

PRIVACY POLICY

1. WHAT DOES THIS PRIVACY POLICY MEAN?

In this privacy policy (hereinafter referred to as the **Privacy Policy**), we provide you with information about how Panevėžys District Aukštadvario ŽŪB processes your personal data.

2. ABOUT THE PANEVĖŽYS DISTRICT AUKŠTADVARIO ŽŪB

Panevėžys District Aukštadvario ŽŪB (hereinafter referred to as the **Company**), legal entity code 168573274, registered office address Pirties g. 3, Aukštadvaris, Panevėžys district, e-mail address *aukstadvaris@akolagroup.lt*, is a part of the AB Akola Group group of companies and the controller of your personal data.

3. WHAT IS PERSONAL DATA?

Personal data is any information collected by the Company about a natural person which can be used to identify that person. Personal Data includes any information, including a person's name, address, IP address.

4. WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

The Company processes your personal data for the purposes set out below.

4.1. Contract administration

- For the purpose of concluding and executing purchase, sale, service, land lease and other contracts, the Company processes the following personal data: name, surname, date of birth or personal identification number, individual activity certificate number, e-mail address, residential address, telephone number, bank account number, VAT number, land plot: area, location, cadastral address, unique number, amount of the rent; the content of the correspondence, the data of the concluded transactions and their execution. These personal data are processed on the basis of the conclusion and performance of the contract and are kept for 10 years after the expiry of the contract.
- For the purpose of debt management, the Company processes the following personal data: name, surname, address, date of birth, amount and circumstances of arrears. These personal data are processed on the basis of legitimate interest to ensure the performance of contracts and are stored for 10 years after the end of the contract.

4.2. Video surveillance

For the purpose of ensuring the security of persons and property (video surveillance), the Company processes the following personal data: the image and movement of the person entering the field of surveillance of video cameras. This personal data is processed on the basis of a legitimate interest to ensure the security of property and the safety of others and is stored for 14 days after the recording has been made. Data subjects shall be informed of the locations where video surveillance is carried out on the Company's territory by means of warning signs.

4.3. Verification of compliance with international sanctions and restrictive measures

Business partner due diligence requires you to fill in a business partner evaluation questionnaire and a business partner declaration. For this purpose, the Company processes the following personal data: name, surname, position, signature of the person acting on behalf of the business partner, name, surname, date of birth, nationality, residential address, telephone number, e-mail address of the representative of the legal entity, board member: name, surname, nationality, date of birth, shareholder: name, surname, date of birth, size of shares, final beneficiary: name, surname, date of birth, nationality, percentage of ownership, and the personal data contained in the copies of the documents requested. In addition, information on the data subjects included in the scrutiny shall be collected from publicly available sources of information, including but not limited to public registers, public media and other sources.

The personal data is processed on the basis of legitimate interest for the purpose of getting to know our partners and is kept for at least 5 calendar years from the end of the audit.

4.4. Implementing statutory obligations relating to the organisation of activities

In order to ensure the proper implementation of its obligations, the Company processes the following personal data of its members and shareholders, members of the management and control bodies, final beneficiaries and other interested persons: name, surname, personal identification number, place of residence, date of election, copy of the passport of the final beneficiary, information on the participation of the permanent beneficiary and his/her relatives in political activities, date of admission of the person to the membership of the Company, the amount (where the contribution is monetary) and/or value (where the contribution is non-monetary) of the member's share contribution, the date of termination of membership, the date of payment of the person's share contribution, the amount (where the contribution is monetary) and/or value (where the contribution is non-monetary) of the shareholder's share contribution, and the date of the transfer of the member's shareholding, the personal data contained in the decisions, minutes of the members of the Company and powers of attorney.

Personal data is processed in the performance of a legal obligation or in the pursuit of a legitimate interest, and in individual cases personal data is processed on the basis of consent.

Personal data processed for this purpose shall be kept for the period provided for by law.

4.5. Implementing statutory obligations to detect irregularities and ensure sustainability

In order to ensure adequate protection of whistleblowers, prevention of corruption, implementation of equal opportunities, protection of human rights and other sustainability factors, the Company processes the following personal data of the persons concerned: name, surname, telephone number, e-mail address, content of the message or other informative text, evidence of the violation provided by you: video and/or audio recordings, photograph, screenshot, communication, etc. The personal data is processed in order to comply with a legal obligation or legitimate interest.

Personal data processed for this purpose shall be kept for the period provided for by law.

4.6. Staff selection

The Company processes the following personal data when selecting candidates for vacancies: name, surname, education, work experience and other information provided in the CV and cover letter. This personal data is processed for the legitimate interest of the selection of the candidate and on the basis of your consent and is stored for 3 months from the date of recruitment.

If you are not selected for the next stage of the selection process, your CV will be kept only with your individual consent and, in the absence of consent, destroyed within 1 month of the end of the selection process.

5. HOW IS YOUR PERSONAL DATA PROCESSED?

Your personal data will be processed in accordance with the General Data Protection Regulation (hereinafter referred to as **GDPR**), the Law on Legal Protection of Personal Data of the Republic of Lithuania and other legal requirements. Your personal data will be processed responsibly and securely. The Company, both when establishing measures for the processing of personal data and during the processing of the data itself, implements appropriate technical and organisational data protection measures as provided for by the legislation, in order to protect the processed personal data against accidental or unlawful destruction, damage, alteration, loss, disclosure, as well as against any other unauthorised processing. The appropriate measures shall be determined taking into account the risks arising from the processing of personal data.

6. TO WHOM CAN WE DISCLOSE YOUR PERSONAL DATA?

We may disclose information about you to our employees, agents, service providers such as debt management or collection companies, archiving service providers, marketing services, IT service providers or sub-contractors as reasonably necessary for those purposes as set out in this Privacy Policy.

We may also transfer your data within the AB Akola Group group of companies on the basis of a legitimate interest in internal administration or on the basis of your individual consent. The companies of the group and the current organisational structure of the group can be found at <https://www.akolagroup.lt/en/group-structure/>

We may disclose your personal data to personal data processors who provide us with services (perform work), i.e. IT service providers, auditors, lawyers, consultants, and process your data on behalf of the Company as a data controller.

Processors have the right to process personal data only on our instructions and only to the extent and to the extent necessary. When we use data processors, we take all necessary measures to ensure that our data processors also have appropriate organisational and technical measures in place to ensure the security of personal data and to maintain the confidentiality of personal data.

Your data may be communicated to public bodies and institutions and to other persons exercising functions assigned to them by law.

In addition, we may disclose information about you:

- if we have to do it by law;
- to assert our rights or interests (including the provision of your personal data to third parties for the purpose of collecting debts owed to us);
- in the context of the intended transfer of the Company's business or part of its assets or the reorganisation of the Company, or in the course of these processes, disclosing your personal data to the (potential) acquirer of the business or part of the business or part of the business or to the other participants in the reorganisation.

7. WHAT ARE YOUR RIGHTS?

Below you can find information about your rights in relation to the Company's processing of your personal data and when you can exercise these rights. If you would like more information about your rights or to exercise them, please contact us at the email address set out in this Privacy Policy.

7.1. Right of access to your personal data

We want you to fully understand how we use your personal data so that you do not experience any inconvenience. You can contact us at any time to enquire whether we are processing any of your personal data. If we store or use your personal data in any way, you have the right to access it. To do so, please submit a written request to us at the email address set out in this Privacy Policy. We may ask you to confirm your identity in order to fulfil your request. Please observe the principles of fairness and reasonableness when making such a request.

7.2. Right to withdraw consent

If you have given us your explicit consent to the processing of your data, you may withdraw it at any time by contacting us at the email address specified in this Privacy Policy.

7.3. Right to request more information

We hope that you will understand that it is very difficult to discuss all possible ways of collecting and using personal data. We endeavour to provide as clear and comprehensive information as possible and we undertake to update this Privacy Policy as and when our use of personal data changes. However, if you have any questions about our use of your personal data, we will be happy to answer them or provide you with any additional information we may disclose. If you have any specific questions or do not understand the information provided, please contact us.

7.4. Additional rights

Below you will find information about additional rights that you may have, which you can exercise by following the procedures described below.

- You have the right to ask us to correct any inaccuracies in the data we hold. In this case, we may ask you to confirm the corrected information.
- You have the right to ask us to delete your personal data. This right shall be exercised in the cases provided for in Article 17 of the GDPR.
- You have the right to ask us to restrict or not process your personal data.
- You have the right to the transfer of data processed by automated means which we have received from you with your consent or for the purpose of concluding a contract. If you exercise this right, we will transfer a copy of the data you have provided to us upon your request.
- You have the right to object to our use of your personal data in accordance with Article 21 of the GDPR.

8. HOW CAN YOU EXERCISE YOUR RIGHTS?

To exercise your rights, please submit requests, complaints or claims to us in writing:

- email dap@akolagroup.lt;
- by post to Pirties g. 3, LT-38255 Aukštadvaris, Panevėžio r. Lithuania;
- by arriving at Pirties g. 3, Aukštadvaris, Panevėžio r., Lithuania.

We will respond in writing to any requests, complaints or demands we receive in accordance with the procedures and deadlines set out in the law. We will endeavour to provide you with the information as soon as possible, but no later than 30 days after receiving your request.

If you contact us, we may process the data you provide to us, i.e. name, surname, email address, telephone number, date and text of the correspondence in accordance with the procedures set out in this Privacy Policy. Please note that we may need to contact you by post, email or telephone. Please notify us of any changes to your personal data.

If, following a request, complaint or demand, we have any suspicions about the identity of the person making the request, we have the right to ask for the identity document of the person making the request.

If we fail to provide you with the necessary information and/or should you have complaints about how your personal data are processed, you may approach your national Data Protection Authority or Lithuanian State Data Protection Inspectorate (www.vdai.lrv.lt) by filing a complaint.

9. RESPONSIBILITY

You are responsible for ensuring that the data you provide to us is accurate, correct and complete. If the data you have provided us with changes, you must inform us immediately by email. In no event shall we be liable for any damage caused to you as a result of you providing incorrect or incomplete personal data or failing to inform us of any changes to it.

10. CHANGES TO THE PRIVACY POLICY

The Company may update or change this Privacy Policy at any time. Such updated or amended Privacy Policy will be effective upon posting on the website <https://www.akolagroup.lt/> You should check it from time to time to ensure that you are satisfied with the current version of the Privacy Policy.

When we update our Privacy Policy, we will inform you of what we consider to be material changes by posting them on the website. The "Date of Update" below indicates when the Privacy Policy was last updated.

Date of Update: 24/05/2024.