

## ARU GRUPP AS CONDITIONS FOR PROCESSING PERSONAL DATA

### 1. DEFINITIONS AND GENERAL PROVISIONS

**1.1.**The following Aru Grupp AS conditions for processing personal data (from now referred to as **conditions**) provide the arrangements for the conditions of the Data subject, including personal data, which ones Aru Grupp AS processes, the conditions bases set up by Aru Grupp AS, the principles and objectives, the rights of the Data subject and the obligations that Aru Grupp AS has with the conditions and the security measures to protect personal data.

**1.2.**The processor responsible for personal data is Aru Grupp AS (from now referred to as **Aru Grupp AS**), with the registry code of 10108425, address Rakvere tee 12, Hulja, Kadrina vald 45203, Lääne-Virumaa, email address: [info@arugrupp.ee](mailto:info@arugrupp.ee).

**1.3.**The Data subject is a physical person, including a representative of a legal person, whose personal data is processed by Aru Grupp AS (from now referred to as **data subject**)

**1.4.**Personal data is any kind of information on the identified or identifiable Data subject (from now referred to a **personal data**).

**1.5.**The processing of personal data is any kind of action that is done on the personal data of the Data subject (this includes collecting, saving, organising, retaining, changing, providing access, using, trans missioning and deleting the personal data of the Data subject).

**1.6.**Aru Grupp AS has the right to authorize other people or institutions to process the personal data of Data subjects (from now authorized person) with the condition that this kind of authorized person has a signed contract with Aru Grupp AS in which way the authorized person has the obligation to keep all personal data confidential and is obligated to ensure the fulfilment of legal obligations to all authorized processors. Aru Grupp AS will make the names of the authorized processors and their contact details available for the Dsubject if they make an application. In this moment the authorized processors are named in **Appendix nr.1 – Aru Grupp AS authorized processors for customers details** <https://www.arugrupp.ee/documents>.

**1.7.**If the authorized processors or their details change the list will be updated and it will be done within a reasonable amount of time but no later than 30 days after the change of data.

### 2. THE OBJECTIVES AND LEGAL BASIS OF THE PROCESSING OF PERSONAL DATA

**2.1.**Aru Grupp AS processes Data subject's personal data on the following objectives:

**2.1.1** To sign a contract with the Data subject (including making a quote);

**2.1.2.** To fulfil the contract that was signed with the Data subject;

**2.1.3.** To offer the Data subject goods and/or the provision of services;

**2.1.4.** To compose Aru Grupp AS internal sales statistics;

**2.1.5.** To compose marketing and consumer habits and customer satisfaction surveys;

**2.1.6.** To manage, update and to improve the Aru Grupp AS website;

**2.1.7.** For other purposes to meet the contract agreement between Aru Grupp AS and the Data subject, including improving the goods and services that are offered by Aru Grupp AS and needed actions to improve the quality;

**2.1.8.** To protect Aru Grupp AS properties;

**2.1.9.** To follow and fulfil the obligations made by the law.

**2.2.**The legal basis of the processing of personal data made by Aru Grupp AS:

**2.2.1** Contract with Aru Grupp AS – in particular, the processing of personal data in order to sign the contract and to carry it out, including all the actions needed to sign and carry out the contract;

**2.2.2.** Data subject's consent – in particular the processing of personal data to conduct research in marketing, consumer habits and customer satisfaction, also the processing of personal data in a way where the personal data will not be processed based on the contract, the law or other legislations;

**2.2.3.** Laws and other legislations – the processing of personal data from the law and other legislations that Aru Grupp AS has the obligation to follow;

**2.2.4.** Contract with the specific processor – the processing of personal data in a situation where the responsible processor has authorized Aru Grupp AS to process personal data on the objectives that have been specified by the processor.

**2.3.** Aru Grupp AS will make sure that the Data subject will be notified as soon as possible of any processing of personal data of the Data subject that has been required by law, including current conditions and to work together with the Data subject so that all the rights and interests of the Data subject are protected. The data subject at the same time understands that if the personal data is transmitted on their own initiative (for example phone or email) the Data subject gives consent to process the received personal data.

### **3. COMPOSITIONS OF PROCESSING PERSONAL DETAILS**

**3.1.** Aru Grupp AS also processes the following Data subject's personal data:

**3.1.1.** Details on the Data subject (name, date of birth, gender, nationality, bank account number etc);

**3.1.2.** Data subject's contact details (address, email address, phone number, fax number etc);

**3.1.3.** Other personal details that have been provided to Aru Grupp AS by the Data subject, which means personal details that are associated with the Data subject.

**3.2.** The exact combination of the Data subject's personal details that is processed by Aru Grupp AS is based on what kinds of personal details the Data subject reveals to Aru Grupp AS.

**3.3.** The data subject is not obligated to reveal their personal details to Aru Grupp AS if there are details that they do not wish to share, but the Data subject has to take into consideration that in the case of incomplete and insufficient details, Aru Grupp AS might not be able to offer goods to the Data subject and/or offer them services.

### **4. RECORDING AND RETAINING PERSONAL DATA**

**4.1.** Aru Grupp AS records and retains all personal data provided by the Data subject on the conditions that meet the current Conditions and the principles and requirements of legislations.

**4.2.** Aru Grupp AS will provide that all employees that in any way will be in contact with the Data subject's personal data, all have consent from Aru Grupp AS to access the Data subject's personal data in order to carry out the objectives of processing personal data and that they all will follow the obligation of confidentiality.

**4.3.** Aru Grupp AS has the right to record all orders that have been done with all means of communication (phone, email), also other actions that the Data subject has done and if needed use those recordings to show proof of orders or other services and/or for resubmission and to carry out any other objectives in the conditions for processing personal data.

**4.4.** Aru Grupp AS will retain the personal data of Data subjects to offer a specific time for goods and/or services and after that until it is needed to protect the rights of Aru Grupp AS or based on the law.

**4.5.** Aru Grupp AS will retain Data subject's personal data, the ones that Aru Grupp will process as an authorized processor, during a time frame that has been agreed with the processor.

### **5. TRANSMITTING PERSONAL DATA TO THIRD PARTIES**

**5.1.** Aru Grupp AS has the right to forward personal data to third parties, this includes third parties that are located in other European Union countries, in the case if the transmitting of personal data is in conjunction and needed by Aru Grupp AS in order to offer goods and/or services to Data subjects, this includes all actions needed to take to offer goods and/or services or to reach other objectives of processing personal data designed by Aru Grupp AS or to fulfil obligations that come from law or other legislations for Aru Grupp AS.

**5.2.** Aru Grupp AS will transmit personal data to third parties only to the extent where it is needed to fulfil objectives to process personal data designed by Aru Grupp AS. Aru Grupp AS requires individuals to whom personal data is being transmitted and published to, to follow the rules of safety and confidentiality set up by Aru Grupp AS and to ensure that the level of data protection is equivalent to data process activities.

**5.3.** Aru Grupp has the right to transmit personal data to these following third parties:

**5.3.1.** Aru Grupp AS business and cooperative partners;

**5.3.2.** Lawyers and other advisors who are related to Aru Grupp AS;

**5.3.3.** individuals to whom Aru Grupp AS has given claims to;

**5.3.4.** individuals to whom Aru Grupp AS can or is obligated to reveal the personal data of Data subjects based on the obligations from the law that Aru Grupp AS has to follow;

5.4. Aru Grupp AS has based on the current Conditions revealed the list of authorized processors, that is being renewed by Aru Grupp AS based on the Conditions. In the data subject's application Aru Grupp AS will reveal to the Data subject which kind of individuals Aru Grupp AS has forwarded Data subject's personal data to.

## 6. DATA SUBJECTS RIGHTS

6.1. Data subject has the rights:

6.1.1. to get information on the Data subject's personal data processed by Aru Grupp AS and how they are processed, also including information on third parties to whom Aru Grupp AS has forwarded personal data to;

6.1.2. require the immediate fixing of incorrect personal data that is concerning the Data subject, also to fix personal data that is incomplete;

6.1.3. require the immediate termination of the processing of personal data of the Data subject and the deletion of personal data in the cases that is provided by law;

6.1.4. require in the cases provided by law restrictions to processing of personal data of the Data subject or object to the processing of personal data;

6.1.5. to receive personal data of the Data subject that they have provided to Aru Grupp in a structured way, in a common format and in a machine readable form and the right to forward the data to another authorized processor without Aru Grupp AS preventing that;

6.1.6. at any time, forbid the processing of data concerning the Data subject for the purpose of research into consumer habits or direct marketing and the transferring of personal data to third parties, that wish to use them for the researching of consumer habits or direct marketing;

6.1.7. at any given time take back their consent of processing personal data, also the Data subject only has the right to take back their consent of processing personal data that is being used for marketing purposes. Withdrawal of consent does not affect the lawfulness of the processing carried out prior to the withdrawal, nor shall the withdrawal of consent affect the processing of the personal data of the Data subject where the processing of personal data is carried out by the law.

6.2. Aru Grupp AS has the obligation to inform third parties of the fixing, deleting or restricting of processing personal data of the Data subject, from whom they got the personal data or to whom the personal data was forwarded to if it is technically possible and will not bring along disproportionately high costs

6.3. The Data subject has the obligation to present all applications and requirements that concern personal data that is electronically digitally signed to the email address [info@arugrupp.ee](mailto:info@arugrupp.ee) or signed on paper by hand and send them to Aru Grupp AS address Rakvere tee 12, Hulja, Kadrina vald 45203, Lääne-Virumaa.

## 7. ARU GRUPP AS OBLIGATIONS

7.1. Aru Grupp AS is obligated to process personal data, also gather, forward and retain personal data, with current Conditions and other rules of Aru Grupp AS relating to the processing of personal data and to the laws of personal data protection and to the regulations of the European Parliament and of the Council number 2016/679 and in other objectives and conditions of accurate legislations.

## 8. MEASURES FOR PERSONAL DATA PROTECTION

8.1. Aru Grupp AS in their actions follows the measures for personal data protection and will do everything they can to make sure that the processing of personal data, including the gathering, forwarding and retaining of personal data is done in a way where it provides the security of current technical and organizational methods of processing personal data.

8.2. In the case that there is a violation of the Data subject's personal data which in turns gives apparent danger to the Data subject's rights and freedom, Aru Grupp AS is obligated to inform the Data subject without any delays that a violation has happened with the personal data, also explain what the exact kind of violation is, the possible consequences of the violation and the measure that are being taken in order to eliminate the violation and also inform the Data subject with the current information of what individual obtains contact details.

## **9. PROTECTION OF DATA SUBJECT'S RIGHTS**

**9.1.** If the Data subject finds that Aru Grupp AS has made violations while processing their personal data, then the Data subject has the right to contact Aru Grupp AS with the claim to eliminate the violation.

**9.2.** The Data subject also has the right to contact the Data Protection Inspectorate at any time (address: Tatari 39, Tallinn 10134, telephone: 627 4135, email address: [info@aki.ee](mailto:info@aki.ee)) or to a competent court.

**9.3.** The Data subject has the right to contact Aru Grupp AS (registry code 10108425) with relevant questions about processing personal data on the phone number +372 329 5640, email address [info@arugrupp.ee](mailto:info@arugrupp.ee) or on the address Rakvere tee 12, Hulja, Kadrina vald 45203, Lääne-Virumaa.

## **10. FINAL PROVISIONS**

**10.1.** Aru Grupp AS has the right to one-sidedly change the Terms and Conditions, informing the Data subject of the change in at least 30 days on the Aru Grupp AS website <https://www.arugrupp.ee/documents>, except if the Terms and Conditions are changed only for the purpose of changes in the requirements set out in relevant legislations.