

Privacy Policy of AS Tallinna Vesi

AS Tallinna Vesi (ASTV) is committed to providing offering a high-quality service, which is available 24 hours a day and 365 days a year. The number of ASTV’s customers increases consistently. In order to provide the best service to our customers and properly perform all our contractual relationships, we collect and store customer data in line with the principles set out below.

We reserve the right to amend this Privacy Policy document as appropriate, in which case the new Privacy Policy document will replace this document as of the disclosure of the new Privacy Policy document.

I DEFINITIONS

Customer is any natural or legal person, who uses, has used or has expressed willingness to use the services provided by ASTV or who is related to the services in any other way, also the persons, whose personal data ASTV receives in association with the provision of services to a Customer.

Personal data means any information directly or indirectly relating to a Customer, who is a natural person. The groups of personal data processed by ASTV have been set out below.

Processing means any operation performed with personal data (incl. collection, recording, storage, alteration, providing access, retrieval, disclosure by transmission etc.) for the purposes of the General Data Protection Regulation.

General Data Protection Regulation means the regulation (EU) 2016/679, adopted on 27th April 2016 by the European Parliament and the Council of the European Union, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

II GROUPS OF PERSONAL DATA

We may collect customer data from a Customer, upon the use of the services by a Customer and from external sources, e.g. public and private registers and other third parties.

The categories of customer data, mainly collected and processed by ASTV, include but are not limited to:

identification data , e.g. first name, surname, identification code (national identification number), date of birth, identity document (copy of e.g. a passport or an identity card)	contact details , e.g. address, phone number (e.g. desk and cell phone number), e-mail address, language of communication
digital identification data, e.g. social media or Skype name	financial data , e.g. information on arrears, bank account
data relating to a family , e.g. information on associated persons and/or household members	location data (e.g. IP-address, log-in location), internet login details
details of consumption site (place or places, where a Customer uses ASTV’s services)	consumption data (e.g. the average consumption of water in a particular site)
court cases (type)	documents of the exchange of information (type, date)

video-surveillance data , e.g. video recordings made in the customer service front office to safeguard the security	data on reliability and duty of care , e.g. information on payment patterns; on damages caused to ASTV or to a third party
data received and/or created in the course of performing a legal obligation , e.g. data obtained from the requests made by investigating authorities, notary publics, courts and bailiffs	ownership data (we refer to e.g. the address of the consumption site)
audio recordings , such as the recordings of phone calls	information obtained during interactions , e.g. by phone calls between Customers and ASTV or other information collected by e-mail, text messages and other interaction mechanisms, e.g. social media, data associated with a Customer’s visits to ASTV’s website or interaction with ASTV via other channels (e.g. mobile application)
data associated with the Services , e.g. performance or non-performance of contracts, contracts which have been entered into and have expired, submitted applications, requests and complaints	information on habits, preferences and satisfaction

III PRINCIPLES APPLIED IN PROCESSING PERSONAL DATA

- ASTV shall keep the personal data entrusted to it from any unauthorised use. In processing personal data, ASTV shall rely on the General Data Protection Regulation and applicable national legislation.
- Data is collected to an extent that is necessary for performing the contracts concluded and for providing the best possible service to the Customers.
- ASTV shall not process the special categories of personal data (e.g. racial or ethnic origin, political opinions, religious or philosophical beliefs etc.).
- Personal data shall be processed in order to:

conclude contract(s) with a Customer and to perform such contract(s) (e.g. to connect with the public water supply and sewerage services or to use such services);
keep the data up to date and adequate by verifying the accuracy of data and updating it via external and internal sources, which is driven by the performance of a contract or a legal obligation;
protect the interest of a Customer and/or ASTV and to check the quality of services provided by ASTV;
keep records of business communications (e.g. via recorded conversations, logs entered into ASTV’s databases), which is driven by the performance of a contract or negotiations before entry into a contract or performing a legal obligation or is based on a Customer’s consent or driven by ASTV’s legitimate interest in preventing, limiting and inspecting the use or illegal use of ASTV’s services or disruptions in those services, to carry out in-house trainings or to ensure the quality of services;
carry out customer satisfaction surveys, driven by ASTV’s legitimate interest to improve Customers’ experience of using the services;
perform legal duties and establish a person’s identity;
enable and verify the access to digital channels and their operation and misuse, and to ensure data security, enhance the effectiveness of technical systems, IT structure, to adjust the display of service

to the devices and to develop ASTV's interaction channels by testing and improvements, which is driven by ASTV's legitimate interest.

- If a Customer provides ASTV with the information on a third party, the Customer undertakes to notify the third party of the fact that ASTV has received their personal data and to specify the list of such personal data, also provide ASTV with the third party's written consent to allow their personal data to be processed, in the form, which allows establishing the identity of the person who has given the consent, and includes the list the personal data to be processed.
- **ASTV does not create profiles of its Customers or process Personal Data by automated means.**
- ASTV shall keep the personal data revealed to it strictly confidential and uses effective IT security measures to protect the personal data from illegitimate access by third parties.
- ASTV shall not disclose any personal data to third parties, except in case the obligation to disclose the data arises from the law or if the person, to whom the data pertains, has given a permission to disclose the data. Personal data may be disclosed to the authorities (e.g. law enforcement authorities, bailiffs, notary public's offices, tax authorities, supervisory agencies), auditors, solicitors or other processors authorised by ASTV, to the persons associated with the provision of ASTV's services (e.g. providers of archiving and postal services).
- The data of authorised processors shall be communicated to the public. If ASTV has appointed any authorised processors, ASTV shall remain responsible for their activities and the authorised processors shall fully adhere to ASTV's principles of processing personal data. The controller is AS Tallinna Vesi (address at Ädala 10, Tallinn, phone 6262200, e-mail tvesi@tvesi.ee).
- Personal data shall be processed within the borders of the Republic of Estonia.
- ASTV may send its Customers promotional offers regarding its own services or those of its subsidiaries or customer satisfaction questionnaires for improving the quality of service or offers by cooperation partners. Customers have the right to refuse the abovementioned offers or questionnaires any time by informing ASTV thereof, using the contact details provided in this Privacy Policy.

IV DURATION OF PROCESSING AND KEEPING OF PERSONAL DATA

- Personal data shall not be processed longer than necessary. The period of keeping personal data may be based on the contracts with a Customer, ASTV's legitimate interest, consent or applicable law (e.g. accounting laws or laws associated with the period of limitation, other private law).

V RIGHTS OF A CUSTOMER WHO IS A NATURAL PERSON

With regard to the processing of personal data, a Customer who is a natural person has the following rights:

to request the correction of his/her personal data if the data is insufficient, incomplete or incorrect;

to object processing his/her personal data if the use of personal data is based on ASTV's legitimate interest;

to apply for the deletion of his/her personal data, e.g. if he/she has given the consent to process the personal data and has thereafter withdrawn the consent. Such right does not apply if the personal data, which is asked to be deleted, is processed also on other legal grounds, e.g. based on a contract or to perform legal duties **or if it damages the rights of other persons;**

to restrict the processing of his/her personal data in line with the applicable law, for example at the time, when ASTV assesses whether the Customer is entitled to the deletion of his/her data;

to obtain information on whether ASTV processes his/her personal data and if ASTV does, then to gain access to the aforementioned data;

to obtain one's personal data, which has been submitted by oneself and is being processed based on a consent or in order to perform a contract, in writing or in a commonly used electronic format, and if technically feasible, to forward such data to another service provider (data portability);

to obtain confirmation from ASTV, whether his/her personal data is being processed or not;

to withdraw one's consent allowing his/her personal data to be processed;

to lodge complaints to the Estonian Data Protection Inspectorate in relation to the processing of personal data (website: www.aki.ee) if one finds that the processing of his/her personal data infringes his/her rights and interests under the applicable law.

ASTV shall respond to Customers' requests within 30 days at the latest.

VI CONTACT DETAILS

- Customers may contact ASTV, submit inquiries, request their rights to be exercised in processing their personal data and to lodge complaints on the processing of personal data either by phone 6262200 or by e-mail at tvesi@tvesi.ee.
- The contact details of ASTV's Data Protection Specialist are provided on ASTV's website <https://tallinnavesi.ee/kontaktid/>.

VII VISITING ASTV'S WEBSITE – COOKIES

- ASTV's website uses cookies. Cookies are small files that are downloaded to user's device by the website that the user is visiting. The aim of using cookies is to differentiate the user from other persons visiting the website and to improve user experience.
- Cookies allow storing the information about the user's IP, browser type and version, time and duration of visiting ASTV's website, preferences and interests of the user, etc.
- Cookies may be used for identifying the name of a particular user.
- ASTV only uses the first-party cookies, which are divided specifically into technical, analytical and authentication cookies.
- ASTV, who is the processor responsible for personal data, installs first-party cookies and manages the website visited.
- Technical cookies enable the user to navigate the website and use the functions of the website.
- Analytical cookies collect data regarding how the website is used. These cookies do not collect information that would directly enable establishing the user's identify.
- Authentication cookies allow the website to remember the selections made by the user (e.g. name, language or area). If users do not want the browser to save cookies into their computers, they can disable the function – instructions for changing the browser settings are available under "Help" button at the toolbar for most of the browsers. Even though ASTV's website can be visited also by disabling cookies, it may happen that certain services or parts of the site do not work as expected. Disabling cookies restricts the options to use ASTV's website.