

PRIVACY NOTICE OF UAB "ACME VALDA"

1. General Provisions

This document (hereinafter, the Privacy Notice) sets out the basic principles of collection, processing, and retention of Customer personal data (as defined below) performed by UAB "ACME Valda" (the company data is collected and kept with the Register of Legal Entities of the Republic of Lithuania, legal entity code 302312717, address of registered office: Raudondvario Road 131B, LT-47191 Kaunas, Lithuania, e-mail: acmevalda@acme.lt, tel.: +370 37 333102) (hereinafter, the Company or we (us, our)).

The Privacy Notice is designed to protect and secure the Customer's Personal Data from unauthorised use.

When processing Personal Data, the Company complies with the Regulation (as defined below), the Law of the Republic of Lithuania on Legal Protection of Personal Data, the Law of the Republic of Lithuania on Electronic Communications and other directly applicable legal acts regulating the protection of Personal Data, as well as instructions and recommendations of competent authorities.

2. Definitions Used in the Privacy Notice

Personal Data means any information relating to a natural person—the data subject, who is identified or can be identified, directly or indirectly, by reference to relevant data.

ACG Company/s means any company belonging to the ACME group.

Customer, hereinafter can also be referred to as you (your), means any person who orders, purchases or uses our services, or who has expressed an intention to use or in any way uses the Company's services, intends to purchase or purchases the Company's goods and is otherwise connected with the Company's services or goods or a person, who is intending to apply or applying for vacant job positions in ACG Companies.

Processing means any operation which is performed upon the Personal Data (including collection, recording, retention, modification, granting of access, submission of queries, transfer, etc.).

Login Data means Internet Protocol (IP) address and the Internet service provider used to connect a device to the Internet, browser type and version, time zone settings, browser plug-in type and version, operating system and platform, login location, font encoding, Uniform Resource Locator (URL), products you have viewed.

Regulation means 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).

3. Principles of Personal Data Processing

The Company follows these main principles of Personal Data Processing in its activities:

- Personal Data is collected for specified and legitimate purposes.
- Personal Data is processed accurately and fairly.
- Personal Data is processed lawfully, i.e. only in cases where:
 - a) the data subject gives his consent, for example, to receive marketing information;
 - b) an agreement is concluded or executed, to which the data subject is one of the parties;
 - c) the Company is required to process Personal Data by applicable laws;

- d) Personal Data processing is necessary for the purposes of the legitimate interest of the Company or by a third party to whom Personal Data is disclosed, except where such interest is overridden by interests of the data subject;
 - e) Personal data is processed when Customer applies for vacancies in ACG Companies.
- Personal Data is kept up to date.
 - Personal Data is retained no longer than necessary for the purposes of data processing.
 - Personal Data is processed only by the employees who have been granted such a right.
 - All information about the processed Personal Data is confidential.

4. Nature of the Collected Information

Depending on the nature of the goods/services provided, the Company may collect the following Customer data:

- Customer's key information: first name, surname, personal ID number, address, copy of personal identity document (if provided) and other data: telephone number, e-mail address;
- information on products/services purchased by the Customer: information on the selected/provided services and their duration of use, information related to the assessment of the quality of the goods/services, information on the return of goods, warranty service, etc., data on the Customer's insolvency risk assessment;
- information on payments for goods/services: data on invoices issued to the Customer, data on payments from the Customers or other persons, information on debt management (including data transfer to third parties);
- information on the Customer's direct marketing consent: information on the Customer's consent/objection to receiving marketing information (news, program offers, promotions, etc.), participating in opinion polls, data usage, providing the Customer's data to third parties, as well as on the consent to insolvency risk assessment;
- communication and Customer support information: data about browsing on the Company's websites and self-service websites (collected by cookies and similar technologies); records on the telephone conversations with the Company's representatives, correspondence with the Company (via self-service platform, e-mail, customised programs, etc.). For more information on the use of cookies, please see Clause 13 of the Privacy Notice;
- other data: information on prize winners, information on survey participants, newsletter subscribers;
- Data related to your person, qualifications, professional skills and subject characteristics (name, surname, place of residence (address), telephone number, e-mail address, date of birth, age, education, position, work experience (current and former workplaces), length of service in the workplace(s), position(s) held, other work experience), knowledge of foreign languages (levels of reading, writing, speaking, ability to work with computer programs), curriculum vitae, motivation letter and other data provided in the curriculum vitae, cover letter and other related documents and/or sources;
- Other data provided during job interviews and/or otherwise communicating with representatives of the Company and ACG Companies, i.e. desired job (position) and salary, date of receipt of resume, note about participation in a job interview, date of interview, personal characteristics, date of acceptance to work, note about refusal to accept the candidate (indicating the reason), recommendation (s), work functions, competences.

5. Purposes of Data Processing

The Company uses the collected data in order to provide you with its services/goods, as well as to provide assistance, send notices, offers and promotional information, protect its rights and interests and the rights and interests of third parties, ensure the security of Personal Data, comply with applicable laws and also to carry out and complete the selection procedures of ACG Companies' employees.

Purposes of data processing:

- conclusion and performance of an agreement (provision of goods/services), assurance of the quality of goods/services, Customer support and provision of information. If the Customer fails to provide Personal Data, it will not be possible to conclude an agreement and fulfil the obligations set out therein;
- direct marketing and provision of general information on new products and services (unless you have opted out);
- accounting;
- performance of legal obligations, for example - debt management and recovery;
- administration and improvement of the Company's website, maintenance of its safety, and ensuring that the content is presented on your device in the most efficient way;
- performance of legal obligations provided for in applicable laws;
- other purposes for which the Company has the right to process your Personal Data, if you give your consent, when the processing is necessary for the Company's legitimate interest or when the processing by the Company is required by applicable laws. We may also process the Personal Data for other purposes if we have obtained the consent of the data subject or if we have the right to process data on the basis of the legitimate interest;
- to administer, execute and complete the selection procedures of ACG Companies' employees.

6. Methods of Data Collection

We collect information about you in the following ways:

- when you provide information to the Company yourself (e.g., by completing the Company's applications, agreements and/or other documents (including through our partners), on our website electronically, by submitting inquiries, by mail, email, phone, during live video chats, via other electronic means of communication);
- when we receive information about you from third parties with whom we cooperate (e.g., partners, public authorities, etc.);
- when you provide information to third parties that provide services to the Company, such as job advertisement portals, the MeetFrank recruitment application, targeted higher education institutions, in cooperation with companies providing personnel selection services, etc.). Other sources of internal and external communication may be used as needed.

7. Duration of Data Processing

The Company processes the Personal Data no longer than is necessary to accomplish and implement the purposes set out in this Privacy Notice, considering the nature of the goods/services provided to and the agreements concluded with the Customers, unless a longer Personal Data and related documents retention period is set or permitted by applicable laws and retention of such data is required (e.g., mandatory document retention periods, limitation periods, etc.).

8. Transfer of Data

To achieve the purposes set out in the Privacy Notice, the Company may transfer your data to the following data recipients:

- data processors who provide services and process your data on behalf, in the interests, and at the request of the Company (e.g., IT service providers, auditors, consultants, advisers, etc.). Data processors process your Personal Data only in accordance with explicit instructions, committing themselves to ensure proper protection, confidentiality and security requirements of the Personal Data received from the Company in line with organisational and technical measures as specifically established in the data processing agreements between the Company and its subcontractors;

- entities engaged in the administration of debt and debtor databases. Data is provided only to the extent and under the conditions permitted by applicable laws;
- entities entitled to receive information in accordance with the requirements of applicable laws (e.g., courts, state and municipal institutions, etc.) and only to the extent necessary for the proper enforcement of applicable laws;
- companies of the ACME Group to which the Company belongs, when it is necessary to ensure the proper provision of services or to administer, carry out and complete the recruitment procedures of the ACG Companies;
- other third parties on another lawful basis or with your consent that may be obtained in a particular case.

Data processors to whom the Company transfers your personal data may be established outside the Republic of Lithuania, the European Union, or the European Economic Area. Data will be transferred to such processors only if this is permitted under the requirements of applicable laws and only if appropriate or customised security measures and methods are in place to ensure the protection of your privacy.

9. What are the rights of the Customer?

The Customer has the following rights:

- to contact us to discuss any issues regarding the processing of Personal Data performed by the Company;
- to obtain confirmation from the Company that the Personal Data relating to him is being processed and, if such Personal Data is being processed, the right to access the Personal Data being processed and related information;
- to receive his own Personal Data which is processed on the basis of his consent or performance of the agreement, in written or in a commonly used electronic form and, if possible, to request the transfer of such data to another service provider;
- to demand rectification of his Personal Data, if the data is inaccurate, or supplementing of incomplete data;
- to demand erasure of his, as the Company's Customer, Personal Data, which is processed with the Customer's consent, if the Customer withdraws the relevant consent. This right does not apply if the Customer's Personal Data requested to be erased is also processed on another legal basis, such as processing necessary for the performance of the agreement or the fulfilment of an obligation under applicable laws;
- to demand restriction of the processing of his Personal Data, e.g., for the period while the Company analyses whether the Customer has the right to request and whether it is practically possible to delete the Personal Data;
- to object to the processing of the Customer's Personal Data if the Personal Data is processed for direct marketing purposes, including profiling for this purpose;
- to object to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning the Customer or similarly significantly affects the Customer. This right does not apply if such decisions are necessary for entering into, or performance of, an agreement with the Customer, are authorised by applicable laws or are based on the Customer's explicit consent;
- to withdraw his / her consent to the processing of Personal Data.

The Customer exercises his rights by making a specific request contacting Company via contacts indicated in this Privacy Notice. Information relating to the exercise of their rights is provided to the Customers free of charge. The Company must provide the Customer with information on the action taken upon receipt of the Customer's request for the implementation of his rights or indicate reasons for inaction no later than 1 month after receipt of the request.

The period for the provision of the requested information may be extended by 2 further months where necessary, considering the complexity and number of the requests. When the Customer submits the request by electronic means, the information is also provided to him / her by electronic means.

The Customer's request for the exercise of rights may be waived or a subject to an appropriate fee if the request is manifestly unfounded or excessive, as well as in other cases specified in applicable laws.

If the Customer considers that his Personal Data is processed in violation of his rights and legitimate interests under the applicable legislation, the Customer has the right to file a complaint against the processing of his Personal Data with the State Data Protection Inspectorate.

10. Update of the Privacy Notice

If necessary, the Privacy Notice may be updated, i.e., the Company reserves the right to change the terms and conditions of the Privacy Notice, and after updating the Privacy Notice, the information will be posted on Company administered websites the number of the version and the approval date of the Privacy Notice and also posted to www.acmegrupe.lt.

11. Contact Details

If you have any questions, requests or comments regarding the Company's Privacy Notice or the processing of Personal Data or the implementation of data subjects' rights, please do not hesitate to contact us by e-mail: duomenuapsauga@acme.lt.

Contacts of the Company's Data Protection Officer:

- e-mail: duomenuapsauga@acme.lt

Address: Raudondvario Road 131B, LT-47191, Kaunas.

12. Other Information

The Company's website and products may contain links to third party websites. These third-party websites have their own privacy policies. If you visit these websites, their respective policies will apply to you. When you use third-party applications, services or websites even if accessed through Company's websites and products, this Privacy Notice does not apply to the data processing, applications, services or websites of such third parties. The processing and collection of data by third parties and their services are subject to the privacy policies and terms of service of respective third parties – we recommend to familiarize with them before starting any actions.
