"BSS IT", UAB,

PRIVACY POLICY

I. GENERAL PROVISIONS

- 1. The Privacy Policy (hereinafter referred to as the Policy) regulates the principles of processing your personal data when the Data Controller "BSS IT", UAB, (hereinafter referred to as the Company) processes your (hereinafter referred to as the Data Subject) Personal Data for the purposes specified below.
- 2. The Company processes personal data in accordance with 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, hereinafter referred to as the Regulation), the Law of the Republic of Lithuania on the Legal Protection of Personal Data and other legal acts and local acts of the Company. The Company takes all necessary technical and organizational security measures to ensure the security of personal data.
- 3. If you use the Company's website and/or the services provided by the Company, this Policy applies to you without reservation, which sets out the purposes and scope of Data Processing, your rights as a Data Subject, etc. If you do not agree with this Policy, the Company will not be able to provide you with services.

II. PURPOSES, SCOPE, TERMS AND GROUNDS OF DATA PROCESSING

1. Purpose: Protection of the Company's rights and interests in legal proceedings.

Scope: name, surname, address of the place of business of the natural persons participating in the case (applies to natural persons), signature, position, telephone number, e-mail address, date, number, content of the document confirming the powers of attorney.

<u>Storage period</u> - during the examination of the legal dispute and 1 year after the final procedural decision enters into force.

Legal basis - Article 6, paragraph 1 (f) of the Regulation

2. Purpose: Publicizing the Company's activities

Scope:

- Parties to contracts regulating civil legal relations (natural persons): name, surname.
- Representatives of parties to contracts regulating civil legal relations (legal persons): name, surname, position, workplace.

Storage period - until consent is revoked.

Legal basis - Article 6, paragraph 1 (a) of the Regulation

3. Purpose: Accounting.

Scope:

- Personal data of parties to contracts regulating civil legal relations (when they are natural persons): name, surname, address of the place of performance of the activity, current account number, signature, e-mail address, telephone number.
- Personal data of representatives of parties to contracts regulating civil legal relations: name, surname, e-mail address, telephone number, position, signature.

<u>Storage period</u> - during the performance of the contract and 10 years after the date of termination of the contract.

<u>Legal basis</u> – Article 6, paragraph 1, subparagraphs (b) and (c) of the Regulation

4. Purpose: Conclusion, performance and administration of contracts regulating civil legal relations.

Scope:

- Parties to contracts regulating civil legal relations (when they are natural persons): name, surname, e-mail address, telephone number, signature, current account number, address of the place of performance of activities.
- Representatives of parties to contracts regulating civil legal relations (when they are legal persons): name, surname, e-mail address, telephone number, position, signature.

<u>Storage period</u> – during the validity of the contracts and 10 years after the date of expiry of the contract.

<u>Legal basis</u> – Article 6, paragraph 1, subparagraphs (b) of the Regulation

5. Purpose: Personnel selection.

<u>Scope</u>: Candidate's name, surname, telephone number, e-mail address, data on education and qualifications, work experience and other data provided by the candidate at his/her own discretion or for which the candidate's consent has been obtained (content of social media accounts, image, etc.).

<u>Storage period</u> - until the end of the selection for the applied position, and in case of the candidate's consent - the period specified in the consent.

Legal basis - Article 6, paragraph 1 (a) of the Regulation

6. Purpose: The purpose of concluding, executing and administering internship contracts.

<u>Scope:</u> name, surname, personal code, address of residence, educational institution, signature, other personal data provided in the internship contract of the person performing the internship.

Storage period - during the validity of the contracts and 3 years after the date of expiry of the contract.

Legal basis - Article 6, paragraph 1 (b) of the Regulation

7. Purpose: Administration of requests, claims, inquiries and other received documents, external communication.

<u>Scope:</u> Name, surname, pseudonym, contact details, content of the address and other data of the Data Subject who addresses the Company with a request, claim, inquiry, etc. and/or with whom communication is maintained, which he/she provides during communication (when such Data Subject is a representative of a legal entity - such data as workplace, position are additionally processed).

Storage period - 3 years.

<u>Legal basis</u> - Article 6, paragraph 1, point (b) and (c) of the Regulation.

8. Purpose: Administration of social networks (when you provide opinions, comments, likes, mentions, personal messages and become a follower on the Company's Website and/or social networks (LinkedIn, Facebook, etc.):

<u>Scope:</u> name, surname or pseudonym of the social network user, position and other Personal Data specified by the Data Subject.

<u>Storage period</u> – during the validity period of the Company's social network account; correspondence via internal messages on the social network is stored for 3 years from the date of receipt of the last message.

Legal basis – Article 6, paragraph 1 (a) of the Regulation

9. Purpose: Administration of the Website. Cookies are used when browsing the website https://bss.biz on any device. The Company is constantly improving its Website and seeks to make its use as convenient as possible. For this, the Company collects information about which information is most relevant to you, how often you log in to the Website, which browsers and devices you use, what content you usually read, what location you are from, etc. You can find out what information is collected by clicking on this link to the Cookie Policy. (active link).

10. Purpose: Direct marketing

Scope:

- Parties to the contract regulating civil legal relations (when they are natural persons): name, surname, telephone number, email address.
- Representatives of the parties to the contract regulating civil legal relations (when they are legal persons): name, surname, position, workplace, telephone number, email address.

Storage period – until consent is withdrawn.

<u>Legal basis</u> - Article 6, paragraph 1, point (a) of the Regulation.

III. PRINCIPLES OF DATA PROCESSING

The Company, when processing Personal Data, adheres to the following principles:

- 1. Personal data is processed in accordance with the principles of lawfulness, fairness and transparency;
- 2. Personal data are collected for specified, explicit and legitimate purposes and are not further processed in a manner incompatible with those purposes (principle of purpose limitation);
- 3. Personal data are adequate, relevant and not excessive in relation to the purposes for which they are processed (principle of data minimisation);
- 4. Personal data processed are accurate and, where necessary, kept up to date (principle of accuracy);
- 5. Personal data are kept in a form which permits identification of the data subject for no longer than is necessary for the purposes for which they are processed (principle of storage limitation);

6. Personal data are processed in such a way that appropriate technical or organisational measures ensure appropriate data security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage (principle of integrity and confidentiality).

IV. WHO DO WE TRANSFER YOUR DATA TO?

The Company may transfer personal data, without separate consent, to:

- 1. Courts and other law enforcement and (or) dispute resolution institutions when exercising their lawful powers or at the Company's initiative, when declaring, exercising or seeking to defend legal claims;
- 2. The State Tax Inspectorate;
- 3. Financial institutions, information technology monitoring service providers, electronic communications service providers and persons providing other services to the Company;
- 4. Other entities, insofar as it is related to the activities carried out by the Company.

V. YOUR RIGHTS AS A DATA SUBJECT

You have the right:

- 1. To become familiar with Personal Data;
- 2. To demand correction of incorrect, inaccurate or incomplete data;
- 3. To restrict the processing of Personal Data until the lawfulness of their processing is verified at your request as a Data Subject;
- 4. To demand deletion of Personal Data;
- 5. To object to the processing of Personal Data for direct marketing purposes;
- 6. To request the transfer of Personal Data to another legal entity or to provide it directly to you, as the Data Subject, in a form convenient for you (applies to those Personal Data that were provided by the Data Subject himself and which are processed by automated means on the basis of consent or on the basis of submitting a request or concluding and performing a contract);
- 7. To withdraw the consent given, without affecting the use of Personal Data carried out before the withdrawal of consent;
- 8. To file a complaint with the supervisory authority the State Data Protection Inspectorate.
- 9. You, as the Data Subject, can submit any request related to the processing of Data to the Company by e-mail info@bss.biz, by signing the request with an electronic signature, or by visiting the Company's office.
- 10. Taking into account the subject of the request and in order to ensure the confidentiality of the Personal Data processed by the Company, the Company reserves the right to require the Data Subject who submitted the request to provide additional information necessary to establish the identity of the Data Subject and/or to confirm his/her identity in a specific manner (for example, to personally

come to the office and provide a valid personal identification document). If the Data Subject fails to comply with such a request, the requested information may not be provided.

- 11. The Company undertakes to respond to all requests related to the processing of Personal data in accordance with the procedure established by the Regulation.
- 12. Each Data Subject has the right to appeal the processing of his/her data by the Company at any time by submitting a complaint to the State Data Protection Inspectorate (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

"BSS IT", UAB

Legal entity code 135979659

Registered office address: V. Krėvės pr. 26A, 50412, Kaunas

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