

Ekspozicijų centras, UAB
Registration number 122897137

APPROVED
7 June 2018
Director's order No. DA-001

PERSONAL DATA PROCESSING AND PROTECTION POLICY

I. MAJOR TERMS AND DEFINITIONS

1. **The Company** – Ekspozicijų centras, UAB, registration number 122897137; legal address: Savanorių Ave. 178F-110, LT-03154 Vilnius, Lithuania; home page: www.expo.lt, Facebook page: <https://www.facebook.com/Ekspozicijucentras>.

2. **The Data Subject** — a natural person whose personal data the Company obtains and processes.

3. **The Employee** — a natural person in an employment relationship with the Company, who has been appointed (as per decision of the Company Director) to process Personal Data, or whose personal data is processed.

4. **Personal data** — any information relating to a natural person, which can be used to identify the said person, both directly and indirectly. Personal data includes name, surname, personal ID number, social security number, passport or identity card number, residence address, telephone, e-mail, bank account number, and family status.

5. **The Data Controller** — in this case, the Company which defines means and purposes of personal data processing, and to which personal data is transferred for processing.

6. **Data transfer** — disclosure of personal data by transferring or otherwise making the said data available (other than publication in the media).

7. **Data processing** — any action performed with personal data, such as collection, recording, accumulation, storage, classification, grouping, merging, rectification (updating or correction), submission, publication, use, logical and (or) arithmetic operations, search, propagation, destruction, and other action or series of actions or activities.

8. **Automatic data processing** — data processing operations, wholly or partially carried out by automatic tools.

9. **Sensitive personal data** — include data relating to racial or ethnic origins, political, religious, philosophical and other beliefs, trade union membership, health, or sexual life of a natural person as well as information about the person's criminal record.

10. **Consent** — the Data Subject's voluntary declaration permitting to process his (her) personal data for the purpose known to him (her). The consent to the processing of personal data must be explicit, i.e. written, equivalent or in other form unequivocally proving the Data Subject's free will.

II. GENERAL PROVISIONS

11. This Policy regulates actions of the Company and its employees when processing personal data using both automatic and non-automatic personal data processing tools installed by the Company, as well as defines the rights of the Data Subject and security measures to safeguard personal data, and regulates other matters related to the processing of personal data.

12. The Company shall collect the Data Subjects' data which they voluntarily submit by e-mail, phone or arriving directly to the Company's office when ordering or buying the Company's goods and services.

13. In order to safeguard the privacy of the Data Subject, the Company undertakes to use his (her) personal data solely for the purposes specified herein and do not disclose the said data to any third parties without the Data Subject's consent, except in cases referred to in the current legislation.

14. The Data Subject shall be deemed to be notified and agreeing that due to the specifics of their services (e.g. management of IT systems) certain service providers of the Company should be technically allowed to familiarize themselves with the Data Subject's data processed by the Company. The service and cooperation agreements signed between the Company and these service providers contain provisions addressing obligations of the service providers and warranties regarding protection of privacy and adequate protection of personal data.

15. The Company shall process personal data for the following approved purposes:

15.1. Processing and administration of sale and purchase (order) of goods and services of the Company or the Data Subject;

15.2. The Data Subject's identification in the Company's information systems;

15.3. Issuance or administration of invoices and other financial documents relating to the goods and services sold and purchased;

15.4. Fulfilment of other contractual obligations;

15.5. Providing information about goods and services, promotional offers and the Company's news;

15.6. The Company's business analytics and statistical analyses, general researches, which allow to improve services and their quality;

15.7. Audits ordered by the Company and State inspections;

15.8. Conclusion and performance of employment contracts signed with the Data Subjects, payroll;

15.9. The Company's proper discharge of its employer's obligations defined by the current legislation; concession to be applied to the Data Subjects under the current legislation;

15.10. Supporting proper communications with the Data Subjects employed by the Company outside working hours;

15.11. Ensuring adequate working conditions for the Data subjects.

16. When submitting his (her) personal data to the Company, the Data Subject shall confirm and voluntarily agree that the Company is allowed to manage and process his (her) personal data in accordance with the applicable legal acts and this Policy.

17. This Policy shall be mandatory for all employees of the Company who handle personal data provided to the Company or learn such data in the course of performing their duties, and only in cases where this is necessary to achieve the goals and objectives listed in Paragraph 15 hereof.

III. PERSONAL DATA AND PRIVACY

18. The Company shall collect the following data about natural persons who are the Company's employees: the Data Subject's name, surname, address, e-mail, Skype account name, telephone, data (date and place of issue, expiration date, number) of personal identity documents (passport, identity card), personal ID number, social security number, bank account number or other payment details, copies of documents confirming the Data Subject's family status.

19. The Company shall collect the following data about natural persons who are the Company's customers, suppliers, business partners or their representatives: the Data Subject's name, surname, address, e-mail, and telephone.

20. The Company's website may collect certain information about the Data Subject's visit, such as: Internet Protocol (IP) address used by the Data Subject to reach the Internet; date and time of the Data Subject's visit to the Company's website; other websites visited by the Data Subject while on the Company's website; browser used; information about the Data Subject computer's operating system; mobile gadget versions; language settings, and so on. If the Data Subject uses a mobile device, certain data helping to determine the type of mobile device, device settings and geographical coordinates (longitude and latitude), may also be collected. This information shall be used to administer and improve the Company's website, analyse trends, improve products and services. The Data Subject shall voluntarily submit these data by visiting the Company's website and granting his (her) consent regarding the cookies used by the Company's website and collected IP address information.

21. All personal data of the Data Subjects provided to the Company shall be collected, stored and processed in accordance with the EU General Data Protection Regulation, Republic of Lithuania Law on Legal Protection of Personal Data and other legal acts regulating the protection of personal data in the Republic of Lithuania.

22. The Company shall ensure the protection of the data received and shall use this information only for the purposes referred to in Paragraph 15 hereof, only to the extent specified in the Data Subject's consent, only in cases provided for by law, only for purposes provided for by law, and only using methods provided for by law.

23. While performing their duties and processing the Data Subject's personal data, the Company Employees shall comply with the following principles:

23.1. The information provided by the Data Subject shall be collected, processed and protected only for the Company's legitimate business purposes and in strict accordance with this Policy and the current legislation regulating the protection of personal data.

23.2. The Data Subject's personal data shall be collected only for the purposes referred to in Paragraph 15 hereof and processed precisely, honestly and lawfully.

23.3. When collecting and processing personal data, the Employees shall comply with the principles of purposefulness and proportionality; therefore, the Data Subject's data not required to achieve the Company's business goals and objectives shall not be collected and accumulated.

23.4. The Company seeks to ensure that the Data Subjects' data are accurate, comprehensive and up-to-date. As a result, all data are constantly checked and updated.

23.5. The Data Subject's personal data shall not be stored longer than it is necessary to achieve the data processing goals and objectives which are based on the Company's legitimate business purposes, and not longer than required by the current legislation. The redundant data shall be immediately destroyed.

23.6. The Data Subject's personal data shall be processed and available only to the Company employees who require this information to perform their duties.

23.7. The Company shall not disclose the Data Subject's personal data to third parties, except in cases referred to in the current legislation, or if the Company was bound to do so by the Data Subject.

24. The Company respects the Data Subject's privacy and undertakes to always comply with the principles of personal data protection referred to in this Policy.

IV. MARKETING AND CORRESPONDENCE

25. By purchasing the Company's products and services, the Data Subject may voluntarily consent to the use of his (her) submitted personal data for the Company's marketing purposes, expressing his (her) consent by marking the corresponding sections of his (her) consent to personal data processing.

26. After confirming his (her) consent to receive Company's marketing information, the Data Subject may:

26.1. visit the Company's website and subscribe to the Company's newsletters;

26.2. receive the Company's newsletters about goods and services, promotions, discounts, the Company's news and customer satisfaction surveys by e-mail.

27. The Data Subject will be able to refuse the information sent by the Company by clicking on the link of refusal of the Company's offers and news in a newsletter or other letter sent to the Data Subject.

28. The Data Subject may implement the right to refuse to have his (her) data to be processed for direct marketing purposes through notifying the Company by mail or any available means of communication other than telephone.

V. COOKIES AND IP ADDRESSES

29. A part of information identifying a person shall be automatically collected during the Data Subject's visit to the Company's website because the Data Subject's Internet Protocol address will be recognized by the Company's server. IP address is a unique number assigned to each computer connected to the Internet, also known as the Internet Protocol (IP) address. IP addresses are used to manage web pages and diagnose potential failures.

30. Websites owned by the Company also use certain data analysis tools — cookies.

31. When visiting the Company's web pages, the Data Subject agrees that the cookies referred to herein be recorded onto his (her) computer (device).

32. Cookies are small data files sent from the website and stored on the Data Subject's computer. Cookies allow the website to recognize the Data Subject's browser (but do not allow to identify the user). The main purpose of cookies is recording the Data Subject's selected options, for example, his (her) preferred language. Cookies help us recognize the Data Subject after he (she) returns to the same website as well as customize the website for the Data Subject's personal use. During the recording of cookies, no personal identifying information is transmitted to any third parties.

33. The Company's websites use the following cookies:

Websites: www.expo.lt , www.stendai.lt			
Cookie name	Creation moment	Expiration time	Usage description
<u>_cfduid</u>	When opening a website page	1 month	This cookie is used to support additional (Cloudflare) services: to isolate an uninfected computer from an infected one when connecting from the same network.
<u>_utma</u> <u>_utmb</u> <u>_utmc</u> <u>_utmt</u> <u>_utmz</u>	When opening a website page	2 years 30 minutes Until closing 1 year 6 months	These Google Analytics cookies are used to collect statistical information on website traffic. The data obtained are used to generate reports and improve the page. IP addresses and unique ID numbers are used for accounting.

Website: www.parodos.lt			
Cookie name	Creation moment	Expiration time	Usage description
<u>_utma</u> <u>_utmb</u> <u>_utmc</u> <u>_utmt</u> <u>_utmz</u>	When opening a website page	2 years 30 minutes Until closing 1 year 6 months	These Google Analytics cookies are used to collect statistical information on website traffic. The data obtained are used to generate reports and improve the page. IP addresses and unique ID numbers are used for accounting.

Website: www.messefrankfurt.lt			
Cookie name	Creation moment	Expiration time	Usage description

has_js	When opening a website page	Until closing a website page	This cookie is used to validate JavaScript language status in the browser (active / inactive).
_cfduid	When opening a website page	1 month	This cookie is used to support additional (Cloudflare) services: to isolate an uninfected computer from an infected one when connecting from the same network.
_ga _gid _gat_gtag_UA_109697048_1	When opening a website page	2 years 24 hours 1 minute	These Google Analytics cookies are used to collect statistical information on website traffic. The data obtained are used to generate reports and improve the page. IP addresses and unique ID numbers are used for accounting.

Websites: www.messefrankfurt.lv, www.messefrankfurt.ee

Cookie name	Creation moment	Expiration time	Usage description
has_js	When opening a website page	Until closing a website page	This cookie is used to validate JavaScript language status in the browser (active / inactive).
_ga _gid _gat_gtag_UA_109697048_1	When opening a website page	2 years 24 hours 1 minute	These Google Analytics cookies are used to collect statistical information on website traffic. The data obtained are used to generate reports and improve the page. IP addresses and unique ID numbers are used for accounting.

Websites: www.fairs.lt, www.fairs.lv, www.fairs.ee

Cookie name	Creation moment	Expiration time	Usage description
_cfduid	When opening a website page	1 month	This cookie is used to support additional (Cloudflare) services: to isolate an uninfected computer from an infected one when connecting from the same network.

34. Each time the Data Subject visits the Company's website, he (she) may accept or refuse cookies. However, in case of refusal the Company will not be able to guarantee the quality of browsing. The Data Subject may also delete all or part of cookies from his (her) computer at any time, or block them

by using the browser on his (her) computer. After blocking the cookies, for certain technical reasons some parts of the Company's website may not function properly or not function at all for the Data Subject.

35. Cookies shall not be used to accumulate and store personal data of the website visitor. During the recording of cookies, no personal identifying information is transmitted to any third parties.

36. The Company's Facebook page shall only record traffic statistics and shall not use cookies.

VI. SECURITY AND PROCESSING OF PERSONAL DATA

37. In accordance with the current legislation regulating the protection of personal data, the Company shall ensure that the data provided by the Data Subject is protected against any unlawful actions, such as unauthorized alteration, disclosure or destruction of personal data, identity theft or fraud. The level of protection of personal data shall comply with the requirements of the legal acts of the Republic of Lithuania.

38. The Company undertakes to use the appropriate business systems and procedures, security systems, technical and physical measures allowing to defend and protect the Data Subject's personal data entrusted to the Company.

39. Personal data shall be processed using both automatic and non-automatic personal data processing tools installed by the Company.

40. The Data Subjects' personal data shall be processed only by persons authorized by the Company Director.

41. All Employees who handle personal data or may access personal data by chance shall sign the Employee's obligation not to disclose confidential information and shall be processing personal data strictly in accordance with the applicable legislation and this Policy, protecting its confidentiality at all times. Upon termination of the employment relationship, the Employee shall continue complying with the confidentiality principle. The Employee shall lose the right to process personal data after the contract legalizing the Employee's employment relationship with the Company expires or the Company Director revokes the authorization allowing the Employee to process personal data.

42. All Employees who process personal data automatically or from whose computers one can access the local network or cloud areas where personal data are stored, must use passwords. Passwords must be changed regularly as well as in certain circumstances (for example, if an employee is replaced, if there is the threat of hacking, if there is a suspicion that the password has become known to third parties, etc.). The Employee working on a particular computer may only know his (her) own password.

43. The Employee responsible for computer maintenance shall ensure that personal data files are not "shared" by other computers (unless this is required to achieve the Company's business goals and objectives), and that antivirus programs are automatically updated at regular intervals.

44. The Employee responsible for computer maintenance shall be making copies of the data files stored on computers. Should these files be lost or damaged, the responsible Employee must restore them within three (3) business days at the latest.

45. Excessive, outdated, incorrect and otherwise unnecessary copies of the Company's documents and data files containing personal data shall be immediately destroyed in such a way that these documents and files could not be restored or their contents deciphered.

46. Documents of the Data Subjects and copies thereof, financial, accounting and reporting, archival or other files containing personal data shall be stored in well protected premises, in locked cabinets or safes.

VII. RIGHTS OF THE DATA SUBJECT

47. The Data Subject shall have the following fundamental rights:

47.1. To know that his (her) personal data is processed by the Company;

47.2. To access his (her) personal data processed by the Company and find out how they are processed;

47.3. To demand that the Company correct or destroy his (her) personal data, or terminate the processing (except for storage) when his (her) personal data are processed in breach of the current legislation;

47.4. To object to the processing of his (her) personal data, or completely or partially withdraw his (her) consent to the processing of the said data, unless the Data Subject has submitted an order for the Company's goods and services, or there is a valid agreement of sale and purchase of goods and services.

48. After providing a personal identity document, the Data Subject shall have the right to access his (her) personal data stored and processed by the Company, and receive information on the sources from which the said personal data were collected, which personal data were obtained, for what purpose they are being processed, and to whom they are provided. After receiving (by registered mail or e-mail) the Data Subject's written request, the Company shall provide (by registered mail or e-mail) the requested data in writing not later than within thirty (30) calendar days after the receipt of the Data Subject's request, or shall specify the reasons for the refusal to grant such request. The response to the Data Subject's request shall be given in the same form in which the request was received, unless the Data Subject expressed a desire to obtain information in a different way.

VIII. LIABILITY

49. The Data Subject undertakes to provide the Company with complete and accurate personal data as well as inform the Company in the event of change of any of these personal data. The Company shall not be liable for the Data Subject's damages and losses resulting from him (her) providing inaccurate and (or) incomplete personal data or failing to notify the Company of their changes in a proper and timely manner.

50. Although the Company cannot fully guarantee that its website will continuously function without any errors or malfunctions, or that the website will be always and fully protected against viruses or other harmful components, the Company undertakes to use security systems and technical means to prevent cybercrimes.

IX. VALIDITY AND MODIFICATION OF POLICY

51. This Policy and its possible subsequent versions shall enter into force upon their approval by the order of the Company Director. Each valid version of the Policy must be published on the Company's websites.