

PRIVACY POLICY OF POLIMASTER EUROPE UAB

25/08/2022

PART I: GENERAL PROVISIONS

1. This Privacy Policy (hereinafter referred to as the Policy) regulates activities of Polimaster Europe UAB with its registered office at Ežero 4, Didžiasalio k., LT-13264 Vilnius r. parish (hereinafter referred to as the Office), email polimaster@polimaster.eu code of legal entity 123508375 (hereinafter referred to as the Data controller) in the sphere of personal data collection, management and storage performed by the Data controller and operation of the Website <http://www.polimaster.com/eu> managed by the Data controller (hereinafter referred to as the Website).
2. The data subject for the purposes of this Policy is any natural person whose personal data is processed by Polimaster Europe UAB.
3. By using the services, visiting the Company's office, and continuing to browse the Website, the Visitor (user of the Website) confirms that he/she has read and understood the Policy and agrees comply with its provisions.
4. The Data Controller shall ensure that, when adopting and implementing this Policy, it seeks to implement the following fundamental principles relating to the management of personal data:
5. Personal Data in relation to the data subject is processed in a lawful, fair and transparent manner (the principle of legality, integrity and transparency);
6. Personal data is collected for specified, clearly defined and legitimate purposes and will not continue to be processed in an incompatible way;
7. Further processing of personal data for archiving purposes in the public interest and for statistical purposes shall not be considered incompatible with the original purpose (purpose limitation principle);
8. Personal data is adequate, relevant and necessary for the purposes for which they are processed (data minimisation principle);
9. Every effort shall be made to ensure that personal data is accurate and, where necessary, kept up to date within a reasonable time after the change has occurred;
10. All reasonable steps shall be taken to ensure that that personal data that is not accurate in terms of processing purpose, is deleted or corrected within the reasonable period of time (accuracy principle);
11. Personal data is stored in such a way that the identification of the Data Subject cannot be set for longer than is necessary for the purposes for which personal data is processed;
12. Personal data may be stored for longer periods when such data is processed for archiving or statistical purposes, and upon the implementation of technical and organisational measures in order to protect rights and freedoms of the Data Subject (principle of limitation of storage period);
13. Personal data, taking into account the generic nature of the personal data processed by the Data Controller, is processed in such a way as to ensure the proper security of personal data, including protection from unauthorised processing or processing of unauthorised data, and against accidental loss, destruction or damage by appropriate technical or organisational measures (principle of integrity and confidentiality);
14. The Data Controller is responsible for ensuring compliance with the above principles and must be able to demonstrate that they are being complied with (accountability principle).
15. This Policy has been developed in accordance with the provisions of the Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (hereinafter referred to as the GDPR), the Law on the Legal Protection of Personal Data of the Republic of Lithuania (hereinafter referred to as the Law on LPPD) and other legal acts of the Republic of Lithuania and the European Union. Concepts used in the Policy shall be understood as defined in the GDPR and Law on LPPD.

PART II: BASIS OF DATA PROCESSING

16. Data shall be processed by the Company only under one or more criteria of lawful processing – (i) in order to ensure provision of services under the contract (i.e., in order to perform the contract or to take action at the request of the data subject prior to the conclusion of the contract); (ii) with the consent of the data subject; (iii) when data processing is necessary to fulfil a legal obligation applicable to the Company; (iv) when data processing is necessary for reasons of public interest or in the course of implementation of functions delegated to the Company' (v) when personal data shall be processed for the legitimate interests of the Company or a third party.
17. The Company when managing and storing personal data shall implement proper organisational and technical measures aimed at protection of personal data from unauthorised or accidental loss, destruction or damage or disclosure and other unauthorised processing. Access to personal data processed by the Company shall be limited to those employees and auxiliary service providers of the Company who need it to perform their job functions or provide services to the Company.
18. Existing or potential clients of the Company, employees and other natural persons are responsible for ensuring that the personal data they provide is accurate, correct and complete. They must immediately inform the Company, if their personal data changes. The Company shall not be liable for any damage caused to the person and / or third parties due to the person providing incorrect and / or incomplete personal data or not requesting to supplement and/or modify the data in case of changes.

PART III: PERSONAL DATA SOURCES

19. Personal data is usually obtained directly from the Data Subject (existing or potential client of the Company, employee or candidates) who makes them available through the Website, through the services provided by the Company, in the provision of services to the Company, in the course of employment or applying for employment in the Company upon arrival at the Company's registered office.
20. Personal data may also be obtained from third parties (e.g., temporary employment agencies, recruitment services, public authorities and registers) in the cases provided for by law or with a consent of a relevant person.
21. Although the client is not required to provide any personal data to the Company, it is possible that certain services may not be provided to him or her or he/she may not be employed in the Company if personal data is not provided.

PART IV: PURPOSE OF COLLECTING PERSONAL DATA

22. **Administration of orders and inquiries for services and goods** (legal basis: fulfilment of the contract, compliance with legal requirements; personal data: name, surname, telephone number, email address, address, other information, payment method information that may be required for the provision of services or goods at the time of sale).
23. **Security of property and persons** (video surveillance at the office and premises) (legal basis: legitimate interest, security of property and persons; personal data: video data).
24. Customer service quality assurance and customer satisfaction survey analysis (legal basis: legal interest: customer service quality assurance; service improvement, website improvement, assessing the success of our advertising campaigns, or customising services to your needs. The following personal data is collected for this purpose: email address and content of correspondence, contact information).
25. **Sending newsletters.** The following personal data is collected for this purpose: name and surname, email address, and contact information;
26. **Marketing purposes** - submission of promotional and sponsored content, promotional messaging, analysis and evaluation of markets, customers, products and services, including collection of your opinion on services and conducting customer surveys (legal basis: for this purpose, we process your personal data with a legal interest: to inform about our services, events, news and other relevant information, with your consent; personal data: name, surname, social network account details, phone number, email address, address).

27. **Information related to your request for services, partners or goods** (legal basis: provision of information relating to a legitimate interest in providing accurate information on our or partners' services, ancillary services, etc.; personal data: in order to respond to your inquiries by telephone, email, social networking environment, etc., we may ask for your phone number, residential address, email address or other your preferred contact information).
28. **In order to defend our interests before a court or other authority** (legal basis: fulfilment of legal requirements, legal interest - to defend against claims and requirements; personal data: depending on the lawsuit or claim being filed, all of your personal data we hold about you and listed in this Privacy Policy may be processed for this purpose).
29. **In order to comply with the mandatory provisions of applicable law.** For this purpose we collect the following data: personal data relating to immigration and customs control, personal data relating to invoices, personal data relating to logistics, our obligations in the event of disruption or delay in the delivery of goods.

PART V: MANAGEMENT OF PERSONAL DATA IN IMAGE MONITORING

30. In order to protect the property, health and life of the Company, our employees, guests and others, the Company conducts video surveillance at its office and areas around it.
31. We conduct video surveillance and process data (video data) of our employees and guests entering the video surveillance field on the basis of our legitimate interest. Our video surveillance systems do not use face recognition and / or analysis technologies and do not group, or profile video data captured with them to a specific data subject (person).
32. Employees and guests are informed about the ongoing video surveillance by providing a video camera symbol and details of the Data controller before entering the monitored area.
33. Premises in which employees or guests of the Company expect absolute protection of personal data, such as changing rooms, lounges, and WCs, are outside the field of view of video cameras.
34. Personal data (video data) collected during video surveillance is stored for up to 30 (thirty) calendar days from the date of capture.

PART VI: USE OF COOKIES

35. The Data Controller uses cookies on the Website www.polimaster.eu to distinguish between users of the Website. By using cookies, the Data controller seeks to provide a more enjoyable experience for individuals browsing the Website and to improve the Website itself.
36. Cookies are small text files that are stored on your personal browser or device (personal computer, mobile phone, or tablet).
37. Cookies used on the website do not allow us to identify the user of the website. Visits to the Website are logged anonymously, recognising your personal computer, mobile phone or tablet, and your IP address, and such information is not shared with third parties except as required by law.
38. By opening the Website and clicking the "Accept" button in the pop-up box, the person browsing agrees that cookies will be stored on his/her computer, mobile phone or tablet.
39. In order to revoke the consent, the person browsing may delete or block cookies by selecting the appropriate settings on his / her browser allowing him / her to refuse all or part of the cookies. It shall be noted that using browser settings that block cookies (including necessary cookies) may cause trouble using all or part of the functions of the Website.
40. Personal data collected by cookies is managed and processed in accordance with the provisions of the Law on Legal Protection of Personal Data of the Republic of Lithuania, the Law on Electronic Communications of the Republic of Lithuania, the Regulation (EU) 2016/679 of the European Parliament and of the Council 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 and other legal acts regulating management of personal data.
41. In compliance with legal requirements, the Website is subject to security measures that prevent unauthorised disclosure and unauthorised use of Personal Data.

PART VII: RIGHTS OF THE DATA SUBJECT

42. Rights of the Data subject
43. The Data subject shall have, inter alia, the following rights:
44. To receive information about the personal data processed by the Company, where and in what way personal data is collected and on what basis;
45. To apply to the Company with the request to correct personal data, suspend processing, or destroy it when data is incorrect, incomplete or inaccurate, or if data is no longer needed for the purposes for which it was collected. In such a case, the Data subject must submit a request, after which the Company will verify the information provided and take appropriate action. It is very important for the Company that the personal data it holds is accurate and correct;
46. To apply to the Company for the destruction of personal data or suspension of the processing of such personal data, other than storage, in the event that the person, having become aware of his/her personal data, determines that the personal data is being processed illegally or fraudulently;
47. To object processing of personal data where such data is or is intended to be processed for the purposes of direct marketing or for a legitimate interest pursued by the Company or a third party to whom the personal data is provided;
48. To revoke at any time his/her consent to the processing of personal data for direct marketing purposes;
49. To contact the Company for free assistance, if the Data subject is concerned about the Company's actions (omissions) that may not comply with the requirements of this Policy or the law.
50. Person may exercise all his / her rights as a Data subject by applying to the Company by email polimaster@polimaster.eu
51. In the event of failure to resolve the matter with the Company, the Client shall be entitled to apply to the State Data Protection Inspectorate (<https://vdai.lrv.lt/>), which shall be responsible for the supervision and control of personal data protection legislation.

PART VII: FINAL PROVISIONS

52. This Privacy Policy shall be reviewed at least every two years. As we update our Privacy Policy, we will notify you of material changes by posting a notice on a particular Website. If you access or use our content and / or services after the posting of such notice, you will be deemed to have accepted the new requirements set out in the update.

The Privacy policy last modified on 25 August 2022.

This policy is available to all interested parties and is published on the Internet at:

<https://polimaster.com/eu/terms.php/>

Contact us

If you notice an inconsistency with this privacy policy, a security loophole on our website, or have other questions regarding the processing of your personal data, please contact us in one of the most convenient ways for you:

By post: Polimaster Europe UAB, Ežero 4, Didžiasalio k., LT-13264 Vilnius r.

By email: polimaster@polimaster.eu

By telephone: +37052102323

Director Donatas Sirgedas