1. Purpose and application of the privacy statement

1.1. This privacy notice (hereinafter also - **Notice**) has been developed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter - Regulation).

1.2. The purpose of this Notice is to provide information to data subjects - identifiable natural persons (hereinafter referred to as **the Data Subject or You**) - about how the personal data controller AS "VIRŠI-A" (hereinafter referred to as VIRŠI or We) processes, including collecting, storing, sharing, deleting and protecting the personal data of these natural persons.

1.3. Personal data, according to the provisions of the Regulation, is any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

1.4. VIRŠI has additionally developed separate privacy statements for certain personal data processing operations. Accordingly, the Notice is considered a general privacy notice, and other privacy notices are considered specific privacy notices. In case of conflict, the provisions of the specific privacy notices apply.

1.5. The terms "personal data", "processing", "third party", "controller", "data subject", "processor" are used in the Notice within the meaning of the Regulation.

2. Personal data controller and contact information

2.1. The controller of the personal data processing specified in this Notice is AS "VIRŠI-A" (unified registration number 40003242737), whose contact information for communication on personal data protection issues is as follows:

2.1.1. 40003242737, registered address: Kalna Street 17, Aizkraukle, Aizkraukle Parish, Aizkraukle county, LV-5101, Latvia;

2.1.2. e-mail address: birojs@virsi.lv;

2.1.3. phone 80 700 070; for calls from abroad +371 62 333 311.

2.2. For all personal data processing and protection issues, you can also contact the VIRŠI Data Protection Officer in the following ways:

2.2.1. e-mail address: datuaizsardziba@virsi.lv;

2.2.2. postal correspondence address: Kalna Street 17, Aizkraukle, Aizkraukle Parish, Aizkraukle Municipality, LV-5101, Latvia. Address the letter to: AS "VIRŠI-A" Data Protection Officer.

3. How will you be informed about the processing of your personal data?

3.1. VIRŠI informs and explains what personal data is processed and in what manner when VIRŠI carries out its business activities. The aforementioned information is provided in the Notice.

3.2. When processing personal data for purposes not specified in this Notice, as well as to clarify information about the individual conditions of data processing, VIRŠI may inform you separately (for example, by placing notifications in e-mails). VIRŠI staff can also provide you with information by explaining it or asking you to familiarize yourself with the information specified in certain documents.

4. What is the applicable law?

The processing of personal data, including its acquisition and transfer, is carried out in accordance with the following regulatory enactments:

4.1. Regulation;

4.2. Law on the Processing of Personal Data;

4.3. other binding regulatory enactments applicable to the processing and protection of personal data, such as the Accounting Law or the Law on the Prevention of Money Laundering and Financing of Terrorism and Proliferation.

5. What are the purposes (purposes) of personal data processing and how are personal data processed in this context?

to achieve goals?

5.1. VIRŠI determines the purposes (purposes) of personal data processing specified in the table below and additional information about each purpose of personal data processing.

Purpose of processing and its explanation	Data subjects	What information do we process?	Legal basis for processing foundation	Source of personal data	To whom personal data may be transferred, recipients – third parties persons	How long will we store personal data?
Contractual obligations establishment and execution - We we process your data to conclude and perform a contract, would process payments and contact you within the scope of this contractual obligation.	Customers, service providers, their representatives, employees, contact persons.	First name, last name, personal identification number, contacts, car registration number, bank details, payment information, fuel card data, communication records.	Article 6(1)(b) of the Regulation – conclusion, performance of a contract; Article 6(1)(c) of the Regulation – performance of legal obligations (Civil Law, Commercial Law, Accounting Law); Article 6(1)(f) of the Regulation – legitimate interest in achieving the specified goals.	From client and public records.	Government institutions (e.g. State Revenue Service, Rural Support Service), courts, franchisees, auditors, sworn lawyers, consultants, cooperation partners, etc.	Contract duration and then claims limitation period (up to 3 years) commercial transactions or up to 10 years in accordance with the Civil Law); accounting registers and accounting organizations documents – 10 years in accordance with Article 28 of the Accounting Law.

Purpose of processing and its explanation	Data subjects	What information do we process?	Legal basis for processing foundation	Source of personal data	To whom personal data may be transferred, recipients – third parties	How long will we store personal data?
Complaints (including applications, claims) review - We review your complaint to assess the situation and would offer a solution.	Complaints the applicant, his/her representative, contact person.	Name, surname, contact phone number, e-mail, content of the complaint, detailsof the relevant purchases or services.	Article 6(1)(c) of the Regulation – compliance with a legal obligation; Article 6(1)(f) of the Regulation – legitimate interest in achieving the specified purpose.	From the data subject, complainant, to other sources as provided for in regulatory enactments cases.	Sworn lawyers, consultants, public authorities, e.g. Consumer Rights Protection Center, etc.	Until the complaint is resolved, including the right to claim limitation period (up to 3 years for commercial transactions or up to 10 years according to the Civil Law).
Unfulfilled payment administration - If you incur debt, We will process the data to send reminders, agree on payment terms, cases transferred for debt collection and credit information office.	Customers/debtors, their representatives, contact persons.	Identification data, payment information, information about the debt, so supporting information.	Article 6(1)(b) of the Regulation – performance of the contract; Article 6(1)(f) of the Regulation – legitimate interest in achieving the stated goals.	From the data subject, in the course of contract performance obtained data, public registers.	Debt collection company, credit bureau, sworn attorneys, consultants, etc.	Claims law limitation period (up to 3 years for commercial transactions or up to 10 years according to the Civil Law); accounting registers and accounting organizations documents – 10 years in accordance with Article 28 of the Accounting Law.

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Purpose of processing and its explanation	Data subjects	What information do we process?	Legal basis for processing foundation	Source of personal data	To whom personal data may be transferred, recipients – third parties	How long will we store personal data?
Portal "Virši Tev" for companies - for legal entities to monitor their transactions, would administer users according to AS VIRŠI-A company AS VIRŠI-A Company Self-Service System "Virši for You" User Manual	Legal entities – customer represent atives, authorized persons, employees, contact persons.	First name, last name, transaction, purchase information, information about representation, role, username, e-mail, phone no., connection times, IP address.	Article 6(1)(f) of the Regulation – legitimate interest in achieving the specified purpose.	Legal entity – client, system user, including information registered as a result of using the system.	State institutions (e.g., State Revenue Service), franchisees, auditors, attorneys-at-law, consultants.	Contract duration and then claims limitation period (up to 3 years) commercial transactions); accounting registers and accounting organizations documents – 10 years in accordance with Article 28 of the Accounting Law. Audit logs of portal logins, other events are stored for a maximum of 3 years.

Purpose of processing and its explanation	Data subjects	What information do we process?	Legal basis for processing foundation	Source of personal data	To whom personal data may be transferred, recipients – third parties	How long will we store personal data?
Protection of rights in court - if need to defend the interests of the TOP, we can use and transfer data in legal proceedings.	Persons involved in the proceedings, including the current, former client, service provider, this person representatives, employees, authorized persons persons.	Identification data, payment data, contracts, complaints, video/audio recordings as evidence.	Article 6(1)(f) of the Regulation – legitimate interest in achieving the stated purpose; Article 6(1)(c) of the Regulation - compliance with a legal obligation, e.g. obligations set out in the Civil Procedure Law.	True, public records, obtaining evidence in accordance with the procedure provided for in regulatory enactments.	Courts, sworn attorneys, consultants, other law enforcement institutions legal proceedings within.	Until the dispute is resolved and 10 years after the trial ruling in force entry into force and completion of execution.

Purpose of processing and its explanation	Data subjects	What information do we process?	Legal basis for processing foundation	Source of personal data	To whom personal data may be transferred, recipients – third parties	How long will we store personal data?
Money laundering and terrorism prevention of financing and prevention of sanctions violations.	Customers, business partners (including potential ones), their representatives, beneficial owners, officials, payers.	Identification data, address, financial data, transaction monitoring information.	Article 6(1)(c) of the Regulation – compliance with legal obligations, Anti-Money Laundering and Counter-Terrorism and proliferation financing Prevention Law, International and National Sanctions Law of the Republic of Latvia; Regulation 6. Article 1(f) – legitimate interest in achieving the stated goals.	From the client, from counterparty, public registers.	Financial supervisors institutions, Financial Intelligence Unit, State Revenue Service, Consumer Rights Protection Center, other supervisory authorities institutions, court.	5 years after the transaction relationship termination or casual making a transaction.

Purpose of processing and its explanation	Data subjects	What information do we process?	Legal basis for processing foundation	Source of personal data	To whom personal data may be transferred, recipients – third parties	How long will we store personal data?
List of insiders, closely associated persons maintenance.	Employees, officials, representatives, management, consultants, business partners and their employees, shareholders with access to inside information for information.	Identification data, contact information, status on the list.	Article 6(1)(c) of the Regulation – compliance with legal obligations, Market abuse Regulation; Article 6(1)(f) of the Regulation – legitimate interest in achieving the specified purpose.	Data subject, internal resources of the company.	Financial supervisors institutions, police, prosecutor's office and other law enforcement agencies.	5 years behind schedule update or longer - until the dispute is resolved, for solving (if applicable).

Prevention of conflicts of interest, transparency and compliance regulatory enactments that regulate transactions with related parties, provision.	VIRŠI officials, shareholders, their relatives, spouses, employees and their relatives, spouses	Identification data, contact information, relationship with business (kinship, ownership, position in another related company), information about transactions, compliance documentation.	Article 6(1)(c) of the Regulation – compliance with legal obligations, including compliance with the Commercial Law, Financial instruments market law and other regulatory enactments; Article 6(1)(f) of the Regulation – legitimate interest in achieving the specified goals.	Data subject, publicly available registers, third party information information in accordance with regulatory enactments.	Financial and capital markets commission, tax administration and other supervisory authorities, sworn attorneys, consultants.	5 years or more - until the dispute is terminated, resolved (if applicable).

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Purpose of processing and its explanation	Data subjects	What information do we process?	Legal basis for processing foundation	Source of personal data	To whom personal data may be transferred, recipients – third parties	How long will we store personal data?
List of shareholders and relations with shareholders governance, including shareholder meetings organization, provision of information shareholders, shareholder loyalty system on hold.	Shareholders, their representatives.	Name, surname, personal identification number, address, citizenship, number of shares, bank, contact information.	Article 6(1)(c) of the Regulation — Commercial law compliance with requirements; Article 6(1)(f) of the Regulation – legitimate interest in achieving the specified purpose.	From shareholders, from NASDAQ (central securities depository).	Shareholders, members of the board and council, auditor and competent authorities public institutions, service providers who organizes shareholder meetings or communication with shareholders.	All company TOPS operating time and 10 years after VIRŠI operation the end. Received from the central securities depository information about the company for holders of dematerialized shares - no longer than one year after the CHIEF EXECUTIVE OFFICER has learned of the shareholder status loss.

Purpose of processing and its explanation	Data subjects	What information do we process?	Legal basis for processing foundation	Source of personal data	To whom personal data may be transferred, recipients – third parties	How long will we store personal data?
Brand promoting awareness - photo/video materials from OVER organized events can be made public to inform about VIRŠI's image, services, and offers.	Event visitors, customers, employees.	Photo, video, audio event descriptions.	Article 6(1)(f) of the Regulation – legitimate interest in achieving the specified purpose.	Data subject, attending the event, when registering for the event.	Publishing on social networks (e.g. facebook.com, instagram.com, youtube.com), media, www.virsi.lv and TOPS on the internal network.	The information is published as long as it is relevant and until the purpose is achieved.

Purpose of processing and its explanation	Data subjects	What information do we process?	Legal basis for processing foundation	Source of personal data	To whom personal data may be transferred, recipients – third parties	How long will we store personal data?
Communication with persons who have not paid for fuel - whether intentionally or due to negligence, or a technical problem due to which payment for fuel is not made at the gas station, then with video surveillance assistance and data from VAS “Roads traffic safety directorate" we can find out and contact with person who is probably responsible for the specific case.	Road transport owner, possessor, holder, its representative, contact person.	Car registration number, video recordings, visual image, road transport owner, possessor, holder, so representative, contact person details.	Article 6(1)(f) of the Regulation – legitimate interest in achieving the specified purpose.	Video surveillance, Data from the State Enterprise "Road Traffic Safety Directorate".	Police, insurers, sworn lawyers, consultants.	Until the purpose of the processing is achieved.

Purpose of processing and its explanation	Data subjects	What information do we process?	Legal basis for processing foundation	Source of personal data	To whom personal data may be transferred, recipients – third parties	How long will we store personal data?
Telephone call recording if a call is made to number +371 80 700 070; +371 62 333 311 or if OVER makes calls outside the company, customer service for improvement, quality for ensuring, resolving disputes and claims (proof of what was said/promised).	Existing and potential customers, cooperation partners, their officials, representatives, employees.	Information discussed during the telephone conversation.	Article 6(1)(f) of the Regulation – legitimate interest in achieving the specified purpose.	Telephone conversation.	Law offices, sworn lawyers, consultants, public authorities (e.g. consumer protection institutions).	No longer than 30 days. If the specific conversation is the basis for the contract for conclusion, then everything contract term and then claim limitation period (up to 3 years) commercial transactions or up to 10 years in accordance with the Civil Law); accounting registers and accounting organizations documents – 10 years in accordance with Article 28 of the Accounting Law. If the specific conversation is necessary to resolve the dispute, then

						specific conversations the record may be kept longer – until the dispute is resolved and 10 years after court decision in force entry and execution completion.

Offer to conclude a contract, agreement closing offer evaluation – this may also include obtaining credit history information and assessment in accordance with the Credit Information Bureaus Law.	Potential customers, service providers, their representatives, employees, contact persons.	Name, surname, personal identification number, contacts, banks data, credit history information.	Article 6(1)(a) of the Regulation — consent; Regulations Article 6(1)(b) - processing is necessary to carry out measures against the data subject request before concluding a contract; Article 6(1)(f) of the Regulation – legitimate interest in achieving the specified purpose.	From a potential client, service provider; public registers; credit information office.	No transfer of personal data is planned.	Personal data is stored until VIRŠI decides not to conclude the contract or VIRŠI is not accepted. offer (during the validity period of the offer), and for up to 3 months after the adoption of this decision administrative process for ensuring. If the contract is concluded, then see point 1.

5.2. Transfer of personal data to a processor - VIRŠI may transfer personal data to its processor - this is not a third party, but a merchant or individual who processes personal data on behalf of VIRŠI, based on specific and documented instructions from VIRŠI. The processor has a binding obligation to ensure the security of personal data and is permitted to use personal data only for the specified purpose. For example, VIRŠI, as a processor, may transfer personal data to an IT system maintainer, developer, consulting service provider, product supplier, or other service provider who performs the processing on behalf of and on behalf of VIRŠI. VIRŠI carefully selects these processors to ensure that they provide an adequate level of personal data protection, have concluded a contract with them that complies with the Regulation, and monitor their operations.

5.3. Transfer of personal data outside the European Union - VIRŠI ensures that personal data is processed and stored within the territory of the European Union or the European Economic Area. However, in certain cases, personal data may also be transferred to recipients outside these territories. Within the scope of the objective "Promoting brand awareness (marketing, publishing photos/videos from events)", when publishing information, data is transferred to the operators of digital platforms or social networks whose place of operation is located outside the European Union (for example, "Meta Platforms" - Facebook, Instagram, YouTube, etc.). In such cases, VIRŠI ensures that data transfers are only made if appropriate security and confidentiality measures are in place to ensure a level of personal data protection equivalent to that in the European Union. The data subject is entitled to receive additional information regarding the transfer of personal data outside the European Union and the European Economic Area, as well as regarding the security measures applied, by contacting VIRŠI using the contact information provided in this Notice. VIRŠI invites data subjects to also familiarize themselves with the privacy statements and policies of the relevant social network providers to learn more about the processing of personal data carried out by these companies, for example: Facebook privacy policy; Instagram privacy policy;YouTube Privacy politics.

6. What are the rights of the data subject regarding the processing of personal data?

6.1. The data subject has the right to access and correct personal data. In accordance with the provisions of the Regulation, the Data Subject has the right to request access to the personal data of the Data Subject held by VIRŠI and to receive information, including information on what personal data about him or her is held by VIRŠI; for what purposes VIRŠI processes these personal data; categories of recipients of personal data (persons to whom personal data have been disclosed or to whom they are intended to be disclosed, unless regulatory enactments in a particular case permit VIRŠI to provide such information); information on the period for which personal data will be stored or the criteria used to determine that period.

6.2. If the Data Subject believes that the information held by VIRŠI is outdated, inaccurate or

incorrect, the Data Subject has the right to request correction of their personal data.

6.3. The data subject has the right to request the erasure of their personal data or to object to the processing if the person believes that personal data has been processed unlawfully or is no longer necessary in relation to the purposes for which they were collected or processed (implementing the principle of "right to be forgotten"), or in other cases.

6.4. The Data Subject has the right to request that VIRŠI restrict the processing of the Data Subject's personal data if any of the following circumstances exist:

6.4.1. The data subject disputes the accuracy of personal data – for the period during which VIRŠI verifies the accuracy of personal data;

6.4.2. the processing is unlawful and the Data Subject objects to the erasure of personal data and instead requests the restriction of the use of the data;

6.4.3. OVERALL personal data is no longer necessary for processing, but is still necessary

To the data subject to establish, exercise or defend legal claims;

6.4.4. The data subject has objected to the processing – pending the verification of whether the legitimate grounds of VIRŠI override the legitimate grounds of the Data Subject.

6.5. If the processing of the Data Subject's personal data is restricted in accordance with clause 6.4, such personal data shall only be processed with the Data Subject's consent (except for storage) or for the establishment, exercise or defence of legal claims, or to protect the rights of another natural or legal person, or important public interests. Before lifting the restriction on the processing of the Data Subject's personal data, VIRŠI shall inform the Data Subject.

6.6. Right to withdraw consent - if VIRŠI processes personal data based on the consent of the Data Subject, then the Data Subject has the right to withdraw consent at any time by sending a revocation in accordance with the procedure specified in paragraph 2 of the Notice. VIRŠI after receipt of the withdrawal, the personal data of the Data Subject will no longer be processed for the purpose for which the withdrawal of consent was received, unless there is another legal basis for this.

6.7. The data subject has the right to submit a complaint to a supervisory authority, including the Data State Inspectorate (contact information available: https://www.dvi.gov.lv/, +371 67223131), if he or she believes that VIRŠI has processed his or her personal data unlawfully. VIRŠI invites you to contact them first, using the contact information specified in Section 2 of the Notice, in order to promptly find a solution to the situation.

7. Acceptance of data subject submissions, requests and complaints

7.1. If the Data Subject has questions, requests, objections or complaints regarding the processing of personal data by VIRŠI, the Data Subject may submit a request to VIRŠI (hereinafter - Request) using the following communication channels:

7.1.1. personally identifying yourself in person - presenting an identity document (e.g. passport or ID card, etc.), submit a written Request to the TOP of the Notification at the contact information address specified in paragraph 2;

7.1.2. by sending the Request by mail to the contact information address specified in

Section 2 of this Notice. The response will be prepared and sent via registered mail, thus ensuring that unauthorized persons will not be able to receive this shipment. At the same time, VIRŠI reserves the right to request additional information from the Data Subject in case of doubt;

7.1.3. by sending a Request to the e-mail address: datuaizsardziba@virsi.lv or birojs@virsi.lv, by signing it with a secure electronic signature. In this case, it is presumed that the Data Subject has identified himself/herself by submitting a Request signed with a secure electronic signature. At the same time, VIRŠI reserves the right to request additional information from the Data Subject in case of doubt;

7.1.4. In another way, when VIRŠI does not have any doubts about the identity of the Data Subject, coordinating the procedure for submitting the Request and issuing a response to it.

7.2. The data subject is obliged, to the extent possible, to specify in his/her Request the time, place and other circumstances that would help fulfill his/her Request, as well as to provide additional necessary information upon request of VIRŠI.

8. What measures does VIRŠI take to ensure the protection of personal data?

8.1. VIRŠI regularly reviews and improves personal data protection measures to protect personal data from unauthorized access, accidental loss, disclosure or destruction. To ensure this, VIRŠI uses appropriate technical and organizational measures.

8.2. VIRŠI carefully checks all service providers who process personal data (processors) on behalf of and on behalf of VIRŠI. VIRŠI assesses whether processors ensure appropriate measures to ensure that personal data is processed in accordance with VIRŠI's delegation and the requirements of regulatory enactments.

8.3. In the event of a personal data breach that could result in a high risk to the rights and freedoms of the Data Subject, VIRŠI will notify the Data Subject of this using the contact information available to them (if possible), or the information will be made public on the VIRŠI website www.virsi.lv or on social networks administered by VIRŠI, or in another way (for example, using the media).

9. Other rules

9.1. This Notice will be reviewed periodically and updated as necessary. The current version of the notice comes into force on the date specified therein. The current version of the notice is posted on the website https://www.virsi.lv/lv/par-mums/dokumenti, made available to data subjects in another way, and is also available at VIRŠI's places of business.

9.2. This Notice shall enter into force on 27 January 2026.