

June 1, 2023

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# Privacy Policy

Last updated: June 1, 2023

ICD SERVICES ("Company", "us", "we", or "our") operates <https://icdservices.com> and <https://logiteasy.com> (the "Sites"). This page informs you of our policies regarding the collection, use and disclosure of Personal Information we receive from users of our web pages and portals (the Sites), employees and service providers.

We use your Personal Information only for providing our services and improving the Sites and services. By using the Sites, you agree to the collection and use of information in accordance with this policy.

## Information Collection and Use

While using our Sites, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to your name, email address, mailing address, phone number, office location ("Personal Information"). You may provide us with personal information in various ways on this web page and social media accounts owned by Company.

The mandatory fields of the data provided (in order to be able to complete user registration and to provide them with our services) are indicated at the time of collection by an asterisk. In addition, certain data is collected automatically (see the paragraph - Cookies).

## Storage period

As long as your user account is active or we are providing services according to your request. We will not delete or de-identify your personal data once the contract period has ended, you can delete your account and your personal data anytime you no longer need our services.

The time limits for the storage of employee or cooperation partners personal data (documents containing it) are specified in the regulatory enactments of Republic of Latvia.

We always try to process your personal data in the EU/EEA. Your personal data is not sent or processed in a country outside the EU/EEA. The only exception is your payment administration, if you have requested paying our services via electronic wire transfer to ICD's bank account in USA. Then your payment and personal data will be processed in USA. Your credit card will be billed through an intermediary provider we are partnering, such as Stripe.

The Sites are hosted in the server virtualization data center of cooperation partner DigitalOcean (<https://www.digitalocean.com/>), physical address: 101 6th Ave, New York, NY 10013, United States

June 1, 2023

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For security reasons, data backup copies are made for the Sites, which are stored in the data center of the cooperation partner DigitalOcean (<https://www.digitalocean.com/>), physical address: 101 6th Ave, New York, NY 10013, United States

If you are employee or natural person working on the basis of company agreement, ICD will collect, hold, share or otherwise process the following information:

- Personal information; such as name, address, phone number, personal email address, Personal Code;
- Contractual information; such as start dates, hours worked, position/title, roles and remuneration information, banking information;
- Work absence information; such as number of absences and reasons;
- Qualifications/training courses attended;
- Other information such as paid taxes and all information included in these necessary to administer them, time and attendance records, information in applications made for other posts

#### **Legal basis of data processing**

- Performance of the contract and providing our services (Article 6, part 1, (b) of GDPR)
- Personal data is processed for creation of your user account and the performance of the contract concluded. The prerequisite for the use of the services is the processing of user identification data. Personal data are necessary for the performance of a contract of employment or service agreement; for taking measures prior to entering into a contract.
- Legal obligation (Article 6, part 1, (c) of GDPR) regarding the criminal convictions and offences is processed for compliance with a legal obligation. We will process your personal data if such information is requested by government institutions for compliance with tax purposes or other obligatory requests from Law enforcement agencies, state and municipal authorities.
- Legitimate interest (Article 6, part 1, (f) of GDPR). Personal data may be processed on the ground of legitimate interest, including for the purpose of for improving the Sites and services, investigating and detecting fraudulent payments.

#### **Communication**

We may use your Personal Information to contact you with newsletters, marketing or promotional materials and other information. You will be asked to choose whether you want to receive the respective information, when you register your user account (opt- in) or You can change your preferences in your profile under Profile & Preferences. Users can unsubscribe from ICD SERVICES and LOGitEASY newsletters or marketing emails by following the unsubscribe links in each of these emails.

#### **User Rights**

Data protection legislation gives you a number of rights regarding the processing of your personal data.

June 1, 2023

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- **Access to personal data**  
You have the right to request confirmation from us as to whether we are processing personal data relating to you and, in such cases, to request access to the personal data we are processing about you.
- **Correction of personal data**  
If you believe that information about you is incorrect or incomplete, you have the right to ask us to correct it.
- **Withdrawal of consent**  
Where the legal basis for the processing is consent, users have a right to withdraw their consent to the processing of personal data at any time.
- **Objection to processing on the basis of legitimate interests**  
You have the right to object to the processing of personal data that we process on the basis of our legitimate interests, however, we will continue to process your data even if you have objected, if we have compelling reasons to continue processing the data . To exercise the above rights, please submit a written request to us.
- **Deletion**  
Under certain circumstances, you have the right to ask us to delete your personal data, however, this does not apply to cases where the law requires us to retain data. To exercise the above rights, please submit a written request to us.
- **Processing restriction**  
In certain circumstances, you have the right to restrict the processing of your personal data. To exercise the above rights, please submit a written request to us.
- **Data portability**  
You have the right to receive or transfer your personal data to another data controller ("data portability"). This right only includes data that you have provided to us based on your consent or contract and where the processing is automated. To exercise the above rights, please submit a written request to us or our data protection officer.

The Users may exercise their rights by sending an email to [info@icdservices.com](mailto:info@icdservices.com). These requests will be processed within 30 days.

Users may also at any time modify their personal data by logging in to <https://ws.icdservices.com> or <https://logiteasy.com/workspace> and clicking on "profile & preferences".

### **Cookies and Log Data**

Like many site operators, we collect information that your browser sends whenever you visit our Sites ("Log Data").

This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, pages of our Sites that you visit, the time and date of your visit, the time spent on those pages and other statistics.

June 1, 2023

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In addition, we may use third party services such as Google Analytics that collect, monitor and analyze this data.

What is a cookie?

A cookie is a small text file that is sent to your computer or mobile device when you visit a website and that the website stores on your computer or mobile device when you access the website. On each subsequent visit, cookies are sent back to the originating website or to another website that recognizes the cookie. Cookies act as a memory for a specific website, allowing this page to remember your computer on subsequent visits, including cookies can remember your settings or improve user comfort. Cookies are sent to your browser from a Sites and stored on your computer's hard drive.

Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Sites.

We use information we collect on web page in a variety of ways in providing services and operating our business, in a way as - to improve services, to analyze the usage trend and preferred features of services as well as to contact you for important notifications.

### **Disclosing Information**

Except as described in this Policy, we will not disclose your information that we collect on this web page and services to third parties without your consent. We may disclose information to third parties to ensure the performance of the contract and provide our services; if such information is requested by government institutions for compliance with tax purposes or other obligatory requests from Law enforcement agencies, state and municipal authorities; on the basis of our legitimate interest as defined and provided in this Policy.

Following examples are given to describe circumstances of possible disclosure of your data:

- Any information that you voluntarily choose to include in a publicly accessible area of web page and services, such as a public profile page, will be available to anyone who has access to that content, including other users.
- We work with third party service providers to provide website, application development, hosting, exchange, marketing, maintenance, payment processing, and other services for us. These third parties may have access to or process your information as part of providing these services for us. Generally, we limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions.
- We may make certain automatically-collected, aggregated, or otherwise non-personally-identifiable information available to third parties for various purposes, including:
  - compliance with various reporting obligations;
  - for business or marketing purposes, or

June 1, 2023

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- to assist such parties in understanding our users' interests, habits, and usage patterns for certain programs, content, Service, advertisements, promotions, and/or functionality available through web page and services.
- We reserve the right to disclose your information that we believe, in good faith, is appropriate or necessary to:
  - take precautions against liability,
  - protect ourselves or others from fraudulent, abusive, or unlawful uses or activity,
  - investigate and defend ourselves against any third-party claims or allegations,
  - protect the security or integrity of the web page, services and any facilities or equipment used to make the services available, or
  - protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights, property, or safety of others.
- Information about our users, including personal information, may be disclosed and otherwise transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.
- In order to fulfill our legal obligation, we may transfer your personal data to law enforcement authorities, as well as state and local government authorities at their request. We may also transfer your personal data to law enforcement authorities, as well as state and local government authorities, in order to defend our legal interests by drafting, submitting and defending legal claims.

### **Third-Party Services**

Sites and services may contain features or links to websites and services provided by third parties. Any information you provide on third-party websites or services is provided directly to the operators of such service and is subject to those operator policies, if any, governing privacy and security, even if accessed through services. We are not responsible for the content or privacy and security practices and policies of third-party websites or services to which links or access are provided through the services. We encourage you to learn about third party privacy and security policies before providing them with information.

### **Security**

Security of your Personal Information is important to us but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

We use certain physical, managerial, and technical safeguards that are designed to improve the integrity and security of personal information that we collect and maintain. We cannot, however, ensure or warrant the security of any information you transmit to us or store on the

June 1, 2023

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services, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

If we learn of a security systems breach, we may attempt to notify you electronically so that you can take appropriate protective steps. We may post a notice on our web page if a security breach occurs. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. To receive a free written notice of a security breach you should notify us at [info@icdservices.com](mailto:info@icdservices.com).

### **Privacy Settings**

We are not responsible for circumvention of any privacy settings or security measures on services. Additionally, we cannot control the actions of other users with whom you may choose to share your information. Further, even after information posted on services is removed, caching and archiving services may have saved that information, and other users or third parties may have copied or stored the information available on services. We cannot and do not guarantee that information you post on or transmit to the services will not be viewed by unauthorized persons.

### **Changes To This Privacy Policy**

This Privacy Policy is effective as of June 1<sup>st</sup>, 2023 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

### **Contact Us**

If you have any questions about this Privacy Policy, our use and disclosure practices, your consent choices, or you want to contact our data protection officer, please contact us at [info@icdservices.com](mailto:info@icdservices.com)

SIA "ICD SERVICES", Dīķu iela 16B, Ikskile, LV-5052, Latvia

If you are not satisfied with the answer you received, you have the right to file a complaint with the Data Inspectorate of Latvia.

June 1, 2023

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**Data Controller:**

Legal name: Sabiedrība ar ierobežotu atbildību "ICD SERVICES"

Legal address: Ogres nov., Ikšķīle, Dīķu street 16B

Registration number in Company register of Latvia: 40003683298

Phone number: +371 29491626; +1 (312) 239-0505

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

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