

RULES FOR PROCESSING CUSTOMER PERSONAL DATA

CHAPTER I

GENERAL PROVISIONS

1. The Rules for the Processing of Customer Personal Data and the Use of the Self-Service System (hereinafter referred to as the "Rules") set out the basic rules of EUROCASH1, UAB, with legal entity code 225329030, registered office at Savanorių pr. 19, Vilnius, Republic of Lithuania (hereinafter referred to as the "Company" or "Data Controller") the purposes, principles, rights and rights of customers and the Company's personal data, including their storage obligations. In accordance with the principles and provisions set out in these Terms and Conditions, the processing of customer data shall be carried out in respect of both - personal data of both natural persons and representatives of legal persons, as well as personal data of the customers specified by the data of the natural persons in charge of the customers.
2. In processing personal data, the Company is guided by the provisions of the Directive of the European Parliament and of the Council of 27 April 2016 on the processing of personal data. Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the freedom of movement of such data and repealing Directive 95/46/EC (OJ 2016 L 119, p. 1) (General Data Protection Regulation, hereinafter referred to as "GDPR"), the Republic of Lithuania on the legal protection of personal data Law on Personal Data (hereinafter referred to as 'the Law') and other applicable legislation governing the protection of personal data the processing of personal data.
3. The purpose and purpose of these Rules is to regulate the processing of personal data of customers by the Company, ensuring compliance with and implementation of the GDPR, the Act, and other relevant legislation, and to provide data subjects with access to information about the processing of their personal data.
4. These Rules shall regulate the actions of the Company and its employees in processing personal data using automated and non-automated means of personal data processing installed in the Company, as well as determine the rights of the Data Subject, the means of implementation of the personal data protection and other issues related to the processing of personal data.
5. The Company collects and processes the Data Subject's data which the Data Subject voluntarily provides by e-mail, registered mail, fax, telephone, by direct access to the Company's office, by registering on the Company's website and/or downloading the mobile application and becoming a registered user (where the Company provides such an opportunity) or by using the Company's website or the Company's mobile application. In the course of providing security services, the Company also collects data transmitted by means of equipment installed at the protected premises.
6. All employees of the Company who process personal data contained in the Company or become aware of it in the course of their duties, data processors engaged by the Company or third parties engaged by the Company for the provision of the service, and only where necessary for the provision of the service, must comply with the Rules.
7. The Company's clients, when providing the Company with the data of other persons, undertake to inform them about the possibility of familiarizing themselves with these Rules.

8. Basic concepts used in the rules:

8.1. Data subject – means a natural person from whom the Company receives and processes personal data.

8.2. Personal data - any information related to a natural person - a data subject, whose identity is known or can be directly or indirectly determined by using such data such as name, surname, personal identification number, date of birth, one or more specific to a person characteristics of a physical, physiological, psychological, economic, cultural or social nature.

8.3. Data processing - any action performed with personal data: collection, recording, accumulating, storing, classifying, grouping, connecting, changing (addition or correction), provision, publication, use, logical and/or arithmetic operations, search, dissemination, destruction or other action or set of actions.

8.4. Data controller – a legal or natural person who, alone or together with others, determines the personal data purposes and means of data processing. If the purposes of data processing are determined by law or other legal acts, the data controller and/or the procedure for its appointment may be determined in those laws or in other legal acts.

8.5. Data controller – a legal or natural person (who is not an employee of the data controller), authorized by the data controller to process personal data. Data controller and/or its designator the procedure may be established in laws or other legal acts.

8.6. Consent is a voluntary statement of the will of the data subject to process his personal data for him for a known purpose. Consent to process special personal data must be expressed clearly - in writing, to her equated, or other form that undoubtedly proves the will of the data subject.

8.7. Direct marketing is the activity of making offers to individuals by mail, telephone, or other direct means of goods or services and/or asking for their opinion on the goods or services offered.

8.8. Other terms used in the Rules correspond to the terms defined in the GDPR, the Act, or other laws in the acts.

CHAPTER II

PRINCIPLES AND PURPOSES OF PROCESSING PERSONAL DATA

9. The company processes customer personal data in accordance with the following principles:

9.1. Personal data is processed in a legal, fair, and transparent manner (principle of legality, fairness, and transparency).

9.2. Personal data is collected for established, clearly defined, and legitimate purposes and is not further processed in a manner incompatible with those purposes (principle of purpose limitation).

9.3. The personal data processed by the company are adequate, appropriate, and only necessary to achieve the purposes for which they are processed (principle of reducing the amount of data).

9.4. The personal data processed by the company are accurate and, if necessary, updated (principle of accuracy).

9.5. Personal data is kept in such a form that the identity of the person can be determined no longer than is necessary for the purposes for which the personal data of customers is processed (principle of storage duration limitation).

9.6. Personal data is processed using appropriate technical or organizational measures, ensuring adequate personal data security, including protection against unauthorized data processing or unlawful data processing and against accidental loss, destruction, or damage (principle of integrity and confidentiality).

10. Personal data is processed and used for the following purposes:

10.1. For the processing and administration of purchasing (ordering) services of the data subject;

10.2. For the provision of services ordered by the data subject;

10.3. For the identification of the data subject in the Company's information systems;

10.4. For the identification of the data subject when logging into his account on the Company's website or mobile app (when the Company provides such an opportunity);

10.5. for issuing confirmations, invoices, and other financial documents of purchased (ordered) services;

10.6. solving problems related to the implementation, provision, and use of services;

10.7. for communication with the Data Subject, if the conditions of the services purchased by the Data Subject have changed;

10.8. for the fulfillment of other contractual obligations;

10.9. for direct marketing purposes, in order to assess customer satisfaction with the services provided and to improve the services provided and improve their quality;

10.10. express legal claims and exercise rights belonging to the Company.

CHAPTER III

PERSONAL DATA PROCESSING, STORAGE, TRANSFER

11. The company collects and processes the following personal data of customers on the specified legal grounds:

11.1. For the execution of the contract with the data subject. On this basis, personal data provided by the data subject in order to conclude a contract or (name, surname, personal identification number,

address of the protected object, address for correspondence, telephone number, e-mail address, data of responsible persons (name, surname, phone number), other information that the data subject can specify by e-mail in a letter or by phone), as well as those data that are received during the provision of services (location of sensors, location in the protected object, signals transmitted from the protected object with the help of installed equipment, password assigned to the protected object,

customer username in the self-service system, information provided by the customer, contacting about a service failure or other issues by e-mail or phone);

11.2. For the fulfillment of the company's legal obligations. On this legal basis, concluded contracts and various financial documents are processed, which the Company must prepare and keep as prescribed by legal acts.

order On this basis, we process and transfer your data to state institutions, we store copies of contracts or other documents (archiving) for the period specified in legal acts;

11.3. On the basis of the company's legitimate interests (to improve the quality of provided services). On this legal basis, various notices or appeals regarding disruption of service provision completed questionnaires regarding

service quality. On this basis, we process and transfer your data to state institutions, we store copies of contracts or other documents (archiving) for the period specified in legal acts;

11.4. On the basis of the Company's legitimate interests (expressing legal claims and defending the Company's violated rights). On this legal basis, your data is processed: name, surname, social security code, residential address, and e-mail address. On this basis, we process and transfer your personal data by specifying them in procedural documents, transferring them to legal or natural persons providing legal or debt collection services;

11.5. Based on the data subject's consent. The following Your data are processed on this legal basis: information we collect for You using the Company's website or mobile application, using cookies (more information in the Cookie Policy at www.eurocash1.lt), as well as for direct marketing purposes, by sending surveys regarding the evaluation of the quality of the provided services.

11.6. Other personal data, not specified in these Rules, may be processed on the basis of a separate consent of the data subject.

12. The company does not collect or manage customers' special personal data, i.e. data revealing racial or ethnic origin, political views, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data, health data or data about a natural person's sex life and sexual orientation.

13. Personal data of customers are stored:

13.1. Data processed in the performance of the contract concluded with the customer (providing services) are stored for as long as specified in the contract or as long as the contract for the provision of services is valid, except for the cases specified below;

13.2. After the customer provides updated data (telephone, e-mail address, list of responsible persons, or other information), no longer relevant data is immediately deleted (except for data in reserve, backup copies);

13.3. Data contained in contracts or other documents, the storage of which is determined by legal acts, is kept for the period determined by the procedure of legal acts;

13.4. Data processed on the basis of data consent are stored as long as services are provided to the client or until the client withdraws the given consent.

13.5. Data required to assert legal claims or defend violated Company rights, including minimal data proving the client's consent to data processing, may be stored until the statute of limitations for filing or defending against claims expires, or until the court proceedings are over.

14. Customers' personal data may be transferred to third parties in the following cases:

14.1. For entities providing various services to the company - data processors: companies providing data centers, hosting, cloud services, developing and providing software,

for supporting and developing companies, companies providing information technology infrastructure services, companies providing communication services, companies providing consulting, audit services, and other service providers. The personal data of customers are disclosed to these entities only to the extent that it is necessary to provide the services.

14.2. In order to ensure adequate quality of services and quick response after receiving a call to a protected object, the personal data of customers (object address, list of responsible persons) may be transferred to other security companies - our partners.

14.3. In the course of fulfilling the obligations imposed on the Company by law, the personal data of customers may be transferred to state institutions, institutions, and organizations.

14.4. In order to file legal claims or defend violated rights, customers' personal data may be transferred to judicial authorities and entities providing legal or debt collection services.

14.5. According to the individual request of the data subject, the data may be transferred to other third parties.

CHAPTER IV

RIGHTS OF DATA SUBJECTS AND THEIR IMPLEMENTATION

15. The data subject has the following basic rights enshrined in the GDPR in relation to the processing of his personal data:

15.1. to know (be informed) about the processing of your personal data;

15.2. get familiar with your personal data and how it is handled;

15.3. to demand correction, destruction of the Data Subject's personal data, or suspension, except for storage, of the Data Subject's personal data processing actions, when the Data Subject's personal data are processed in non-compliance with the provisions of applicable and valid legal acts;

15.4. to demand that the processed personal data be transferred to him or to a data controller of his choice in a digitized, common computer-readable format (right to portability);

15.5. do not consent to the processing of the personal data of the Data Subject;

15.6. The data subject also has the right to refuse to provide his personal data. In such a case, the Data Subject automatically waives its claims regarding the quality of services provided by the Company, since the requested data may be necessary in order to properly provide the services requested/ordered by the Data Subject;

16. By becoming our customer, the data subject indicates his preferences regarding the use of his personal data, when providing advertising messages - newsletters, questionnaires about the quality of services, or other offers. The data subject can adjust his preferences by clicking on the link in the advertising message or by contacting the Company using the specified contacts. The company reserves the right to send messages related to the execution of the services ordered by the client, reminders about unpaid bills, information about the changed conditions for changing services, or other information about which the client must be informed.

17. The data subject can exercise his rights by contacting the Company by e-mail. by mail info@eurocash1.lt or by phone no. (8-5) 274 46 86, as well as by coming to the Company's office at Savanorių pr. 19, Vilnius. The data subject must submit a document confirming personal identity together with the request. The company will fulfill the request of the data subject within 30 calendar days, except in cases where it is impossible to fulfill it due to the large number of requests or the complexity of the request. In this case, the Company undertakes to fulfill the request within the shortest reasonable period, but no longer than within 60 calendar days from the receipt of the request. The company reserves the right to refuse to fulfill certain requirements of the data subject or to charge for their fulfillment if the data subject clearly abuses his rights.

18. If the data subject suspects that his data may be processed without complying with the requirements of legal acts, he has the right to file a complaint with the State Data Protection Inspectorate (more information at www.ada.lt). In the event of any claims, questions, or suspicions regarding data processing, the Company recommends trying to resolve them peacefully.

CHAPTER V

CHANGE OF RULES, VALIDITY

19. These Rules, adopted on 05/24/2018, enter into force after they are published on the Company's website www.eurocash1.lt. The latest (latest) version of the Rules is published on the website. The Company reserves the right to change these Rules without prior notice. We will inform customers about any changes to the rules by publishing the latest version on the Company's website or through other communication channels.

20. Any changes to these Rules come into force after they are publicly announced on the Company's website.