

# Privacy policy

At Linda Nektar AS (hereinafter referred to as “Linda Nektar” or “we”) we value privacy and personal data protection and follow the principles of data processing set out in this privacy policy. We consider integrity and confidentiality of personal data of utmost importance and guarantee lawfulness of personal data processing. The privacy policy explains how we collect and use personal data including our website, [www.lindanektar.ee](http://www.lindanektar.ee).

## 1. Terms and definitions

1.1. Personal data – means 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;

1.2. Processing of personal data – means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

1.3. Controller – means the 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; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

1.4. Processor - means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

1.5. Third party – means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

1.6. Personal data breach – means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

1.7. Data subject – person whose personal data is processed (e.g. client who is a natural person, website user or a contact person of a legal entity client).

## 2. Principles

2.1. Linda Nektar and the processors working for us process personal data adhering to following principles:

2.1.1. lawfulness, fairness and transparency – the processing is lawful, fair and transparent to the data subject;

2.1.2. purpose limitation – collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;

2.1.3. data minimisation – adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

2.1.4. accuracy – the personal data is accurate and up to date; we employ all reasonable measures to ensure that inaccurate personal data is deleted or corrected;

2.1.5. storage limitation – kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;

2.1.6. integrity and confidentiality – processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## 3. Security of processing

3.1. Linda Nektar applies necessary, and appropriate to a risk, organisational, physical and technological measures to protect personal data. These measures include rules and procedures for employees, for managing data and IT infrastructure, internal and external networks and also protecting all the equipment and the building of Linda Nektar.

3.2. Linda Nektar has provided relevant training to all employees processing personal data.

3.3. Linda Nektar may use processors to process personal data, we ensure that all our processors process personal data in accordance with our instructions, applicable law and employing all appropriate organisational and technological security measures.

## 4. Lawful basis of processing

4.1. Linda Nektar processes personal data to ensure performance of a contract, to comply with legal obligations, out of legitimate interest, or on the basis of data subject's consent.

4.1.1. We process personal data to ensure performance of a contract is used when we have concluded a contract and the contractual aim is not achievable without processing personal data.

4.1.2. Legal obligations of processing include all personal data processing under relevant laws and regulations for example Employment Contracts Law or Accounting Act.

4.1.3. We process personal data on grounds of legitimate interest to improve the quality of our services and for the purpose of business development. To ensure that our legitimate interest doesn't breach data subjects' fundamental freedoms and rights we conduct a three-part test to guarantee that the processing is purposeful, required and proportional to the stated purpose.

4.1.4. When processing personal data with consent as lawful basis we only process specifically what data subject has consented to. The consent is freely given, specific and informed. Data subject can take back consent at any given time and as easily taken back as it was given.

## 5. Data controller or data processor and collection of data

5.1. Linda Nektar can be a controller or a processor in various data processing operations. To ensure data subjects privacy rights Linda Nektar abides by confidentiality principles and strictly limits disclosure of personal data.

5.2. Only the persons authorised by Linda Nektar have the right to modify and process personal data.

5.3. Linda Nektar processes personal data received directly from the data subject (i.e. person who submitted the personal data) or indirectly (through corporate clients). Personal data received indirectly is processed by Linda Nektar only if we have a need to process the personal data in order to provide a service, such as payroll accounting, to a corporate client.

## 6. Types of personal data

6.1. personal data: first and last name, personal number (ID code);

6.2. contact details: e-mail address and contact telephone number;

6.4. Internet data: data on website visitors' sessions, cookies, log data and IP addresses.

## 7. Purposes of processing personal data

7.1. The purpose of processing the personal data specified in clause 6 of this privacy policy is to:

7.1.4. send out newsletters and conducting client satisfaction studies;

7.1.5. process purchase and sales invoices;

7.1.6. comply with legal obligations and activities resulting thereof.

## 8. Retention of personal data

8.1. Linda Nektar retains personal data only as long as this is necessary to fulfil the purpose for which the personal data is processed, unless there is an applicable legal obligation stating otherwise. We retain data as follows:

8.2. accounting documents must 7 years as stipulated in the Accounting Act;

8.3. Linda Nektar retains other data until the end of the respective retention term specified in the company's personal data processing inventory.

8.4. Linda Nektar shall securely destroy and/or delete all personal data that has fulfilled its purpose or upon expiring of the retention term.

## 9. Third parties and data processors

9.1. Strictly limited by necessity and pursuant to the purposes, Linda Nektar may forward personal data to third parties and data processors for the following purposes:

9.1.1. for issuing sales invoices;

9.1.2. for client relationship management;

9.1.3. to partners to improve the quality of our services.

9.2. Regardless of access restrictions, Linda Nektar shall release a document to an organisation or a person who legal right to request the data (e.g. police, court, supervisory authority etc).

## 10. Rights of the data subject

10.1. The data subject has the right to receive information regarding processing of their personal data. Data subject can obtain a copy of their personal data held by Linda Nektar by submitting a request via e-mail to [info@lindanektar.ee](mailto:info@lindanektar.ee).

10.1.1. Linda Nektar has a legal obligation to make sure that a person requesting information about themselves is indeed the person who has the right to receive the data. For this reason, the requesters may have to prove their identity or right to request the data.

10.2. The data subject has the right to deletion of personal data if the processing of personal data took place on the basis of consent.

10.3. The data subject has the right to restrict the processing of personal data.

10.4. Where feasible a data subject has the right to data portability.

10.5. The data subject has the right to lodge a complaint to the Data Protection Inspectorate regarding processing of personal data.

## 11. Cookies

11.1. The website administered by Linda Nektar AS, [www.lindanektar.ee](http://www.lindanektar.ee), uses cookies to make the user experience on the website more convenient and the use thereof smoother.

11.2. A cookie is a small text file that a web browser automatically saves in the device used by the user.

11.3. We use cookies to gather anonymous and generalised statistics on the number of website visitors and information on how the website is used to improve our websites user-friendliness.

11.4. It is possible to refuse or block cookies on the device, this may mean that the website may not function properly and all services may not be available. To refuse or block cookies you need to change your browser settings.

## 12. Changes to the privacy policy

12.1. Personal privacy is important to Linda Nektar and we updates this privacy policy regularly. The version published on Linda Nektar website is always the latest version.

## 13. Contact information

13.1. If you have any issues, concerns or suggestions pertaining to processing of personal data, contact the controller using the following contact details:

Kobela  
Antsla vald  
66407 Võrumaa  
Estonia  
Tel +372 785 5768  
[info@lindanektar.ee](mailto:info@lindanektar.ee)