

UAB Klaipėdos terminalo grupė

PRIVACY POLICY

I. GENERAL PROVISIONS

- 1.1. The Privacy Policy (hereinafter referred to as the **Policy**) governs the principles of processing of personal data (hereinafter referred to as the **Data**) provided by you (hereinafter referred to as the **Data**) to the Data Controller UAB Klaipėdos terminalo grupė, located at Minijos g. 180, LT-93269, Klaipėda, Lithuania (hereinafter referred to as the **Company**), in the case when you (hereinafter referred to as the **Person**):
- visit the Company's Website www.ktgrupe.lt (the **Website**), office or social media accounts and
 - perform actions, including but not limited to: using search facilities, reading published information, submitting inquiries (via email, phone, social media, and the Company's Website), providing and receiving any type of information and/or data, and availing services to the Company or purchasing services from the Company (hereinafter collectively referred to as the **Services**).
- 1.2. The Company processes your Data as:
- Data of candidates seeking employment with the Company;
 - Data of representatives of contractual parties;
 - Data of persons contacting the Company with requests, complaints, claims, or inquiries (hereinafter referred to as **Applicants**);
 - Data of visitors using the Company's Website and/or social media accounts.
- 1.3. The Company processes data in accordance with the General Data Protection Regulation (GDPR) (EU) 2016/679, herein referred to as the GDPR, the Republic of Lithuania Law on Personal Data Legal Protection, as well as other legal acts and internal regulations of the Company. The Company implements all necessary technical and organisational security measures to ensure the security of the Data.
- 1.4. If you use the Website and/or Services, this Policy applies to you without exception. The Policy outlines the purposes and methods of data collection, conditions for processing and storage, your rights as a data subject, and other relevant aspects. If you do not agree with this Policy, the Company will not be able to provide you with the Services (on the Website, social media accounts, and/or in the office).
- 1.5. This privacy policy also applies to individuals processing personal data on behalf of the Company and to individuals authorized to process personal data on behalf of the Company.

II. PURPOSES, SCOPE, TIME LIMITS AND GROUNDS FOR DATA PROCESSING

2.1. **Aim: Archiving.**

Scope:

- Data of representatives of the contracting parties: full name, e-mail address, telephone number, signature.
- Data of applicants: Personal information of the contacting individual, including full name, pseudonym, contact details, content of the inquiry, and other data provided when making written inquiries.
- Candidates' data: full name, phone number, email address, education and qualification details, work experience, and other information provided by the candidate at their discretion or with the candidate's consent.

Data storage term:

- Data of Representatives of Contracting Parties are retained during the contract execution and for 10 years after the termination of the contract;

- Data of applicants are retained during the processing of requests, complaints, claims, or inquiries and for 3 years after the completion of the review of the request, complaint, claim, or inquiry ;
- Candidates' Data shall be retained for 1 working day after the end of the selection process for the position for which the Person is a candidate, and, in the case of consent, for the period of time specified in that consent.

Legal basis:

- Data of Representatives of Contracting Parties and Applicants are processed due to the Company's legal obligation to process data;
- Candidates' Data shall be processed with the consent of the individual.

2.2. **Aim: Bookkeeping administration**

Scope:

- Data of representatives of the contracting parties: Full name, phone number, email address, position title, signature.

Retention period – during the contract execution and for 10 years after the termination of the contract.

Legal basis – for the purpose of the Company's performance of contracts; existence of a legal obligation on the part of the Company to process the Data.

2.3. **Staff selection**

Scope:

- Candidates: full name, phone number, email address, education and qualification data, work experience, and other information provided by the candidate at their discretion or with the candidate's consent (content from social media accounts, images, etc.).

Retention period – until the end of the selection process for the position applied for and, with the person's consent – for the duration specified in the consent.

Legal basis – consent of the person.

2.4. **Social network administration** (when you submit reviews, comments, likes, mentions, personal messages and become a follower on the Company's Website and/or social networks (LinkedIn):

Scope: full name, or alias, position title, job and other contact details provided by the person.

Retention period – for the duration of the Company's social media account; internal messaging on social media is retained for 3 years from the date of the last message.

Legal basis – consent of the person.

2.5. **Administration of requests, complaints, inquiries, and other incoming documents**

Scope: Personal information of the contacting individual, including full name, pseudonym, contact details, content of the inquiry, and other data provided when making written inquiries.

Retention period – during the processing of the request, complaint, inquiry, or claim, and 3 years after the date of processing the request, complaint, claim, or inquiry.

Legal basis in accordance with the Company's legal obligation to process data.

2.6. Execution and administration of contracts with counterparties (contracting parties)

Scope: Full name, email address, telephone number, signature of the counterparty's representative.

Retention period – during the validity of contracts and for 10 years after the termination of the contract.

Legal basis – for the Company to fulfil the contracts.

2.7. Communication with third parties using various means (business cards, correspondence, phone calls, etc.).

Scope: Full name, alias, position, phone number, email address, content of communication, and other data provided by the individual.

Retention period:

- Data received via email is retained during the communication and for 3 years after the last received email, then deleted and destroyed within 1 working day after the retention period ends.
- Business cards are destroyed once every three years.
- Data obtained during phone calls is retained until consent is revoked, then deleted within 1 working day after the revocation of consent.

Legal basis – consent of the person.

2.8. Website administration. Cookies are used when browsing the Website <https://seia.lt> on any device. The Company is constantly improving its Website and aims to make its usage as convenient as possible. For this purpose, the Company collects data regarding the most relevant information to you, your frequency of accessing the Website, the browsers and devices you use, the content you predominantly read, your location, and more. This information is gathered using the automated Google Analytics tool. **Details on the data collected can be found by clicking on this link to the Cookie Policy (active link).**

The retention period is specified in the Cookie Policy.

Legal basis:

- The legal basis for using essential cookies is the Company's legitimate interest,
- Other cookies are collected with the consent of the visitor.

2.9. Protection of the Company's rights and interests in legal proceedings

Scope: Personal data of persons involved in the case, including full name, personal code, date of birth (if the personal code is not provided), residential address, bank account number, circumstances of the dispute, signature, representation details.

Retention period during the legal dispute resolution and 1 year after the final legal decision becomes legally effective.

Legal basis – the Company's legitimate interest.

2.10. Direct marketing

Scope: full name, alias, e-mail address, telephone number.

Retention period until the revocation of consent.

Legal basis – consent of the person.

III. PRINCIPLES OF DATA PROCESSING

3.1. When managing data, the Company adheres to the following principles:

- 3.1.1. Data is processed in accordance with the principles of lawfulness, fairness, and transparency;
- 3.1.2. Data are collected for specified, clearly defined and for legitimate purposes, and not further processed in a way incompatible with those purposes (the purpose limitation principle);
- 3.1.3. Are adequate, appropriate data and necessary only for the purposes for which they are processed (the data reduction principle);
- 3.1.4. The processed data is accurate and updated, if necessary (principle of accuracy);
- 3.1.5. Data are stored in such a form that the subjects can be identified for no longer than is strictly necessary for the purposes for which personal data are processed (the principle of limitation of the length of the storage);
- 3.1.6. Data are processed in such a way as to ensure the adequate protection of personal data, including the protection against unauthorised processing or processing of unauthorised data and unintentional loss, destruction or damage by appropriate technical or organisational measures (the principle of integrity and confidentiality).

IV. TO WHOM DO WE DISCLOSE YOUR DATA?

4.1. Without separate consent, the Company may disclose data to:

- 4.1.1. Courts and other law enforcement and dispute resolution institutions when exercising legal powers or at the Company's initiative, declaring, enforcing, or defending legal claims;
- 4.1.2. Legal entities providing transportation services;
- 4.1.3. Legal entities providing grain storage elevator services;
- 4.1.4. State Social Insurance Fund Board;
- 4.1.5. TO: State Tax Inspectorate;
- 4.1.6. Lawyers, notaries, bailiffs, auditors, consultants, financial institutions, information technology service providers, electronic communication service providers, archiving services, and other companies providing services to the Company;
- 4.1.7. Third parties providing accounting, marketing, personnel recruitment, and administration services;
- 4.1.8. Other data processors, as far as it relates to the Company's business activities.

V. INDIVIDUAL RIGHTS

5.1. The person shall be entitled:

- 5.1.1. To familiarize oneself with the data;
- 5.1.2. To request correction of inaccurate, incomplete, or incorrect data;
- 5.1.3. To restrict data processing until the lawfulness of the processing is verified at the request of the data subject;
- 5.1.4. To request the deletion of data;
- 5.1.5. To object to data processing for direct marketing purposes;

- 5.1.6. To request the transfer of data to another Company or to receive data directly in a convenient form (applies to data provided by the data subject and processed by automated means on the basis of consent or on the basis of a request or the conclusion and performance of a contract);
- 5.1.7. To withdraw consent, without affecting the lawfulness of data use prior to consent withdrawal;
- 5.1.8. To file a complaint with the supervisory authority – the State Data Protection Inspectorate.
- 5.2. Any request relating to the processing of Data may be submitted to the Company by e-mail info@seia.lt, by signing the request with an electronic qualified signature, or by visiting the Company's office.
- 5.3. Considering the nature of the request and aiming to ensure the confidentiality of the data processed by the Company, the Company reserves the right to request additional information from the individual submitting the request, necessary to verify the individual's identity, and/or confirm identity in a specific manner (for example, by personally visiting the office and providing a valid identity document). If the person fails to fulfil such a request, the requested information may not be provided.
- 5.4. The Company undertakes to respond to all requests related to data processing in accordance with the procedures established by the General Data Protection Regulation (GDPR).
- 5.5. Any person has the right to lodge a complaint with the State Data Protection Inspectorate at any time regarding the processing of their data by the Company. (A. Juozapavičiaus g. 6, 09310 Vilnius, tel. 8 5 2712804, fax 8 5 2619494, e-mail ada@ada.lt, www.ada.lt).

VI. COMPANY CONTACT INFORMATION

UAB Klaipėdos terminalo grupė
Code of legal entity 140725121
Registered headquarters address: Minijos g. 180, 93269, Klaipėda.
Tel. No. +370 694 97022
E-mail address: info@ktgrupe.lt

