

DATA PROTECTION TERMS AND CONDITIONS OF VIIMSI KESKUS

The data protection terms and conditions of the Viimsi Keskus introduce the principles that Tallinna Kaubamaja Kinnisvara Aktsiaselts, the company operating the Viimsi Keskus, follows in processing personal data. The data protection terms and conditions of Viimsi Keskus apply to all natural persons who visit the Viimsi Keskus shopping centre or the website www.viimsikeskus.ee, submit an inquiry to the Viimsi Keskus, or apply for a job at Tallinna Kaubamaja Kinnisvara Aktsiaselts.

The valid data protection terms and conditions are always available on the website of the Viimsi Keskus at www.viimsikeskus.ee. It is also possible to review the data protection terms and conditions by contacting the data protection specialist of the Viimsi Keskus at the e-mail address dpo@kaubamaja.ee.

1. THE CONTROLLER OF PERSONAL DATA

The controller of personal data is Tallinna Kaubamaja Kinnisvara Aktsiaselts, registry code 10544758, address Gonsiori 2 Tallinn 10143, e-mail address kinnisvara@nginvest.ee. For questions related to the processing of personal data, please contact the data protection specialist of the Viimsi Keskus at the e-mail address dpo@kaubamaja.ee.

The Viimsi Keskus shopping centre is the largest shopping centre in the region with almost 40 different shops, service and catering places, and entertainment establishments.

2. SCOPE OF THE DATA PROTECTION TERMS AND CONDITIONS

The data protection terms and conditions of the Viimsi Keskus apply to all natural persons who visit the shopping centre of the Viimsi Keskus or the website www.viimsikeskus.ee. The data protection terms and conditions also apply to those natural persons who submit an inquiry containing personal data to the Viimsi Keskus or apply for a job at Tallinna Kaubamaja Kinnisvara Aktsiaselts.

3. WHAT IS THE BASIS FOR THE VIIMSI KESKUS IN PROCESSING PERSONAL DATA?

Viimsi Keskus collects and processes your personal data on the following legal bases:

- on the basis of your consent, i.e. you have given consent to the Viimsi Keskus to process your personal data for one or more purposes known to you in advance (e.g. customer satisfaction survey, direct marketing, consumer games, social media of the Viimsi Keskus).
- on a contractual basis, i.e. the processing of personal data is required for the performance of a contract entered into between the Viimsi Keskus and you or for entering into a contract in accordance with your will to the extent of the rights and obligations arising from the contract.

- on the basis of law, i.e. the Viimsi Keskus processes personal data to fulfil its obligations arising from law (e.g. to answer inquiries of state agencies in cases and to the extent permitted by law).
- legitimate interest, i.e. the Viimsi Keskus processes personal data in its legitimate interests (video surveillance used for the protection of persons and property, processing of legal claims, profile analysis of personal data). The Viimsi Keskus processes personal data on the basis of a legitimate interest only if such processing of data is not outweighed by the interests of the data subject or the fundamental rights and freedoms that necessitate the protection of personal data. You have the right to receive accurate information regarding the emergence of a legitimate interest by contacting the data protection specialist of the Viimsi Keskus at the e-mail address dpo@kaubamaja.ee.

If the Viimsi Keskus requires your personal data to provide a service or sell goods on the basis of a contract entered into with you or pursuant to law, but you refuse to provide your personal data to the Viimsi Keskus, then the Viimsi Keskus has the right to refuse to provide you with services or sell goods to you.

4. FOR WHAT PURPOSES DOES THE VIIMSI KESKUS PROCESS PERSONAL DATA?

The Viimsi Keskus processes personal data for the following purposes:

- the conclusion and performance of contracts;
- customer relationship management and customer communication;
- customer base management and analysis;
- provision of products and services;
- direct marketing;
- research of customer habits;
- management and development of services;
- use and improvement of the website;
- conducting raffles and interviews;
- compilation of sales statistics;
- assessment of the suitability of a candidate applying for a job in the recruitment process;
- protection of persons and property;
- processing of legal claims;
- fulfilment of legal obligations.

The Viimsi Keskus adheres to the minimum information principle in processing personal data, i.e. we process only the data and to the corresponding extent required to achieve a specific purpose. If Viimsi Keskus intends to process the collected personal data for purposes not mentioned above, then the Viimsi Keskus shall provide information on this other purpose together with other relevant additional information before further processing of the personal data.

5. WHICH PERSONAL DATA DOES THE VIIMSI KESKUS PROCESS?

The Viimsi Keskus collects and processes the following personal data when you visit the Viimsi Keskus or the website:

- when visiting the Viimsi Keskus shopping centre, the Viimsi Keskus collects and processes personal data left on a video recording used for the protection of persons and property.
- when sending a request to the Viimsi Keskus or making inquiries or ordering services via social media, the Viimsi Keskus only collects and processes the data that you provide in your request (e.g. your first and last name, postal address, e-mail address, telephone number). The Viimsi Keskus processes the personal data provided by you only for the purpose of processing your request and responding to it.
- when visiting the website of the Viimsi Keskus, the so-called tracking data are processed, which are sent to the Viimsi Keskus via the website and general web services (e.g. IP address, web browser, cookies, etc.).
- when applying for a job at Tallinna Kaubamaja Kinnisvara Aktsiaselts, the data provided by you in your CV and other documents submitted by you (e.g. your first and last name, postal address, e-mail address, telephone number, data on your education and work experience, and other relevant information provided by you) will be processed.
- the Viimsi Keskus processes special types of personal data only if an incident affecting your health has occurred to you at the Viimsi Keskus or you have contacted us with a request including special types of personal data.

The Viimsi Keskus processes your personal data only if you provide such information voluntarily. The Viimsi Keskus has the right to check the accuracy of the personal data provided by you and to collect additional data about you from public sources.

6. TERM FOR PROCESSING PERSONAL DATA

The Viimsi Keskus processes your personal data at the beginning and during the customer relationship, especially when you visit the Viimsi Keskus shopping centre and the website of the Viimsi Keskus. The Viimsi Keskus processes your personal data for as long as is necessary due to the customer relationship or other equivalent relationship between the Viimsi Keskus and you or until you withdraw your consent to the processing of personal data or for legal purposes until the deadlines provided by law.

The most common terms for processing personal data are as follows:

- video recordings of the Viimsi Keskus shopping centre – 30 calendar days, unless the need for longer retention of data is related to ongoing proceedings related to the protection of persons or property or is due to a longer term provided by law.
- requests and applications, claims and complaints of customers – three years as of the transmission of the final answer by the Viimsi Keskus.
- data of job applicants – data of the selected applicant in accordance with the Employment Contracts Act and data of the applicant not selected for the job for up to one year and four months as of the making of the recruitment decision.

– personal data related to the processing of legal claims – three years from the end of the procedure.

After these terms, personal data will be automatically deleted or anonymised.

If you have questions about data retention terms, please contact the Viimsi Keskus at the e-mail address info@viimsikeskus.ee.

7. TRANSFER OF YOUR PERSONAL DATA

The Viimsi Keskus may use third-party service providers, i.e. processors of personal data, to process your personal data and provide the services necessary to the Viimsi Keskus (e.g. software development, direct marketing, security and video surveillance services, payment and postal service providers, etc.). Processors of personal data have the right to process personal data only in accordance with the instructions received from the Viimsi Keskus and adhering to contracts concluded with processors regarding the confidentiality of the personal data. In addition to the above, the Viimsi Keskus has the right to transfer personal data to supervision, investigation and law enforcement agencies, and third parties if the respective obligation is provided by law.

The Viimsi Keskus's list of processors of personal data can be reviewed by contacting the Viimsi Keskus at the e-mail address info@viimsikeskus.ee.

8. DIRECT MARKETING AND CUSTOMER SATISFACTION SURVEYS

With your consent, the Viimsi Keskus may use the personal data provided by you to provide you with information about special offers, campaigns, and offerings and to conduct customer satisfaction surveys.

If you no longer wish to receive direct marketing offers from the Viimsi Keskus, you have the right to withdraw your consent to the processing of personal data at any time by following the instructions in direct mail or by contacting the Viimsi Keskus at the e-mail address info@viimsikeskus.ee. Withdrawal of the consent does not apply retroactively, i.e. it does not affect the processing of personal data on the basis of the consent provided before withdrawal.

9. VIDEO RECORDINGS

The Viimsi Keskus shopping centre has video surveillance for the protection of persons and property. The controller of video recording and personal data processed as a result of video surveillance is Tallinna Kaubamaja Kinnisvara Aktsiaselts. All video recordings are accessible only to persons who have the right to access the video recordings to perform their work duties.

As a rule, video recordings are retained for up to 30 calendar days, unless the need for longer retention is related to ongoing proceedings related to the protection of persons or property or is due to a longer term provided by law.

10. PROCESSING OF PERSONAL DATA AT EVENTS OF THE VIIMSI KESKUS

The Viimsi Keskus has the right to make photo and video recordings of events organised by the Viimsi Keskus. The Viimsi Keskus has the right to use and publish the recordings made at the events at its own discretion and to a moderate extent on the intranet, website, social media, and public media of the Viimsi Keskus. If you as a participant in the event do not wish your personal data to be processed on the aforementioned recordings, please inform the person who made the recordings at the event.

11. PROCESSING OF PERSONAL DATA OF JOB APPLICANTS

When applying for a job at Tallinna Kaubamaja Kinnisvara Aktsiaselts, the personal data submitted by the applicant are processed for the purpose of assessing the professional suitability and conformity of the applicant with the requirements set for the position applied for. Information about the candidate may also be obtained from other sources, such as public registers, referrers, former employers, etc. The referrer or former employer of the candidate will only be contacted if the applicant has agreed that the referrer would be contacted.

Personal data and documents related to the application are available only to authorised persons participating in the recruitment process. The data of the chosen applicant shall be retained in accordance with the Employment Contracts Act and the data of the applicant not chosen for up to one year and four months as of the making of the recruitment decision. With the consent of the applicant, Tallinna Kaubamaja Kinnisvara Aktsiaselts may retain the personal data of the applicant for up to three years with the aim of forwarding other job offers to the applicant in the future.

12. HOW DOES THE VIIMSI KESKUS PROTECT YOUR PERSONAL DATA?

The Viimsi Keskus uses up-to-date and adequate technical and organisational security measures to collect, retain, and process your personal data. These measures protect against unauthorised access, modification, disclosure, or deletion of personal data. Only authorised persons have access to the modification and processing of personal data.

13. YOUR RIGHTS REGARDING THE PROCESSING OF YOUR PERSONAL DATA

You have the right at any time to request your personal data from the Viimsi Keskus, to request the correction or transfer of your personal data, to restrict the processing of your personal data, or to delete your personal data, and to submit objections regarding the processing of your personal data.

Requests related to the processing of personal data should be submitted electronically to the Viimsi Keskus at the e-mail address info@viimsikeskus.ee. In order to ensure the security of the processing of personal data, your request must be digitally signed.

The Viimsi Keskus has the right to respond to your request within one month of receiving it. The Viimsi Keskus has the right to reject your request if your identity cannot be established or

the transfer of personal data is not secure or your requests are clearly unfounded or excessive, especially due to their repetitive nature. The Viimsi Keskus has the right to refuse to satisfy your request to restrict the processing of personal data or to delete personal data if the obligation to process personal data arises from a valid contract, law, or is necessary for preparing, submitting, or protecting legal claims related to the protection of persons or property. If the Viimsi Keskus is unable to satisfy your request, the Viimsi Keskus will notify you of the reason for this without delay and no later than within one month of receiving the request.

14. SUBMISSION OF COMPLAINTS

If you find that the Viimsi Keskus violates your rights in processing personal data, you have the right to turn to the Data Protection Inspectorate (www.aki.ee) or to court at any time.

15. USE OF COOKIES

A cookie is a small text file that a web browser automatically saves to a device used by the user. Cookies are used to collect information about how the user uses the website to provide the user with a better user experience. The website uses the following cookies:

- session cookies intended to enable the use of the website;
- persistent cookies, the purpose of which is to remember the customer's choices on the website;
- first-party and/or third-party cookies designed to show the user appropriate advertising and offers;
- third-party analytics cookies aimed at optimising marketing communications.

The visitor of the website may delete and/or block cookies stored on their devices by changing the corresponding settings of their web browser. If you do not use cookies, the website may not work as intended and/or some functionalities may not be available to the users.

In addition to the use of analytics cookies, the website uses pixel tags, web beacons to monitor the use of the website. In doing so, personally identifiable data will not be processed.

16. PROCESSING OF NON-PERSONAL DATA

When visiting the website, the Viimsi Keskus may collect non-personal data, such as the date and time of the website visit, information downloaded from the website, information about the browser name and the operating system, the internet service provider and other similar information. The Viimsi Keskus processes this data anonymously and the data is used primarily for the purpose of improving the functionality of the website.

17. PROFILING

The Viimsi Keskus may use statistical data related to you to perform a profile analysis to better understand your expectations and to offer you better goods and services as a result. The Viimsi Keskus does not make any decisions that have legal significance for you as a result of profiling.

18. AMENDMENT OF DATA PROTECTION TERMS AND CONDITIONS

The Viimsi Keskus has the right to amend and supplement the data protection terms and conditions at any time. The valid data protection terms and conditions are always available on the website of the Viimsi Keskus at www.viimsikeskus.ee. It is also possible to review the data protection terms and conditions by contacting the Viimsi Keskus at the e-mail address info@viimsikeskus.ee or by contacting the data protection specialist of the Viimsi Keskus at the e-mail address dpo@kaubamaja.ee.