

EOLTAS PRIVATE LIMITED LIABILITY COMPANY

PRIVACY POLICY

General provisions

EOLTAS Private Limited Liability Company, number of legal entity 133769530, registered headquarters address – Žemaičių pl. 65A, LT – 48104, Kaunas, Lithuania (hereinafter the Company) cares about the protection of your information. We comply with the European Union General Data Protection Regulation (the so-called GDPR Regulation, 2016/679 of the European Parliament and of the Council (EU) 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, and repealing Directive 95/46/EC (General Regulation on the Protection of Personal Data) (Text with EEA relevance) and other laws protecting your information that we collect, use and store in our Company. In our Privacy Policy you will find answers to the most frequent questions about how we collect, use and store information about you.

If you have questions, comments or complaints about how we collect, use and store information about you, the Company is ready to assist you. If you need help, please contact us by email ads@eoltas.lt.

By registering on the websites www.eoltas.lt, <https://e-shop.eoltas.lt>, <https://b2b.eoltas.lt>, www.egt.lt, www.egt.eu (hereinafter referred to as the Websites), you provide your personal data to the Company and you give us the right to process them in the scope, manner and purpose indicated in this Policy (hereinafter the Policy) and/or the Rules for the sale and purchase of goods (hereinafter the Rules).

Please note that both the Policy and the Rules may be amended, completed and updated.

Personal data is any information that can be used to identify a person, as well as any information about a person who has already been identified.

The Company respects your privacy, and the security of your personal data is our priority. The Company shall take appropriate organizational and technical measures to ensure that your personal data is always safe and that the processing operations comply with the requirements of the data protection legislation and the Company's internal procedures.

The Company collects and manages your personal data listed in these Rules on the following legal grounds:

- Your consent;
- Company's legitimate interest;
- Enforcement of legal obligations arising and applicable to the Company.

Under the terms and conditions stipulated by applicable law, one or more of the above legal bases may apply to the processing of your personal data.

1. What of your data we process, and why?

1.1. Registration, verification, administration and communication registration

Registration

By registering and accepting the Rules, you provide us with the following personal data. Submission of certain registration data is necessary and you will not be able to use the Services without providing them. By signing up, you confirm that the personal data you provide is accurate and correct, and that you are at least 16 years of age. We are not liable for inaccurate, incomplete or misleading submission of your data.

Personal data:	
Data categories	Your name, surname, address, e-mail address, phone number, address, internet protocol (IP) address, device information.
Legal basis for data processing	Your consent to use the Services under the terms and conditions provided for in the in the Policy and/or the Rules
Term of data processing	For the duration that you use the Services. We can keep your consent and proof of it for a longer period if necessary so that we can defend against any claims, lawsuits or actions brought against us.

How and for what purposes do we use your personal data?

Using your personal data, we create a unique profile on our Websites to identify you as a registered Website user and which will give you access to the Services provided to registered users in accordance with the Rules and/or the terms and conditions provided for in this Policy.

By using your personal data, we also can recognize you, for example, if you wish to update or edit your data, or contact us regarding the provision of certain personal information, the implementation of rights related to the processing of personal data, etc. We also use contact details provided in your questionnaire (email, telephone number) to communicate with you, including, to respond to your requests, comments, to provide important information about the Services to you, their provision and (or) changes in this Policy. We contact you if you have forgotten to accept your purchases or we have detected any problems with transactions, etc.

It is very important that the personal data you provide to us is accurate and correct. If you provide incorrect (false) data, forget them or do not update the changed data, it may be difficult for us to ensure the provision of the Services, or there may be problems in exercising your rights. We will under no circumstances be liable for any damage caused to you due to incorrect or incomplete personal data. If the data you submit to us change, you must inform us immediately by replacing the relevant data on the registration form on the website or mobile application. Please read Article 6.2 of this policy about updating of your personal details.

The Company will not be able to verify the accuracy and correction of the data you provide to us. By accepting your registration form, we will assume that your data is accurate and correct, and all your consent are provided voluntarily, being fully aware of this Policy and Rules.

1.2. Administration of your account

We process your data so that we can maintain and manage your account.

Account details:	
Data categories	Data provided when signing up to the Websites, account login details, account activity, including technical browsing data (IP address, login and browsing technical information)
Legal basis for data processing	Your consent to create and use the account under the terms and conditions provided for in the Rules
Term of data processing	For the entire period when you are an account user. We can keep your consent and proof of it for a longer period if necessary so that we can defend against any claims, lawsuits or actions brought against us.

We consider your consent for using the accounts on the Websites to be received when you perform the necessary actions for creating the account specified in the Rules and confirm the registration.

1.3. Processing your purchase details.

Purchase data processing

By providing you our Services and offering various advantages – by concluding and executing sales contracts, by making refunds (if you return the purchased item), by giving discounts, etc. – In addition to your registration data, we also process the details of your purchase transactions (hereinafter the purchase details).

Your purchase details are processed for the purpose of service administration:	
Data categories	Your name, surname, e-mail address, telephone number, delivery and residential addresses, signature (if you accept the items yourself), date and time of purchase and delivery, item names, quantities, purchase prices and discounts, payment method and payment information
Legal basis for data processing	Your consent to use your account under the terms and conditions of the Rules
Term of data processing	5 years from the date of the purchase transaction.

How do we use your purchase details?

We store your purchase details for 5 years from the date of the purchase transaction, and upon expiry of this term we destroy them and/or reliably deconstruct, i.e., irrevocably decouple them from your personal data and other personalized information.

1.4. Provision of offers and information

If you agree to receive offers and newsletters when filling in the registration form, we process your personal data by providing you with such offers and information, such as general newsletters, information about our and our partners' offers, discounts, promotions, sales, inviting you to participate in the campaigns, games and win prizes, listening to your feedback

about the services provided and products, etc. We provide offers and information in your account, as well as in other ways that you choose: e.g. by mail, in SMS messages.

Personal data processed for the purpose of submitting offers and information:	
Data categories	Your name, email address and/or telephone number
Legal basis for data processing	Your consent to receive offers and information
Term of data processing	Until your consent to receive offers and news is valid. We can keep your consent and proof of it for a longer period if necessary so that we can defend against any claims, lawsuits or actions brought against us.

You can choose your preferred communication channels in the privacy settings of your Website accounts. You can change these settings freely at any time. You may refuse to receive offers and news at any time, at any time, to decline or change your preferred channels (methods) for receiving notifications. Your refusal to receive offers and news will not prevent you from using the Services.

1.5. Handling customer queries, complaints, requests and feedback

We will use your personal data to respond to your inquiries, complaints, requests, and administer your feedback (hereinafter the Query).

Data processed when handling queries, complaints, requests for administration:	
Data categories	Identification and contact information you have specified: name, telephone number, e-mail address, residential address, date of birth; Content of your Query: the event you are contacting us for, its circumstances, date, place, your request, claim or feedback, item, loyalty card number, other information in the Query; Other documents and/or data submitted with the Query: for example, purchase receipt details; photos; Phone call record if you contact our Customer Support Helpline.
Legal basis for data processing	Our legal responsibility to investigate and respond to user Queries as well as our legitimate interest in evaluating our customer feedback in order to improve the quality of our business and services.
Term of data processing	Up to 12 months

We use your data only in order to properly and objectively examine your Query, provide you with the necessary information, answer your questions, and resolve your requests or requirements. We can also analyze the data in the Query in order to improve the quality of our activities and the services provided to you, taking into account your opinions and suggestions.

1.6. Statistics, market research and consumer behaviour surveys

We constantly make every effort to ensure that our range of goods, promotions and discounts are as close as possible to our customers' needs.

Data processed for statistical, market, and behavioural studies of our customers:	
Data categories	Place of residence, purchase details (including date and time of purchase, item names, quantities, total purchase price, amount of discounts)
Legal basis for data processing	It is our legitimate interest to analyze the data and prepare reports for our business in order to evaluate our activities and create value for you both as a client and for the Company's business.
Term of data processing	5 years

We use automated data analysis in conducting surveys of statistics, market and customer behaviour, and reporting on our business. During the analysis, we use non-personalized data and do not process your name, contact details and other personal information. Data analysis for the purpose of statistical, market, and customer behaviour testing enables us to make important business decisions, such as the product range matching, customer pricing, etc. Our data analysis activity do not have any legal or material implications for you.

2. How long do we process and store your data?

We process and store your Queries and the data related to it as long as we investigate the Query, provide you with the answer and comply with the accepted decisions, as well as up to 12 (twelve) months after the Query has been resolved, but no less than:

- Queries by e-mail – 12 months;
- Appeals/complaints – 12 months;
- Call records on the hotline. – 14 days
- “*Let's Talk*” function correspondence records – 14 days
- *Instagram* messages – 12 months;
- Facebook personal messages – 12 months;

If the Query is related to initiating a legal dispute or there is a likelihood of such a dispute, we may retain your data longer, until the statutory limitation period for lodging a complaint or action is due and/or the decision is finalized.

Upon the expiration of your data processing and retention period set forth in this Policy, we will destroy your data or depersonalise you reliably and irrevocably as soon as possible, within a reasonable and justifiable timeframe for such action.

3. From which sources do we collect your personal data?

We receive almost all of your personal data from you. You provide us your personal data directly, for example by filling in registration forms, and purchasing details using the Services.

We also receive your data directly from you when you submit a Query in any of the following ways: by emailing us written request, by submitting as a written Query, by calling our customer support line, etc.

If, in order to examine your Query with good quality and objectively, we need to collect

additional information or to investigate the relevant circumstances, we may associate the data in your Query with the data we collect and (or) the data collected when investigating the Query, for example, we can check the details of your purchase transactions, the history of using your account, interview our employees, etc.

4. In which cases and to which third parties do we disclose your data?

We may transfer your data for processing to third parties who assist us in the execution and administration of the Services, provide us with services related to the administration of Customer Queries. These persons may include database software vendors, database administrators, data centres, hosting and cloud service providers, direct marketing service providers, market research or business intelligence service providers, providers of careers service, etc. In each case, we provide to the data processor only as much data as is absolutely necessary to complete a specific order or provide a specific service. Our recruited data processors can process your personal data only according to our instructions and cannot use them for other purposes or transfer to others without our consent. In addition, they must ensure the security of your data in accordance with applicable law and written agreements with us.

If, in the provision of the Services, we grant the right to use our partner services (for example, through partners' loyalty programs), some of your data will also be made available to our partner, but only for the purpose of providing such services or other terms of co-operation.

If the Event description described in the Query can be recognised as insured, we will transfer your Query and data to the insurance company (ies) where we insure our civil liability, property or which provides us with a different insurance coverage related to the event named in your Query. Insurance companies act as independent data controllers and process your data in accordance with the terms and conditions established by the insurance company.

Data may also be provided to competent authorities or law enforcement agencies such as the police or the supervisory authorities, but only upon request and only when required by applicable law or in the cases and procedures provided by law, in order to safeguard our rights, the safety of our buyers, employees and resources, and to bring forward, present and defend legal requirements.

If we use the website analysis service (such as Google Analytics) to determine how you use the information provided on the Website, we may exchange your depersonalized data with third parties who rely on this information to evaluate how the Website is used, to prepare reports the website operators about the Website functioning, and to provide other services related to the use of the website. For more information, see annex1

- Cookie policy.

5. In which territories and jurisdictions do we process your personal data?

We process your personal data only in the territory of the European Union. We do not transfer your personal data to third countries.

6. What of your rights are guaranteed by the data protection legislation and how can you use it?

Data protection legislation gives you many rights that you can freely use, and we need to provide you with that opportunity. We provide information about your specific rights and how they are implemented are presented in this Policy below, please read it carefully.

6.1. The right to access our personal data processed by us

You are entitled to receive our confirmation as to whether we process your personal data, as well as the right to access our personal data and information about the objectives of processing your data, the categories of data being processed, categories of recipients of data, the period of data processing, sources of data and the consequences for you.

We provide the majority of this information to you in this Policy and we believe that it is useful to you.

If you are a user of website accounts, you can access your personal data at any time from your account (for example: check the relevant personal information, the concerns you have provided), receive invoices issued to you for the last 12 months.

If the information provided in this Policy, the Website accounts is not sufficient to you, or if you would like to receive a transaction history for more than 12 months, you can always contact us by email ads@eoltas.lt.

6.2. The right to correct personal data

If the information you submit it to us in the registration form has changed, or if you believe our information about you is inaccurate or incorrect, you have the right to request that information to be corrected, revised or changed.

You can make adjustments to your data on the Website accounts. You can also contact us by e-mail to ads@eoltas.lt and request that your information is corrected or revised by us.

6.3. Right to withdraw your consent

In cases where we process your data on the basis of your consent, you are entitled to withdraw your consent at any time and the processing of your data based on your consent will be terminated. In certain cases, this may mean that we will no longer be able to continue to use our Services.

For example, you may at any time withdraw your consent to receive offers and news. Withdrawal of these consents will not prevent you from continuing to use the Services, but this will mean that you will not be aware of the Company's discounts, promotions, new arrivals etc.

You can edit (cancel or resubmit) your consents by submitting an appropriately updated registration form, by changing the consent settings in your account, or by contacting us by email ads@eoltas.lt.

Upon expiration, withdrawal or cancellation of your consent, we will destroy the data processed with your consent, and in the cases specified in the Policy we will depersonalise them reliably and irrevocably.

In any event, we may retain your consent and proof of it for a longer period, if necessary, so that we can defend against claims, lawsuits or actions brought against us.

6.4. Right to file a complaint

If you believe that we process your data in violation of the requirements of the data protection laws, we will always ask you to contact us directly first. We believe that by benevolent efforts, we will be able to dispel all your doubts, satisfy requests and correct our mistakes, if any.

If you are not satisfied with our proposed solution to the problem or, in your opinion, we do not take action as required by your request, you will have the right to file a complaint to the

supervisory authority which in the Republic of Lithuania is the State Data Protection Inspectorate.

6.5. The right to disagree with the processing of data where the processing is based on legitimate interests

You have the right to disagree with the processing of personal data when personal data is processed on the basis of our legitimate interests. However, in view of the objectives of the Service Provision and the balance between the legitimate interests of both parties (both your as a data subject and as, as a controller), your objection may mean that, upon termination of our processing of your data based on our legitimate interest, we will not be able to provide the Services to you.

To exercise the right specified in this section, please submit a written request by email ads@eoltas.lt.

6.6. Right to delete the data (the right to be forgotten)

In certain circumstances specified in the data processing legislation (when the processing of personal data is illegal, the basis for the processing of data has expired, etc.), you have the right to request that we delete your personal data. To use this right, please submit a written request by e-mail ads@eoltas.lt.

It is important to note that your personal data is deleted without your separate request, and the other data deleted or reliably depersonalized if you discontinue the use of the Services.

6.7. Right to restriction of processing

In certain circumstances specified in the data processing legislation (when the processing of personal data is illegal, you dispute the accuracy of the data, you have filed an objection to the processing of data on the basis of our legitimate interest, etc.), you also have the right to restrict the processing of your data. However, we must point out that due to limitation of data processing and during this period of limitation, we may not be able to guarantee the provision of Services to you.

To exercise the right specified in this section, please submit a written request by email ads@eoltas.lt.

6.8. Right to data portability

You are entitled to transfer the data that we process with your consent and which are processed by automated means, to another data controller. We will provide you with the data you wish to transfer in the format normally used in our systems and in computer readable form, and if you wish and if we have technical possibilities, we will forward the data directly to the other controller you have specified. To exercise the right to data portability, please submit a written request by email ads@eoltas.lt.

6.9. Procedure for handling applications

In order to protect the data of all our customers from unauthorized disclosure, we will be required to identify you upon receipt of your request for data or for the exercise of your other rights. To this end, we may ask you to provide the relevant personal data indicated in your registration form (for example: your name, email address or phone number) and we will

compare whether the information you provided matches the relevant personal data we have in our systems. In carrying out this verification, we may also send a control message to the contact (SMS or email) that you submitted in the registration form requesting authorization. If the verification procedure is unsuccessful (e.g.: The personal data you provide those not match the data specified in the registration form, or you do not authorise according to the SMS or email would have received), we will be forced to state that you are not the subject of the requested data and we will be required to reject your request.

Upon receipt of your request for the implementation of any of your rights and having successfully performed the above-mentioned verification procedure, we undertake to inform you without undue delay, but in any case no later than within one month from the receipt of your request and completion of the verification procedure, about the actions that we have taken in respect of your request. Depending on the complexity and they number of requests, we have the right to extend the one-month period for another two months, informing you by the end of the first month and indicating the reasons for such extension.

If your request is submitted electronically, we will provide you with an answer also by electronic means, unless this is impossible (for example: because of the extremely high volume of information) or if you ask you to respond in a different way. We will refuse to satisfy your request and indicate the reason when the circumstances specified in the legal acts are determined, by informing you in writing.

7. Cookies

We use cookies (this is a small information file sent to your computer or other device (such as a mobile phone) when you visit our website). The cookie is downloaded to your computer or other device in order to save data and we can identify you as a Service user when you are visiting our website. The information collected by the cookies allows us to provide the customer with the opportunity to browse through more convenient, attractive offers and learn more about the behaviour of the users of the site, to analyze trends and improve both the website and the service, as well as your servicing.

You can read more about the cookies used on our Websites in Annex 1 – Cookie Policy of UAB EOLTAS.

8. Policy validity and changes

This Policy applies from 25 May 2018. If we change this Policy, we will announce its updated version on the Websites.

COOKIE POLICY

Last update date: 21-05-2018

1. What cookies are?

Cookies are small text files stored on your device (such as a computer, mobile phone, tablet) in your browser when you browse the websites. Other technologies, including data stored in your browser or device, identifiers associated with your device, and other software, may be used for similar purposes. Cookies are used extensively to make websites work better or more efficiently. In this policy, all of these technologies are referred to as cookies.

2. Why do you use cookies?

We use cookies:

- to ensure that the site performs as it should;
- to make sure you do not have to log in every time you visit the site;
- to save your settings, selected during and between visits;
- to increase site speed and security of the website;
- to give you the opportunity to share pages on social networks, such as *Facebook*, *Instagram*, or *LinkedIn*;
- to ensure that you can customize our website to your needs so you can quickly find what you are looking for;
- to continuously improve our website to make it even more appealing to you;
- to engage in more effective marketing.

3. What are the types of cookies?

(a) strictly mandatory cookies

These cookies on the site are necessary for the user to browse and use the features of the site, for example, to memorize the information entered in the forms when the user moves from one page to another during the browsing session. Without strictly mandatory cookies it would be impossible to provide certain services for the website, and the site would not work as seamlessly as it should. These cookies do not collect any information for marketing purposes and do not remember where you've been online.

(b) analytical cookies

Analytical cookies collect information about the use of the site and help improve the functioning of the site. For example, analytical cookies can show which pages are visited most often, help to record mistakes in the site and show the effectiveness of the site's display. Analytical cookies do not collect personal information from users, and all the information collected by these cookies is aggregated and anonymous.

(c) functional cookies

Functional cookies allow the site to remember your choices and provide improved and more customized features. Functional cookies also remember the changes you make, such as the

customisation of a particular web page, as well as in other cases, such as when you watch a video or leave a comment on our webpage. Functional cookies do not track your actions on other sites.

(d) target or promotional cookies

Target or promotional cookies are used to show you a more relevant and customised advertisements, or to limit the number of displays on the same ad on the website. This type of cookies is also used to measure the effectiveness of a promotion campaign. These cookies can be used to memorize what you watched while visiting your website.

4. What cookies do you use?

Cookies used on the websites www.eoltas.lt, <https://e-shop.eoltas.lt>, <https://b2b.eoltas.lt>, www.egt.lt, www.egt.eu:

Cookie category/type	Cookie name	Purpose of the cookie	Storage period of the cookie
Analytical cookies from <i>Google Analytics</i>	__utma, __utmb, __utmc	Information is sent anonymously to the server. utma identifies unique visitors; utmb and utmc monitor user sessions. For more information, see Google's website.	Accordingly, two years, 30 minutes and until the end of the browsing session.
Analytical cookies from <i>Google Analytics</i>	_utmz	Information is sent anonymously to the server. utmz determines where the traffic comes from. For more information, see Google's website.	Six months
Mandatory cookies	PHPSESSID	A technical cookie used by the program server to support the user session.	Until the end of the browsing session
Analytical cookies	hjIncludedInSample	Third party cookie saving information for the Hotjar system	Until the end of the browsing session
Functional cookies	changeCountryPopup	Technical cookie to support user session settings	Until the end of the browsing session
Functional cookies	language	The technical cookie is used to support the user's session language	Until the end of the browsing session

Analytical cookies	omnisendAnonymousID omnisendCartProducts omnisendSessionID	Third party cookies that collect cart statistics	Correspondingly, 1 year and until the end of the browsing session
Mandatory cookies	sid sid_key sid_long	A technical cookie used by the program server to support the user session.	Until the end of the browsing session
Analytical cookies	soundest-views soundestID	Third-party analytics cookies	Until the end of the browsing session
Analytical cookies	__zlcmid	A third-party <i>Zendesk</i> tracking cookie to support the consumer support tool	1 years

5. How can I manage my cookies?

Strictly mandatory cookies and analytical cookies are a prerequisite for using our site. If you opt out of these types of cookies, we cannot guarantee how our site will function when you visit it.

You can control the use of functional cookies and target or promotional cookies by changing your browser settings.

Please note that by deleting cookies or disabling the future use of cookies may prevent you from accessing certain parts or features of our site. If you change your cookie settings, it will affect other sites you visit.