**PRIVACY POLICY**

[**INSERT COMPANY NAME**]

# PURPOSE AND SCOPE

[**insert Company name**] (also referred to as “**we**”, “**us**” or “**Company**”), company registration number [...], having its registered office at [...], is committed to protecting and respecting your privacy.

Therefore, in this privacy policy (the “**Policy**”) we explain what kind of personal data we collect and for what purposes, when providing you with our products and/or services (the “**Services**”), when you visit our website, and/or when you otherwise make contact with us.

In any case, all personal data collected by us are processed in accordance with the EU General Data Protection Regulation No. 2016/679 (the “**GDPR**”), Law on the Legal Protection of Personal Data of the Republic of Lithuania and other applicable legal acts.

For any questions regarding this Policy or any requests regarding the processing of your personal data, please contact us at [insert e-mail address].

# **WHAT INFORMATION ABOUT YOU WE COLLECT, FOR WHAT PURPOSES AND ON WHAT LEGAL BASES**

## We have set out below, in a table format, a description of how and why we use your personal data – i.e. we listed the personal data or categories of personal data used for specific purposes and indicated which legal basis we rely on to do so.

| **Purpose[[1]](#footnote-1)** | **Legal basis** | **Personal data** |
| --- | --- | --- |
| To conclude a contract with you, or to take steps at your request prior entering into a contract | * Taking necessary steps before conclusion of a contract and/or conclusion of a contract

[...] | [*example: name, surname, address, telephone, e-mail address* add the types of personal data] |
| To perform a contract concluded with you, including (but not limited to) the provision of Services | * Performance of a contract

[...] | [add the types of personal data] |
| To provide an answer when you contact us via our website or other communication means | * Your consent
 | [add the types of personal data] |
| [...] | * [...]
 | * [...]
 |

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# HOW WE COLLECT YOUR PERSONAL DATA

We collect information you provide directly to us when you[[2]](#footnote-2):

1. fill out any forms on our website, platform and/or mobile application;
2. communicate with our customer support team;
3. contact us with via our website or by using other means of communication (e.g., via our social network accounts);
4. use our Services.

We may also receive your personal data from third parties. In particular:

1. we may receive personal data from a third party which is connected to you or is dealing with us, for example, business partners, sub–contractors, service providers, merchants, etc.;
2. we may collect personal data from banks or other financial institutions in case the personal data is received while executing payment operations;
3. we may receive personal data from other entities that we collaborate with.

# DIRECT MARKETING[[3]](#footnote-3)

In case you are our existing client (i.e. you already use our Services), we may use your e-mail address for direct marketing purposes, but only with regard to products and/or services that are similar or related to the Services, and only if you do not object to such use of your e-mail address. You are also granted with a clear, free of charge and easily realisable possibility to object or withdraw from such use of your contact details.

In other cases, we may use your personal data for the purposes of direct marketing, only if you give us your prior consent regarding such use of the data.

We provide a clear, free of charge and easily realisable possibility not to give your consent or, at any time, to withdraw your consent to receive our marketing communications. We shall state in each communication sent by e-mail that you are entitled to object to such processing of your personal data, and to refuse receiving communications from us. You shall be able to refuse receiving our marketing communications by clicking on the respective link in each marketing e-mail received from us.

# HOW WE SHARE YOUR PERSONAL DATA

We may disclose your personal data to the recipients of the following categories:

1. public authorities, institutions, organisations, courts and other third parties, but only upon request and only when required by applicable laws, or in cases and under procedures provided for by applicable laws, e. g. for the purposes to secure and/or defend Company’s legitimate interests;
2. third parties providing services to the Company including providers of legal, financial, auditing, tax, business management, personnel administration, accounting, advertising (including online advertising), direct marketing, communications, data centers, hosting, cloud and/or other services. In each case, we provide such third parties with only as much data as necessary to provide their services. Service providers engaged by us may process your personal data only in accordance with our instructions and may not use them for other purposes;
3. third parties for the purpose of performance of the contract concluded with you;
4. our affiliate companies – i.e., other companies belonging to the same group[[4]](#footnote-4);
5. third parties, when the Company intends to enter into a business sale transaction and/or to perform legal and/or financial due diligence of the Company prior to such transaction;
6. other persons with your consent.

# INTERNATIONAL DATA TRANSFERS

In case your personal data is transferred outside the European Economic Area (EEA), we will take necessary steps to ensure that your data is treated securely and in accordance with this Policy and we will ensure that it is protected and transferred in a manner consistent with the legal requirements applicable to the personal data. This can be done in a number of different ways, for example:

1. the third country to which we send the personal data, a territory or one or more specified sectors within that third country, or the international organization is approved by the European Commission as having an adequate level of protection;
2. the recipient has signed or contains in its terms of service (service agreement) the standard contractual clauses (SCC) adopted by the European Commission (for more information please see here: <https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en>);
3. special permission has been obtained from a supervisory authority.

We may transfer personal data to a third country by taking other measures if it ensures appropriate safeguards as indicated in the GDPR or on the basis of derogations.

# HOW LONG WE KEEP YOUR PERSONAL DATA

We will keep your personal data for as long as it is needed for the purposes for which your data was collected and processed, but not longer than it is required by the applicable laws and regulations, including for the purposes to comply with any legal, regulatory, tax, accounting or reporting obligations. If the legislation of the Republic of Lithuania does not provide any applicable data retention period, it shall be determined by us, taking into account the legitimate purpose of the data retention, the legal basis and the principles of lawful processing of personal data. Personal data that is important for the contractual relationship between you and Company is normally stored for as long as the contractual relationship lasts and thereafter for a maximum period of 10 years after the relationship.

If you do not enter into a contract with us, the personal data are normally stored for a maximum of [...] months. We may retain your personal data for a longer period when:

1. it is necessary for the Company to be able to defend itself against existing or threatened claims or to exercise its rights, or for the proper resolution of dispute, complaint or claim;
2. there is a suspicion of illegal activity;
3. it is required by applicable laws.

Upon expiration of the retention period, we will delete and/or reliably and irrevocably depersonalize your data as soon as possible, within a reasonable time required to perform such action.

# YOUR RIGHTS

1. **The right to be informed**. You have the right to be provided with a clear, transparent and easily understandable information about how we process your personal data.
2. **The right to access**. You have the right to request from us the copy of your personal data. Where your requests are excessive, in particular if they are a repetitive, we may refuse to act on the request, or charge a reasonable fee taking into account the administrative costs for providing the information.
3. **The right to rectification**. You have the right to request us to correct or update your personal data at any time, in particular if your personal data is incomplete or incorrect.
4. **The right to data portability**. When a legal basis for data processing is consent or contract, you have the right to request that we transfer your data that we have collected to another organization, or directly to you, under certain conditions.
5. **The right to be forgotten**. When there is no good reason for us to process your personal data anymore, you can ask us to delete your data. We will take reasonable steps to respond to your request.
6. **The right to restrict processing**. You have the right to restrict the processing of your personal data in certain situations (e.g., when you want us to investigate whether that data is accurate; we no longer need your personal data, but you want us to continue holding it for you in connection with a legal claim).
7. **The right to object to processing.** Under certain circumstances you have the right to object to certain types of processing (e.g., to receive our marketing communications).
8. **The right to lodge a complaint with a supervisory authority.** You have the right to lodge a complaint with a competent supervisory authority, if you believe that your personal data is processed in a way that violates your rights and legitimate interests stipulated by applicable legislation. Our data processing is supervised by the State Data Protection Inspectorate of the Republic of Lithuania (address: L. Sapiegos St. 17, LT-10312 Vilnius, phone No.: +370 5 271 2804 / 279 1445, e-mail address: ada@ada.lt, for more information, visit <https://vdai.lrv.lt/en/>).
9. **Right to withdraw your consent.** If personal data is processed on the basis of your consent, you can withdraw it at any time. Withdrawal will not affect the lawfulness of processing of your data before the withdrawal.

If you would like to exercise any of these rights, please contact us via e-mail: [...].

Your request shall be fulfilled, or fulfilment of your requests shall be refused by specifying the reasons for such refusal, within 30 (thirty) calendar days from the date of submission of the request that complies with our internal rules and the GDPR. The afore-mentioned term may be extended by 60 (sixty) calendar days taking into account the complexity and number of the requests. The Company will inform you of any such extension within 30 (thirty) calendar days of receipt of the request, together with the reasons for the delay.

We may refuse to satisfy your request if the exceptions and/or limitations to the exercise of data subjects' rights set out in the GDPR apply, and/or if your request is found to be manifestly unfounded or disproportionate. If we refuse to satisfy your request, we will give you our reasons for such refusal in writing.

# HOW WE PROTECT YOUR PERSONAL DATA

Please note that, although no system of technology is completely secure, we have implemented security measures to minimize the risk of unauthorized access to or improper use of your personal information.We and our third-party service providers that may be engaged in the processing of personal data on our behalf (for the purposes indicated above) are contractually obligated to respect the confidentiality of the personal data.

# COOKIE POLICY[[5]](#footnote-5)

If you access our information or Services through our website, you should be aware that we use cookies.

For more information on how to control your cookie settings and related browser settings, or how to delete Cookie from your device, please read the Cookie Policy available on our website[[6]](#footnote-6).

# LINKS TO OTHER WEBSITES

Our website may contain links to other websites which are not operated by the Company. When you decide to click on these links and be led to such websites, we recommend familiarising yourself with their privacy policies or notices, cookie policies and/or other documents. The Company assumes no responsibility for the content, policies or practices of such third-party websites or services.

# CHANGES TO THIS POLICY

We regularly review this Policy and reserve the right to modify it at any time in accordance with applicable laws and regulations. Any changes will take effect immediately upon their publication on our website[[7]](#footnote-7).

Please review this Policy from time to time to stay updated regarding any changes.

# CONTACT US

You may contact us by writing an e-mail to [...] or post by address [...].

# OUR DATA PROTECTION OFFICER (DPO)[[8]](#footnote-8)

You may contact our DPO regarding all issues relating to the Company’s processing of your personal data and the exercise of your data protection rights by sending an e-mail to the address: [...].

1. DRAFTING NOTE: it is an example. The purpose, legal basis, and categories of personal data shall be adopted in accordance with the company’s specifics, considering what kind of personal data is the process, for what purposes, and on what legal basis. [↑](#footnote-ref-1)
2. DRAFTING NOTE: it is an example. If there are more specific cases from how the company may get the personal data, this list shall be amended by adding such sources. [↑](#footnote-ref-2)
3. DRAFTING NOTE: considering if the company has direct marketing. If not, this section shall be deleted. [↑](#footnote-ref-3)
4. DRAFTING NOTE: considering if the company does not belong to a Group companies. If not, this section shall be deleted. [↑](#footnote-ref-4)
5. DRAFTING NOTE: the cookies policy shall be prepared and placed at your website. [↑](#footnote-ref-5)
6. DRAFTING NOTE: add a hyperlink to the website. [↑](#footnote-ref-6)
7. DRAFTING NOTE: add a hyperlink to the website. [↑](#footnote-ref-7)
8. DRAFTING NOTE: considering if the company has DPO. If not, this section shall be deleted. [↑](#footnote-ref-8)