

UADBB “InPacto” PRIVACY NOTICE

Effective from January 14th of 2021

1. ABOUT US

- 1.1. UADBB “InPacto” is an insurance brokerage limited company, registered at Miežių g. 20-1, Vilnius, Lithuania, legal entity code 302693499 (hereinafter – “Company”) and is considered as Data Controller of Your information for the purposes of this Privacy Notice.
- 1.2. This Privacy Notice describes how UADBB “InPacto” collects and processes the personal data of its customers and shares it with third parties. Please read this document carefully as this notice is legally binding when You visit our website and / or use our services. We value our relationship with You and place the highest importance on respecting and protecting Your privacy, Your personal information will be processed in accordance with applicable law and this Privacy Notice.

2. MAIN DEFINITIONS

- 2.1. **Company** – UADBB “InPacto”, registration code 302693499. The Company is the Personal Data Controller.
- 2.2. **GDPR** – the General Data Protection Regulation 2016/679.
- 2.3. **Personal Data** – any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

3. HOW DO WE PROTECT YOUR PERSONAL INFORMATION

- 3.1. We use a secure server and other secure implements to store the information we gathered about You. To keep Your personal data as secure as possible, we have adopted internal rules on information security that include both instructions and measures to protect Your personal data against being destroyed, lost or modified, as well as against unauthorized publication and access.
- 3.2. As You will know, the transmission of information via the internet is not completely secure. Although we will do our best to protect Your personal data, we cannot guarantee the security of Your data during transmission, and any transmission is at Your own risk.

3.3. We restrict access of Your personal information to those Company employees who have a business reason for knowing such information. We maintain physical, electronic and procedural safeguards that comply with the relevant laws and regulations to protect Your personal information from unauthorized access.

4. INFORMATION WE MAY COLLECT ABOUT YOU

4.1. We may collect the following information about You when you use our Services or visit our Websites:

4.2. Information YOU provide to us:

4.2.1. You may give us Your Personal Data (e. g. your name, surname, date of birth, etc.) when You use our services (e. g. when you signing the contract, etc.). This also includes information You provide through Your continued use of our services or on any of our website, enter a promotion or survey, and when You report a problem with our services.

4.2.2. In providing the Personal Data of any individual (other than yourself) to us during Your use of our services, You promise that You have obtained consent from such individual to disclose his / her Personal Data to us, as well his / her consent to our collection, use and disclosure of such Personal Data, for the purposes set out in this Privacy Notice.

4.2.3. Information from Your phone, computer or other device that You use to access our website or services and You make it available to us. For example, what You have searched for and viewed on the website and the way You use our services, including Your IP address, statistics regarding how pages are loaded or viewed, browser type and version, the websites You visited before coming to our website and other usage and browsing information collected through Cookies.

4.3. Information about YOU from third parties we are working with:

4.3.1. business partners (e.g. insurers, sellers, etc.) may provide us Your name, address, personal identification number and financial information, etc.;

4.3.2. credit institutions (banks, etc.) which You use to get loan or other financing instrument may provide Your basic personal information, e. g. name, address and Your financial information to us;

4.3.3. credit bureaus, state registers and etc. may provide us Your data on financial liabilities and debts, etc.:

4.3.4. analytics providers, advertising networks and search information providers may provide us with information about You;

- 4.3.5. social media networks (e. g. Facebook or Google, etc.) may provide relevant information that is necessary to authenticate You.

5. USE OF PERSONAL DATA

- 5.1. We use Your Personal Data information in the following ways for:

- 5.1.1. **For contractual relationship, for purpose to provide services** – Company collect and processes Personal Data in order to provide services to You: to carry out Company's obligations relating to agreement with You and (or) third parties, products and services. For this purpose, Company process Your Personal Data (personal identification number, name, surname, phone number, identity document number, e-mail address, phone number, etc.).

The processed Personal Data is stored for the entire period of validity of the agreement concluded between the Company and the You and for 2 (two) years from the date of submission of the Personal Data of You or their update, unless given consent is to store longer or it is required to do so by law.

- 5.1.2. **For purpose of security** – Company processes Your Personal Data in order to keep services safe and secured (e. g. to verify Your identity, comply any applicable legal and regulatory requirements and to confirm Your eligibility to use Company's products and services).

The Company may keep Personal Data up to 8 (eight) years from the date of termination of business relationship with You.

- 5.1.3. **For purpose of agreements performance and any disputes from the agreements maintenance** – Company processes Your Personal Data in order to ensure proper performance of the agreements between Company and You and for the settlement of disputes from these agreements. For this purpose, Company process Personal Data (personal identification number, name, surname, address, phone number, identity document number) received directly from You, from publicly available sources (e. g., Population Register, data provided by third parties, etc.) and from other third parties in order to administer possible disputes regarding indebtedness, performance of the agreement, etc.

The processed Personal Data is stored for the entire period of validity of the agreement concluded between the Company and You and up to 10 (ten) years after the termination of business relationship with You, unless given consent is to store longer or it is required to do so by law.

- 5.1.4. **For purpose of direct marketing** – any information that could be used for direct marketing purposes will be used only upon Your given consent. You have a right to

give, not to give or refuse this given permission of use of Personal Data for marketing purposes at any time. For this purpose, Company process Personal Data only upon Your given consent (e.g. IP address, browser type, browsing history information, name, e-mail address, phone number).

The processed Personal Data kept only for direct marketing purposes shall be processed for a maximum of 6 (six) months from the date of termination of the relationship with You, except in cases where You express disagreement regarding the processing of Personal Data for direct marketing.

- 5.1.5. **For business communication purpose** – Company process and store Personal Data for business communication (e. g. emails, chats, letters) and / or record any telephone conversation between Company and You regarding to provisions of services with the purpose of safeguarding party's interests and / or conducting a quality check of the services provided by Company and / or for the provision of a commercial transaction or other business communication evidence. For this purpose, Company process and store Personal Data received from You (e. g. emails, chats, letters) and / or record any telephone conversation between Company and You.

The Company may keep processed Personal Data up to 3 (three) years after Yours last communication with the Company.

- 5.1.6. **For purpose of improvement of websites that Company control** – Company processes Personal Data, including any Personal Data that Company receive from the use of Company's websites by You, to improve and develop Company's websites in order to offer better services. For this purpose, Company process Yours IP address, browser type, browsing history information, demographics, other data from cookies, etc., received from Your visits in Company's websites.

The Company may keep Personal Data up to 3 (three) months after You used Company's Website.

- 5.1.7. **For purpose of selection and data base of candidates to vacancies in the Company** – Company processes Personal Data in order to find candidates to work with the Company. For this purpose, Company process Personal Data received from candidates (Data Subjects) (e.g. name, surname, e-mail, phone number, qualification data and other data provided in candidate's CV) and received from other persons (e. g., recommendations of current or former employers, social networks, media, etc.).

The Personal Data shall be kept for up to 6 (six) months from the date of receipt of the applications.

6. PERSONAL DATA USAGE FOR DIRECT MARKETING

- 6.1. We may use Your Personal Data for direct marketing purposes in order to provide You the offers and information about our services (e. g. new products, etc.). For this purpose, if You have accepted UADBB “InPacto” Agreement and have given Your consent for direct marketing, specified Your e-mail and telephone number, we process the following Personal Data and use Your e-mail, name, surname and telephone number making it possible to disagree to such use of the Personal Data.
- 6.2. If You do not have an Agreement with the Company, we process Your Personal Data upon receipt of your additional consent.
- 6.3. We may use Your information for direct marketing in the following ways.
 - 6.3.1. to measure or understand the effectiveness of advertising we serve and to deliver relevant advertising to You;
 - 6.3.2. to provide You with information about other similar goods and services we offer that are like those that You have already purchased or enquired about if you gave us the permission for direct marketing purposes which You can refuse at any time;
 - 6.3.3. to provide You, or permit selected third parties to provide You, with information about goods or services we believe may of interest to You;
 - 6.3.4. to combine third party information, we receive with the information You give to us and information we collect about You. We may use this combined information for the purposes set out above (depending on the types of information we receive);
 - 6.3.5. to process applications for products and services available through us including making decisions about whether to agree to approve any applications;
 - 6.3.6. we may use Your Personal Data also to analyze and improve the effectiveness of our websites, advertising and market research, etc. In this case, we will use Your depersonalized data.
- 6.4. Your Personal Data kept only for direct marketing purposes shall be processed for a maximum of 6 (six) months from the date of termination of the relationship with us, except in cases where You express disagreement regarding the processing of Your Personal Data for above mentioned purposes. If you withdraw Your consent, we will endeavour to terminate the processing of Your Personal Data for direct marketing purposes from the date of receipt of Your disagreement in the acceptable manner of writing.
- 6.5. Even if you have given Your consent to the processing of Your Personal Data for direct marketing purposes, You may easily withdraw this consent any time for all or some of the Personal Data processing activities. In addition, You may express Your consent or disagreement on the processing of Your Personal Data for direct marketing purposes at any time by submitting a respective notice to us in writing: ***sending e-mail to info@inpacto.lt or by post to UADBB “InPacto”, Antakalnio str. 17, Vilnius, LT-10312, Lithuania.***

7. DISCLOSURE OF YOUR INFORMATION

- 7.1. We may share your Personal Data with the following data processors in order to perform the Company services:
- 7.1.1. Cloud storage providers – in order to safely and securely store your data with the Company.
 - 7.1.2. Banking and financial services partners – financial services providers that help us provide our services to You.
 - 7.1.3. Affiliates, business partners, suppliers and sub-contractors – for the performance and execution of any contract we enter with them or You.
 - 7.1.4. Advertisers and advertising networks solely - to select and serve relevant adverts for You and others;
 - 7.1.5. Analytics and search engine providers that assist us in the improvement and optimization of our websites;
 - 7.1.6. Other persons and / or companies assisting us to carry out our business as well as direct marketing.
- 7.2. We may disclose Your personal information to third parties:
- 7.2.1. if we sell or buy any business or assets, in which case we may disclose Your Personal Data to the prospective seller or buyer of such business or assets;
 - 7.2.2. if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply our agreement and other applicable agreements; or to protect the rights, property, or safety of the Company, our customers, or others;
 - 7.2.3. in response to a subpoena, warrant, court order, or as otherwise required by law;
 - 7.2.4. to protect our rights for breach of contract ant etc.;
 - 7.2.5. to assess financial and insurance risks;
 - 7.2.6. to help develop customer relationships, services and systems.
- 7.3. We do not publish a list of all the third parties with whom we share Your Persona Data with, as this would be heavily dependent on Your specific use of our services. However, if you would like further information about who we have shared Your Personal Data with, You can request this by writing to info@inpacto.it
- 7.4. The ability of the abovementioned service providers to use Your Personal Data is limited, e.g. they cannot use these Your Personal Data for any purposes other than providing services to us. We guarantee to You that Your Personal Data will not be sold, provided or otherwise illegally transferred to third parties, and used for purposes other than those they were collected for.

8. WHERE WE STORE AND HOW WE SHARE YOUR PERSONAL DATA

- 8.1. The Personal Data that we collect from you may be transferred to and stored at secure and GDPR compliant servers. It may also be processed by staff operating in this destination, who work for us or for one of our suppliers. By submitting Your Personal Data, You agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that Your Personal Data is treated securely and in accordance with this Privacy Notice.
- 8.2. We remind You that the transmission of information via the internet is not completely secure. Although we will do our best to protect Your Personal Data, we cannot guarantee the security of Your Personal Data transmitted to us via internet; any transmission is at Your own risk. Once we have received Your information, we will use strict procedures and security features to try to prevent unauthorized access.
- 8.3. In order to provide our services to You, it is sometimes necessary for us to transfer your data to the third parties outlined in Article 7. In these cases, we ensure that both ourselves and our partners take adequate and appropriate technical, physical and organizational security measures to protect Your Personal Data. We also ensure we have appropriate contractual protections in place with these third parties.

9. DATA RETENTION

- 9.1. As a licensed and regulated insurance brokerage firm, UADBB “InPacto” is required by law to store some of Your Personal Data.
- 9.2. We will delete Personal Data that is no longer required for the purposes stated in this Privacy Notice (Article 5) or / and relevant law or jurisdiction in which we operate.

10. YOUR RIGHTS

- 10.1. You have the rights provided by GDPR including the following:
 - 10.1.1. You have the right to ask for modifications to Your Personal Data in case You believe that this Personal Data is not up to date or accurate.
 - 10.1.2. You have the right to access Your Personal Data that we process.
 - 10.1.3. You have right to demand the destruction of Personal Data when they are no longer needed for the purposes for which they were collected, if they are processed illegally or when You cancel Your consent to the processing of Personal Data or do not provide such consent, except the obligations required to us by law.
 - 10.1.4. You have the right to ask the Company for information about what Your Personal Data is being processed (the right to be informed about) and the rationale for such processing.
 - 10.1.5. You have the right to withdraw previously given consent for processing of Your Personal Data for a purpose or disagree with the processing of Personal Data.

- 10.1.6. You have right to demand, if technically feasible, the provision of Your Personal Data collected with Your consent or for the purpose of performing the contract in an easily readable format, or to request their transfer to another data controller.
- 10.1.7. You have the right to ask us not to contact You for direct marketing purposes by contacting us at info@inpacto.lt or by post to **UADBB “InPacto”, Antakalnio str. 17, Vilnius, LT-10312, Lithuania.**
- 10.2. You could make Your requirements related to the implementation of Your rights in person, by post or by e-mail specified in this Privacy Notice. Upon receipt of Your request, we may ask You to provide a proof of identity and additional information necessary for the request.
- 10.3. We have the right not to comply with Your requirements when it is necessary to ensure the following:
- 10.3.1. the state security and defence, important economic or financial interests of the state;
 - 10.3.2. public order, prevention, investigation, detection or prosecution of criminal offenses;
 - 10.3.3. the fulfilment of legal obligations imposed on us;
 - 10.3.4. the prevention, investigation and detection of breaches of official or professional ethics;
 - 10.3.5. the protection of rights or freedoms of Yours or other individuals.
- 10.4. Upon receipt of Your request, we will respond to You within 30 calendar days following the receipt of Your application and the date of submission of all documents necessary for the response. If we consider it necessary, we will stop processing Your Personal Data, except storage, until your application is resolved. If You legally withdraw Your previously given consent, we will immediately but not later than within 30 calendar days terminate the processing of Your Personal Data, except in cases specified in clause 10.3. above and in cases provided for by law.
- 10.5. If You disagree with our actions or the response to Your application, You have right to complain about our actions to a competent state authority - **State Data Protection Inspectorate, L. Sapiegos str., Vilnius, LT-10312 Lithuania.**

11. COOKIES POLICY

- 11.1. The cookies are a small amount of data, which often includes an anonymous unique identifier that is sent to Your browser from a website’s computer and then stored on Your hard drive. We use cookies for analyse the use of our websites, for develop services to better meet Your needs and for administrative purposes. If You reject all cookies, You may not be able to take full advantage of the website. Please see more detailed information about cookies by visiting <https://www.allaboutcookies.org/> .

12. CHANGES TO PRIVACY NOTICE

12.1. Any changes we may make to our Privacy Notice will be posted on this page and (or), where appropriate, notified to You by e-mail. Please check back frequently to see any updates or changes to our Privacy Notice.

13. CONTACT US

13.1. If You have questions about our privacy practices that are not addressed in this Privacy Notice, please email us at **info@inpacto.lt**.