

SIA ISP Optics Latvia
Reg. No.: 40103009686
Address: *Ganību dambis* 24a k-13, Rīga, LV-1005

Rīga, 7 May 2019



A LightPath[®] COMPANY

SIA ISP Optics Latvia
Regulation on the processing of data of cooperation partners (1.3)

The purpose of this Regulation is to provide information to cooperation partners of SIA ISP Optics Latvia regarding data processing within the framework of contractual relations. This Regulation shall be available to cooperation partners of SIA ISP Optics Latvia during contractual relations. Amendments can be made to this regulation. When making amendments to the Regulation, SIA ISP Optics Latvia shall inform cooperation partners on amendments to the Regulation at least 10 days before the Regulation coming into force.

Personal data, received within the framework of need for fulfilment of the cooperation agreement

In order to ensure successful cooperation, it may be necessary for SIA ISP Optics Latvia to obtain personal data of the cooperation partner. SIA ISP Optics Latvia shall provide information to the cooperation partners regarding data processing under Article 13 of the General Data Protection Regulation, that is: Contact information of SIA ISP Optics Latvia and contact information of the representative of SIA ISP Optics Latvia; purposes of processing, for which the personal data are provided, as well as legal basis for processing; recipients or categories of recipients of personal data, if any; information if SIA ISP Optics Latvia plans to send personal data to any third country, and information about the fact if the Commission decision exists or does not exist regarding protection level sufficiency; time period, for how long the personal data will be stored, or, if it is not possible, criteria used for determination of the above-mentioned time period; the fact that there are rights existing to request to the controller for access to the personal data of the data subject and rectification or erasure thereof, or limitation of processing with regard to data subject, or the right to object against processing, as well as the right to data portability; the right at any time to revoke consent, without affecting the lawfulness of processing, which was based on consent before revocation; the right to submit a complaint to the supervisory authority; information, whether provision of personal data is determined according to law or contract, whether it is a pre-condition in order to enter into a contract, as well as information on the fact, whether the data subject has an obligation to provide personal data and what could be the consequences in cases, when such data are not provided.

SIA ISP Optics Latvia shall store personal data of cooperation partners until the end of contractual relations and shall erase them after completion of the particular cooperation. The person, being responsible for processing of data of cooperation partners, shall have an obligation to ensure timely erasure of such data. If cooperation partners give their consent, SIA ISP Optics Latvia may process personal data of the cooperation partners for half-a-year after the termination of the contract.

Data processing within the framework of contractual relations

SIA ISP Optics Latvia shall process personal data of the cooperation partner within the framework of contractual relations both, manually as well as by electronic means, for the purpose of fulfilment of the employment contract and lawful entrepreneurship of SIA ISP Optics Latvia, in accordance with the applicable regulatory enactments.

A cooperation partner may not provide to ISP Optics Latvia any other data that objectively are not required for achievement of the above-mentioned purposes. SIA ISP Optics Latvia shall warn the cooperation partner on any additional purpose of data processing and period of storage.

The cooperation partner, by submitting a prior written request to the head of the office, may view the personal data being at the disposal of SIA ISP Optics Latvia and request additional information regarding storage and processing of such data and making necessary amendments free of charge. The head of the office shall inform the data protection officer and employee responsible about

the particular domain of data processing. SIA ISP Optics Latvia has an obligation to reply to such request within a time period of 1 month from the day of submission thereof.

Types of processed data

SIA ISP Optics Latvia shall process the following types of personal data of cooperation partners:

Data necessary for fulfilment of cooperation agreements:

1. Personal identity data of the representative of the cooperation partner (name, surname);
2. Profession/ position of the representative of the cooperation partner;
3. Contact information of the cooperation partner (e-mail address; telephone No.);
4. Place of location of the cooperation partner (country).

In order SIA ISP Optics Latvia could maintain the most up-to-date personal data of cooperation partners, the cooperation partners shall inform SIA ISP Optics Latvia without unreasonable delay if his or her personal data are inappropriate, incomplete or outdated.

Transfer of data to third persons

SIA ISP Optics Latvia may make the personal data of the cooperation partner available to the companies, who provide maintenance and service of information systems of SIA ISP Optics Latvia, as well as to the state and law enforcement authorities in cases of receipt of a reasoned request for implementation of duties assigned to them. Such transfer of data may happen to the extent it is necessary in order to ensure daily work of SIA ISP Optics Latvia and fulfil the requirements of regulatory enactments. SIA ISP Optics Latvia and data processors selected by it shall process data only in accordance with the set purpose.

SIA ISP Optics Latvia may transfer data to data recipients, who are located in Latvia or any other country, and indicate that the national data protection laws may be applied in the country of the data recipient. SIA ISP Optics Latvia, in particular, may transfer data to the following companies of SIA ISP Optics Latvia group: ISP Optics Corporation, legal address: 50 South Buchout Street, Irvington, New York, United States of America and LightPath Technologies, Inc, legal address: 2603 Challenger Tech Court, Ste 100, Orlando, Florida, 32826, United States of America and their officials, employees, company departments, branches and third persons.

Data receivers may receive, possess, use, save, process and transfer data only for the needs of commercial activity and contractual relations of SIA ISP Optics Latvia and/or requirements of regulatory enactments. Cooperation partners are aware of the fact that data shall be stored only as long as it is necessary for such purposes. Cooperation partners may request a list of names and addresses of data recipients, requesting it to SIA ISP Optics Latvia.

Time limits for data storage

Personal data of cooperation partners, electronically processed by SIA ISP Optics Latvia, shall be stored in accordance with the time period set forth in the Data Processing Register. Personal data of cooperation partners, processed in the paper format, shall be stored by SIA ISP Optics Latvia in accordance with the time period set forth in the Data Processing Register, unless the requirements of regulatory enactments determine other time periods for storage. After expiry of the storage period the documents containing personal data shall be erased from the systems of SIA ISP Optics Latvia, but the documents stored in the paper format shall be utilized or archived in accordance with the procedure determined in regulatory enactments.

Notification on data protection breach

A cooperation partner without any delay shall have an obligation to report on any data protection breach or suspicions to the data protection officer of SIA ISP Optics Latvia via phone +371 29232855, save evidences regarding the possible data protection breach and to cooperate with SIA ISP Optics Latvia, in order to perform proper and timely internal investigation, documentation and assessment of the situation. Data protection officer of SIA ISP Optics Latvia shall be the responsible person for documentation of the data protection breach.

Video Surveillance

SIA ISP Optics Latvia performs video surveillance of persons in halls and during the production process of the company for the purpose of protection of the property, prevention of unlawful offences, recording of the fact of unlawful offence and identification of potential offenders. The board of SIA ISP Optics Latvia shall have access to the video surveillance system. SIA ISP Optics Latvia shall store records of video surveillance for 2 (two) months, the cooperation partner may turn to the head of the office of SIA ISP Optics Latvia, in order to receive additional information about the video surveillance or, in case of need, to receive video records by writing to the e-mail of the head of the office: info@isptoptics.eu.

Access codes to video surveillance system of SIA ISP Optics Latvia shall be available only to the head of the office and chairman of the Board.

Violations in the area of data protection

In case if SIA ISP Optics Latvia establishes that the cooperation partner has violated this regulation or regulations of regulatory enactments in the area of data protection, SIA ISP Optics Latvia may initiate activities in relation to direct or indirect caused losses, arising due to the breach of the cooperation partner.

Communication with SIA ISP Optics Latvia on the issues in the field of data protection

In order to receive information on their data processing, the cooperation partner may turn to SIA ISP Optics Latvia by writing to the e-mail: info@isptoptics.eu. In cases regarding protection of their rights to personal data processing issues the cooperation partner may turn to the supervisory authority – the State Data Inspectorate.

Provision of replies to requests of data subjects

Data protection officer shall provide replies to requests of other data subjects regarding personal data, received from cooperation partners or other data subjects.

Data protection officer shall identify the data subject and establish the role of SIA ISP Optics Latvia in the data processing cycle (controller/ processor/ other).

After receipt of the request of data subject the request shall be assessed without unreasonable delay and in case of need the communication with data processor or the relevant employee of SIA ISP Optics Latvia, under the supervision of whom the particular data processing process is, shall be performed.

In all cases, when a request of the data subject is received and SIA ISP Optics Latvia has a role of the data processor in the particular data processing process, the data processing officer shall contact with the representative of the controller without unreasonable delay, in accordance with the time period set forth in the cooperation agreement.

Data protection officer shall give a reply to the data subject within a time period of one month from the day of receipt of the request, or, in cases, when requirements of regulatory enactments require that, without unreasonable delay. In case if preparation of the reply may take longer period of time (but in total not exceeding 3 months), the data protection officer shall provide information to the data subject within a time period of one day from the day of receipt of the notification, regarding the reasons, why the prolonged time period for provision of the reply to the request of the subject is prolonged as well as estimated time for provision of the reply.

Action in case of data safety incident

Data protection office shall be a contact person, with whom cooperation partners of SIA ISP Optics Latvia shall contact in case if they have suspicions or they establish that a personal data security incident has occurred. The above-mentioned person shall perform the following activities after receipt of the above-mentioned information:

- a) commence investigation procedure of the incident and document the process thereof;
- b) receive and collect information from the employees or cooperation partners of SIA ISP Optics Latvia in relation to data safety incident;
- c) contact with potentially involved processors in the data security incident to the extent it is possible;

- d) ensure effective investigation of the incident and saving of evidences, in order to ensure notification on the data safety incident not later than within 72 hours from the moment, when it has become known.

If necessary, the data protection officer shall attract the relevant employees or other specialists hired by SIA ISP Optics Latvia for provision of effective investigation of the incident and an opinion regarding the impact of the incident to personal data protection.

After performance of all of the above-mentioned activities the data protection officer shall collect information about the occurred data security incident and shall analyse the content of the breach, documenting the process.

In case if after evaluation of the data security incident it is concluded that it is necessary to notify the supervisory authority, the data protection officer shall prepare and submit a notification to the State Data Inspectorate within 72 hours from the moment, when the data safety incident became known.

If the data security incident could cause high risk to rights and freedoms of data subjects, notifications regarding the data security incident shall be sent also to the affected data subjects by coordinating the content thereof and the type of notification with the board of SIA ISP Optics Latvia.

If data security incident has happened in the part of SIA ISP Optics Latvia as a processor, the data protection officer shall report to the relevant controller regarding the happened incident, circumstances and consequences thereof within the time period determined in the cooperation agreement.

In case of data security incident, the activities should be performed, in order to eliminate the harm to rights and freedoms of data subjects, to recover the regular operations of SIA ISP Optics Latvia and eliminate the harm to the reputation of SIA Optics Latvia.

Maintenance of the Data Processing Register

Data protection officer regularly but not less than once per year performs the review and updates Data Processing Register of SIA ISP Optics Latvia based on the responsible employees about the relevant data processing domain. For the data with expired storage term, employees responsible for any data processing domain, shall organize proper and timely erasure of the data.

On behalf of SIA ISP Optics Latvia

Chairman of the Board



Eriks Bedikis (*Ēriks Bediķis*)