

## **UAB “Betono mozaika” Privacy Policy**

### **Data Controller**

Data controller is UAB “Betono mozaika”, legal entity code 141524826, with its registered office at Liepų g. 87N, Klaipėda (hereinafter referred to as either ‘Company’, ‘We’, ‘Us’ or ‘Our’). This Privacy Policy has been issued and is intended for individuals purchasing goods from the Company, using the Company's services, visiting the Company's territory or premises, interested in employment in the Company, or visiting our website at [www.betonomozaika.lt](http://www.betonomozaika.lt).

### **Joint Controllers**

The Company may process your data independently, or jointly with other controllers (i.e. joint controllers within the meaning of Article 26 of the GDPR). Joint controllers in such case determine, in a transparent manner, their respective responsibilities for compliance with the obligations under GDPR to duly reflect the respective roles and relationships of the joint controllers *vis-à-vis* the data subjects by means of an arrangement between them. The essence of the arrangement shall be made available to the data subject on request made in writing. The data subject may exercise his or her rights under GDPR in respect of and against each of the controllers.

### **General Provisions**

This Privacy Policy defines and establishes the key principles for the processing of personal data, and for exercise of the rights of the data subject. Additional information may be provided in sale/purchase contracts, contracts for provision of services as well as other contracts.

By using our services, purchasing goods, providing data, sending or otherwise submitting CV, visiting the Company's premises or territory, continuing to browse our website, you confirm that you have read this Privacy Policy, understood its provisions and agree to be bound by it. If you do not agree to this Privacy Policy, please do not use the services of the Company, do not provide us with your personal data for the purposes whatsoever, and do not browse our website [www.betonomozaika.lt](http://www.betonomozaika.lt).

### **Principles relating to processing of personal data**

Personal data are processed by the Company in line with the provisions of the applicable legislation of the European Union and the Republic of Lithuania governing personal data processing.

The extent of personal data we process depends on the used or ordered services, and goods as well as the information provided by a person when ordering goods and/or services, visiting or making registration on our website, providing his/her data for the purposes of employment in the Company, or visiting the Company's premises or territory.

Data are processed exclusively subject to the existence of lawful processing criteria, i.e. the processing is necessary to ensure supply of goods and / or services; the data subject has given consent to the processing; processing is necessary for compliance with a legal obligation to which the Company is subject; processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.

The Company pursues that personal data are processed accurately, fairly and lawfully, exclusively for the purposes for which they were collected, ensuring compliance with clear and transparent principles and requirements of personal data processing.

### **Sources of personal data**

Personal data may be obtained directly from the data subject who provides such data when sending his / her CV or otherwise contacting the Company, may originate from the client's activities, or obtained from data processors of the Company or other external sources. Data may also come from publicly accessible sources.

Data may also be generated when a person uses our services, for example, by making a phone call, sending an SMS, e-mail, ordering goods and / or services, or visiting our website.

You are not obliged to provide any personal data, except when such is necessary for concluding transactions (for example, for sale of goods or provision of services, for invoicing purposes).

## **The purposes of processing**

We process personal data for the following purposes: performance of contractual obligations; vehicle and freight tracking and tracing (GPS); administration of road traffic offense reports; debt recovery purposes; administration of requests; web statistics and analytics; protection of property and individuals; recruitment purposes; conclusion, performance and administration of employment contracts and other human resource management related purposes.

Groups of data subjects include buyers (clients), representatives of buyers (clients), business partners, representatives of business partners, employees, jobseekers, individuals entering premises and the territory of the Company, visitors.

Categories of personal data subject to processing may include, without limitation, a name, workplace, job position, personal number, mobile phone number, CV, e-mail address, video records, information on visits at the premises and in the territory of the Company, vehicle plate numbers, other information required for sale of goods and provision of services, for maintaining relationship and for contract administration purposes; IP address, browsing history and date.

Data recipients and groups of recipients include public authorities and institutions, law enforcement authorities; auditors, legal and financial advisors; third parties engaged in management of registers and software; debt collection agencies.

## **Data processing for the purposes of ensuring personal security, protection of property and assets as well as continuity and stability of the Company' operations**

To ensure personal security, protection of property and assets as well as continuity and stability of the Company' operations, the Company's visitors may be registered, with their data recorded and stored in special logbooks or electronically in Proxyclick SA servers in compliance with Privacy Policy available at <https://www.proxyclick.com/privacy>. Personal data that may be collected include visitor' full name, company name, indication of an employee of the Company accepting a visitor, time of arrival and exit. Such data are obtained from the data subject being a visitor. Visitors of the Company are notified of their personal data processing verbally or by submitting a written notice thereof upon arrival at the Company, and may find additional information in this Privacy Policy of the Company.

## **Video surveillance for the purposes of ensuring personal security and protection of the property of the Company**

Video surveillance in the Company is effected exclusively in the premises and/or territories owned by the Company, with such premises and territories used for activities of the Company. Video surveillance is effected for the purposes protection of property and people, whereas the data collected include video records.

We pursue to organize video surveillance in a way to ensure that an area (room, part of a room) larger than required is not covered by surveillance. No video surveillance is present in the premises and/or territories designated for private use, i.e. toilets, showers, changing rooms, etc.

At the end of the storage period, video records are subject to automatic overwriting, thus deleting the data for the oldest period.

Video records may be used exclusively for the purposes of identifying and revealing alleged offences, or seeking to prove and disclose damage caused to the Company by its employees, service providers, or third parties, and may be handed over solely to the persons entitled to receive such data under the applicable laws.

Video records may be reviewed and handed over to law enforcement authorities, if necessary, upon their written request. If video records are reviewed outside the premises of law enforcement authorities or courts, such review shall take place in the closed premises of the Company. The data subject and a responsible employee of the Company shall be entitled to participate in such review.

Where there are any grounds to believe that an infringement (offence) has been recorded on the video surveillance materials, the required video data (episodes) shall be transferred to secure media and stored as long as an objective need exists.

The request of the data subject for presentation of video records must specify the exact circumstances of an incident (including the address of the premises / territory owned by the Company; specific place in such premises / territory where the incident occurred; date, time of an incident (to the nearest half an hour). The request of the data subject for review of video records shall be responded no later than 30 business days from the date of its receipt in the same form as received, or in the manner specified in the request, provided the data subject confirms that such transmission will ensure security of data; otherwise, the data subject shall be notified of the refusal to comply with the request, by providing the grounds for the request rejection.

### **Data processing for the purposes of employment in the Company**

Personal data provided by potential employees of the Company (candidates, jobseekers) shall include their CV, full name, contact details. Potential employees, at the point of the first contact, are informed about the processing of their personal data and the time limits for the data storage. Furthermore, potential employees may find out about the processing of their personal data in this Privacy Policy.

Personal data of potential employees submitted when applying for a specific job position in the Company are processed for the purposes of concluding an employment contract with a potential employee.

Personal data of an applicant for a specific position who is not submitted a job offer are destructed at the end of the process of recruitment for a specific position.

In cases when the procedure of selection of employees or trainees for a specific position in the Company is not carried out but the data subject, when applying to one or more positions, or applying without indication of a specific position, as well as applying for internship in the Company, contacts the Company and provides personal data (e.g. CV, name, contact details) voluntarily, such personal data of the data subject are not stored.

### **Data processing for direct marketing purposes**

Personal data processed for direct marketing purposes may include without limitation your full name, e-mail address, phone number. Consent to the use of personal data for direct marketing purposes may be expressed by ticking the appropriate box in the notice on the processing of personal data. Such consent is voluntary, and does not constitute a pre-condition for entering into the contractual relationship with the Company, nor affect the relationship between the data subject and the Company.

The Company may send informative content, invitations to participate in surveys, or conduct telephone surveys if the consent by the data subject was given to the Company for the use of data for direct marketing purposes; the Company may also send such information without a separate consent to the existing Company customers, provided in both cases that they are given an explicit, free and easily accessible opportunity to object to or refuse such use of their contact details, and did not object to such use of the data at the first communication.

For direct marketing purposes, the Company may send messages by email or contact you by telephone.

In cases where the information sent by the Company or provided by telephone is no longer relevant, you may at any time withdraw your consent to the processing for direct marketing purposes by notifying the Company thereof by e-mail to [dap@concretus.lt](mailto:dap@concretus.lt).

### **Social media accounts of the Company**

The Company has its accounts on such social media as Facebook, LinkedIn, Instagram, YouTube. Information you provide on social media (including messages, clicking of Like and Follow, etc.), or information obtained when you visit the Company' accounts is managed by a particular social media provider Facebook, LinkedIn, or Instagram, which collect the information about the content you are viewing, your activity and contacts on a social network, and other information. Therefore, the Company recommends reading their privacy notices. You can find more information about Facebook privacy policy at <https://www.facebook.com/policy.php>, LinkedIn privacy policy at <https://www.linkedin.com/legal/privacy-policy>, and Instagram privacy policy at: <https://help.instagram.com/402411646841720>.

The Company, as the administrator of its social media accounts, chooses the appropriate settings in view of its target audience as well as its management and promotion objectives. When creating and administering its social media accounts, the Company is not able to influence what information on the data subject will be collected by social networks after the Company has created such account.

All those settings may affect the processing of personal data when the data subject uses social media, visits the Company's accounts, or reads the Company's messages on social media. Usually, social networks process personal data (even those collected upon the Company's choice of additional account settings) for the purposes set by them in line with the provisions of a particular social network privacy policy. However, when the data subject uses social networks to communicate with the Company, or visits the Company's social media accounts by viewing messages, the Company receives the information about such data subject. The extent of the data obtained depends on the account settings chosen by the Company, agreements with social networks regarding additional services, and cookies set by social networks.

### **Time limits for personal data storage**

Personal data are stored for no longer than is necessary for the purposes for which the personal data are processed, or no longer than required by data subjects and/or applicable legislation.

Usually, the data are processed for 10 years following a relevant contract expiry or following the end of the relationship with a customer.

Video records are retained for 14 days, unless otherwise provided for in this Policy or the personal data register. Before deleting video records, verification of any requests from data subjects obtained in this relation is made.

Specific time limits for the storage of personal data are set in the personal data register.

### **Transfer of personal data to other entities**

The Company does not provide the data it processes to any third parties without a prior consent of a person (data subject), except for personal data provided in accordance with the procedure established by the applicable legislation, and except for data shared within Concretus Group.

### **Data processors**

Data may be processed by other data processors providing the Company with accounting, website hosting, data centre and / or server rental, IT support, external audit, security and other services.

Data processors are entitled to process personal data exclusively under the Company's instructions and solely to the extent necessary for proper performance of the obligations set forth in a relevant agreement. By engaging other processors, the Company pursues obtaining sufficient guarantees that they have implemented appropriate organisational and technical measures and will comply with an obligation of secrecy.

### **Data Protection Officer**

The Company has designated its Data Protection Officer who may be contacted by e-mail [dap@concretus.it](mailto:dap@concretus.it).

### **Rights of Data Subjects**

Every data subject shall exercise the following rights:

- a) the right to know (obtain communication) about the processing of his/her personal data;
- b) the right to information and access to personal data, i.e. the right to obtain information on the period for which the personal data will be stored, the applicable technical and organisational measures to protect the data, as well as the information from which source the personal data originate, what personal data were collected, the purposes of the processing, and recipients of personal data;
- c) the right to rectification, the right to erasure, or the right to restriction of processing, except for storage, where the processing is unlawful;
- d) the right to object to processing of personal data concerning him or her, except when the processing is for the purposes of the legitimate interests pursued by the controller or by a third party, if interests of the data subject not outweigh such legitimate interests of the controller or a third party;
- e) the right to request erasure of personal data;
- f) the right to request restriction of the processing of personal data;

g) the right to have the personal data processed by automated means on the basis of his/her consent or a relevant agreement, to be transmitted directly from one controller to another, where technically feasible (right to data portability);

e) the right to lodge a complaint with State Data Protection Inspectorate.

Data subject, upon producing a valid identity document or upon confirmation of identity in accordance with the procedure set forth by legal acts, or upon confirmation by electronic means which permit identification of a person, has the right to submit the request whether in person or through a representative, by regular mail, courier service, or e-mail. The request will be responded within 30 calendar days following its receipt.

Your request may be delivered to [dap@concretus.lt](mailto:dap@concretus.lt), sent if signed with a qualified electronic signature, or delivered in person to our office at Žarijų g. 6A, Vilnius.

### Ensuring data security

The Company pursues implementation of appropriate, technically feasible and cost-effective organisational and technical measures to protect personal data from accidental or unlawful destruction, alteration, unauthorised disclosure as well as against any other unlawful processing. All personal data and other information provided by the data subject constitutes the confidential information.

Access to personal data is limited to those employees, service providers and authorized data processors who need personal data for the performance of the functions assigned to their organisation. UAB Concretus group is the joint data controller and has access to personal data.

### Cookies

We use cookies on our website to optimise your user experience. A cookie is a small text file automatically generated while browsing the website and stored on your computer or other terminal equipment.

The table below sets out the specific cookies that are used on our website [www.betonomozaika.lt](http://www.betonomozaika.lt)

Cookie	Purpose	Duration
tv_session_id	General purpose platform session cookie, used to maintain functionality of the website to improve browsing experience	Expires when user leaves site
_ga	Statistic cookie	2 years
_gid	Statistic cookie	24 hours
_fbp	Cookie placed for Facebook advertising purposes	2 months
_fr	Cookie helps Facebook to provide you with more personalized advertisements	2 months
_gat	Statistic cookie	1 minute
_gat_UA_18929680-27	Statistic cookie	1 minute
_gat_UA_78457120-1	Statistic cookie	1 minute
IDE	Cookie is used by Google to track visitors for advertising purposes	1 year

The data collected by the cookies allows us to improve your browsing experience, to better tailor proposals and learn more about user' behaviour, analyse trends and improve both the website and the services we provide.

If you reject the cookies, you may change your browser settings and disable them all at once, or enable / disable them one by one. However, this may slow down your browsing, cause some of the features on our website not function, or block access to the website.

## **Other Provisions**

The Company may, in its sole discretion, amend this Privacy Policy which is effective as of its publication on the website [www.betonomozaika.lt](http://www.betonomozaika.lt). Last revision is dated 15 September 2020.