ORLEN Latvia SIA

Privacy Policy

Important information on how we collect, use and store your personal information

Date of last revision: 18.06.2025

ORLEN Latvia SIA (hereinafter Company or us) processes information concerning you and your privacy. When collecting, using and storing information on you, we comply with the European Union General Data Protection Regulation (GDPR) and other legislation.

1. What will I find in this Policy?

In this Policy you will find answers to the most important questions on how we collect, use or store information related to you. This is very important for you – please read carefully the information provided in this document. This Policy can be amended or updated. Please visit from time to time the Company website <u>www.orlen.lv</u> for an updated version of this Policy.

2. Who is responsible for the security of my personal information?

ORLEN Latvija SIA

Our company code: ORLEN Latvija SIA

Our office address: Miera iela 2-3, LV-1001, Riga

Our e-mail address: zinas@orlen.lv

Our telephone number: +371 67103300

3. How can your Data Protection Officer help me?

If you want to file a request, complain or question, our Data Protection Officer is ready to help you. Please contact him by email dap@orlenlietuva.lt.

4. Why and what information do you collect on me?

We collect, use and store information on you that is required to:

- To perform properly petroleum product sales contracts concluded with you;
- To perform properly services or supply contracts or other agreements concluded with you;
- To maintain relationships with natural and legal persons represented by you;
- To ensure safe and smooth functioning of the Company's website.

For more detailed information please refer to the Company's Description of Processed Data.

5. What information do I have to provide to you?

Please refer to the <u>Description of Processed Data</u> – you must present personal information that is necessary to conclude or execute contracts with you, that we are legally obliged to collect or that is required to ensure public order and to protect you.

6. Where do you get information from?

- From you;
- From your represenatives, employers;

7. What are the legal grounds for collecting information on me?

- We have your consent (GDPR Article 6 (1) (a))
- We conclude and perform contracts with you (GDPR Article 6 (1) (b))
- We have a legal obligation to collect information (GDPR Article 6 (1) (c))
- We protect the vital interests of you and other natural persons (GDPR Article 6 (1) (d) and Article 9 (2) (c))
- We have legitimate interests to do so (GDPR Article 6 (1) (f))
- Legal proceedings (GDPR Article 9 (2) (f))

For more detailed information please refer to the Description of Processed Data.

8. Who do you transfer my personal information to?

To the extent permitted by law and for reasons specified in the answer to question 3, we disclose your personal information to:

- AB "ORLEN Lietuva"
- Attorneys, auditors, consultants, suppliers of IT support services and electronic communications services, insurance companies, suppliers or archiving and other services;
- Would it be necessary enterprises that intend or are interested in taking over the Company's business;
- Would it be necessary to persons who will be assigned (for payment or for free) the rights, obligations, debts, etc. under contracts concluded with you.

We normally process and store your personal data within the European Union (EU) or the European Economic Area (EEA), but we may transfer your personal data outside the EU / EEA, for example when necessary for the conclusion and performance of a contract or if you have consented to such transfer. We will transfer your personal data outside the EU / EEA if at least one of the following measures is implemented:

- The European Commission has recognized that the State to which the data are transferred ensures an adequate level of protection of personal data;
- the contract is concluded in accordance with the Standard Contractual Clauses (SCC) approved by the European Commission;
- compliance with codes of conduct or other safeguards under the GDPR.

9. For how long do you keep my personal information?

To the extent necessary to achieve the objectives and to the extent permitted by law. For more detailed information please refer to the <u>Description of Processed Data</u>.

10. What security measures does the Company apply to protect your personal data?

The Company belongs to the ORLEN group companies, which sets the highest requirements for information security. This confirms that we make every effort to create security barriers to protect information. Data processing agreements are signed with Data Processors, which contain obligations for them to comply with all possible security measures and legal requirements to ensure the protection of personal data. Confidentiality agreements / confidentiality obligations have been concluded with the employees of the Company, where sanctions are provided for illegal disclosure of personal data and information.

11. What are my rights?

GDPR and other laws grant you certain rights and define the cases these rights can be and cannot be exercised by you as well as the procedures to be followed by you. To the extent permitted by law you may:

- File an inquiry on whether the Company processes your personal data and if so request access to the processed data and associated information;
- File a request to rectify the inaccurate or incorrect information or to supplement incomplete information;
- File a request to erase personal information if unlawfully used by us;
- File a request to restrict the processing of your personal information when you contest the accuracy of data or object to the processing of data or to erasure of unlawfully processed data or need data for the establishment, exercise or defense of legal claims;
- Express your objection to data processing when we do this in the lawful interests of the Company and/or interests of third parties;
- File a request to transfer (receive) the data that you provided to us under contract or by your consent and that are processed by us using automatic means, in the commonly accepted electronic format;
- Object to automated decision-making, including profiling, if such decision could have legal consequences or similar significant effects on you;
- Revoke your consent to the use of your personal information when we use your data for which you have given your consent;
- File a complaint to the Data Protection Authority : <u>Sākumlapa | Datu valsts inspekcija</u>

12. What principles we follow when processing your personal data?

We follow the following principles when collecting and using the personal data:

- Your personal data is processed in a lawful, fair and transparent manner (principle of lawfulness, fairness and transparency) (Article 5 (1) (a) of the GDPR);
- Your personal data is collected for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes (purpose limitation principle) (Article 5 (1) (b) of the GDPR);
- Your personal data are adequate, relevant and only necessary for the purposes for which they are processed (principle of data minimisation) (Article 5 (1) (c) of the GDPR);
- the personal data processed are accurate and, where necessary, kept up to date (principle of accuracy) (Article 5 (1) (d) of the GDPR);

- Your personal data are kept in a form that allows for the identification of the person for no longer than is necessary for the purposes for which your personal data are processed (principle of storage limitation) (Article 5 (1) (e) of the GDPR);
- Your personal data is processed in such a way as to ensure adequate security of personal data through appropriate technical or organizational measures, including protection against unauthorized or unlawful processing of data and against accidental loss, destruction or damage (principle of integrity and confidentiality) (Article 5 (1) (f) of the GDPR).

Why do you	What information do you collect on me?	What is the legal	For how long
collect my		ground for	do you keep
personal		collecting	my personal
information?		information on me?	information?
Because we conclude and perform petroleum product sales contracts with you	Name, surname, signature, date of birth, personal ID, address, email address, phone number, bank account number, VAT number (if a VAT payer), payment information, identification document copy, contract, date, number and place of conclusion of contract, contract performance information, communication, description and quantity of goods, place, time and terms of delivery, copies of authorizations, copies of purchase record cards, amount and expiry of your trade credit, copies of performance guarantees, provided documents, information concerning the contract and its performance.	We conclude and perform a petroleum products sales contract with you (GDPR Article 6 (1) (b)) We have a legal obligation to collect information (GDPR Article 6 (1) (c))	During the term of contract and 10 years after the completion of transaction with you

Description of the Processed Data

Because we conclude and perform works, services and other contracts with you	Name and surname, signature, date of birth, personal ID, address, email address, telephone number, VAT number (if a VAT payer), bank account number, payment information, copy of identification document, contract, number, date and place of conclusion of contract, contract performance information, communication, provided documents, number of self- employment certificate, information concerning the contract and its performance.	We conclude and perform a works, services or other contract with you (GDPR Article 6 (1) (b)) We have a legal obligation to collect information (GDPR Article 6 (1) (c))	During the term of contract and 10 years after the completion of transaction with you
We maintain relationships with natural and legal persons represented by you	Name, surname, personal ID, address, authorization and its validity, signature, relationship with the represented person, represented person, job title, telephone number, email address, communication with the Company, information about the person represented by you, etc.	We have legitimate interests (to maintain relationships with persons represented by you) (GDPR Article 6 (1) (f))	During the term of contract and 10 years after the completion of transaction with you
We ensure safe and smooth functioning of the Company's website.	IP address, information on the use by you of our website and related services, information about computer from which our website has been accessed	You consent to the use of your personal information by us (GDPR Article 6 (1) (a) We have legitimate interests (to ensure the security of our website) (GDPR Article 6 (1) (f))	1 year after your last visit