

**„BSS IT“, UAB,
PRIVACY POLICY**

I. GENERAL PROVISIONS

1. This Privacy Policy (hereinafter referred to as the "**Policy**") governs the principles for the processing of 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, repealing Directive 95/46/EC (the **General Data Protection Regulation**, hereinafter referred to as the "**GDPR**"), the **Law on the Legal Protection of Personal Data of the Republic of Lithuania**, as well as other applicable legal acts and the Company's internal policies. The Company implements all necessary technical and organizational 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. The Policy sets out the purposes and scope of personal data processing, your rights as a Data Subject, and other relevant information. If you do not agree with this Policy, the Company will not be able to provide its services to you.

II. PURPOSES, SCOPE, RETENTION PERIODS, AND LEGAL BASES FOR DATA PROCESSING

1. Purpose: Protection of the Company's Rights and Legitimate Interests in Legal Proceedings

Scope of personal data processed: First name, last name, business address (applicable to natural persons), signature, position, telephone number, email address, date, number, and content of the document confirming authorization of the individuals involved in the legal proceedings.

Retention period: During the legal proceedings and for one (1) year after the final court decision becomes legally effective.

Legal basis: Article 6(1)(f) of the GDPR.

2. Purpose: Promotion of the Company's Business Activities

Scope of personal data processed:

- *Parties to civil law contracts (natural persons): first name and last name.*
- *Representatives of parties to civil law contracts (legal entities): first name, last name, position, and employer.*

Retention period: Until consent is withdrawn.

Legal basis: Article 6(1)(a) of the GDPR.

3. Purpose: Accounting

Scope of personal data processed:

- Parties to civil law contracts (where they are natural persons): first name, last name, business address, bank account number, signature, email address, and telephone number.
- Representatives of parties to civil law contracts: first name, last name, email address, telephone number, position, and signature.

Retention period: During the term of the contract and for ten (10) years following its termination.

Legal basis: Articles 6(1)(b) and 6(1)(c) of the GDPR.

4. Purpose: Conclusion, Performance, and Administration of Civil Law Contracts

Scope of personal data processed:

- *Parties to civil law contracts (where they are natural persons): first name, last name, email address, telephone number, signature, bank account number, and business address.*

- *Representatives of parties to civil law contracts (where the parties are legal entities): first name, last name, email address, telephone number, position, and signature.*

Retention period: During the term of the contract and for ten (10) years following its termination.

Legal basis: Articles 6(1)(b) and 6(1)(f) of the GDPR.

5. Purpose: Recruitment

Scope of personal data processed: Candidate's first name, last name, telephone number, email address, information regarding education, qualifications, work experience, and any other personal data voluntarily provided by the candidate or processed with the candidate's consent (including social media profile content, photographs, and similar information).

Retention period: Until the recruitment process for the relevant position has been completed or, where the candidate has given consent, for the period specified in such consent.

Legal basis: Article 6(1)(a) of the GDPR.

6. Purpose: Conclusion, Performance, and Administration of Internship Agreements

Scope of personal data processed: First name, last name, personal identification number, residential address, educational institution, signature, and other personal data included in the internship agreement.

Retention period: During the term of the internship agreement and for three (3) years following its termination.

Legal basis: Article 6(1)(b) of the GDPR.

7. Purpose: Administration of Requests, Complaints, Enquiries, and Other Received Documents; External Communication

Scope of personal data processed: The Data Subject's first name, last name, pseudonym, contact details, the content of requests, complaints, enquiries, or other communications, and any other personal data provided during communication. Where the Data Subject acts as a representative of a legal entity, the Company also processes the representative's employer and position.

Retention period: Three (3) years.

Legal basis: Articles 6(1)(b) and 6(1)(c) of the GDPR.

8. Purpose: Administration of Social Media Accounts (Where you provide opinions, comments, likes, mentions, private messages, or become a follower of the Company's website and/or social media accounts (such as LinkedIn, Facebook, etc.).

Scope of personal data processed: Social media user's first name, last name or pseudonym, position, and any other personal data provided by the Data Subject.

Retention period: For the duration of the Company's social media account. Correspondence via the social media platform's private messaging service is retained for three (3) years from the date of the last message received.

Legal basis: Article 6(1)(a) of the GDPR.

9. Purpose: Website Administration

Cookies are used when browsing the website <https://bss.biz> using any device. The Company continuously improves its website and strives to make its use as convenient as possible. For this purpose, the Company collects information about which content is most relevant to you, how often you visit the Website, which browsers and devices you use, what content you read most frequently, your approximate location, and similar information.

Detailed information about the data collected through cookies is available in the Company's **Cookie Policy** (active link).

10. Purpose: Direct Marketing

Scope of personal data processed:

- *Parties to civil law contracts (where they are natural persons): first name, last name, telephone number, and email address.*
- *Representatives of parties to civil law contracts (where the parties are legal entities): first name, last name, position, employer, telephone number, and email address.*

Retention period: Until consent is withdrawn.

Legal basis: Article 6(1)(a) of the GDPR.

III. PRINCIPLES OF PERSONAL DATA PROCESSING

When processing Personal Data, the Company adheres to the following principles:

1. Personal Data is processed lawfully, fairly, and in a transparent manner.
2. Personal Data is collected for specified, explicit, and legitimate purposes and is not further processed in a manner that is incompatible with those purposes (the purpose limitation principle).
3. Personal Data is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed (the data minimization principle).
4. Personal Data is accurate and, where necessary, kept up to date (the accuracy principle).
5. Personal Data is retained in a form that permits identification of Data Subjects for no longer than is necessary for the purposes for which the data is processed (the storage limitation principle).
6. Personal Data is processed in a manner that ensures appropriate security through the implementation of suitable technical and organizational measures, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage (the integrity and confidentiality principle).

IV. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

Without requiring separate consent, the Company may disclose Personal Data to:

1. Courts and other law enforcement authorities and/or dispute resolution bodies in the exercise of their lawful powers, or where necessary for the establishment, exercise, or defense of the Company's legal claims.
2. The State Tax Inspectorate.
3. Financial institutions, information technology maintenance service providers, electronic communications service providers, and other service providers engaged by the Company.
4. Other entities, where such disclosure is necessary in connection with the Company's business activities.

V. YOUR RIGHTS AS A DATA SUBJECT

You have the right to:

1. Access your Personal Data.
2. Request the rectification of inaccurate or incorrect Personal Data or the completion of incomplete Personal Data.
3. Request the restriction of the processing of your Personal Data while the lawfulness of the processing is being verified at your request.
4. Request the erasure of your Personal Data.
5. Object to the processing of your Personal Data for direct marketing purposes.
6. Request the transfer of your Personal Data to another legal entity or receive your Personal Data in a structured, commonly used, and machine-readable format. This right applies only to Personal Data provided directly by the Data Subject and processed by automated means on the basis of consent or for the performance of a contract or at the request of the Data Subject prior to entering into a contract.
7. Withdraw your consent at any time, without affecting the lawfulness of the processing carried out before the withdrawal of consent.

8. Lodge a complaint with the supervisory authority, the State Data Protection Inspectorate.
9. Submit any request relating to the processing of Personal Data by email to **info@bss.biz**, provided that the request is signed with a qualified electronic signature, or by submitting the request in person at the Company's registered office.
10. Depending on the nature of the request and in order to ensure the confidentiality of the Personal Data processed by the Company, the Company reserves the right to request additional information necessary to establish and/or verify the identity of the Data Subject (for example, by requiring the Data Subject to appear in person at the Company's office and present a valid identity document). If the Data Subject fails to comply with such a request, the Company may refuse to provide the requested information.
11. The Company undertakes to respond to all requests relating to the processing of Personal Data in accordance with the procedures and time limits established by the GDPR.
12. Every Data Subject has the right to lodge a complaint regarding the Company's processing of their Personal Data with the **State Data Protection Inspectorate** (L. Sapiegos St. 17, Vilnius, Lithuania; Tel.: +370 5 271 2804; Email: **ada@ada.lt**; Website: **www.ada.lt**).

VI. COMPANY CONTACT INFORMATION

„BSS IT“, UAB

Company registration number: 135979659

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

Telephone: +370 657 80672

Email: **info@bss.biz**