



LatteInc OÜ

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Personal Data Processing Policy

1. General Provisions

This personal data processing policy has been prepared in accordance with the Personal Data Protection Act of the Republic of Estonia and defines the procedure for processing personal data and measures to ensure their security, as implemented by LatteInc OÜ (hereinafter – the Operator).

1.1. The Operator's primary goal and condition for conducting its activities is to respect the rights and freedoms of individuals and citizens when processing their personal data, including protecting their right to privacy, personal, and family confidentiality.

1.2. This Operator's personal data processing policy (hereinafter – the Policy) applies to all information that the Operator may collect from visitors to the website <https://latteinc.net/>.

2. Key Terms Used in the Policy

2.1. **Automated processing of personal data** – processing of personal data using computer technology;

2.2. **Blocking of personal data** – temporary suspension of personal data processing (except in cases where processing is necessary for data clarification);

2.3. **Website** – a collection of graphic and informational materials and databases that ensure their availability on the Internet at <https://latteinc.net/>;

2.4. **Personal data information system** – a collection of personal data contained in databases and processed using information technology and technical tools;

2.5. **Anonymization of personal data** – actions that make it impossible to determine the ownership of personal data to a specific User or another data subject without additional information;

2.6. **Processing of personal data** – any action (operation) or set of actions (operations) performed with or without the use of automation tools on personal data, including collection, recording, systematization,

accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), anonymization, blocking, and deletion of personal data;

2.7. **Operator** – a state authority, municipal authority, legal entity, or individual that organizes and/or carries out the processing of personal data independently or jointly with other parties, as well as determines the purposes of personal data processing, the composition of personal data to be processed, and actions (operations) performed with personal data;

2.8. **Personal data** – any information directly or indirectly related to a specific or identifiable User of the website <https://latteinc.net/>;

2.9. **User** – any visitor to the website <https://latteinc.net/>;

2.10. **Provision of personal data** – actions aimed at disclosing personal data to a specific person or group of persons;

2.11. **Distribution of personal data** – any actions aimed at disclosing personal data to an indefinite number of persons (transfer of personal data), making them available in mass media, information and telecommunication networks, or providing access to personal data in any other way;

2.12. **Cross-border transfer of personal data** – the transfer of personal data to a foreign country's territory, to a foreign government authority, foreign individual, or foreign legal entity;

2.13. **Destruction of personal data** – any actions that result in the irreversible deletion of personal data, making it impossible to restore their content and/or destruction of physical storage media containing personal data.

3. The Operator may process the following personal data of the User:

3.1. Email address, IP address, phone numbers, last name, first name, mailing address;

3.2. Additionally, the website collects and processes visitor data (including cookies) using internet analytics services (Google Analytics and others).

3.3. The above-mentioned data are collectively referred to as "Personal Data" in this Policy.

4. Purposes of Personal Data Processing

4.1. The purpose of processing the User's personal data is the conclusion, execution, and termination of civil-law contracts.

4.2. The Operator also has the right to send the User notifications about new products, services, special offers, and events. The User may opt out of receiving such messages at any time by sending an email to the Operator with the note "Unsubscribe from notifications about new products and services and special offers."

4.3. Anonymized User data collected through internet analytics services are used to gather information about User actions on the website to improve the quality and content of the site.

5. Legal Grounds for Personal Data Processing

5.1. The Operator processes personal data only when the User independently fills out and submits them through special forms available on the website <https://latteinc.net/>. By completing these forms and/or submitting their personal data to the Operator, the User agrees to this Policy.

5.2. The Operator processes anonymized data about the User if allowed in the User's browser settings (e.g., if cookies and JavaScript are enabled).

6. Procedure for Collecting, Storing, Transferring, and Other Processing of Personal Data

The security of personal data processed by the Operator is ensured through legal, organizational, and technical measures necessary to fully comply with current legislation on personal data protection.

6.1. The Operator ensures the security of personal data and takes all reasonable measures to prevent unauthorized access to personal data.

6.2. The User's personal data will never be transferred to third parties under any circumstances, except in cases related to compliance with legal requirements.

6.3. If inaccuracies in personal data are detected, the User may update them by sending a notification to the Operator at group@latteinc.xyz with the note "Personal data update."

6.4. The period of personal data processing is unlimited. The User may withdraw their consent to personal data processing at any time by sending an email to the Operator at group@latteinc.xyz with the note "Withdrawal of consent for personal data processing."

7. Cross-Border Transfer of Personal Data

7.1. Before initiating the cross-border transfer of personal data, the Operator must ensure that the foreign country to which the data is being transferred provides reliable protection of data subjects' rights.

7.2. Cross-border transfer of personal data to countries that do not meet the above requirements may only take place if the data subject has given written consent for the transfer or if it is necessary for the performance of a contract in which the data subject is a party.

8. Final Provisions

8.1. The User may obtain any clarification on questions of interest regarding the processing of their personal data by contacting the Operator via email at group@latteinc.xyz.

8.2. Any changes to the personal data processing policy will be reflected in this document. The Policy remains in effect indefinitely until replaced by a new version.

8.3. The current version of the Policy is available online at <https://latteinc.net/policy>.

Kinnitatud LatteInc OÜ juhatuse poolt 11.07.2025.

11. JUULI 2025

LatteInc OÜ

Tallinn linn