to inform you that *Felicity Apartments* personal data processing is performed in cooperation with the mentioned joint manager and in case of communication you can contact whether *Felicity Apartments* as the personal data processing manager or LLC “Domuss” as the personal data processing joint manager, using the following contact information:

## **Personal data processing management and joint manager’s contact information:**

### **Manager:**

**LLC “Felicity Apartments”**

**Reg. No. 40003342827**

**address: 20/22-1 Baznicas Street, Riga, LV-1010**

**Phone: +371 67228086; +371 67226220**

**e-mail: domuss@domuss.lv**

### **Joint Manager:**

**LLC “Domuss”**

**Reg. No. LV 40003312536**

**address: 20/22 Baznicas Street, Riga, LV-1010**

**Phone: +371 67228086; +371 67226220**

**e-mail: domuss@domuss.lv**

Manager and Joint Manager, hereinafter jointly or separately referred to as the – **Manager**.

Within the context of privacy policy a term is used – **client**, which is the person showing written or verbal consent regarding *Felicity Apartments* offered products. Client’s status is preserved till the moment, when limitation period for arising claims comes into force which arises from contractual relations of the parties or the client has refused from the offer to receive news and special offers.

*Felicity Apartments* wishes to state that the purpose of your personal data processing is as follows:

- Execution of contract on real estate purchase, rent or lease, where you are a contractual party, or for measure performance upon your request before contract conclusion. In such cases, transfer of personal data is defined according to the contract and is a mandatory precondition to conclude it;

- Relationship establishment with clients and analysis of such relations within the marketing activities context;
- Provision of activities connected with real estate sales: contract conclusion, provision of execution of normative acts' requirements. *Felicity Apartments* is entitled to fully or partially transfer relevant personal data to sub-contractors and other cooperation partners, if it is necessary for contract execution. By transferring personal data to the sub-contractors, *Felicity Apartments* concludes a separate agreement, by which it is ensured that sub-contractors will follow the Manager's instructions, this Privacy Policy and that personal data will be processed according to the normative acts;
- Provision of marketing activities: informing, communication, sending of notifications, which are connected with products and services.

**Accepting and agreeing with the Privacy Policy and applying to *Felicity Apartments* news and special offers, you have given your approval that we may send commercial notifications about *Felicity Apartments* news and special offers.**

If you wish to withdraw such commercial notification on *Felicity Apartments* news and special offers, then you can do that at any time, by notifying the Manager using the given contact information, and decline. Your request will be carried out as soon as possible.

The Manager performs personal data processing according to the following conditions:

1. The Manager processes your personal data according to the valid normative acts in relation to personal data processing, including the European Union's (EU) *General Data Protection Regulation*, and without your approval cannot disclose them to the third persons, except the following cases:
  - If by the court judgment, decision of public law-enforcement institutions or other official institution, there is a duty to disclose this information;
  - if the Manager or the person supporting the website needs personal data to perform actions, which are connected with website functioning and maintenance. In this case, *Felicity Apartments* will ensure that sub-contractors will observe *Felicity Apartments* instructions, this Privacy Policy and that personal data will be processed according to the normative acts;
  - in other cases, which are provided for by the normative acts and the Privacy Policy.
2. If you wish to access your personal data, which are at the disposal of *Felicity Apartments*, to amend them, improve or delete, you must contact the Manager, using the given contact information, and we will do anything to execute your request as soon as possible.
3. *Felicity Apartments* commits to follow the normative acts, which regulate use of personal data available to us, and also continue to review and perfect our policy in relation to personal data processing and their safety.
4. In addition we draw your attention that your personal data will be transferred outside the European Union or the European Economic Area, only on condition that the compliant or applied guarantees are defined in the EU's *General Data Protection Regulation*.
5. We wish to inform you that in case if the Manager will plan to process your provided personal data for other purposes, which are not the purpose they were collected for, the Manager will inform you before the mentioned further processing about the mentioned other purpose and will give you all required information provided for by the EU's *General Data Protection Regulations*.

6. We draw your attention that your personal data will be stored until the moment when client relations between *Felicity Apartments* and you exist. But upon termination of client's relations, personal data will be stored until the limitation period of right to demand commences, which arises from the contractual relations of the parties.

In addition to the mentioned conditions, requirements of personal data storage arise from the requirement of the normative acts to store them for specific time. Respectively, the Manager will store these data while these conditions exist.

7. We wish to inform you that if *Felicity Apartments* will receive your personal data not from you, but from other persons, then you will be provided with information about it, the source your data have been received, and when applicable – information about whether data have been acquired from the publicly available sources, as well as other information, which arises from the requirements of the EU's *General Data Protection Regulation*.

8. If you state that your personal data transferred to *Felicity Apartments* are used for purpose not provided for it or the grounds of such personal data processing are violated, then you are entitled to file a claim to the Public Data Inspectorate, address: 11/13-11 Blaumaņa Street, Riga, LV-1011, additional information – [www.dvi.gov.lv](http://www.dvi.gov.lv)

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## **POLICY OF COOKIES**

Supporter of this website and its owner is LLC “*Nāre*” developer of residential project in Riga city center *Felicity Apartments* (hereinafter – *Felicity Apartments*). Using this website, you accept and agree with application of *Felicity Apartments* “Policy of Cookies Use” (hereinafter – Policy of Cookies Use).

Policy of Cookies Use defines the purpose of cookies use, as well as the rights of cookies users to choose, change or refuse cookies according to the user's requirements and needs.

### **What is a cookie and where is it stored?**

A cookie (HTTP cookie) is a small text file, which the website browser saves on your computer or other device, for example: a mobile phone.

### **How do the *Felicity Apartments* cookies function?**

When a user of *Felicity Apartments* website visits the website for the first time, then an identification code named *cookie* (cookie) is sent to the user's browser. When this user visits *Felicity Apartments website* next time, then the cookie technology allows us to define that this user has previously visited the website of *Felicity Apartments*. During each next visit of the website, cookies are sent back to the original homepage or other webpage recognizing this cookie. This way, also your habits and needs of website use are recognized.

### **What cookies are used by *Felicity Apartments*?**

#### **Technical cookies**

These cookies are necessary so that you could quickly visit and review the website. These cookies identify the user's device, but they do not collect and do not summarize the users' information. Without these cookies, the website could not fully function. Technical cookies are stored on the user's device, until the website browser is closed.

### **Functional cookies**

With functional cookies, the website remembers the user's selected settings and the performed choices to use the website in a more convenient way. These cookies are stored on the user's device permanently or for time, depending on the settings.

### **Analytical cookies**

Analytical cookies summarize information, how the user uses the website, state the most often visited sections, including content chosen by the user reviewing the website. Information is being processed for analysis purposes to find out what are the interests of website users, and to improve website's functionality, make it more convenient to use. Analytical cookies do not use information for other purposes.

### **Third persons' cookies**

*Felicity Apartments* website may have the third persons' cookies, especially, *Facebook*, *Instagram*, etc. social networks or search engines, especially *Google Analytics*. *Google Analytics*, the tool is provided by *Google Inc.* (USA company), which has access to this tool's collected statistical data. *Google Inc.* has joined the European Union -USA Privacy Protection Principles, EU-USA Privacy Protection List, which confirms that service provider follows the EU required privacy standards.

*Felicity Apartments* bear no responsibility for processing of information performed by the third persons cookies.

### **How does *Felicity Apartments* use cookie information?**

1. *Felicity Apartments* summarizes *Felicity Apartments* website use statistical data, performs their analysis;
2. Cookies are used by *Felicity Apartments* to know whether the user has visited *Felicity Apartments* website before;
3. Basing on which pages of *Felicity Apartments* website user has looked at, how long he has spent on the website, from which place he has entered the website, where he has clicked when he was on the website, the repeated marketing ad is applied;
4. Allows *Felicity Apartments* to evaluate the efficiency of advertisements.

### **Refusal from cookies use**

*Felicity Apartments* website user may refuse from cookies use, respectively selecting settings in his browser and deleting *Felicity Apartments* cookies. Please, pay attention to the fact that changes in the browser safety settings shall be performed in each browser individually.

### **Data protection and personal data**

We draw your attention that to guarantee your data protection, *Felicity Apartments* has introduced electronic, administrative and physical safety measures, which it continues to perfect.

*Felicity Apartments* wishes to inform you that if you do not enter your personal data while visiting *Felicity Apartments* website, then *Felicity Apartments* is unable to identify you and your status is "anonymous user".

### **How to contact us?**

LLC "*Felicity Apartments*" (registration No. 40003342827), address: 20/22 Baznicas Street, Riga, LV-1010, phone: + 371 67228086; +37167226220, e-mail:domuss@domuss.lv bears responsibility for cookies use on the website and personal data processing.