

APPROVED BY:
The Order No. ĮS-392
of the head of SE State Forest Enterprise
8 September 2018

Privacy Policy of the SE State Forest Enterprise

We seek to inform you in detail about the processing of your personal data. Your personal data is controlled by the State Enterprise State Forest Enterprise, code of the enterprise: 132340880, registered office: Pramones Ave. 11A, Kaunas, Republic of Lithuania ((hereinafter referred to as the **SFE**), tel.: 852734021, email: info@vivmu.lt). This document shall apply if your personal data is being processed by the SFE.

We take care of your personal data protection and privacy.

This SFE Personal Data Processing Policy (hereinafter referred to as the **Policy**) is intended to inform you how we collect, use and share your personal data or other personal data we collect from you at the SFE. By this we strive to ensure fair and transparent collection and use of information about you.

Please, take the time to review this Policy and feel free to contact us in one of the ways below if there are some questions.

We could amend this Policy in the future, thus it is strongly recommended to review this Policy periodically.

Your personal data is processed in accordance with the General Data Protection Regulation (EU) 2016/679 (hereinafter referred to as the **General Data Protection Regulation (GDPR)**), the Law on the Protection of Personal Data, as well as other legal acts.

Personal data means any information that may be used to identify you provided by you, or received from other sources, which allows us to identify you. This could include for instance a first and last name, contact information, information about agreement between you and the SFE or their historical data, use of services, participation in the auction, image data captured by video surveillance equipment, etc.

The data subject (you) is the natural person (the recipient of the service, the contractual partner to the agreement, his agent, his family member, whose personal data we receive and use.

Other concepts used in the Policy shall be understood as defined in the General Data Protection Regulation and other legal acts.

Contact Information of Data Protection Officer

For any matter related to the processing of your personal data, please do contact the SFE Data Protection Officer by email: to duomenupsauga@vivmu.lt or by post at Savanoriu pr. 176, LT-03154, Vilnius.

What data do we collect about you?

We collect the following personal data:

- **General personal data**, such as name, surname, date of birth, telephone number, email address, address;
- **Identification data**, such as personal data;
- **Financial data**: accounts, payment documents;
- **Economic data** such as place of employment, your economic and commercial activity.
- **Video** data (video surveillance, video records), audio records when you visit our departments or contact our employees.

Important: We do not collect **special categories of personal data** that reveal your racial or ethnic origin, political opinions, religious or philosophical beliefs or membership of trade unions, sex life or sexual orientation, your biometric or genetic data, unless you have agreed to the processing of such data in a predefined manner or in other cases specified in legal acts.

If you provide us with the data of other persons related to you, you should obtain the consent of these persons and familiarise them with this Policy.

We may also collect your personal data if you are affiliated with our clients (contractors) - legal entities, for example, if you are:

- Head of the company;
- Shareholder of the company;
- A member of the board or other governing body;
- Ultimate Beneficial Owner (UBO);
- Representative of the company acting in accordance with the Power of Attorney;
- Contact person of the party to the agreement with the SFE.

For what purposes do we collect and use your personal data?

We process your personal data for the following main purposes:

In order to implement and perform the functions of the SFE provided for in the legal acts of the Republic of Lithuania we collect the following personal data: name, surname, date of birth, data included to the registration in professional hunting form (the first letter of a name of a person, surname, telephone number, email address, other data included to the form), data included to the hunting files (name, surname and signature of hunting leader, number of a hunter's ticket, other data included to the hunting file). Previously mentioned data is collected for reasons of public interest in the course of implementation of functions of public authority delegated to the SFE or on the basis of legitimate interests of the SFE.

In order to identify and contact you we need to collect your name, surname, date of birth, a copy of the identity document, address, telephone number and other contact details.

In order to consult you, provide services and execute our contractual obligations in a proper way, perform our functions established in legal acts, as well as to ensure your participation in the SFE services we use data about transactions between you and us and information received from you in the course of services or transactions.

In order to manage your everyday transaction and protect legal interest, as well as achieve the following:

- comply with the requirements of applicable law, regulations, manuals, codes, professional regulations and rules;
- comply with the requirements of local and international institutions, courts, law enforcement authorities and to satisfy their requests, as well as to comply with the requirements of court proceedings or other resolution of disputes; and
- find out or to take the action against people violating our rules or pursuing illegal activities or other activities harmful to other persons or their property.

In order to improve quality of services and be as close to you as possible. To this end, based on our legitimate interest, we analyse your personal data, your purchase history, i.e. what goods and services you purchased through our services. We collect and analyse your data for internal purposes such as auditing, data analysis or research to provide and improve our electronic platforms, content and services. We use cookies for these purposes on our website.

In order to provide you with general direct marketing proposals and in order to request your feedback on the quality of our services and invite you to participate in market research we collect and use your full name, telephone number, email address, and age. If you are our customer and do not oppose direct marketing messaging, we will send you such emails based on our legitimate interest. If you have given your consent for such activities, we will send you emails not only by email, but also by other electronic means of communication.

If you oppose (object) the use of your personal data for direct marketing, please do contact us immediately by email duomenuapsauga@vivmu.lt.

In order to communicate with you we:

- answer your questions and requests for the provision of services, as well as receive your feedback;
- send important notices on amendments of such important documents as General Terms of Service, this Policy or other documents;
- send technical reports, updates, security alerts, support and administrative messages;
- we manage your contact data and the main content of received and forwarded messages.

On the basis of your consent and for the **purpose of improving the quality of services and resolving disputes**, we record telephone conversations or conversations held via other communication means. For this purpose, we also store a telephone number, IP address and other identification data, conversation content, duration, time and other technical data.

In order to ensure the security of our assets, we conduct video surveillance and process your image data, date and time of your visits to the SFE.

What is the legal basis for the receipt and use of your personal data?

We receive and use your personal data in case of the presence of at least one of the following conditions:

- You intend to conclude or have concluded an agreement with the SFE;
- You gave your consent;
- Processing of personal data is possible on the basis of legislation;
- For reasons of public interest in the course of implementation of functions of public authority delegated to the SFE;
- On the basis of legitimate interests of the SFE, such as:
 - to improve the quality of our services, to ensure the consistency and sustainability of our activities, comprehensiveness of services and compliance with your expectations and to achieve your maximum satisfaction with our services;
 - to file and protect legal claims and take other legal actions in order to avoid losses or reduce them;
 - to ensure systematic monitoring and preventing of unlawful acts and to assess the risks involved on a constant basis.

Important: if you do not provide us with personal data that is necessary for the purpose of concluding and / or executing an agreement or the provision of which is clearly required by law or by the agreement, we will not be able to provide you with the service and / or fulfil our legal obligations.

Where do we get your personal data?

We use personal data that you provide us when applying for and using our services, filling in the data forms, submitting requests or claims, as well as the data registered at the SFE website, video surveillance equipment or by recording telephone conversations as described above.

We may also collect your personal data from the following resources:

- Law enforcement agencies, registries and state institutions;
- Natural persons, when they submit data of their spouses, children, other relatives or family relatives, lenders, guarantors, beneficiaries, etc.;
- Data available to us from natural persons or legal entities in the course of the fulfilment of contractual and other legal requirements;
- Data available to us from legal entities when you act as a representative of a legal entity, employee, contractor, founder, shareholder, participant, owner, etc.;
- Data available to us from partners or other legal entities cooperating with us in provision of services.

We may collect your personal information by monitoring our technological tools and services, including, inter alia, emails sent from or to the SFE. Otherwise, we collect and generate information about you when you submit it to us.

We could receive information about you from our suppliers as well.

We can combine available information about you from different sources.

Who is provided with your personal data?

We provide your personal data in accordance with the requirements of legal acts. We could transfer your data to:

- Providers of payment and other services participating in our transaction with you;

- State Enterprise Centre of Registers, notaries, bailiffs, law enforcement agencies, other registers and state institutions;
- Financial Crime Investigation Service, the courts and other law enforcement authorities at their request or on our initiative if there are suspicions that a criminal offense has been committed;
- Companies providing message forwarding, direct marketing, event organisation and related services;
- Our professional advisors, auditors;
- Courts, tribunals, arbiters or other dispute-resolution institutions;

We also attract the following data processing agencies for the processing of personal data referred to this Policy: data centres, companies providing hosting, cloud, website administration and related services, companies providing document archiving services, advertising, marketing companies, companies developing software, supporting and developing software solutions, companies providing information technology infrastructure services, communications services, consulting companies, companies in charge of online browsing or online business analysis services.

We could attract other supplier for the processing of personal data referred to in the Policy. We strive for service providers to comply with the requirements of the General Data Protection Regulation, laws, Policies and other mandatory legal acts.

The relationship between us as a data controller and a particular processor are governed by a written agreement or written terms and conditions unless such relationships are governed by laws or regulations. Generally, we process and keep your personal data in the territory of the European Union or the European Economic Area (EU / EEA), but we may transfer your personal data outside the EU / EEA, for example, when it is necessary for the conclusion and execution of the agreement, or if you have given a consent to such transfer. We transfer your personal data outside the EU / EEA if at least one of the appropriate protection measures provided for in the General Data Protection Regulation has been implemented.

Important: We take every precaution to ensure that your personal data is used safely, but there may be cases where we cannot ensure that the recipient complies with the same requirements as the ones applicable in the European Union.

How long do we keep your personal data?

Your personal data is kept for no longer than it is necessary for the purposes for which it was collected or for a period that is provided for by law, for instance:

- We process the data collected through our services as long as you use our services and store it for another 10 years after you stop using our services;
- We store the image data for 60 days;
- We process the direct marketing data for one year upon the receipt of the consent or for one year from the time you use our services or purchase goods;
- We process conversation records for four years from the recording date;
- As long as it is necessary for the purpose of archiving documents in accordance with statutory deadlines;
- Data, the storage and processing terms of which are not specified in this Policy, are processed by the deadlines specified in the relevant Index of General Document Storage Terms (approved by the Order No. V-100 of 9 March 2011 of the Chief Archivist of Lithuania).

How secure your personal information is?

We use various security technologies and procedures to protect your personal information from unauthorised access, use or disclosure. Our suppliers are carefully selected, we require them to use appropriate means to protect your confidentiality and to ensure the security of your personal information. However, the security of information transmission, Internet, email or mobile communication may sometimes be unsecured for reasons beyond the control of the SFE, so you should be careful about providing us with confidential information.

What are your rights?

You shall have the following rights:

- the right to request that we allow access to your personal data;
- the right to request rectification of incorrect, inaccurate or incomplete data;
- the right to restrict processing of your personal data until your application is checked for legality of their processing;
- the right to request erasure of personal data;
- the right to object processing of direct marketing data, including profiling, or on the basis of legitimate interests of the SFE;
- the right to transfer your personal data to another data controller or provide in a form that is directly accessible to you (applicable to personal data that you provided yourself and which is processed by automated means on the basis of consent or on the basis of the conclusion and execution of the agreement);
- the right to cancel your consent, without prejudice to the use of your personal data for the purpose of cancelling the consent;
- the right to file a complaint with the State Data Protection Inspectorate (detailed information at www.ada.lt).

How will you enforce your rights?

The procedure for implementing your rights as a data subject is published on our website at www.vivmu.lt.

What are the principles of personal data protection that we follow?

By collecting and using personal data that you have entrusted to us and the data from other sources, we adhere to the following principles:

- Your personal data is processed in a lawful, fair and transparent manner (the principle of legality, integrity and transparency);
- Your personal data is collected for specified, clearly defined and legitimate purposes and will not continue to be processed in an incompatible way (purpose limitation principle);
- Your personal data is adequate, relevant and necessary for the purposes for which they are processed (data minimisation principle);
- Processed personal data is accurate and, if necessary, updated (accuracy principle);
- Your personal data is stored in such a way that the identification cannot be set for longer than is necessary for the purposes for which your personal data is processed (the principle of limitation of the length of the storage);
- Your personal data is processed in such a way as to ensure the proper security of personal data, including protection from unauthorised processing or processing of unauthorised data, and against accidental loss, destruction or damage (integrity and confidentiality) by appropriate technical or organisational measures.

Our obligations

By collecting and using personal data that you have entrusted to us and the data from other sources, we adhere to the following principles:

- To process your personal data only for clearly defined and legitimate purposes.
- Not to process your personal data for purposes other than those specified in this Policy, except in cases stipulated by law.
- Process your personal data lawfully, accurately, transparently, honestly and in such a way as to ensure the accuracy, identity and security of personal data processed.
- Ensure that no excessive personal data is processed.
- Process your personal data for longer than it is necessary for the purposes for which your personal data is processed;

- Be responsible for compliance with the principles established in this Policy and be able to demonstrate that they are respected.
- Execute other statutory duties.

Validity and amendments to privacy policy

This Policy can be changed due to the amendments to legislation and changes in our activities. All the changes and amendments are provided at www.vivmu.it and by other means.