

APPROVED  
By CEO's of Aveplast, JSC  
order No. T-18-12 dated on the 24th of  
October, 2018.

## JSC „AVEPLAST“ PERSONAL DATA PROCESSING POLICY

### I. KEY POLICY CONCEPTS

1. Key terms used in the Personal Data Processing Rules (“the Rules”) include:
  - 1.1. **ADTAJ** – the Law on the Legal Protection of Personal Data of the Republic of Lithuania.
  - 1.2. **Personal data** means any information about an identified or identifiable natural person;
  - 1.3. **Recipient** of the data means a natural or legal person, public authority, agency or other body to whom the Personal Data is disclosed, whether or not it is a third party;
  - 1.4. **Data subject** – a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, a personal identification number, location data and an identifier on the Internet, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
  - 1.5. **Data processing** means any operation or sequence of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, sorting, organisation, storage, adaptation or alteration, retrieval, access, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination with other data, restriction, erasure or destruction;
  - 1.6. **Data Processor** - a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
  - 1.7. **Data Controller** means a natural or legal person, public authority, agency or other body who, alone or jointly with others, determines the purposes and means of processing.
  - 1.8. **Profiling** means any form of automated processing of personal data which involves the use of personal data for the purpose of evaluating certain personal aspects relating to a natural person, in particular for the purpose of analysing or predicting aspects of the performance, economic situation, state of health, personal interests, hobbies, interests, trustworthiness, behaviour, whereabouts or movements of that natural person;
  - 1.9. **Regulation** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.
  - 1.10. **Sub-processor** means another external processor engaged by the processor to process personal data on behalf of the controller in the performance of its service functions;
  - 1.11. **Direct marketing** – the activity of offering goods or services to persons by post, telephone or other direct means and / or seeking their opinion on the goods or services offered;
  - 1.12. **Video surveillance** – the processing of image data relating to a natural person ("image data") by means of automated means of video surveillance (video and still cameras, etc.), regardless of whether the data are stored in a medium.
  - 1.13. **VDAI** – State Data Protection Inspectorate;
  - 1.14. **other terms** as defined in the Regulation, the GDPR and other legislation governing the processing and protection of personal data..

### II. GENERAL PROVISIONS

2. The Rules of Aveplast JSC (hereinafter referred to as the "Company") determine the purposes, grounds, categories of data subjects, categories of personal data, conditions for the transfer of personal data to third parties, the terms of storage of personal data, the conditions for the destruction of personal data, the limitations and the procedure for the destruction of personal data, the rights of data subjects, the organisational and technical measures to protect the protection of personal data, and the procedures for the use of data processors and the relations of the Company and data processors, the content of the records of

processing operations, the procedures of the preparation thereof, and the liability of the employees who process personal data.

3. Purpose of the Rules - to ensure the proper processing and protection of personal data, the right to privacy of natural persons, and to protect the fundamental rights and freedoms of natural persons in relation to the processing of their personal data.

### **III. PRINCIPLES AND PURPOSES OF PROCESSING PERSONAL DATA**

4. The Company's processing of personal data is guided by the principles set out in the Regulation in relation to the processing of personal data:

4.1. the principle of fairness and equity - personal data must be processed in a lawful and fair manner in relation to the data subject;

4.2. transparency - the information and notices relating to the processing of those personal data must be easily accessible and understandable, in clear and plain language;

4.3. purpose limitation – personal data should only be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes;

4.4. data minimisation – personal data must be adequate, relevant and only necessary for the purposes for which they are processed;

4.5. accuracy – personal data must be accurate and updated as necessary;

4.6. storage limitation principle – personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;

4.7. integrity and confidentiality principle – personal data must be processed in such a way as to ensure, by means of appropriate technical or organisational measures, adequate protection of the security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage;

4.8. accountability principle - the company is responsible for ensuring adequate security of personal data, lawful processing of personal data, and ensuring the rights of data subjects.

### **IV. FUNCTIONS, RIGHTS AND DUTIES OF THE COMPANY**

5. Company must perform the following functions:

5.1. It shall provide information to its data subjects about the processing of their personal data in a concise, transparent, comprehensible and easily accessible form, in clear and plain language, from the moment of receipt of the personal data of the data subjects. Particular attention shall be paid to the provision of information to minors under the age of 16, as this category of data subjects may not understand the meaning of the processing of their personal data;

5.2. analyse technological, methodological and organisational problems in the processing of personal data and take the necessary decisions to adequately ensure the security of personal data;

6. Corporate responsibilities:

6.1. ensure compliance with the requirements of these Rules, the Regulation, the GDPR and other legislation governing the processing and protection of personal data;

6.2. to properly implement the rights of the data subject in accordance with the requirements set out in the Regulation;

6.3. ensure the security of personal data by implementing technical and organisational measures to secure personal data;

6.4. keeping records of processing activities;

6.5. notify the State Data Protection Inspectorate within 72 hours of becoming aware of a personal data breach, unless the personal data breach does not endanger the rights and freedoms of natural persons;

6.6. notify the data subject of a personal data breach without undue delay where the personal data breach is likely to result in a serious risk to the rights and freedoms of the data subject;

6.7. ensure that personal data are retained for the periods set out in the Terms and Conditions and for no longer than is necessary to achieve the purposes set out in the Terms and Conditions;

6.8. only use processors for the processing of personal data that guarantee the necessary technical and organisational measures to protect personal data;

6.9. not to store, disclose, transfer or make available by any means whatsoever the personal data processed to any person who is not authorised to process such personal data, whether inside or outside the Company;

6.10. other obligations provided for in the Regulation, the ADTAJ and other legal acts of the Republic of Lithuania.

## **V. SELLING PRODUCTS, PROVIDING CONTRACTING AND SERVICES TO CUSTOMERS**

7. For the purposes of the sale of plastic windows or doors and other products and the provision of contracting and other services to customers, the Company processes the following personal data of natural persons of customers:

- 7.1. name;
- 7.2. surname;
- 7.3. address of permanent residence and/or address;
- 7.4. personal ID code;
- 7.5. signature;
- 7.6. telephone number;
- 7.7. e-mail address.

8. For the purposes of the sale of plastic windows or doors and other products and the provision of contracting and other services to customers, the Company processes the following personal data of the customer's legal entity representatives:

- 8.1. name;
- 8.2. surname;
- 8.3. signature.

9. The Company's clients, natural persons and representatives of the clients' legal entities, are hereinafter collectively referred to as Clients.

10. The personal data of customers are processed on the basis of the performance of contracts for the sale and purchase of plastic windows or doors and other products, contracts for the provision of contractual services, i.e. in order for the Company to duly fulfil its obligations and exercise its rights set out in contracts for the sale and purchase of plastic windows or doors and other products, contracts for the provision of contractual services and contracts for the provision of other services.

11. The Client's personal data may be transferred without the Client's consent only in compliance with the Company's legal obligation to disclose the Client's personal data to the State Tax Inspectorate under the Ministry of Finance, the State Enterprise "Centre of Registers", other state and municipal institutions and bodies in accordance with the procedure established by law. In other cases, the Client's personal data may only be disclosed with his/her written consent.

12. The Company may transfer the Clients' personal data to data processors on the basis of a personal data processing agreement.

13. The personal data of the Clients shall be processed by the employees authorised by the Director of the Company. Only those employees who have been delegated to process the relevant data shall have access to specific Customer Personal Data.

14. The personal data of the Customers, except for storage, shall be processed until the termination of the business relationship with the Customers and the fulfilment of all mutual obligations arising from the sale and purchase agreements for plastic windows or doors and other products, contractual agreements and other service contracts.

15. After the expiry of the contracts for the sale and purchase of plastic windows or doors and other products, contractual agreements and other service contracts, the personal data of the Customers shall continue to be stored for the terms set out in the General Document Retention Periods Index and the Company, and shall be erased from all computers, the internal network, the CMS, the accounting system, and the contracts, invoices, and other documents in which the personal data of the Customers is stored shall be destroyed upon expiry of these terms.

## **VI. COOPERATION WITH PARTNERS**

16. The Company, in the context of joint projects or joint activities, as well as in cooperation with its partners on other grounds, processes the following personal data of natural persons of its partners:

- 16.1. name;
- 16.2. surname;
- 16.3. personal ID code;
- 16.4. signature;
- 16.5. telephone number;
- 16.6. e-mail address;
- 16.7. Skype name;
- 16.8. the number of the current bank account.

17. The Company processes personal data of the following representatives of the legal entities of its partners in the course of joint projects or joint activities, as well as in cooperation with its partners on other grounds:

- 17.1. name;
- 17.2. surname;
- 17.3. signature;
- 17.4. telephone number;
- 17.5. e-mail address;
- 17.6. Skype name;

18. The Partners, natural persons and representatives of legal entities of the Partners are hereinafter collectively referred to as the Partners.

19. The personal data of the partners are processed on the basis of the performance of cooperation and other agreements, i.e. in order for the Company to duly perform its obligations and exercise its rights set out in the cooperation and other agreements.

20. The Partner's personal data may be transferred without the Partner's consent only when the Company is fulfilling its legal obligation to disclose the Partner's personal data to the State Tax Inspectorate under the Ministry of Finance, the State Enterprise "Centre of Registers", other state and municipal institutions and bodies in accordance with the procedure established by law. In other cases, the Partner's personal data may only be disclosed with his / her written consent.

21. The Company may transfer the Partners' personal data to data processors on the basis of a personal data processing agreement.

22. Partners' personal data shall be processed by employees authorised by the Director of the Company. Only those employees who have been authorised to process the relevant data shall have access to the personal data of the Partners.

23. The Partners' personal data, with the exception of storage, shall be processed until the termination of the business relationship with the Partners and the fulfilment of all mutual obligations.

24. After the termination of the cooperation and other agreements concluded with the Partners, the personal data of the Partners shall continue to be stored for the terms set out in the General Document Retention Periods Index and in the Company, and shall be deleted from all computers, internal network, CMS, accounting system, and the contracts, invoices, and other documents in which the personal data of the Partners are stored shall be destroyed upon the expiry of these terms.

## **VII. DIRECT MARKETING**

25. The Company processes the following customer personal data for direct marketing purposes:

- 25.1. name;
- 25.2. surname;
- 25.3. telephone number;
- 25.4. e-mail address.

26. The Company shall carry out direct marketing by sending newsletters to its customers, by placing individual promotional advertisements, by sending notices of promotions applicable to plastic windows, doors and other products and additional services offered by the Company, by organising surveys of its customers regarding the plastic windows or doors sold to them, the quality of the services provided to them, the prices, individual offers.

27. For the purpose of direct marketing, the Company profiles the personal data of its customers in order to offer individual solutions and offers to its customers, as well as in order to assess and analyse its market, its customers, the demand for the sale of plastic windows or doors, and other products and additional services provided. The profiling of customers' personal data is carried out without any automated decision-making process that could lead to legal consequences for users.

28. Customers' personal data are processed for the purposes set out in this section on the basis of their consent.

29. The Company may transfer customers' personal data processed for the purpose of direct marketing to data processors on the basis of personal data processing agreements without the customers' prior consent.

30. Customer personal data for the purpose of direct marketing shall be processed by employees authorised by the Director of the Company. Only those employees authorised to process the relevant data shall have access to the personal data of specific customers.

31. The customer's personal data for the purpose of direct marketing shall be processed until the customer withdraws his/her consent. Upon withdrawal of consent, the Customer's personal data shall be erased from all computers, internal network and the VVS.

### **VIII. VIDEO SURVEILLANCE AND PROCESSING OF VIDEO DATA**

32. Video surveillance and processing of video data shall be carried out on the basis of the legitimate interests of the Company and third parties in order to ensure public safety, protection of the Company's property and confidential information, organisation of work, prevention of accidents at work, control of access to the Company's territory and premises.

33. Every visitor and employee may reasonably believe that he/she is being monitored by CCTV cameras, as he/she is informed about the CCTV surveillance in the Company's territory and premises by means of information signs. The information links shall contain the following information:

33.1. contact details of the company and its representative;

33.2. the objectives of the Company's video surveillance;

33.3. legitimate interest for which the Company carries out video surveillance of the territory and premises;

33.4. categories of relevant personal data;

33.5. the period of retention of image data, defined by a specific time limit or other criteria;

33.6. rights of the persons being filmed;

33.7. right to lodge a complaint with the State Data Protection Inspectorate;

33.8. the source of the video data collected is CCTV cameras in the area and on the premises..

34. Video surveillance shall be carried out in the premises and area specified in Annex 1.

35. Without the written consent of the data subject, image data may be transmitted to a pre-trial investigation agency, a public prosecutor or a court of law as evidence, as well as to other bodies or institutions in accordance with the procedure established by law.

36. Image data may be processed by the Company's data processors on the basis of personal data processing agreements.

37. Image data shall be processed by employees authorised by the Director of the Company. Only those employees authorised to process the relevant data shall have access to the image data.

38. Image data is deleted after the disk is full (16Tb in total), image data is automatically deleted from the oldest.

### **IX. RIGHTS AND OBLIGATIONS OF THE DATA SUBJECT**

39. Data subjects have relevant rights:

39.1. the right of access to personal data processed;

39.2. the right to have incorrect or inaccurate personal data rectified or clarified;

39.3. the right to have personal data processed erased;

39.4. the right to restrict the processing of personal data;

39.5. the right to obtain personal data relating to data subjects which they have provided to the controller in a structured, commonly used and computer-readable format and to have those data transmitted to another controller;

39.6. the right to object to the processing of personal data;

39.7. the right to withdraw consent to the processing of their personal data at any time.

40. The conditions, limitations, and procedures for exercising the rights of Data Subjects shall be set out in the Schedule of Procedures for the Exercise of the Rights of Data Subjects approved by the Director of the Company.

41. Data subjects have corresponding responsibilities:

41.1. provide the Company with complete and correct personal data;

41.2. in the event of a change in the data subject's personal data or in the event that the data subject has provided incorrect personal data, the data subject shall immediately inform the Company thereof and provide the Company with new or revised personal data;

41.3. use and not abuse your rights in good faith.

## **X. TECHNICAL AND ORGANIZATIONAL MEASURES FOR PERSONAL DATA PROTECTION**

42. The security of personal data shall be ensured by the organisational and technical data protection measures specified:

42.1. protecting, managing and controlling access to personal data;

42.2. ensuring the protection of personal data processed;

42.3. access to personal data and Company resources shall only be granted to employees who are authorised to process personal data. Employees handling personal data shall be required to have signed an undertaking to handle personal data appropriately and to ensure the confidentiality of such data.

### **A LIST OF PREMISES AND AREAS SUBJECT TO VIDEO SURVEILLANCE**

1. Video surveillance is carried out in the following premises:
  - 1.1. PVC, ALU and ancillary production facilities at Kertupio g. 59, Neveronys;
  - 1.2. warehouses: material warehouse, assembly warehouse, goods for resale (PORTA) warehouse, manufactured goods warehouse at Kertupio g. 59, Neveronys;
  - 1.3. entrance to the administrative building at Kertupio g. 59, Neveronys.
2. Video surveillance is also carried out in the unloading yard of PVC / ALU materials at Kertupio 59, Neveronys.