
Customer Data Processing Policy

TABLE OF CONTENTS

0.	Document history	2
1.	Introduction.....	2
2.	Terms and Abbreviations	2
3.	Person in charge of the processing of your personal data	2
4.	Regulatory framework of this Policy and key principles of our data processing	3
5.	Purposes and legal basis for our processing of personal data	3
6.	Types of personal data processed by us	6
7.	Recipients of your personal data transferred by us.....	7
8.	The period of storing your data by us	8
9.	Your rights in respect of the processing of your personal data performed by the Clinic.....	9
10.	Availability, validity and amendments of the Policy	10

0. DOCUMENT HISTORY

Version	Modifications
23/07/2019	Procedure updated in line with the common data processing policy of Eugin Group.
25/05/2018	Procedure updated in line with the GDPR.
26/04/2013	Document issue date

1. INTRODUCTION

AVA CLINIC SIA (hereinafter – **Clinic** or **We**) hereby acknowledges that it processes its customer data in accordance with the 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 (hereinafter – **Regulation**), and by means of this Customer Data Processing Policy (hereinafter – **Policy**) developed in line with Article 13 and Article 14 of the Regulation provides information to its customers about the processing of customer data collected by the Clinic.

The Policy contains the following information about the processing of personal data performed by the Clinic:

- Details of the person in charge of the processing of your personal data
- Main principles relating to the processing of personal data
- Purposes and legal basis for the processing of personal data
- Categories of the processed personal data and data subjects
- Where your personal data are transferred and their recipients
- Duration of the processing and storage of personal data
- Rights of the data subject

2. TERMS AND ABBREVIATIONS

Processing	Any operation which is performed on personal data, (such as acquisition, collection, structuring, storage, adaptation, alteration, transfer, or erasure).
Processor	A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
Data Subject	A natural person (customer, customer's officer, representative, employee, contact person) who can be identified, directly or indirectly, by reference to personal data.
EEA	European Economic Area.
EU	European Union.
LV	Republic of Latvia.
Profiling	Automated processing of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
Personal Data	Any information relating to an identified or identifiable natural person, i.e. data subject.
Controller	A natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
Regulation	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).
Clinic	SIA AVA CLINIC, registration number: 40003711943, address: Vīlandes Str. 3, Rīga, LV-1010, website: https://www.avaclinic.lv

3. PERSON IN CHARGE OF THE PROCESSING OF YOUR PERSONAL DATA

3.1. Within the scope of this Policy and in respect of the Processing of your Personal Data regulated thereunder, the Clinic shall act as the Controller.

3.2. Contact details of the Clinic in connection with Personal Data Processing matters:

Address: Vīlandes Str. 3, Rīga, LV-1010

Telephone: +371 67001007

E-mail: nadia.martinova@avaclinic.lv

Details of the Data Protection Officer: Ivans Borodenoks, ava.riga@avaclinic.lv, Acting Data Protection Officer: Jekaterina Ivanova, katerina.ivanova@avaclinic.lv

4. REGULATORY FRAMEWORK OF THIS POLICY AND KEY PRINCIPLES OF THE DATA PROCESSING PERFORMED BY US

- 4.1 This Policy provides information about the processing of the following Personal Data performed by the Clinic:
- 1) processing of Personal Data of the former, existing and potential customers of the Clinic (i.e. patients and donors) carried out while providing medical services by the Clinic;
 - 2) processing of Personal Data of visitors of the Clinic;
 - 3) processing of Personal Data of visitors of the Clinic's website www.avaclinic.lv.
- 4.2 The Clinic performs the Processing of Personal Data in line with the requirements of Regulation for the purposes of establishing contractual relationship and contract performance within the scope of carrying out commercial activity, as well as for other legitimate purposes described in the Policy.
- 4.3 The Clinic obtains Personal Data mainly from the former, existing and potential customers. Legal basis for the Processing carried out by the Clinic is largely connected with the necessity of the Clinic as a medical establishment to conclude an agreement and ensure its performance, as well as the necessity to fulfil a legal obligation arising from the law and binding to the Clinic, or legitimate interests of the Clinic.
- 4.4 The Data Subject whose Personal Data are processed by the Clinic, shall have the right to request in writing access to or rectification of or restriction of processing of such data, the right to withdraw their consent and to object to the Processing of Personal Data carried out by the Clinic, as well as the right to data portability. In cases stipulated by law the person's rights may not get exercised or may be restricted, e.g. if it is based on legitimate interests of the Clinic which override the interests of the Data Subject, or if the specific Personal Data Processing is stipulated by laws and regulations applicable to the Clinic ([ORG SOP-04-1 List of Laws and Regulations](#)).
- 4.5 The Clinic ensures safety and storage of Personal Data to the extent and according to the procedure stipulated by the Regulation including implementation of the appropriate technical and organisational measures for protection of such Personal Data. In respect of information systems, for example, individual user accounts and secure passwords, as well as firewall and workstation anti-virus software are used to protect the system from unauthorized access to information resources by third parties.

5. PURPOSES AND LEGAL BASIS FOR OUR PROCESSING OF PERSONAL DATA

5.1 The Clinic performs the Processing of Personal Data for the following purposes:

5.1.1 Provision of medical services

To provide medical services, the Clinic carries out the Processing of your and other persons' (such as your spouse's) Personal Data with an aim to fulfil your request for medical treatment services, to provide this service, as well as to ensure performance of the medical services contract signed between yourself and the Clinic, including management, administration, provision, extension or supplementation of services, and to send the treatment-related technical and operational information for the purposes of treatment by any means of communication including e-mail and/or equivalent.

In case of collecting data concerning health, such data are processed in order to provide medical services which in line with your special request would be more efficient and suitable for your personal situation and health condition.

In any case, within the scope of rendering medical services, the Clinic carries out the Processing of your Personal Data where at least one of the following legal basis for the Processing of Personal Data exists: performance of a contract between the Clinic and you as a Data Subject, compliance

with a legal obligation which We as a medical establishment are obliged to fulfil, or legitimate interests of the Clinic. The Clinic shall have the right to refuse provision of medical services if you fail to provide your Personal Data to us.

5.1.2 Scientific research and clinical study

The Clinic processes your Personal Data which you have provided to us in order to include them in a research project wherein you are involved as a participant, on condition that you have previously signed a relevant informed consent to your participation as a patient in the clinical study. Likewise, the Clinic also performs analysis of the results obtained from your biological samples in order to implement the aforementioned research project.

Your Personal Data, as well as the obtained results, will be properly made anonymous, or encoded, so that they cannot be identified by any other personnel but researchers. The code assigned to your data allows identifying your samples according to your clinical data without using your personal identifiable data. This code may be accessible to only one person who is responsible for sampling in the Clinic, as well as to the research team.

In any case, within the scope of scientific research, the Clinic carries out the Processing of your Personal Data according to the procedure stipulated in laws and regulations including in line with Section 11 of the Law on Patients' Rights.

5.1.3 Processing of information requests

Personal Data provided while requesting information are collected, processed and used in order to fulfil your request to provide information and to find an appropriate solution, as well as to send or request any information related thereto which is necessary to ensure a proper solution, by any means of communication including e-mail and/or equivalent.

In any case, within the scope of processing requests for information, the Clinic carries out the Processing of your Personal Data where at least one of the following legal basis for the Processing of Personal Data exists: performance of a contract between the Clinic and you as a Data Subject based on which you have submitted your request, compliance with a legal obligation, or legitimate interests of the Clinic.

5.1.4 Video surveillance

The Clinic operates an online video surveillance system to ensure safety of visitors, as well as other persons, equipment and materials in the premises of the Clinic, and to guarantee access to such equipment and materials and to ensure their proper maintenance.

The said cameras are installed in a fixed position and they are visible, soundless and bear a respective label 'video surveillance area'. Their installation process has been carried out considering the customers' and team members' rights to privacy and respect, hence, all cameras have been installed only in those premises (hallways and waiting room of the Clinic) where it is not necessary to ensure special privacy of persons.

The Clinic does not keep, nor record any images registered by video surveillance cameras. In any case, within the scope of video surveillance, the Clinic carries out the Processing of your Personal Data based on legitimate interests of the Clinic as a Controller.

5.1.5 Data processing to authorize access to the website

When you visit our website www.avaclinic.lv, we collect the necessary data to enable your access thereto (usage data). They include your IP address and data of the beginning and end time of the website visit, as well as browsing history and, possibly, also identification data (e.g. your login details if you logged in the Secure Private Area). These data are used to provide and develop services based on the needs of each user; however, they will be deleted once become unnecessary.

i. Pseudonymised user profiles for advertising and market research purposes (monitoring and web analytics)

The Clinic uses web tracking systems for advertising and market research purposes, as well as to make the website browsing experience more enjoyable. For this reason, data about using our website are stored in pseudonymised user profiles. It will help us to further develop our websites and adapt their contents to your needs. Besides, user profiles are also used for the so-called redirection. It allows the Clinic to publish and advertise attractive offers on other websites you are visiting. Pseudonymised user profiles are not linked to your Personal Data.

You have the right to object to the creation of pseudonymised user profiles. First, you can disable cookies in your web browser (see Cookies Policy). Second, you can install certain add-ons in your web browser to prevent web tracking, hence, protecting your own privacy.

ii. Data collected by third party service providers / social media

Our websites contain links to social media such as Facebook, XING, Google Plus, LinkedIn, Twitter etc. These social media sites are managed solely by third parties. When you click on those links, information may be transferred to such third parties. To find out for what purposes and to what extent social media sites collect and further process your data for their own needs, as well as to find out your rights and ways to protect your privacy, please refer to privacy protection policies maintained by the respective operators.

5.1.6 Other purposes of data processing

In all other cases of Processing of Personal Data not listed above the Clinic will always ask you to give explicit and unambiguous consent, or will ensure another legal basis for the Processing of such Personal Data. If further Processing of your Personal Data is planned for purposes other than that for which such data have been initially collected, information about such other purpose and all other relevant information will be provided before the beginning of the aforementioned further Processing so that the Data Subject can ascertain the possible consequences of the intended further Processing of Personal Data.

5.2 In cases when the Processing of your Personal Data is based on legitimate interests of the Clinic as a Controller, the Clinic shall ensure that such Processing is proportionate and does not unduly prejudice the fundamental rights or freedoms of the Data Subject. Likewise, if you have a concern that the Processing of your Personal Data carried out by the Clinic based on our legitimate interests is disproportionate, then you as a Data Subject has the right to object to such Processing at any time in accordance with the procedure stipulated in the Policy. The Clinic's legitimate interests based on which the Clinic is entitled to perform the Processing of your Personal Data are as follows:

- 1) to carry out efficient commercial activity;
- 2) to offer high-quality services;
- 3) to ensure fulfilment of contractual obligations;
- 4) in case of debt liabilities, to transfer Personal data of the customer as a Data Subject to a debt collection service provider;
- 5) to maintain the records of customer requests and applications for medical services, other requests and applications and any notes thereof, including those which have been made verbally, by phone and via website;
- 6) to send reports regarding the course of contract performance and events that are essential for contract performance;
- 7) to carry out customer surveys about services rendered by the Clinic;
- 8) to examine customer claims submitted to the Clinic in writing;
- 9) to prevent fraud;
- 10) to ensure corporate management, financial and business accounting and analytics;
- 11) to ensure efficient company management processes;
- 12) to ensure and improve the quality of services provided;
- 13) to administer payments and outstanding payments;

- 14) to seek protection of the Clinic's legitimate interests from public authorities, institutions performing operational activities and judicial bodies;
 - 15) to involve an external auditor for auditing the Clinic's operation, and to involve professional consultants for solving and eliminating problem situations;
 - 16) to ensure protection of the Clinic's property, staff and customers;
 - 17) to inform the public about its operations.
- 5.3 Where Processing of Personal Data is based on a legal obligation to which the Clinic as a Controller is subject for the purposes of rendering medical services, the Processing of your Personal Data shall be carried out based on the effectual laws and regulations ([ORG SOP-04-1 The List of Laws and Regulations](#)).
- 5.4 Where Processing is based on the Data Subject's consent, the Clinic shall ensure that such consent is freely given, is obtained as a specific, informed and unambiguous indication of the Data Subject's wishes in respect of the Processing of such Personal Data relating to him or her for a specific purpose. The Data Subject has the right to refuse to give consent for the Processing of their Personal Data. Refusal to give consent to the Processing of one's Personal Data shall not adversely affect the customer's opportunities to use medical services provided by the Clinic. Likewise, you are entitled to withdraw your consent at any time by sending a withdrawal request to the Clinic by e-mail: Ava.riga@avaclinic.lv or nadia.martinova@avaclinic.lv, or by post: Vilandes Str. 3, Riga, LV-1010. The withdrawal of consent shall not affect the lawfulness of Processing based on consent before its withdrawal.
- 5.5 Where Data Subject's Personal Data are provided or transferred to the Clinic by another person rather than the Data Subject himself or herself, and such person is not a Controller designated by the Clinic, or one of the members, employees, representatives or authorized persons of the Clinic's management bodies, who provide such data based on instructions given by the Clinic, then the person who is transferring another person's Personal Data to the Clinic shall assume full liability for the legal basis of transferring the Personal Data and for fulfilling any other obligations of the Controller stipulated in the Regulation in respect of such Processing.

6. TYPES OF PERSONAL DATA PROCESSED BY US

- 6.1. The Clinic performs the Processing of the following categories of Data Subjects:
- 1) customers (existing, former, potential) of the Clinic, as well as its creditors, debtors and their related persons (representatives, officials, contact persons, attorneys, beneficiaries, staff etc.);
 - 2) business partners of the Clinic, as well as its agents, suppliers, service providers, consultants and their related persons (representatives, officials, contact persons, attorneys, beneficiaries, staff etc.);
 - 3) visitors of the Clinic's website www.avaclinic.lv and on-site at Vilandes Str. 3, Riga, LV-1010.
- 6.2. The Clinic processes those categories of Personal Data which are listed below. The Clinic may obtain these types of Personal Data directly from Data Subjects, i.e. Customers, for example, while visiting the Clinic's premises or website within the scope of rendering services by the Clinic, or when Data Subjects send e-mail letters or make phone calls to the Clinic. Likewise, the Clinic may also obtain such Personal Data from third parties (e.g. public registers, public authorities, business partners, laboratories). Hence, the Clinic may perform the Processing of the following categories of Personal Data:
- 1) personal identification data (e.g. name, surname, personal ID number, date and place of birth, ID document data);
 - 2) personal contact details, e.g. postal address, telephone number, e-mail address, Skype name, IP address etc.;
 - 3) personal data concerning health such as information about the Data Subject's medical history, historical data about medical services provided by the Clinic and performed tests;
 - 4) details about the person's family matters such as information about the Data Subject's marital status, children, spouse, parents etc.;

- 5) professional details and information about the Data Subject's job position and affiliation to the specific company or institution;
- 6) financial information such as account number, information about financial situation, or debt liabilities;
- 7) correspondence details such as Data Subject's email message sent to the Clinic, response given to the Data Subject by the Clinic, Data Subject's telephone conversations with the Clinic, or information revealed during face-to-face conversations if such has been recorded.

7. RECIPIENTS OF YOUR PERSONAL DATA TRANSFERRED BY US

- 7.1. In order to fulfil specific Processing purposes, the Clinic has the right to transfer your Personal Data and to make them available to the Processors, i.e. entities which are carrying out the Processing of Personal Data on behalf of the Clinic based on instructions given by the Clinic and in line with a written agreement with the Clinic, and only for such purpose of the Processing as stipulated under the agreement. The Clinic may, for example, entrust Processing to the Processors in the following cases:
 - 1) maintenance of the Clinic's information systems, servers and software applications, storage and ensuring protection of Personal Data;
 - 2) invoicing customers;
 - 3) debt collection if the invoices issued by the Clinic are not paid by the set deadline;
 - 4) providing the Clinic's customers with any other information such as marketing communication and information about the Clinic, its most recent offers and new services.
- 7.2. The Clinic may disclose Personal Data to other data recipients such as:
 - 1) members of the management bodies, employees, representatives, attorneys of the Clinic who are performing the Processing based on instructions given by the Clinic. Within the meaning of this Policy such persons shall be considered as the Clinic;
 - 2) the Clinic's Group companies (the EUGIN chain of clinics) as Processors with a purpose to ensure administrative functions and efficient commercial activity of the Clinic and its Group companies. Such transfer of your Personal Data is carried out based on legitimate interests of the Clinic as a Controller. More detailed information about such cases may be obtained by contacting the Clinic via means of communication as specified in the Policy;
 - 3) if the Data Subject attends an appointment at the Clinic accompanied by a third person (e.g. spouse, family member or any other relative), the customer's Personal Data disclosed during such appointment including information concerning the customer's health will be disclosed to the particular third person. Such transfer of data is carried out based on agreement with the Data Subject (customer) according to the Regulation. In such case it shall be deemed that, within the scope of the Regulation, the said third person may be considered as a recipient of the Personal Data, and following the receipt of such data shall become a Controller of such Personal Data and according to the Regulation shall assume liability for legitimate Processing thereof;
 - 4) public authorities (e.g. National Health Service if in cases provided for by law the data are registered in the e-Health system), public officials, investigative bodies including courts, Prosecutor's Office, bodies performing operational activities, Orphan's Court, notaries, bailiffs, judicial and investigative bodies of another Member State and foreign country, tax administration authorities, courts of arbitration, non-judicial dispute resolution bodies, business partners of the Clinic or customers etc. Such transfer is carried out based on the law or the Clinic's legitimate interests according to the Regulation, and following the receipt of Personal Data the recipient shall become a Controller of such Personal Data and according to the Regulation shall assume liability for legitimate Processing thereof;
 - 5) the Clinic's business partners (e.g. other medical establishments, accredited laboratories), suppliers, service providers (e.g. debt collection service providers if invoices are not paid on time), auditors, consultants, or insurers. Such transfer of Personal Data shall be carried out based on the Clinic's contractual obligations or legitimate interests to ensure efficient business activity, risk management or

risk prevention according to the Regulation, and following the receipt of Personal Data the recipient shall become a Controller of such Personal Data and according to the Regulation shall assume liability for legitimate Processing thereof. In certain cases Personal Data may be transferred to debt collection service providers as Processors appointed by the Clinic.

- 7.3. Within the daily business operations, the Clinic may also transfer Personal Data outside the EU and EEA. Such transfer may only be performed in the following cases:
- 1) where Processing is entrusted to the Processor appointed by the Clinic;
 - 2) where Personal Data are transferred to the Clinic's service providers or business partners to ensure fulfilment of the Clinic's contractual obligations towards the customer or business partner outside the EU or EEA. For instance, in certain cases Personal Data of the Clinic's customers may be transferred, if necessary, to the clinical laboratory service providers outside the EU or EEA to ensure further provision of high level medical services to the Clinic's customers;
 - 3) where, upon the Data Subject's request, Personal Data are transferred to the Data Subject himself or herself who is residing outside the EU or EEA, or to another recipient outside the EU or EEA.
- 7.4. The Clinic transfers your Personal Data outside the EU or EEA subject to any of the following preconditions that meet the requirements of the Regulation:
- 1) it has been decided that a country outside the EU or EEA, a territory or one or more specified sectors, or the international organisation in question ensures an adequate level of protection that meets the requirements of the Regulation;
 - 2) based on binding corporate rules or standard data protection clauses;
 - 3) the Data Subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the Data Subject due to the absence of an adequacy decision and appropriate safeguards;
 - 4) the transfer is necessary for the performance of a contract between the Data Subject and the Clinic as a Controller or the implementation of pre-contractual measures taken at the Data Subject's request;
 - 5) the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the Data Subject between the Clinic as a Controller and another natural or legal person.

8. THE PERIOD OF STORING YOUR DATA BY US

- 8.1. The Clinic stores your Personal Data according the Regulation and the applicable laws. Personal Data are generally stored in a manner that permits the identification of Data Subjects but no longer than it is necessary for the fulfilment of the particular Processing purposes. The period of Personal Data Processing including their storage period is specified in the applicable laws and regulations, or alternatively such period shall be set by the Clinic in line with the applicable laws and regulations, and it depends on the type of the particular document or contract and legal basis for the Processing of Personal Data. The Clinic shall store Personal Data collected during treatments as long as business relationship exists between the parties, having regard also to the following storage periods of Personal Data:
- 1) for patients – 75 years after completion of each health care process;
 - 2) for donors – 75 years after the clinical usage or expiry of suitability of the obtained biological material;
 - 3) in case of scientific research the Clinic will store your Personal Data throughout the entire research project, however, the results of the performed studies and data which have been properly made anonymous will be stored for an indefinite period of time. After completion of the research project, the Clinic will destroy your Personal Data;
 - 4) the Processing based on the Data Subject's consent is carried out until the particular Data Subject's consent is valid unless any other legal basis for the Processing exists.
- 8.2. The applicable laws lay down the obligation for the Clinic to store certain documents containing Personal Data for a specific period of time. Such storage period, for instance, is laid down in the laws regulating the medical, tax and accounting (e.g. Law on Accounting) and employment sectors (e.g. Labour Law). Storage

of certain Personal Data may be permitted based on the Clinic's legitimate interests except when the Data Subject's interests or fundamental rights and freedoms, which request the protection of Personal Data, override such legitimate interests.

- 8.3. An example for storing Personal Data based on the Clinic's legitimate interest would be the necessity to protect our rights within the scope of legal proceedings. The Clinic stores certain documents containing Personal Data for this purpose until expiry of the limitation period set for such documents. The Clinic may also store contracts and any documents related to performance of such contracts 10 years after contract obligations have been fulfilled in line with the overall limitation period stipulated by the law of contracts.
- 8.4. Additional information about the storage periods of other Personal Data may be obtained by sending a request to the Clinic by e-mail: ava.riga@avaclinic.lv, nadia.martinova@avaclinic.lv or by post: Vīlandes Str. 3, Rīga, LV-1010.
- 8.5. After expiry of the Personal Data storage period the Clinic shall ensure that such Personal Data are erased or made anonymous, namely, it shall make the Personal Data unidentifiable so that they may no longer be related to the Data Subject.

9. YOUR RIGHTS IN RESPECT OF THE PROCESSING OF YOUR PERSONAL DATA PERFORMED BY THE CLINIC

- 9.1. According to the data protection laws including Article 12 – 22 of the Regulation, the Data Subject, i.e. a natural person whose Personal Data are being processed by the Clinic, shall have the following rights in respect of the Processing performed by the Clinic:
 - 1) to obtain additional information about the Processing of the Data Subject's Personal Data performed by the Clinic, to request a copy of the Data Subject's Personal Data held by the Clinic, as well as to obtain information about receiving a copy of Personal Data or where they have been made available in respect of those Personal Data which are transferred outside the EU or EEA;
 - 2) to request rectification of the Data Subject's Personal Data (if you establish that the information held by the Clinic in respect of the Data Subject is incorrect or incomplete, the Data Subject shall have the right to request the Clinic to rectify such data);
 - 3) to withdraw the consent to the Processing of Personal Data;
 - 4) to request erasure of the Data Subject's Personal Data;
 - 5) to request restriction of the Processing of the Data Subject's Personal Data (marking of the Personal Data held by the Clinic with the aim of limiting their Processing in the future);
 - 6) to request Personal Data portability (a possibility to receive information about the Data Subject's Personal Data in a machine-readable format);
 - 7) to object to the Processing of Personal Data where legal basis for such Processing is the Clinic's legitimate interests.
- 9.2. The aforementioned rights of the Data Subject are not absolute, and their execution may be restricted as necessary. For instance, the Clinic is entitled to refuse to stop the Processing of Personal Data if the Clinic provides sound legitimate reasons for such Processing which override the Data Subject's interests, rights and freedoms, or to raise, to pursue or to protect legitimate claims.
- 9.3. To execute the Data Subject's rights or to obtain more information about this Policy and the Processing performed by the Clinic, the Data Subject or any other persons shall contact the Clinic by sending a request to the Company by e-mail: ava.riga@avaclinic.lv, nadia.martinova@avaclinic.lv or by post: Vīlandes Str. 3, Rīga, LV-1010, Latvia, with an indication "FAO: SIA "AVA Clinic"".
- 9.4. Activities performed by the Clinic in respect of the Personal Data protection are supervised by the Data State Inspectorate. In order for the Clinic to resolve any disagreements or misunderstandings as quickly as possible, we kindly ask the Data Subjects to contact the Clinic first. Where the Data Subject is not satisfied with the received answer, as well as in all other cases the Data Subject has the right to make a complaint to the Data State Inspectorate (address: Blaumaņa Str. 11/13-15, Rīga, LV-1011; e-mail: info@dvi.gov.lv; telephone: +371 67223131.

10. AVAILABILITY, VALIDITY AND AMENDMENTS OF THE POLICY

- 10.1. The Policy can be found on the Clinic's website www.avaclinic.lv under the section *Customer Data Processing Policy*.
- 10.2. The Policy is effective from 10 April 2019.
- 10.3. To provide updated information about the Processing of Personal Data performed by the Clinic to the Data Subjects and other persons, we are committed to ensure reviewing and updating of the Policy as per the requirements of the laws. For this reason we would like to encourage you to read, from time to time, the most recent version of the Policy on the Clinic's website. We will first notify of any amendments to the Policy on the Clinic's website.