

PRIVACY POLICY

In this Privacy Policy we explain how we process your personal data when you become a BFFI member, participate in the events organized by us and when you navigate through our website, as well as when you communicate with us by phone, e-mail, social media and otherwise.

This Privacy Policy describes policies and practices regarding our collection and use of Your personal data, as well as sets forth Your privacy rights. We recognise that personal data protection is an ongoing responsibility, and we may from time to time update this Privacy Policy, as we undertake new personal data processing practices.

Please take your time to carefully read this Privacy Policy and, if you have any questions, please feel free to contact us.

1. DEFINITIONS

The following terms are defined as follows in this Privacy Policy:

- **We** - Association "Baltic Family Firm Institute", address: Strēlnieku iela 4a, Rīga, LV-1010, Latvia, Reg. No. 40008318130.
- **You** – our members, consultants, event visitors and speakers, as well as the visitors of our Website.
- **Website** - the website accessible at <https://bffi.global>.
- **BFFI Membership Program** - platform for family firms providing professional support, advocacy and access to the relevant knowledge and expertise to enhance family firm multi-generational prosperity and financial stability.

II. ON WHAT LEGAL GROUNDS DO WE PROCESS YOUR PERSONAL DATA?

We process your data specified in this Privacy Policy on these legal grounds:

- for conclusion, performance, amendment and administration of an agreement (Article 6(1)(b) of the GDPR);
- for fulfilment of legal obligations and requirements of legal acts applicable to us (Article 6(1)(c) of the GDPR);
- for pursuing our legitimate interests and those of third parties (Article 6(1)(f) of the GDPR);
- for acting in accordance with your consent (Article 6(1)(a) of the GDPR).

In the scope and under the conditions set by applicable legislation, one or several of the above-mentioned legal grounds may apply to processing of the same of your personal data.

III. WHAT PERSONAL DATA DO WE COLLECT AND FOR WHAT PURPOSES DO WE USE THEM?

3.1. Providing and managing the BFFI Membership Program

In order for us to grant you a BFFI Membership upon your request, as well as to manage the BFFI Membership Program, we obtain and process certain information about you.

Providing and managing the BFFI Membership Program

Data categories	<p>During your participation in the Membership Program, you provide us with and we process the following personal data:</p> <ul style="list-style-type: none"> • First name, surname; • Contact information (e-mail); • Company name; • Membership fee payment data (name, surname, amount, date and time); • Membership category; • Other information related to your participation in the Membership Program.
Legal grounds for data processing	<p>Taking steps at your request prior to entering into a contract and fulfilling contractual obligations (Article 6(1)(b) of the GDPR).</p> <p>Legal obligations and requirements of legal acts (Article 6(1)(c) of the GDPR) in the following areas:</p> <ul style="list-style-type: none"> • Accounting.
Duration of data processing	<p>We retain your personal data throughout the course of your participation in the Membership Program and for a maximum period of 5 years after its expiry.</p> <p>Chapter VI of the Privacy Policy lists cases and conditions where personal data of yours can be stored or otherwise processed for a longer period of time.</p>

3.2. Direct marketing, marketing

3.2.1. BFFI newsletter

When you give us your consent by signing up, we process your personal data for the purpose of providing our news and information about our activities, as well our offers, by sending you an e-mail newsletter.

BFFI newsletter	
Data categories	<p>In order to provide you with relevant notifications, offers and information, we process the following data:</p> <ul style="list-style-type: none"> • First name, surname; • Contact information (e-mail).
Legal grounds for data processing	<p>Your consent (Article 6(1)(a) of the GDPR) to receive our news and information, also, as much as applicable, consents presented by you before the effective date of this Privacy Policy to receive direct marketing notifications.</p> <p>Our legitimate interest (Article 6(1)(f) of the GDPR)</p> <ul style="list-style-type: none"> • to send you our news and information.

Duration of data processing	We will process your personal data throughout the validity of your consent.
	Chapter VI of the Privacy Policy lists cases and conditions when these personal data of yours can be stored or otherwise processed for a longer period of time .

3.2.2. Marketing on social media

We administer our profiles and Accounts on social networks:

<https://www.facebook.com/profile.php?id=100086962282467>

<https://www.linkedin.com/company/baltic-family-firm-institute>

<https://twitter.com/BalticFFI>

If you are interested in our activities and news and follow our profiles on social media, we collect and process the data we obtain directly from your social media account, so that we can manage our social media accounts.

Marketing in social media	
Data categories	Name, surname, country, photograph, information about communication in the Account ("like", "follow", "comment", "share", etc.), notifications sent, information on notifications (message receipt time, message content, message attachments, correspondence history, etc.), comments, reactions to published entries, sharing, information on participation in events and/or games organized by us.
Legal grounds for data processing	Your consent (Article 6(1)(a) of the GDPR). Our legitimate interest to manage our social media profiles (Article 6(1)(f) of the GDPR), Facebook Insights, etc.
Duration of data processing	During the period of consent validity. Personal data used for this purpose shall be stored as long as you are registered on a specific social network.
	Chapter VI of the Privacy Policy lists cases and conditions when these personal data of yours can be stored or otherwise processed for a longer period of time .

3.4. Operation and security of the Website and our internal systems

We process your personal data to protect the Website, information systems and data from unauthorized modifications, cyber-attacks, unauthorized access and other related risks, ensure the operation, integrity, security of the information systems.

Operation and security of the Website and our internal systems	
Data categories	Data about the device operating system, entry, use, data or other activities in the Account, log entries, changes and their history, settings, other system parameters.

<p>Legal grounds for data processing</p>	<p>Legitimate interest pursued by us or by third party (Article 6(1)(f) of the GDPR):</p> <ul style="list-style-type: none"> • to ensure security, resilience, recoverability, traceability, integrity, functioning of actions, operation of the Website and our information systems; • to ensure uninterrupted provision of our Services, their support and improvement. <p>Legal obligations and requirements of legal acts (Article 6(1)(c) of the GDPR) in the following areas:</p> <ul style="list-style-type: none"> • personal data protection; • information security; • other areas relevant for us.
<p>Duration of data processing</p>	<p>Logs and related entries – up to 24 months.</p> <hr/> <p>Chapter VI of the Privacy Policy lists cases and conditions when these personal data of yours can be stored or otherwise processed for a longer period of time.</p>

3.5. Administration of damages

We process your personal data in order to defend our legitimate interests, protect our property and interests and those of our members and other persons, collect evidence of violations and prevent the abuse of our interests, those of our members and other persons, the Website, our services, also to administer, manage and recover damages inflicted on us and our property.

<p>Administration of damages</p>	
<p>Data categories</p>	<ul style="list-style-type: none"> • Information on the damages inflicted, including the debt amount, date, history, other related information; • All other relevant personal data specified in this Privacy Policy.
<p>Legal grounds for data processing</p>	<p>Our legitimate interest (Article 6(1)(f) of the GDPR):</p> <ul style="list-style-type: none"> • to ensure protection of our property, property interests and those of our members, other persons; • to administer, manage and recover any damages inflicted on us and our property; • to ensure pursuance of our rights and legitimate interests.
<p>Duration of data processing</p>	<p>We retain your personal data throughout the course of your participation in the Membership Program and for a maximum period of 5 years after its expiry.</p> <hr/> <p>Chapter VI of the Privacy Policy lists cases and conditions when these personal data of yours can be stored or otherwise processed for a longer period of time.</p>

3.6. Website administration, support, improvement

When you visit and browse our Website, for the purpose of collecting statistical data and improving the quality of Services and visitor experience, we process personal data listed below.

Website administration, support, improvement	
Data categories	IP address, MAC address, date of visit, duration of visit, pages visited, devices used for web browsing, etc.
Legal grounds for data processing	Your consent (Article 6(1)(a) of the GDPR). Our legitimate interest to analyse data in order to administer, improve the Website operation, improve our activities and create value both for you as a customer and for our business (Article 6(1)(f) of the GDPR).
Duration of data processing	Please refer to the Cookie Policy.

Cookies are used on the Website. More information on cookies used on the Website can be found in our Cookie Policy.

3.7. Providing consultations, answering inquiries, requests, complaints

If you contact us by e-mail, phone or book a consultation with one of our pro-bono consultants, we will store the fact of you contacting us and the information provided, including personal data, so that we can properly examine your request and/or respond to your question, request or complaint.

Providing consultations, answering inquiries, requests, complaints	
Data categories	Information pertaining to your consultation, request, complaint or inquiry, including, but not limited to, first name, surname, technical details of the booked consultation (date, duration, etc.), complaint, request, inquiry, description of the circumstances of the consultation, complaint or another inquiry, documents supporting the consultation, complaint, request, inquiry, other information provided to us.
Legal grounds for data processing	Your consent (Article 6(1)(a) of the GDPR). Conclusion, performance, amendment and administration of the agreement (Article 6(1)(b) of the GDPR). Our legitimate interest and that of third parties (Article 6(1)(f) of the GDPR).
Duration of data processing	We retain your personal data throughout the course of your participation in the Membership Program and for a maximum period of 5 years after its expiry. Chapter VI of the Privacy Policy lists cases and conditions when these personal data of yours can be stored or otherwise processed for a longer period of time .

3.8. Conducting research projects on family firms and maintaining a family firm database

We process your personal data to carry out various research projects in the field of family firms and to create and maintain a comprehensive family firm database in the Baltics.

Conducting research projects on family firms and maintaining a family firm database	
Data categories	<p>During your participation in the Membership Program, you provide us with and we process the following personal data:</p> <ul style="list-style-type: none">• First name, surname;• Contact information (e-mail);• Company name;•
Legal grounds for data processing	<p>Your consent (Article 6(1)(a) of the GDPR).</p> <p>Our legitimate interest (Article 6(1)(f) of the GDPR).</p>
Duration of data processing	<p>We retain your personal data throughout the course of your participation in the Membership Program and for a maximum period of 5 years after its expiry.</p> <p>Chapter VI of the Privacy Policy lists cases and conditions when these personal data of yours can be stored or otherwise processed for a longer period of time.</p>

3.9. Organising events

We process your personal data to organise various events, networking events, conferences and presentations.

Organising events	
Data categories	<p>For the purposes of organising the BFFI events, you provide and we process the following personal data:</p> <ul style="list-style-type: none">• First name, surname;• Contact information (e-mail);• Company/organisation name;• Pictures/videos from the event;• Information related to your speech/presentation if you are attending our event in the capacity of a speaker.

Legal grounds for data processing	Taking steps at your request prior to entering into a contract and fulfilling contractual obligations (Article 6(1)(b) of the GDPR). Our legitimate interest (Article 6(1)(f) of the GDPR).
Duration of data processing	We retain your personal data throughout the course of your participation in the Membership Program and for a maximum period of 5 years after its expiry. Chapter VI of the Privacy Policy lists cases and conditions when these personal data of yours can be stored or otherwise processed for a longer period of time .

IV. FROM WHAT SOURCES DO WE OBTAIN YOUR DATA?

We receive almost all your personal data from you when you apply for our Membership and participate in our events as a visitor or as a speaker.

Our Consultants

We obtain certain personal data about you from our Consultants. This includes general information about the Consultant's services provided to you as Member, without identifying the content of the consultation. If there are any complaints or inquiries, we and the relevant Consultant will also exchange information about the complaint or inquiry to ensure it is appropriately investigated and dealt with.

Third party service providers

We may also rely on use third party service provider to obtain your personal data, such as payment service providers, when you choose to pay for your Membership by using your payment instrument. We will receive information regarding the payment, such as payer and payment status.

From your use of the Website

We also collect data about you based on your actions, for example, we collect data about how and when you use our Website. This can include information such as mouse clicks/taps, mouse movements, page scrolling and text entered into forms which we collect through software which monitors how customer uses or Website. This helps us to monitor the service we provide to you, to design improvements to our products and services (including changes to our Platform).

V. DO WE SHARE YOUR DATA WITH OTHERS?

Consultants

Throughout the course of your Membership, when it is relevant, we may share information with our Consultants. Please be informed that the particular Consultants with whom we will share your personal data will depend on your particular needs and requests and we will not share your personal data with Consultants without obtaining your authorisation.

Service providers

In order to carry out our day-to day activities and to organize events and conferences, we rely on various service providers (e.g. payment service providers, providers of server hosting, event organisers, data centres, audit, accounting, legal, tax advisory services, administration of damages, analytics, direct marketing, e-mail, and other services).

Our data processors we use are located in the Member States of the European Union or store data entrusted to them by us in the European Union.

However, when we manage our social media Accounts, we receive and provide data to social network platform operators (e.g. LinkedIn, Facebook), which also operate outside the European Union, e.g. in the USA. We closely follow practices of data protection supervisory authorities and the guidelines on the transfer of data outside the European Union, and we diligently consider conditions, under which data are transferred and may be subsequently processed and stored after the transfer outside the European Union. To ensure an adequate level of security of data and to guarantee legitimate transfer of data, we conclude Standard Contractual Clauses approved by the European Commission for data transfer outside the European Economic Area (EEA) or follow other grounds and conditions set out in the GDPR.

Third parties

If necessary and legally justified, we also provide your data to separate data controllers, namely to the competent authorities, institutions, organisations, also other data controllers who are entitled to receive information in line with the applicable legislation and/or our legitimate interests, or based on your consent. Please see below a non-exhaustive list of examples of such situations:

- family firm associations in other regions during the course of cooperation;
- we have the right and the obligation to transfer information to the competent authorities (pre-trial investigation bodies, etc.) for the purposes of crime prevention and investigation.

VI. HOW LONG DO WE STORE YOUR PERSONAL DATA?

Personal data specified in this Privacy Policy shall be stored and otherwise processed for no longer than the period specified in Section III of this Privacy Policy for each relevant data category and for no longer than necessary to achieve the purposes for which the data were collected.

In those cases when the data storage period is not indicated in this Privacy Policy, your data will be stored no longer than necessary for achievement of the purposes, for which the data were collected, or for a period set by legal acts.

After the end of your data processing and storage period set in this Privacy Policy, we destroy your data or anonymise them irreversibly and reliably as soon as possible, within a period reasonably necessary for performance of such an action.

If different processing or storage periods can be applied to the same data category for different purposes in accordance with this Privacy Policy, the longest of the applicable periods shall apply.

Your personal data can be stored for a period longer than indicated in this Privacy Policy only when:

- your data is necessary for the proper administration of damages (for example, you have caused damage to us or other persons), examination and settlement of a dispute, complaint, the protection of our legitimate interests or those of third parties;
- that is necessary in order that we could defend ourselves from existing or threatening demands, claims or legal actions and exercise our rights;
- there are reasonable suspicions of violations, illegal activities, which are or may be a subject to investigation;

- this is necessary for ensuring the functioning, resilience, integrity of backup copies, information systems, traceability of operations, statistical and other similar purposes;
- there are other grounds provided for in legal acts.

VII. YOUR RIGHTS

You, as a data subject, have certain rights under the GDPR, including the right:

- to request access to your personal data and get a copy thereof;
- to request rectification or restriction of inaccurate or incomplete personal data;
- to request deletion or restriction of personal data which are excessive or unlawfully processed;
- to object to the processing of your personal data;
- to request transfer of your personal data provided in a structured, machine-readable format;
- to withdraw your consent at any time if data processing is based on the data subject's consent (withdrawal of the data subject's consent shall not affect lawfulness of data processing before the withdrawal of the consent);
- to file a complaint with the State Inspectorate (Datu Valsts Inspekcija) (Elijas iela 17, Latgales priekšpilsēta, Rīga, LV-1050, e-mail: pasts@dvi.gov.lv), however, we would recommend contacting us first and we will try to resolve all your concerns together with you.

How can you contact us to exercise of your rights?

You can submit your request for the exercise of your rights to us by e-mail at bffi@bffi.global signed with qualified e-signature.

7.1. The right to access data processed and the right to obtain a copy of personal data

Should you wish to obtain a copy of your personal data, please contact us.

7.2. Right to rectification of personal data

In case of changes in data presented by you to us (name, e-mail address), or in case you think that the information processed by us about you is inaccurate or incorrect, you have the right to demand to modify, amend or correct such information.

7.3. Right to withdraw the consent

When we process your data on the basis of your consent, you have the right to withdraw your consent at any time and data processing based on your consent will stop.

For instance, you can withdraw your consent to receive offers and information at any time. The withdrawal of these consents will not prevent you from continuing to use our Services and our Partner Services, however, this will mean that we will not be able to give offers that may be useful to you.

you have the right to withdraw consent at any time in the following ways:

- by e-mail: bffi@bffi.global
- by clicking on the link "Unsubscribe from newsletters" in the e-mail at any time.

7.4. Right to object to data processing, when processing is based on legitimate interests

You have the right to object to personal data processing, when personal data is processed based on our legitimate interests. In the event that we send you general offers and information on the basis of our legitimate interest, you have the right to opt out of general offers at any time:

- by e-mail: bffi@bffi.global
- by clicking on the link "Unsubscribe from newsletters" in the e-mail at any time.

7.5. Right to erasure (right to be forgotten)

When there are certain circumstances indicated in the legislation on personal data protection (e.g. when the basis for data processing has disappeared, etc.), you have the right to request that we erase your personal data. In order to exercise this right, please contact us.

If you provide us with the request to erase all or some of your data and express your wish "to be forgotten", we will no longer process those data of yours which will no longer be necessary for the purposes for which they were collected or otherwise processed. After you have exercised the right "to be forgotten", your personal data will be further processed for the following main purposes and on the following main grounds (the list is non-exhaustive):

- for the purposes of meeting accounting, tax requirements, personal data will be further processed according to Article 6(1)(c) of the GDPR (data processing is necessary to fulfil the legal obligation imposed on the data controller);
- in case of disputes, administration of damages, in order to pursue our other legal claims and protect our rights, data will be further processed according to Article 6(1)(f) of the GDPR (data processing is necessary in pursuance of legitimate interests of the data controller or a third party).

7.6. Right to restriction of data processing

When there are certain circumstances indicated in personal data protection legislation (when personal data is processed unlawfully, when you challenge data accuracy, you stated an objection to data processing on the basis of our legitimate interest, etc.), you also have the right to restrict your data processing.

However, we must point out that, because of the restriction of data processing and during the period of such restriction, we may be unable to guarantee you all the Services.

In order to exercise this right, please contact us.

7.7. Right to data portability

In order to exercise this right, please contact.

7.8. Right to lodge a complaint

If you think that we process your data in breach of requirements of personal data protection legal acts, we always ask that you contact us directly at first. We believe that our good will efforts will be enough to disperse any doubts you may have, to answer your questions, to satisfy requests and correct any errors we made, if any.

If you are not satisfied with a problem solution we suggest or if, in your opinion, we are not taking actions that must be taken in order to satisfy your request, you will have the right to

lodge a complaint with the Data State Inspectorate (*Datu Valsts inspekcija*) (Elijas iela 17, Latgales priekšpilsēta, Rīga, LV-1050, e-mail: pasts@dvi.gov.lv).

VIII. HOW DO WE ENSURE THE SECURITY OF YOUR PERSONAL DATA?

We use appropriate organisational and technical personal data security measures, including protection against unauthorized or unlawful processing of data and against accidental loss, destruction or damage. Such measures have been selected taking into account the risks that may arise for your rights and freedoms as those of a data subject.

We regularly monitor our systems for possible breaches or attacks, but it is not possible to guarantee full security of information transmitted online. With this in mind, you provide us with information by use of the internet connection at your sole discretion and assuming any associated risks.

IX. YOU CAN CONTACT US AS FOLLOWS:

Biedrība "Baltic Family Firm Institute"
Strēlnieku iela 4a, Rīga, LV-1010, Latvia
Reg. Nr. 40008318130
Phone: +371 29959106