

# PRIVACY POLICY

Date last modified: 27.02.2023

## 1. GENERAL

- 1.1. We do care about your privacy and the security of your personal data which is why we have prepared this privacy policy (hereinafter referred to as the **Privacy Policy**) where we explain how we handle and protect your personal data, what rights we ensure and provide other information about the processing of your personal data.
- 1.2. The term ‘personal data’ used in this Privacy Policy (hereinafter referred to as the **Personal Data**) means any information or set of information by which we can determine your identity, either directly or indirectly, for instance, your full name, email, telephone, etc.
- 1.3. When processing your Personal Data, we comply with the General Data Protection Regulation No. 2016/679 (EU) (hereinafter referred to as the **GDPR**) and the legal acts of the Republic of Lithuania, as well as the instructions of the controlling authorities.
- 1.4. The Privacy Policy applies when you visit our website <http://www.ecso.lt/> (hereinafter referred to as the **Website**), our social network accounts Facebook, LinkedIn (hereinafter referred to as the Social Accounts), view the information provided by us, order our products or services, contact us by telephone, e-communication channels, review our offers or give other questions.
- 1.5. The Website and Social Accounts may contain links to external websites to which this Privacy Policy does not apply. Before browsing or submitting your Personal Data to such websites, please review their privacy policies.
- 1.6. If you order our goods or services, visit our Website, Social Accounts, contact us, apply to us for other issues, we shall consider that you have read and agreed to the terms and conditions of the Privacy Policy and the purposes, methods and procedure of using Personal Data provided therein. If you do not agree with the Privacy Policy, you cannot use the Website, Social Accounts, or contact us for product or service offers.
- 1.7. We would like to note that this Privacy Policy is subject to change. Hence, please visit the Website from time to time and read the latest published version of the Privacy Policy.

## 2. WHO ARE WE?

- 2.1. We are Ecso JSC, a joint-stock company established in the Republic of Lithuania, entity code 302446374, registered office address «buveines\_adresas», Lithuania, data are collected and processed in the State Enterprise Centre of Registers (hereinafter referred to as the **Company** or **We**).
- 2.2. We manage the Website, Social Accounts and act as a Data Controller.

## 3. WHAT YOUR PERSONAL DATA DO WE PROCESS?

- 3.1. We process your Personal Data obtained in the following ways:
  - 3.1.1. When you provide us with your Personal Data, for example, when you order goods and services, contact us by email or telephone, etc.
  - 3.1.2. When we collect your Personal Data when you use the Website, Social Accounts, for example, your IP address, history of visiting the Website, opened URL links, etc. or when you visit our premises (video surveillance).
  - 3.1.3. When we receive Personal Data from other entities, such as public registers, state or local self-government authorities or bodies, our partners, other third parties, e. g. payment institutions, about payments made, etc.

- 3.1.4. When your Personal Data is provided to us by other entities, for example, when they indicate you as a contact or authorised person, recipient of goods, customer of services, etc.
- 3.2. The person providing the Personal Data to us is responsible for the correctness, completeness and relevance of such Personal Data, as well as for the consent of the person whose data is provided for the transfer of the data to us. We may ask you to confirm that a person has the right to provide us with Personal Data (for example, when filling out product order forms). If necessary (for example, a person asks us about receiving his or her Personal Data), we will identify the provider of such data.
- 3.3. We process your Personal Data for the following purposes and conditions:

<b>The purpose of personal data processing</b>	<b>Processing of the Personal Data</b>	<b>Personal Data processing terms</b>	<b>Legal basis for processing Personal Data</b>
Production of the products, sale of products, provision of services related to the products and administration of contractual/pre-contractual relations arising from these activities, and guaranty service (quality assurance).	Name, surname, position, workplace, represented company (employer), address/workplace (activity) address, names of recipient/sender of products, services, email, signature (in agreements, other documents), telephone, content of authorisation to represent a person, communication data, and vehicle license plates.	According to the Personal Data storage term index approved by the Company.  Personal data that do not fall within the content of the above-mentioned documents are stored during the period of maintenance of the contractual/pre-contractual relationship and up to 5 years after the end of the relationship.	It is necessary to process data in order to conclude and fulfil an agreement (Article 6) (1) (b))  Legitimate interests of the data controller or a third party (Article 6) (1) (f))
Conclusion and execution of agreements necessary for the execution, administration and maintenance of the Company's activities and other internal administration related to the Company's activities.	Name, surname, personal identification number (if necessary), telephone, e-mail, contact with the represented person, position, functions, workplace, individual activity certificate data, address/workplace (activity) address, documents confirming the person's qualification or	According to the Personal Data storage term index approved by the Company.	It is necessary to process data in order to conclude and fulfil an agreement (Article 6) (1) (b))  Legitimate interests of

specialisation, signature, content of authorisation to represent the person, communication data, and other data required for cooperation.

the data controller or a third party (Article 6) (1) (f))

<p>Performing financial transactions, managing accounts and accounting, fulfilling tax obligations, and debt management.</p>	<p>Name, surname, personal identification number (if necessary), e-mail, telephone, individual activity certificate data, signature, relationship with the represented person, position, workplace, address/workplace (activity) address, signature, bank account, financial, credit, payment institution, the payment order also contains data related to the payment order, VAT payer's code, if the person is a VAT payer, information provided in payment documents, tax returns, other official tax documents indicate, debt information, content of authorisation to represent the person, and communication data.</p>	<p>In accordance with the legal acts governing financial transactions and accounting, as well as the Personal Data storage term index approved by the Company.</p>	<p>It is necessary to process data in order to conclude and fulfil an agreement (Article 6) (1) (b))</p> <p>It is necessary to process data in order to fulfil the legal obligation imposed on the data controller (Article 6) (1) (c))</p> <p>Legitimate interests of the data controller or a third party (Article 6) (1) (f))</p>
<p>Evaluation and selection of applicants for the job.</p>	<p>Name, surname, date of birth, e-mail, telephone, address (if necessary), education and activity data, CV content, other information required for the applicant selection/evaluation or provided by the applicant himself or herself.</p>	<p>The data is stored for the entire duration of the selection, after the end of the selection the data is deleted. The end of the selection is considered to be the first working day of the employee recruited for the</p>	<p>Consent of the data subject (Article 6) (1) (a))</p> <p>Legitimate interests of the data controller or a third party</p>

		position announced in the selection. Data processed on the basis of consent are stored until the person withdraws his or her consent.	(Article 6) (1) (f))
Management of electronic information submission channels, such as websites, social network accounts, maintenance and improvement of technical tools, and administration of requests submitted through these communication channels.	Name, surname, username, email, IP address, data collected by cookies and settings, browser used, data collected with the social account integration, request subject, request content, and content linked with the user's social network, such as comments, ratings, shares, statistics, etc.	Website data is stored according to the storage terms set by the cookies used but not longer than 2 years.  Data processed on the basis of consent are stored until the person withdraws his or her consent. In social network accounts, data is stored according to the settings selected by the social network manager and/or user.  Data related to requests is stored during the communication period and for 1 year after the end of the communication.	Consent of the data subject (Article 6) (1) (a))  Legitimate interests of the data controller or a third party (Article 6) (1) (f))
Ensuring the security of persons and property, protection of information, seeking to investigate and control illegal behaviour or conflict situations, and managing the production process by means of video surveillance.	Video surveillance data captured by video surveillance equipment and/or means used by the Company.	14 (fourteen) days from the date of receipt of personal data.	Legitimate interests of the data controller or a third party (Article 6) (1) (f))

Examination of requests, complaints related to the Company's activities, examination of disputes in judicial and non-judicial procedures.	Name, surname, personal identification number (if necessary), email, position, workplace, signature, telephone, address/workplace (activity) address, relationship with the represented person, content of the request, claim or another similar document, information/documents related to the request/dispute/claim, and communication data.	According to the Personal Data storage term index approved by the Company.	It is necessary to process data in order to fulfil the legal obligation imposed on the data controller (Article 6) (1) (c))  Legitimate interests of the data controller or a third party (Article 6) (1) (f))
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The person has the right to disagree or withdraw his or her consent to the processing of his or her Personal Data at any time, when it is processed on the basis of his or her consent.

3.4. We host information about our activities in our social accounts, and we can also share advertisements there. Social accounts are also subject to the privacy terms and conditions of the managers of the social networks where the Social Accounts are located. When you contact us on Social Accounts and provide certain information (e. g. you write us messages, comments under our posts), we may, depending on the privacy settings you choose, see your public profile information (name, surname, picture, e-mail, etc.). Also, this information (e. g. your submitted comment) will be visible to other visitors of the Social Accounts.

3.5. In some cases, we may use the contacts provided by you to send messages related to the order of goods or services or to call you, e. g. to inform you about order confirmation, time and date of delivery of goods or service, changes in delivery of goods or service, etc. Such communications are necessary for the proper sale of goods or services and are not considered advertising communications.

#### **4. HOW DO WE USE YOUR PERSONAL DATA AND WHAT PRINCIPLES DO WE FOLLOW?**

4.1. We respect your privacy and collect and process only such Personal Data as are necessary to achieve the purposes of Personal Data Processing specified by us.

4.2. When processing your Personal Data, we:

- 4.2.1. Comply with the requirements of valid and applicable legal acts, including the GDPR.
- 4.2.2. Process your Personal Data in a legal, fair and transparent manner.
- 4.2.3. Collect your Personal Data for established, clearly defined and legal purposes and do not process them in a manner incompatible with those purposes, except to the extent permitted by legal acts.

- 4.2.4. Take all reasonable measures to ensure that Personal Data that are not accurate or complete, taking into account the purposes of their processing, are immediately rectified, supplemented, suspended or destroyed.
- 4.2.5. Keep them only in a form that identifies you for no longer than it is necessary for the purposes for which the personal data are processed.
- 4.2.6. We do not provide Personal Data to third parties and we will not disclose them otherwise than specified in the Privacy Policy or applicable legal acts.
- 4.2.7. We ensure that your Personal Data is handled securely, we ensure technical and organisational security measures, and we also grant access to Personal Data only to those of our employees who need such access for their work functions.

## **5. TO WHOM AND WHEN DO WE TRANSFER YOUR PERSONAL DATA?**

5.1. We will transfer your Personal Data only as specified in this Privacy Policy.

5.2. We may transfer your Personal Data to:

- 5.2.1. Our partners or consultants (auditors, lawyers, etc.), other institutions, companies, individuals, organisations with whom we work or cooperate in the course of our activities.
- 5.2.2. Personal Data Processors hired by us:
  - 5.2.2.1. Provider of accounting, customer management, document management, personnel management software for service providers.
  - 5.2.2.2. The provider of warehouse management and accounting software.
  - 5.2.2.3. The provider of the job maintenance software.
  - 5.2.2.4. The provider of the task and discrepancy management software.
  - 5.2.2.5. Occupational safety and management software provider.
  - 5.2.2.6. Internet, telephone connection service provider.
  - 5.2.2.7. The provider of recruitment services.
  - 5.2.2.8. IT service provider.
  - 5.2.2.9. Server service provider.
  - 5.2.2.10. Website development and support service provider.
  - 5.2.2.11. Video surveillance equipment maintenance company.
  - 5.2.2.12. Providers of financial, credit, payment, and instalment collection services.
  - 5.2.2.13. The transport management system provider.
- 5.2.3. In order to publish content on Social Accounts, we provide data to the following social network platform operators:
  - 5.2.3.1. Meta Platforms Ireland Ltd. (Ireland) and Meta Platforms, Inc., (USA) (data is transferred in accordance with the EU standard contract terms and conditions for data transfer outside the European Economic Area, approved by the European Commission and applied to the service provider).
  - 5.2.3.2. LinkedIn Corporation (USA) (data is transferred in accordance with the EU standard contract terms and conditions for data transfer outside the European Economic Area, approved by the European Commission and applied to the service provider).
- 5.2.4. To law enforcement and pre-trial investigation institutions, courts and other institutions examining disputes, other entities performing the functions assigned by law, in accordance with the procedure provided by the legal acts of the Republic of Lithuania. We provide these entities with mandatory information provided by law or specified by the entities themselves.

- 5.2.5. If necessary, for the companies that would intend to buy or buy the Company's business or carry out joint activities with us or cooperate in any other form, as well as for the companies established by us.
- 5.3. We usually process Personal Data in the EU/EEA, but in some cases your Personal Data may be transferred outside the EU/EEA. Your Personal Data is transferred outside the EU/EEA only under the following conditions:
  - 5.3.1. Data is only transferred to our trusted partners.
  - 5.3.2. Data processing or provision agreements have been signed with such partners to ensure the security of your Personal Data.
  - 5.3.3. The European Union Commission has made a decision on the suitability of the state where our partner is established, that is, an adequate level of security is ensured.
  - 5.3.4. A special permission of the State Data Protection Inspectorate of the Republic of Lithuania to carry out such a transfer was obtained.
  - 5.3.5. You have consented to the transfer of your Personal Data outside the EU/EEA.

## **6. WHAT RIGHTS DO YOU HAVE?**

- 6.1. You, as a data subject, have the following rights related to your Personal Data:
  - 6.1.1. To know (be informed) about the processing of your personal data.
  - 6.1.2. Get to know your Personal Data and how they are processed (the right to access).
  - 6.1.3. Demand rectification or, taking into account the purposes of Personal Data processing, supplement incomplete Personal Data (the right to rectify).
  - 6.1.4. Demand destruction of your Personal Data or the suspension of the processing of your Personal Data (except for storage) (the right to destruction and the right to be forgotten).
  - 6.1.5. Demand that we restrict the processing of Personal Data for one of the legitimate reasons (the right to restriction).
  - 6.1.6. The right to data portability (the right to portability). This right will be exercised only if there are grounds for its implementation and adequate technical measures to ensure that the transfer of the requested Personal Data to the data of other entities will not cause a risk of security breach.
  - 6.1.7. The right to object to the processing of Personal Data. This right may be exercised when we process Personal Data on the basis of our or a third party's legitimate interest, including profiling. If you object, we will continue to process your Personal Data only for compelling legitimate reasons that override your interests, rights and freedoms, or to assert, enforce or defend legal claims.
  - 6.1.8. The right to withdraw your consent to the processing of Personal Data at any time, if the data is processed on the basis of consent, when this data is processed for the purposes of direct marketing, including profiling, as far as it is related to direct marketing.
  - 6.1.9. The right to file a complaint to the State Data Protection Inspectorate.
- 6.2. We may refuse to exercise your rights listed above, with the exception of objection to the processing of your Personal Data for the purpose of direct marketing or in other cases where Personal Data is processed with your consent, when your request allows us to disregard GDPR provisions, or when, in cases provided for by law, it is necessary to ensure the prevention, investigation and detection of criminal offences, breaches of official or professional ethics, as well as the protection of the rights and freedoms of the data subject, us and others.

- 6.3. You can submit any request or instruction related to the processing of Personal Data to us in writing by e-mail [info@ecso.lt](mailto:info@ecso.lt). When submitting such a request, in order to better understand the content of your request, we may ask you to fill in the necessary forms, as well as provide an identity document or other information (e. g. confirm your identity with an e-signature) that will help us verify your identity. After submitting the request by e-mail, depending on its content, we may ask you to come to us or submit a request in writing.
- 6.4. Upon receiving your request or instruction regarding the processing of Personal Data, we will provide an answer and perform the steps specified in the request or inform you why we refuse to perform them, not later than within 1 month from the date of the request. If necessary, the specified period can be extended by another 2 months, depending on the complexity and number of requests. In this case, we will inform you about such an extension within 1 month from the date of receipt of the request.
- 6.5. If Personal Data is deleted at your request, we will only keep copies of information that are necessary to protect our and others' legitimate interests, to comply with the obligations of government authorities, resolve disputes, identify disturbances or comply with any agreements you have entered into with us.

## **7. HOW DO WE PROTECT YOUR PERSONAL DATA?**

- 7.1. Your Personal Data is processed responsibly, securely and protected against loss, unauthorised use and alteration. We have implemented physical and technical measures, such as controlled access, data sharing restrictions, encryption, system updates, use of passwords, virus or malware protection, data protection documentation, etc., to protect the information we collect from accidental or unauthorised destruction, damage, alteration, loss, disclosure, as well as from any other unauthorised processing. Personal Data security measures are determined taking into account the risks arising from the processing of Personal Data.
- 7.2. Our employees have a written commitment not to disclose or distribute your Personal Data to unauthorised third parties.

## **8. HOW DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

- 8.1. Cookie is a small text file that stores information (often consisting only of a sequence of numbers and letters that identifies the device, but may also contain other information) that is used in the browser of the device, such as computer, tablet, mobile phone, etc. (e. g. Google Chrome, Microsoft Edge, Firefox, Mozilla, Opera, etc.) according to its settings and saved on the device's hard drive. In the Privacy Policy, we use the term 'cookies' to describe cookies and other similar technologies, such as pixel tags, web beacons, network data collectors (clear GIF).
- 8.2. We use cookies to analyse information flows and user behaviour, promote trust and ensure security, as well as to ensure the proper functioning of the website, its improvement, remembering your chosen settings, personalising the content shown to you, and linking the website with social accounts.
- 8.3. You can choose whether you want to accept cookies. If you do not agree to cookies being saved to the browser of your computer or other device, you can mark it in your consent in the cookie bar, change the settings of the browser you are using and disable cookies (all at once or one by one or in groups). If you want to refuse cookies on your mobile device, you must follow the official instructions for that device. Please note that in some cases, opting out of cookies may slow down browsing, limit the functionality of certain websites or block access to the website. More details are available at <http://www.AllAboutCookies.org> or [https://www.google.com/privacy\\_ads.html](https://www.google.com/privacy_ads.html).



8.4. You can opt-out of the use of third-party cookies for advertising purposes by visiting Network Advertising's opt-out page at [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp).

8.5. We may use mandatory cookies that are necessary to ensure the operation of the website, analytical cookies, functional cookies that are used to analyse the visit to the website, remember the preferences of visitors and adapt them to the website so that we can provide improved functions, performance cookies, third-party cookies that third parties use, advertising cookies that are designed to show you personalised and general advertising.

8.6. Some third parties, such as social network operators, may use anonymous cookies created by them to personalise their programmes or applications according to your needs. We do not control the use of cookies and tracking technologies by third parties. Thus, we recommend that you check the privacy policy of the relevant third party for more detailed information.

8.7. List of cookies used on the website:

Cookie name	Purpose of a cookie	Creation moment	Expiry date
wp-settings-1	Used to customise website display options	Once you start browsing	12 months
wp-settings-time-1	Used to customise website display options	Once you start browsing	12 months
NID	A Google cookie for Google websites and their advertising preferences and user preferences regarding the display of advertising	Once you start browsing	6 months
ANID	A Google cookie for non-Google websites to collect information about the user's choices regarding the display of advertising	Once you start browsing	13 months EEA UK / 24 months elsewhere
IDE	A Google cookie for non-Google websites to collect information about the user's choices regarding the display of advertising	Once you start browsing	13 months EEA UK / 24 months elsewhere
__Secure-3PAPISID		Once you start browsing	24 months
__Secure-3PSID		Once you start browsing	24 months
__Secure-3PSIDCC		Once you start browsing	24 months

8.8. We also use the following products and tools that record cookies:

Google Adsense	Evaluates the use of the Platform in relation to the displayed advertisements and provides reports. The collected data is transferred to and stored on a Google server in the USA. If you do not wish to receive personalised advertising, you can change the settings as needed at <a href="https://www.google.com/settings/ads">https://www.google.com/settings/ads</a> . In this case, an opt-out cookie will be saved for you. However, if you delete all cookies, the opt-out cookie may also be deleted.
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## **9. CONTACT US**

- 9.1. If you have any questions about the information provided in this Privacy Policy, please contact us by email: [info@ecso.lt](mailto:info@ecso.lt), address: «buveines\_adresas», Lithuania or by telephone: +370 612 60999.
- 9.2. If you wish to make a complaint about our processing of Personal Data, please submit it to us in writing, giving as much detail as possible. We will cooperate with you and try to solve all issues immediately.
- 9.3. If you believe that your rights have been violated in accordance with the GDPR, you can file a complaint with the supervisory authority - the State Data Protection Inspectorate, you can find more information and contact details on the inspectorate website (<https://vdai.lrv.lt/>). We aim to promptly and peacefully resolve all disputes. Hence, we ask you to contact us first.

## **10. FINAL PROVISIONS**

- 10.1. The present Privacy Policy is subject to change. We will notify you about the changes on the website by posting the updated Privacy Policy or by other usual means of communication. Changes to the Privacy Policy take effect from the update date specified in the Privacy Policy, unless a different effective date is specified.
- 10.2. If you continue to use the website, order goods or services from us, use our social accounts, contact us after the change of the terms of the Privacy Policy, it is considered that you have agreed to the changed terms of the Privacy Policy.