

# PRIVACY POLICY

OÜ “KVN Systems” VERSION 10/2025

## THE SCOPE OF THE PRIVACY POLICY

The Privacy Policy (hereinafter – the Policy) sets out information on how OÜ “KVN Systems” (hereinafter – the Controller) processes personal data when the data subject cooperates with the Controller, communicates through contact information (email, phone) or social networks, or visits the website [www.kvnsystems.com](http://www.kvnsystems.com).

The Policy concerns any information enabling the identification directly or indirectly, communication or allowing location of a natural person (personal data).

Processing of personal data is carried out in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR), Estonian national regulations and this Policy.

If the Policy is updated, the updated version will be published on KVN Systems website [www.kvnsystems.com](http://www.kvnsystems.com).

## DATA CONTROLLER

OÜ “KVN Systems”

Reg. No.: 12010009

Address: Tartu mnt. 6, 10145 Tallinn, Estonia

E-mail: [info@kvnsystems.com](mailto:info@kvnsystems.com)

Telephone: +371 25 228 899

Website: [www.kvnsystems.com](http://www.kvnsystems.com)

## THE LEGAL BASIS OF PERSONAL DATA PROCESSING, ITS PURPOSES, CATEGORIES OF PERSONAL DATA

Legal basis for processing of personal data are:

- performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) of GDPR);
- compliance with a legal obligation to which the controller is subject (Article 6(1)(c) of GDPR);
- legitimate interests pursued by the controller or by a third party (Article 6(1)(f) of GDPR);
- data subject's given consent to the processing of his or her personal data for one or more specific purposes (Article 6(1)(a) of GDPR).

Purposes of processing include contract performance, communication, accounting, IT security, event organization, marketing, and website analytics via cookies.

## **CATEGORIES OF PERSONAL DATA**

Depending on the purpose, the Controller may process: name, surname, position, company, contact details, communication content, billing information, photos or videos from events, and website usage data (e.g. IP address, browser type, access times).

## **WHAT IS THE TERM FOR PERSONAL DATA PROCESSING?**

Personal data are stored only as long as necessary for the purposes for which they were collected or as required by law. Contractual and accounting data – up to 10 years; AML/sanctions risk data – up to 8 years after relationship ends; marketing/event data – up to 5 years; website analytics – per cookie lifetime.

Upon expiry of retention period, personal data are permanently deleted or anonymized.

## **WHO CAN ACCESS PERSONAL DATA?**

Recipients of personal data may include service providers (IT, accounting, legal, hosting, marketing), financial institutions, public authorities, partners, or contractors. If data are transferred outside the EEA, appropriate safeguards such as Standard Contractual Clauses will be applied.

## **RIGHTS OF THE DATA SUBJECT**

Data subjects have the right to access, rectify, delete (“be forgotten”), restrict, or object to processing; withdraw consent at any time; and file complaints to the Estonian Data Protection Inspectorate.

Requests to exercise these rights may be sent to [info@kvnsystems.com](mailto:info@kvnsystems.com).

## **HOW ARE THE PERSONAL DATA PROTECTED?**

KVN Systems ensures appropriate technical and organizational security measures to protect personal data against unauthorized access, alteration, disclosure or destruction. Measures include encryption, access control, backups, and secure storage. In case of a personal data breach posing high risk, affected individuals will be notified.

Version valid since 10.10.2025, approved by management of OÜ “KVN Systems”.