# PRIVACY POLICY

The purpose of this Privacy Policy (hereinafter, the Privacy Policy) is to help you understand how Prolabas UAB, reg. No. 303134089, address Lvovo g. 25, Vilnius (hereinafter, the **Company/Controller**) processes your personal data. The Privacy Policy provides important information concerning the protection of your personal data, your rights as a data subject and the implementation thereof.

We take your privacy very seriously. In this Privacy Policy, you will find information on the processing of personal data of individuals using the services provided by the Company, buying its products, applying for a job in the Company, etc.

The Privacy Policy presents information on the amount of personal data processed, the purposes of the processing, the sources, recipients of personal data, etc.

In addition, we may process your personal data for purposes or by means other than those specified in this Privacy Policy. In such event, we will notify you by a separate Privacy Notice.

#### **CONTACT INFORMATION**

For all questions related to the processing of your personal data, please contact the Company by email to *info@prolabas.com* or by registered mail to Lvovo g. 25, Vilnius.

#### **DATA PROCESSING**

The Company processes personal data accurately, fairly and only for the purposes for which it was collected in accordance with the personal data processing principles and requirements established by legal acts.

We collect, store and process all personal data in accordance with:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter,
  GDPR or General Data Protection Regulation)
- Law on Legal Protection of Personal Data
- Other laws and legislation regulating your rights

We do not transfer your personal data to any third parties, unless we are required to do so under the laws, other legislation or where this is necessary for the provision of our services, or your express consent has been received.

We may process your personal data for the following purposes:

- sale of laboratory, pilot and production equipment
- provision of service support
- performance of agreements
- direct marketing
- · personal services
- administration of candidates for a job
- use of cookies (administration of the website at www.prolabas.com)

We receive personal data directly from you when you make an inquiry at <a href="www.prolabas.com">www.prolabas.com</a>, send us your CV or other information related to your employment in the Company, etc.

We may also obtain personal data about you from such sources as your employer, when your employer enters into an agreement with the Company regarding the purchase of goods, provision of services, etc.

We will only collect information that is necessary to provide our services and only in compliance with all legal requirements.

## Sale of laboratory, pilot and production equipment

The company distributes laboratory, pilot and production equipment in the Baltic States. To properly conclude and perform agreements for the sale of products offered by the Company, the Company may process such personal data of employees of its customers-legal entities as their name, surname, contact information (email address, telephone number), workplace (including the position held), signature and the content of correspondence/communication. The Company processes these personal data of employees of its customer-legal entity on the basis of the Company's legitimate interest.

The collected personal data of employees of the customers-legal entities are stored for the entire effective period of the agreement concluded with the customer and for an additional period of 10 years after the end of the respective agreement.

In all cases, we undertake to process all the collected personal data only to the extent necessary to ensure the proper sale of the Company's products, other related purposes and the fulfilment of legal obligations binding upon us.

# **Provision of support services**

While the Company supplies high-quality technically advanced equipment of the world's largest manufacturers, its team of professionals offers high-quality support services, helps us understand customer needs and find the most technically and economically feasible solutions.

To properly provide its support services, the Company may process such personal data of employees of its customers-legal entities as their name, surname, contact information (email address, telephone number), workplace (including the position held), signature and the content of correspondence/communication. The Company processes these personal data of employees of its customer-legal entity on the basis of the Company's legitimate interest.

The collected personal data of employees of the customers-legal entities are stored for the entire effective period of the agreement concluded with the customer and for an additional period of 10 years after the end of the respective agreement.

In all cases, we undertake to process all the collected personal data only to the extent necessary to ensure the proper provision of the support services offered by the Company, other related purposes and the fulfilment of legal obligations binding upon us.

#### Performance of the Company's agreements

To conclude or perform an agreement, the Company may process personal data of employees of the legal entities with which the Company has concluded or seeks to conclude agreements for the provision of services and/or sale of goods to the Company.

In such events, we will process their name, surname, contact information (email address, telephone number), workplace (including the position held), signature and the content of correspondence/communication with such persons. These personal data will be processed on the basis of the Company's legitimate interest.

The collected personal data of employees of legal entities are stored for the entire effective period of the agreement concluded with the legal entity and for an additional period of 10 years after the end of the respective agreement.

# **Direct marketing**

We will send offers for the provision of our services, purchase of our products, our newsletters and other promotional materials by electronic means of communication (by email and, in individual cases, by mobile

devices/telephones) to persons who have provided their contact details to us and expressed their wish to receive information about our services and products, and to receive the Company's gifts.

For direct marketing purposes, the Company will process the following personal data: your name, surname, telephone number, email address, workplace information (including the position held).

If you are our Customer or an employee of our Customer, and no objection to the receipt of direct marketing communications from the Company has been submitted on behalf of the Customer, we will send you, by email and mobile telephone, notifications regarding the services and products that are similar to those already provided/sold to you based on our legitimate interest.

Your personal data processed for direct marketing purposes will be stored for a period of 2 years from the moment of obtaining your consent or from the moment of providing services and/or selling products.

You may opt out of receiving direct marketing communications at any time by contacting us by email to info@prolabas.com.

## Processing of personal data for the purpose of providing personal services

The Company also processes your personal data in cases where you contact us, submit inquiries, ask questions, send information using contact information provided on the Company's website and/or by filling in the inquiry form on the Company's website.

The Company processes your personal data in order to manage inquiries and complaints, respond to your inquiries, ensure the quality of services provided and products sold, protect and ensure the rights and legitimate interests of the Company. You provide your data to us on the basis of a consent which will be expressed by your actions, i.e., contacting us.

Your personal data will be deleted 3 years after we have examined your inquiry.

On the basis of the Company's legitimate interest to collect evidence of the received inquiries, replies given, services provided and previous contacts, in certain cases (depending on the type of data and circumstances), personal data may be stored for a longer period, as long as they are needed to achieve the purposes for which they were collected.

Your personal data may be stored for a longer period in cases where:

- it is necessary for the Company to defend itself against any claims or lawsuits
- your data are necessary for the proper resolution of a dispute, complaint
- there is reasonable suspicion of illegal activities that are being investigated
- on other grounds provided for in the applicable legislation

We would like to emphasize that a minimum amount of personal information is provided when you submit inquiries, questions or other information to the Company. You only provide personal data necessary to achieve the purposes for which the letter, request or inquiry is sent.

### Administration of candidates for a job

The Company may also process the personal data that you provide for the purposes of administering candidates for a job, when you provide your personal data to the Company so that you can join our team. In such event, your personal data will be processed on the basis of your consent which will be expressed by your actions, i.e., contacting us.

We collect and process such data as your CV and/or cover letter, name, surname, contact information (email address, telephone number, residential address) and/or other information provided by you in the recruitment process. The data will be processed for recruitment purposes based on your consent which will be given to us or the recruitment agency that provides services to the Company (you will express your consent by sending your CV).

Without your CV and/or cover letter, we will be unable to assess your suitability for the job.

Do not send any personal information that is not related to your professional skills, qualifications, and that is not necessary for the assessment of your suitability for the relevant position. In your letter, CV and/or cover letter, do not provide any unnecessary personal data, such as national identification number, marital status, sensitive data, financial data, bank account number, etc.

The Company will store personal data received from you until the end of the respective recruitment process, unless you give your consent to the storage of your personal data for an additional period of one (1) year. You may withdraw your consent to the storage of your personal data for an additional period of one (1) year at any time. Please note that the withdrawal of your consent will not affect the lawfulness of the processing of your personal data that took place prior to such withdrawal.

Please be informed that for the purpose of evaluating you as a candidate, we may contact your previous employers and ask them for information about your qualifications, professional skills and professional qualities.

### Use of cookies (administration of the website at www.prolabas.lt)

A cookie is a piece of information that a web server sends to your browser and that is stored on the browser. The information is sent to a web server every time the browser requests to open a page from the server. Cookies are used to ensure the smooth operation of the website.

The Company uses cookies to collect information about the number of website visitors, their IP addresses, etc.

When you use browser to access our content, you can configure its settings to accept all cookies, reject all cookies or receive notifications of cookies. Every browser is different, so if you do not know how to change the cookie settings in your browser, check out its help menu. Your device's operating system may contain additional cookie controls. If you do not want cookies to collect information, follow the simple procedure available in most browsers to allow you to opt out of cookies. To learn more about managing cookies, please visit <a href="http://www.allaboutcookies.org/manage-cookies/">http://www.allaboutcookies.org/manage-cookies/</a>.

Please note, however, that in some cases, deleting cookies may slow down the speed of browsing, restrict certain functionality of the website or block access to our website.

Cookie	Description	Validity

### PROCESSORS. DATA RECIPIENTS

Pursuant to the provisions of the GDPR, the Company may use third-party processors. An agreement for the processing of personal data will be concluded with them in accordance with the requirements of the GDPR. Subprocessors may not be used without the consent of the Company.

The Company may use processors for performing certain personal data processing activities. These service providers will perform processing on behalf of the Company only in accordance with the Company's instructions. Third-party processors are carefully selected in accordance with the applicable data protection legislation.

In certain circumstances, the Company's external service providers may be granted access to your personal data, but only for the specified purposes of data processing. Under the existing agreements, such third parties are obliged to ensure that their level of data protection is at least equivalent to that provided by the Company and required by applicable law. All data processed on behalf of the Company remain under the control of the Company. Compliance with the Company's instructions, applicable data protection levels and contractual obligations of the processor is constantly monitored.

The Company may also transfer your personal data to data recipients when such obligation of the Company is provided by legal acts or this is necessary for the proper performance of an existing agreement for the provision of social services and ensuring the interests of the Company's customers/employees.

The Company may transfer your personal data to:

- the State Tax Inspectorate of the Ministry of Finance of the Republic of Lithuania
- the State Social Insurance Fund Board of the Republic of Lithuania
- other data recipients who are permitted to access personal data under the applicable legislation.

#### DATA SUBJECT'S RIGHTS AND PROCEDURE FOR EXERCISING THEM

The Company will exercise the rights of data subjects without undue delay but, in any case, not later than within one month from the receipt of the request. The Company may extend the one-month period for another two months, depending on the complexity and number of requests but, in any case, the Company will inform you of such extension within one month of receiving the request and provide the reasons for the delay.

You are granted data subject rights under the General Data Protection Regulation. At any time, after the Company has duly verified your identity, you have the right to:

## be informed of the processing

The Company will provide you with all information to which you are entitled and which is not provided in this Privacy Policy, such as: personal data recipients (if any); personal data retention periods or, if this is not possible, the criteria used to determine such periods; the right to request that the Company grant access to the personal data of the data subject and to rectify or delete them, or to restrict the processing of the data, or the right to object to the processing of the data, as well as the right to data portability; whether the provision of personal data is a legal or contractual requirement, etc.

## access the data being processed

The Company will confirm to you whether personal data relating to you are being processed and, if such personal data are being processed, will provide all necessary information: the purposes of the data processing; the categories of personal data concerned; the recipients or categories of recipients to whom the personal data have been or will be disclosed; the personal data retention periods or, if this is not possible, the criteria for determining such periods; the right to request the controller to rectify or delete personal data or to restrict or object to the processing of personal data relating to the data subject; where personal data are not collected from the data subject, all available information on their sources. The Company will provide a copy of the personal data processed. When the data subject submits the request by electronic means, the information will be provided in a commonly used electronic form.

# · obtain the rectification of data

The data subject has the right to require the Company to rectify inaccurate personal data without undue delay. Depending on the purposes for which the data were processed, the data subject has the right to request that incomplete personal data be supplemented.

## • obtain the erasure of data ("the right to be forgotten")

If there are grounds (for example, personal data are no longer needed to achieve the purposes for which they were collected, etc.), you can request that your personal data be deleted.

## · restrict the processing

You may request that the processing of your data be restricted if it meets the criteria set out in the General Data Protection Regulation, for example, the Company no longer needs your personal data for the purposes of the processing, but you need them to defend legal claims; you dispute the accuracy of the data for the period during which the Company may verify the accuracy of the personal data, etc.

### data portability

In cases where the Company processes your personal data by automated means with your consent or on the basis of an agreement with the Company, you have the right to receive your personal data in a structured and computer-readable format and to transfer it to another data controller, and the Company will not interfere with

this. You have the right to request the Company to transfer your personal data to another data controller, where technically feasible.

# • object

You have the right to object at any time to the processing of your personal data when such processing is carried out for the legitimate interests of the Company, except when the Company processes the data for reasons that override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

To exercise any of the rights listed above, you may apply

- by email to info@prolabas.com
- by registered mail addressed to Prolabas UAB to Lvovo g. 25, Vilnius.

Without prejudice to any other remedies, you also have the right to lodge a complaint with the supervisory authorities at any time.

#### PERSONAL DATA BREACHES

The Company will always report a personal data breach to the State Data Protection Inspectorate, unless such a breach does not endanger the rights and freedoms of individuals. When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Company will also communicate the breach to you, as the data subject. Notifications of data breaches are sent in accordance with the procedure provided for in the General Data Protection Regulation.

The notification (may be sent by email, SMS, mail, etc.) to the data subject shall provide (in clear and plain language):

- the description of the breach
- the contact details of the Data Protection Officer
- the description of likely consequences of the breach
- the description of measures taken by the Company to eliminate the breach
- other information that the Company believes should be provided to the data subject.

If communication would involve disproportionate effort, the Company shall report the breach on its website.

The Company will not communicate the breach to the data subject if: appropriate technical and organisational protection measures were implemented and applied to the personal data affected by the breach; the Company has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialise; it would involve disproportionate effort. In such event, a public communication shall be made.

### **DATA PROTECTION**

The Company takes great care to protect your personal data by using appropriate data protection measures. These include: active and reactive risk management, periodic software updates, use of anti-virus programs, access control and security systems, granting and maintenance of controlled access/user rights, ensuring the relevant skills through the training of staff involved in the processing of personal data, and evaluation and selection of controllers. Paper documents are kept in premises with appropriate security measures. Persons/employees working with personal data are bound by confidentiality obligations established by law and confidentiality agreements. The Company regularly updates its internal practices.

#### PRIVACY POLICY

We may update or change this Privacy Policy at any time. Such updated or changed Privacy Policy shall enter into force once it is made available in the Company's premises. You should check it from time to time and make sure that the current version of the Privacy Policy is acceptable to you.
Date of the last revision of the Privacy Policy [].