

KTG Asset Management, UAB

PRIVACY POLICY

I. GENERAL PROVISIONS

- 1.1. The Privacy Policy (hereinafter referred to as the **Policy**) governs the principles of processing of personal data (hereinafter referred to as the **Data**) provided by you to the Data Controller KTG Asset Management, UAB, located at Brastos g. 10, LT-47185, Kaunas, Lithuania (hereinafter referred to as the **Company**), in the case when you (hereinafter referred to as the **Person**):
- visit the Company's Website <https://alia.ktgrupe.lt> (the **Website**), office or social media accounts and
 - perform actions, including but not limited to: using search facilities, reading published information, submitting inquiries (via email, phone, social media, and the Company's Website), providing and receiving any type of information and/or data, entering into contracts with the Company (hereinafter collectively referred to as the **Services**).
- 1.2. The Company processes your Data as:
- Data of contractual parties or their representatives;
 - Data of persons contacting the Company with requests, complaints, claims, or inquiries (hereinafter referred to as **Applicants**);
 - Data of visitors using the Company's Website and/or social media accounts;
 - Data of Persons coming to the Company's premises;
 - Data of Persons as participants in legal proceedings.
- 1.3. The Company processes data in accordance with the General Data Protection Regulation (EU) 2016/679, herein referred to as the GDPR, the Republic of Lithuania Law on Personal Data Legal Protection, as well as other legal acts and local regulations of the Company. The Company implements all necessary technical and organisational security measures to ensure the security of the Data.
- 1.4. If you use the Website and/or Services, this Policy applies to you without exception. The Policy outlines the purposes and methods of data collection, conditions for processing and retention, your rights as a data subject, and other relevant aspects. If you do not agree with this Policy, the Company will not be able to provide you with the Services (on the Website, social media accounts, and/or in the office).
- 1.5. This privacy policy also applies to individuals processing personal data on behalf of the Company and to individuals authorized to process personal data on behalf of the Company.

II. PURPOSES, SCOPE, TIME LIMITS AND GROUNDS FOR DATA PROCESSING

2.1. Purpose: Archiving.

Scope:

- Data of the contracting parties (in case they are natural persons): full name, address, bank account number, signature, e-mail address, address of place of residence.
- Data of representatives of the contracting parties: full name, e-mail address, telephone number, job title, signature.
- Data of Applicants: full name, pseudonym, contact details, content of the inquiry of the Applicant and any other data provided by the Applicant at the time of making inquiries.
- Data of persons involved in the proceedings: full name, personal code, date of birth (if the personal code is not provided), address of place of residence, bank account number,

circumstances of the dispute, signature, job title, telephone number, e-mail address, date, number and content of the document certifying the authority.

Data retention term:

- Data of Contracting Parties and their representatives shall be retained for the duration of the contract and for 10 years after the termination of the contract;
- Data of applicants shall be retained during the processing of requests, complaints, claims, or inquiries and for 3 years after the completion of the review of the request, complaint, claim, or inquiry .
- Data of persons involved in the proceedings shall be retained during the legal dispute resolution and 1 year after the final legal decision becomes legally effective.

Legal basis: existence of a legal obligation and legitimate interest of the Company.

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

Scope:

Data of persons involved in the proceedings: full name, personal code, date of birth (if the personal code is not provided), address of place of residence, bank account number, circumstances of the dispute, signature, job title, telephone number, e-mail address, date, number and content of the document certifying the authority.

Retention period: during the legal dispute resolution and 1 year after the final legal decision becomes legally effective.

Legal basis: the Company's legitimate interest.

2.3. Purpose: Publicity of the Company's activities.

Scope: Full name, job title, image of the Person.

Retention period: during the term of consent.

Legal basis: consent of the Person.

2.4. Purpose: Bookkeeping administration.

Scope:

- Data of the contracting parties (in case they are natural persons): full name, address, bank account number, signature, e-mail address, telephone number.
- Data of representatives of the contracting parties: full name, e-mail address, telephone number, job title, signature.

Retention period: for the duration of the contract and for 10 years after the termination of the contract.

Legal basis: for the purpose of the Company's performance of contracts; existence of a legal obligation of the Company to process the Data.

2.5. Purpose: Communication by information and other means with third parties (correspondence, phone calls, etc.).

Scope: full name, pseudonym, job title, telephone number, e-mail address, content of correspondence, other data provided by the Person.

Retention period:

- Data received via email is retained during the communication and for 3 years after the last received email, then deleted and destroyed within 1 working day after the retention period ends.

- Business cards are destroyed once every three years.

- Data obtained during phone calls is retained until consent is revoked, then deleted within 1 working day after the revocation of consent.

Legal basis: consent of the Person; purpose of performance of the contract; legitimate interest of the Company.

2.6. Purpose: Administration of requests, complaints, inquiries, and other incoming documents.

Scope: Full name, pseudonym, contact details, content of the inquiry of the Applicant, and other data provided by the Applicant making written inquiries.

Retention period: during the processing of the request, complaint, inquiry, or claim, and 3 years after the date of processing the request, complaint, claim, or inquiry.

Legal basis: existence of the Company's legal obligation to process data.

2.7. Purpose: Social network administration (when you submit reviews, comments, likes, mentions, personal messages and become a follower on the Company's Website and/or social networks (LinkedIn, Facebook, Instagram):

Scope: full name, or pseudonym, job title and other contact details provided by the Person.

Retention period: for the duration of the Company's social media account; internal messaging on social media is retained for 3 years from the date of the last message.

Legal basis: consent of the Person.

2.8. Purpose: Conclusion, execution and administration of contracts with counterparties (contracting parties)

Scope:

- Counterparties (in case they are natural persons): full name, e-mail address, telephone number, signature, bank account number, address of place of residence, personal code.

- Representatives of the counterparties: full name, e-mail address, telephone number, job title, signature.

Retention period: for the duration of the contracts and for 10 years after the termination of the contract.

Legal basis: for the purpose of the fulfilment of the contracts by the Company.

2.9. Purpose: Website administration. Cookies are used when browsing the Website <https://alia.ktgrupe.lt> on any device. The Company is constantly improving its Website and aims to make its usage as convenient as possible. For this purpose, the Company collects data regarding the most relevant information to you, your frequency of accessing the Website, the browsers and devices you use, the content you predominantly read, your location, and more. This information is collected using the automated Google Analytics tool. **Details on the data collected can be found by clicking on this link to the Cookie Policy (active link).**

The retention period is specified in the Cookie Policy.

Legal basis:

- The legal basis for using essential cookies is the Company's legitimate interest;

- Other cookies are collected with the consent of the visitor.

2.10. Purpose: Direct marketing.

Scope: Full name, pseudonym, e-mail address, telephone number, job title of Persons, counterparties (natural persons) and representatives of the counterparties.

Retention period: until the revocation of consent.

Legal basis: consent of the Person.

2.11. Purpose: Administration of vehicle access to the Company's parking lot.

Scope: registration number, arrival and departure times of vehicles of persons visiting the site.

Retention period: during the term of the lease or other commercial contract concluded with the Company, or 30 days from the date of entry of the vehicle registration number in the system (if the owner or operator of the vehicle has no contractual relationship with the Company).

Legal basis: the Company's legitimate interest.

2.12. Purpose: Video surveillance.

Scope: Image of persons visiting the site, vehicle registration number.

Retention period: 30 days from the date of recording.

Legal basis: the Company's legitimate interest.

III. PRINCIPLES OF DATA PROCESSING

3.1. When processing data, the Company adheres to the following principles:

- 3.1.1. Data are processed in accordance with the principles of lawfulness, fairness, and transparency;
- 3.1.2. Data are collected for specified, clearly defined and legitimate purposes, and not further processed in a way incompatible with those purposes (the purpose limitation principle);
- 3.1.3. Data are adequate, appropriate and necessary only as necessary to achieve the purposes for which it is processed (principle of data minimisation);
- 3.1.4. The processed Data are accurate and updated, if necessary (principle of accuracy);
- 3.1.5. Data are stored in such a form that the subjects can be identified for no longer than is strictly necessary for the purposes for which personal data are processed (the principle of limitation of the length of the storage);
- 3.1.6. Data are processed in such a way as to ensure the adequate protection of personal Data, including the protection against unauthorised or unlawful processing and unintentional loss, destruction or damage, by appropriate technical or organisational measures (the principle of integrity and confidentiality).

IV. TO WHOM DO WE DISCLOSE YOUR DATA?

4.1. Without separate consent, the Company may disclose data to:

- 4.1.1. Courts and other law enforcement and/or dispute resolution institutions when exercising their legal powers or at the Company's initiative, declaring, enforcing, or defending legal claims;
- 4.1.2. Kitoks miestas, UAB;
- 4.1.3. "PricewaterhouseCoopers", a private limited liability company;
- 4.1.4. UAB Interneto vizija;
- 4.1.5. Telia Lietuva, AB;

- 4.1.6. Bitė Lietuva, UAB;
- 4.1.7. UAB Pajūrio auditas;
- 4.1.8. UAB Klaipėdos terminalo grupė;
- 4.1.9. UAB Argus Security Service;
- 4.1.10. The police, insurance companies in relation to the transmission of video data in the event of an accident;
- 4.1.11. Media, as far as it relates to the Company's business activities;
- 4.1.12. Lawyers, notaries, bailiffs, auditors, consultants, financial institutions, information technology service providers, electronic communication service providers, companies providing archiving services and other services to the Company;
- 4.1.13. Other data processors, as far as it relates to the Company's business activities.

V. RIGHTS OF THE PERSON

5.1. The Person shall be entitled:

- 5.1.1. To familiarize oneself with the Data;
 - 5.1.2. To request correction of inaccurate, incomplete, or incorrect Data;
 - 5.1.3. To restrict Data processing until the lawfulness of the processing is verified at the request of the data subject;
 - 5.1.4. To request the deletion of Data;
 - 5.1.5. To object to Data processing for direct marketing purposes;
 - 5.1.6. To request the transfer of Data to another Company or submission directly to the Data Subject in a form convenient to the Data Subject (applies to Data provided by the Person himself/herself and processed by automated means on the basis of consent or on the basis of a request or the conclusion and performance of a contract);
 - 5.1.7. To withdraw the consent given, without affecting the lawfulness of Data use prior to consent withdrawal;
 - 5.1.8. To file a complaint with the supervisory authority – the State Data Protection Inspectorate.
- 5.2.** Any request relating to the processing of Data may be submitted by a Person to the Company by sending a signed document by post to Brastos g. 10, LT-47185, Kaunas, or by visiting the Company's office.
- 5.3.** Considering the nature of the request and aiming to ensure the confidentiality of the Data processed by the Company, the Company reserves the right to request additional information from the Person submitting the request, necessary to establish the identity of the Person and/or confirm identity in a specific manner (for example, by personally visiting the office and presenting a valid identity document). If the Person fails to fulfil such a request, the requested information may not be provided.
- 5.4.** The Company undertakes to respond to all requests related to Data processing in accordance with the procedures established by the GDPR.
- 5.5.** Any Person has the right to lodge a complaint with the State Data Protection Inspectorate at any time regarding the processing of their data by the Company (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

KTG Asset Management, UAB

Legal entity code 305429907

Registered office address: Brastos g. 10, LT-47185, Kaunas

Tel. No +370686 63632