

PRIVACY POLICY

DATA PROCESSOR

UAB ERA Capital, legal entity code 300638657, address Ulonų str. 5, Vilnius, phone number +370 60605834, e-mail address info@eracapital.lt, website www.eracapital.lt.

1. DEFINITIONS USED

- 1.1. **Personal data** - any information relating to a natural person - data subject, whose identity is known or may be directly or indirectly identified using such data as a personal identification number, one or more physical, physiological, psychological, economic, cultural or social features, specific to that person, location data, and Internet identifier.
- 1.2. **Company** - UAB ERA Capital, legal entity code 300638657, address Ulonų str. 5, Vilnius.
- 1.3. **Data Subject** - A natural person or legal entity representative, who uses the services of the Company, or a person who visits the Website.
- 1.3. **IP Address** - a unique number that identifies your computer, phone, tablet, or other device that connects to the Internet. The IP address can be used to identify the country where the computer is connected to the Internet.
- 1.4. **Privacy policy** - this document, which contains the basic rules for collecting, storing, processing and keeping Personal data applied during the visit to the Website, and the rights of Data subjects and the procedure for their implementation, applicable in the Company.
- 1.5. **Website** - The Company's website www.eracapital.lt
- 1.6. **Regulation** - 27 April 2016 Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (General Data Protection Regulation).

2. GENERAL PROVISIONS

- 2.1. The privacy policy is aimed at persons, who are interested in the Company, open vacancies at the Company, its services and persons who visit the Website.
- 2.2. In this Privacy Policy, we provide you with information on how the Company manages the Personal data of the Data subjects.
- 2.3. By contacting us, you express your will for the Company to contact you regarding your request. By submitting personal data to us on this website or by browsing through it or by sending your CV to e-mail, contacting us through social networks or simply watching our activities on social networks you confirm that you have read the Privacy policy and are familiarized with the fact your data is processed.
- 2.4. You can only send inquiry form to the Company on our website after you have read and confirmed this Privacy Policy. We recommend that you read this Privacy policy carefully before you send inquiry form to the Company. You may review the Privacy Policy at any time on the Website.
- 2.5. The processing of personal data in the Company is regulated by the Regulation, the Law on Legal Protection of Personal Data of the Republic of Lithuania and other Lithuanian legal acts.

3. PRINCIPLES FOR PROCESSING PERSONAL DATA

- 3.1. Data is processed only under the criterion of lawful processing - in order to contact the person upon his request; with the consent of the person.

- 3.2. We strive to ensure that Personal data is processed accurately, fairly and lawfully, for the sole purpose of being collected in accordance with clear and transparent principles and requirements for the processing of personal data established by the legislation.
- 3.3. You do not need to provide any Personal data, but we may not be able to contact you unless Personal data is provided.

4. VOLUME, OBJECTIVES, BASIS OF PERSONAL DATA PROCESSING

- 4.1. On the Website, the Company collects the following personal data of a natural person or legal entity representative: name, surname, telephone number, e-mail address and IP address.
- 4.2. Personal data shall be processed for no longer than it is necessary for the purposes for which the data is processed, or for no longer than is required by the data subjects and / or provided for by law.
- 4.3. If the Data Subject, prior to the expiry of the personal data processing / storage terms, specified in this Privacy policy, withdraws the consent given for the processing of personal data, the Company shall only retain the consent of the data subject for the processing of the data for 10 (ten) years from the date of such revocation in order to claim, execute or defend the legal demands of the Company.
- 4.4. The Website collects name, surname, phone number, e-mail address, whenever the potential client is addressing the Company, by filling in the inquiry form on the website, the objectives - to provide preliminary consultation according to the submitted request, to offer the services provided by the Company. Personal data is processed while communication with client/potential client; then the data is stored for 5 (five) years in order to claim, execute or defend the Company's legal requirements and the Company's obligation to archive documents as provided for in legal acts.
- 4.5. Processing personal data for the purposes of employment or traineeship at the Company. Potential Company employees (candidates, persons seeking employment) and potential trainees provide the following personal data to the Company: CV, name, surname, contacts, motivation letter. If you contact us through social media, the social network controller may process your interest in our published positions for the purposes set out in social network controller's policies. Your personal data, submitted whenever you apply for a specific position, published by the Company, shall be processed for the purpose of concluding an employment contract, or a traineeship agreement with you as a potential employee and a trainee. If you are applying for a particular position, but the job or practice offer is not provided, after the end of selection for a specific position, published by the Company, your personal data will be destroyed unless you consent to the retention of your personal data for future trainee or employee recruitment purposes. Withdrawing your consent to the processing of personal data for the purposes, specified in this Privacy policy section, may be expressed at any time to the Company's employee in a clear and unambiguous manner by contacting us by phone or e-mail.
- 4.6. Other objectives. The Company may process your personal data for other purposes in accordance with the requirements and procedures of the Regulation and the Law on Legal Protection of Personal Data of the Republic of Lithuania.
- 4.7. Data processing terms. We process personal data for no longer than required by the purposes of data processing, data subjects and / or legislation. Usually (unless otherwise stated) personal data is processed in the Company for 5 (five) years after the receipt of personal data. If the data subject submits a request to restrict the processing of his data and the Company satisfies such a request, the collected personal data shall no longer be processed in the Company, except for the retention of the collected data within the time limits specified in the Rules. This Privacy Policy may provide specific terms for the processing of Personal Data, including storage.

5. PROVIDING PROCESSED DATA TO OTHER ENTITIES, DATA CONTROLLERS AND PROCESSORS

- 5.1. Your Personal data may be processed by processors who provide the Company with bookkeeping, Web site hosting, data center and / or server rental, IT maintenance and other services.
- 5.2. Data processors shall have the right to process Personal Data only in accordance with the instructions of the Company and to the extent necessary for the proper performance of the contractual obligations. While using the services of data processors, we strive to ensure that they also implement appropriate organizational and technical security measures and maintain the confidentiality of personal data.
- 5.3. Your personal data may be provided to third parties in the following ways: in writing, by electronic means of communication, by connecting to separate data collecting databases or information systems, or by any other means agreed by personal data controllers.

6. SECURITY OF PERSONAL DATA

- 6.1. The Company makes every reasonable effort to ensure that Personal Data is protected from any unauthorized action through its internal organizational and technical measures, All Personal Data and other information provided by the Data Subject is considered confidential. Access to Personal Data shall be restricted to those employees of the Company and to the Company's processors for whom such access is necessary to perform work functions or provide services.

7. RIGHTS OF DATA SUBJECTS

- 7.1. Each data subject has the following rights:
 - 7.1.1.to access his Personal Data submitted to the Company at any time;
 - 7.1.2.by submitting a written request for information, to know from which sources and what Personal Data has been collected, for what purpose they are processed, to whom they are provided;
 - 7.1.3.by a written request via e-mail to correct inaccurate, incomplete, incorrect personal data and / or suspend the processing of such personal data.
 - 7.1.4.disagree with the processing of his Personal Data, except where such personal data is processed for a legitimate interest, pursued by the data controller or a third party to whom the personal data are disclosed and where the interests of the data subject are not more important;
 - 7.1.5.to require that the provided Personal Data be destroyed;
 - 7.1.6.to require action to limit the processing of personal data;
 - 7.1.7.to require that personal data provided by himself, if processed on the basis of his consent or contract, and, if processed by automated means, be transferred by the data controller to a different data controller, in case this is technically possible (data transferability);
 - 7.1.8.the right to object to the use of only automated data processing;
 - 7.1.9.the right to object to the processing of personal data for direct marketing purposes;
 - 7.1.10. the right to revoke the consent given for the processing of personal data;
 - 7.1.11. the right to file a complaint with the State Data Protection Inspectorate regarding the processing of personal data.
- 7.2. The data subject has the right to claim the rights of the data subject, either orally or in writing, by means of a personal application, by post or by electronic means. In case the data subject claims his rights by writing via post, then a copy of the identity document certified either by a notary or according to another order, provided for in the legal acts, must be submitted together with the application. If the personal data of the data subject, such as name or surname have changed, copies of the documents confirming the change of such data should be provided together with the application; if they are sent by post, then a copy of the identity document certified either by a notary

or according to another order, provided for in the legal acts, must be submitted together with the application. When submitting an application by electronic means, the application must be signed by a qualified electronic signature or by electronic means which allow to ensure the integrity and indispensability of the text.

- 7.3. The request for the implementation of the data subject's rights must be readable, signed by the person, and must contain the name, address and / or other contact details of the data subject for the purpose of maintaining the contact or providing a response regarding the implementation of the data subject's rights.
- 7.4. The data subject may implement his rights himself or through a representative. In his application, the person's representative must indicate his / her name, address and / or other contact details to be used by the person's representative to receive a response, as well as the name of the person represented and any other data necessary for the proper identification of the data subject and to provide a document or a copy thereof, confirming the representation. In case of doubt about the identity of the data subject, the Company requests additional information, which is necessary to ascertain its identity.
- 7.5. Upon receipt of the Application, we will provide a response no later than in 30 calendar days from the date of receipt of the Application.
- 7.6. The Company, acting as Data controller, has the right to refuse to exercise your rights in a reasoned manner under the grounds set out in the Regulation.
- 7.7. Information about the processing of your data is provided to you, the lawfulness and integrity of the data processing is checked, the processing operations are terminated and the data is destroyed free of charge.
- 7.8. You can send your application in following ways: by e-mail info@eracapital.lt, or visit the office at
Zalgirio str. 90, LT-09303 Vilnius.

8. COMPANY'S ACCOUNTS IN SOCIAL MEDIA

- 8.1. The Company owns an account on social media LinkedIn. The information you provide on LinkedIn (including notifications, use of the Like and Follow boxes, and other communications) or which comes from visiting our Company account on LinkedIn (including information from cookies used by social network controllers) is controlled by the social network controller. Therefore, we recommend that you read the social network controller's privacy notices (policies).
- 8.2. As the Company's LinkedIn account Administrator, we select the appropriate settings based on our target audience and performance management and promotion goals. By enabling the company to create and manage an account on the social network, the Social network controller may impose restrictions on the ability to change certain essential settings, and so, we cannot influence what information the Social network controller will collect about you due to the Company creating an account on the social network.
- 8.3. All such settings may affect the processing of personal data while using social media, visiting the Company's account or reading Company's announcements on the social media network. Even if you just review our messages on LinkedIn, the social network controller can get some personal information, such as what end device you use, your IP address, and more.
- 8.4. Usually, the social network controller processes your personal data (even those that are collected when we choose additional account settings) for the purposes set by the social network controller, based on the social network controller's privacy policy. However, whenever you are using the social network, communicating with the Company through the social network, visiting the Company's account on the social network or reviewing the Company's records therein, the Company receives information about you. The amount of data we receive depends on our chosen account settings,

agreements with the social network controller on ordering additional services and cookies set by the social network manager.

8.5. LinkedIn Privacy policy: <https://www.Linkedin.com/legal/privacy-policy> .

8.6. Cookies used by LinkedIn are described here <https://www.Linkedin.com/legal/cookie-policy> .

9. FINAL PROVISIONS

9.1. The Law of the Republic of Lithuania applies to the implementation and interpretation of the Privacy Policy.

9.2. If any provision of the Privacy Policy becomes or is acknowledged as invalid, the remaining provisions remain in effect.

9.3. This Privacy Policy is effective from the date of its publication on the Website. This Privacy Policy is not considered to be an agreement between the Company and you regarding the processing of Personal Data. With this Privacy policy, the Company informs you about the principles of personal data processing in the Company. We may change the Privacy Policy at any time. All changes to the Privacy Policy are published on the Website. Changes and / or additions to the Privacy Policy shall become effective upon their publication on the Website. We recommend that you regularly review our Privacy Policy.