

PRIVACY POLICY OF VALENTIS UAB

This Privacy Policy (hereinafter referred to as the **Privacy Policy**) has been prepared by the Limited Liability Company Valentis (hereinafter referred to as **Valentis** or **We/ Us**) pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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), in recognition of the importance of the protection of personal data and respect of the privacy of each data subject.

The Privacy policy is a document intended to be used by the visitors of the website of www.valentis.lt (hereinafter referred to as **You**). This Privacy Policy presents relevant information on the methods and purposes of collecting Your personal data, their subsequent processing, the measures taken by Valentis to ensure the security of the collected personal data and other matters related to the protection of Your personal data.

By continuing to browse our website, You agree with this Privacy Policy and confirm to have read and understood all the provisions of the Privacy Policy.

1. Key definitions used in the Privacy Policy

1.1. **Regulation** or **GDPR** shall mean Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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).

1.2. **Personal Data** shall mean any information relating to an identified or identifiable natural person (Data Subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

1.3. **Data Processing** shall mean any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

1.4. **Data Controller** shall mean Valentis UAB, enterprise number 135896640, registered office address: Molėtų Pl. 11, LT-08409 Vilnius, Republic of Lithuania.

1.5. **Data Processor** shall mean a natural or legal person, public authority, agency or other body which processes Your personal data on behalf of Us.

1.6. **Data Recipient** shall mean a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not.

1.7. **Third Party** shall mean a natural or legal person, public authority, agency or body other than the Data Subject, Controller, Processor and persons who, under the direct authority of the Controller or Processor, are authorized to process personal data.

1.8. **Consent of the Data Subject** shall mean any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data relating to him or her.

1.9. other definitions used in the Privacy Policy comply with the definitions used in the GDPR, the Law on Legal Protection of Personal Data of the Republic of Lithuania (hereinafter referred to as the LLPPD) and the Law on Electronic Communications of the Republic of Lithuania (hereinafter referred to as the LEC).

2. What is the scope of this Privacy Policy?

This Privacy Policy is applied in all cases where We process Your personal data that has been submitted to us via the following methods:

2.1. upon visiting Our website

2.2. upon visiting the social media accounts of Valentis

2.3. upon contacting Us by phone or e-mail and in cases of Valentis receiving Your personal data when implementing agreements with partners or clients, where You are an employee or representative of such legal entities.

3. What principles are applied when processing Your Personal Data?

Valentis ensures that Your Personal Data are processed in accordance with the following key data processing and security principles:

3.1. The Personal Data are processed lawfully, fairly and in a transparent manner in relation to You (lawfulness, fairness and transparency).

3.2. The Personal Data are collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes (purpose limitation).

3.3. The Personal Data processed by Valentis are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimisation).

3.4. Your Personal Data are accurate and, where necessary, kept up to date. We shall take every reasonable step to ensure that Personal Data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (accuracy).

3.5. The Personal Data are kept in a form which permits identification of Your personal identity for no longer than is necessary for the purposes for which the personal data are processed. Personal Data may be stored for longer periods insofar as the Personal Data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the Regulation subject to implementation of the appropriate technical and organizational measures required by this Regulation in order to safeguard the rights and freedoms of the Data Subject (storage limitation).

3.6. The Personal Data are processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorized or unlawful processing and against accidental loss,

destruction or damage, using appropriate technical or organizational measures (integrity and confidentiality).

3.7. Valentis shall be responsible for, and be able to demonstrate compliance with, the above listed principles (accountability).

3.8. The Personal Data are transferred to Data Processors and Data Recipients only when the right and/or obligation to do so is set forth in the respective laws.

4. Which Personal Data is processed by Us?

The Personal Data processed by Valentis and their processing goals:

4.1. When You browse our website and social media networks, We can collect information about Your browser, IP address, clicked links, webpages visited before Our website, name, profile picture, sex, contacts and any other information that the client agrees to share when using third party websites (e.g. when you click Like on Facebook).

4.2. In response to Your requests, enquiries and comments, We can collect the following Personal Data: first name, family name, signature, address, phone number, contact data, circumstances revealed in the complaint, request or declaration, the result of the complaint, request or declaration hearing, other data indicated in the complaint, request or declaration (including special category data).

4.3. When processing Personal Data for the purpose of direct marketing and offering products or services, We can collect the following Personal Data: first name, family name, postal address, e-mail, phone number, work place, position at work, purchasing habits and priorities, purchasing history, payment information (e.g., banking information) and payment history.

5. For how long do We process Your Personal Data?

We guarantee that your Personal Data shall be processed in accordance with the GDPR and other legal norms:

5.1. Valentis shall process the Personal Data for no longer than it is required in accordance with the goals of processing, with respect to the type of document or file, where the said data are indicated.

5.2. The Personal Data of the Data Subjects shall be stored for the terms set forth in the laws, with respect to the type of document or file, where the said data are indicated.

5.3. Upon the end of the processing term of the documents containing Personal Data or their copies, the Personal Data shall be destroyed in such a way that they are impossible to be restored, upon Your request or on the basis of other reasons.

5.4. The documents that contain Personal Data and must be stored permanently shall be transferred for storage at the State Archives in accordance with the Law on Documents and Archives of the Republic of Lithuania.

6. What are Our obligations when processing Your Personal Data?

In our Personal Data processing, We undertake the following:

- 6.1. To ensure that the Regulation, LLPPD and other legal norms regulating Personal Data processing are complied with
- 6.2. To ensure that the rights of the Data Subjects are upheld
- 6.3. To authorize Data Processors to properly handle and process Your Personal Data
- 6.4. To supervise how the Data Processors fulfill their Personal Data processing obligations
- 6.5. To ensure the safety of the Personal Data when implementing technical and organizational Personal Data security measures
- 6.6. To prepare internal regulations for Personal Data protection and processing at least once per two years and to make changes to these regulations, when needed
- 6.7. To assign a Data Protection Officer
- 6.8. To handle data processing entries
- 6.9. To consult the State Data Protection Inspectorate regarding any matters related to Personal Data processing and protection
- 6.10. To notify the State Data Protection Inspectorate in cases of persona data breach, if any
- 6.11. To provide methodical aid to Data Processors and employees of Valentis for the purpose of Data Processing
- 6.12. To hold courses for Our employees on the matters of legal processing and protection of Personal Data
- 6.13. To carry out other functions required to properly exert Our rights and fulfill our obligations while ensuring the protection of the processed Personal Data.

7. What are your rights and how to exert them?

Valentis shall ensure the exertion of all the rights pertaining to You in accordance with the GDPR and other legal norms regulating personal data processing:

- 7.1. Having presented a personal identification document or having confirmed his/her personal identity as set forth in the laws or using electronic means, provided that they allow for proper identification of individuals, the Data Subject has the following rights:
 - to obtain from Us the confirmation as to whether or not the Personal Data concerning him or her are being processed, and, where that is the case, free access to the Personal Data processed by Valentis and the following additional information: the sources of such data, which Personal Data were collected, the purpose of data processing, the Data Recipients that receive or have received the relevant data within one year
 - To obtain from Valentis without undue delay the rectification of inaccurate personal data concerning him or her
 - To have incomplete personal data completed, including by means of providing a supplementary statement
 - To obtain from Valentis the erasure of personal data concerning him or her without undue delay
 - To obtain from Valentis restriction of processing

- To receive the Personal Data concerning him or her, which he or she has provided to Valentis, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller
- To object at any time to processing of personal data concerning him or her by Valentis, except when We are legally obligated to process Your Personal Data.

7.2. We undertake to ensure the proper conditions for the Data Subject to exert his/her rights, except in cases set forth in the laws, where the following must be ensured:

- State security and defense
- Public order, prevention, investigation and determination of crimes, persecution
- Important economic and financial interests of the State
- prevention, investigation and determination of breaches of occupational or professional ethics
- Protection of Your own rights and freedoms and/or that of other persons

7.3. The above listed rights of the Data Subject may be restricted in the cases, where Valentis is legally obligated to process your Personal Data in accordance with the laws and the said laws do not foresee the exertion of any such rights. The said rights of the Data Subject may also be restricted in cases when Valentis is not the competent institution to fulfill Your request. In such cases, We will present a reasonable reply refusing to comply with Your request and refer You to the respective competent institution.

7.4. Any communication and any actions taken shall be provided free of charge. Where requests from a Data Subject are manifestly unfounded or excessive, in particular because of their repetitive character, We may either:

- charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or
- refuse to act on the request of the Data Subject.

7.5. Valentis shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.

7.6. Valentis shall analyze the Data Subject's request to exert his/her rights and present its reply no later than 30 calendar days after the submission of the request. The reply shall be presented in the official language of the country by the method chosen by the Data Subject (by mail, delivered personally or by electronic means).

7.7. In case of any doubts regarding the legality and lawfulness of the processing of the Personal Data of the Data Subject, We shall suspend any related processing actions and check the legality and lawfulness of the processing of the said Personal Data.

7.8. If the Personal Data of the Data Subject are found to be erroneous, incorrect or incomprehensive, We shall correct, specify or change the data immediately but no later than within 30 calendar days from the day we found out about such circumstances.

7.9. If Your Personal Data are found to be processed illegally or unfairly, We shall either destroy the illegally or unfairly processed data or suspend any related actions, except their storage, immediately but no later than 5 business days after we found out about such circumstances until the incorrect data are changed and corrected or the respective data are destroyed.

7.10. Valentis shall inform the Data Recipients about the corrected or destroyed Personal Data of the Data Subject or suspension of any processing actions upon the Data Subject's request or Our initiative, except when the provision of such information would be impossible or too difficult (e.g.

due to large number of Data Subjects, data period, unreasonable high expenses). In such a case, Valentis shall immediately notify the State Data Protection Inspectorate.

7.11. We shall ensure that all the required information is provided to You in a clear and easy to understand way.

7.12. You have the right to lodge a complaint regarding our actions and/or inaction in relation to the exertion of Your rights with the State Data Protection Inspectorate within the term set forth in the LLPPD.

8. Contact data

8.1. Please contact us at the contact details below in case of any questions regarding this Privacy Policy and/or other general personal data protection questions:

Valentis UAB

Enterprise No.: 135896640

Registered office address: Molėtų pl. 11, LT-08409 Vilnius, Republic of Lithuania

E-mail: duom.aps@valentis.lt

9. Final provisions

9.1. Valentis shall retain the right to review and change this Privacy Policy at any time at own discretion, upon the request of the Data Controller and/or in case of changes to the laws regulating Personal Data processing. The Privacy Policy shall be reviewed no less than once per calendar year.

9.2. The Privacy Policy and any changes hereto shall come into force as of their announcement on this website.

Revision date: 21-JUN-2019