

PRIVACY POLICY

Inti Ltd (hereinafter – the **Company**) values the privacy of its clients, therefore, in this Privacy policy (hereinafter – the Policy), we clearly and openly provide the principles of data collection and usage applicable to the performance and the website of the Company, as well as other information about the provisions and principles of the Company to ensure the protection of personal data.

We apply this Policy in those cases when you visit the website of the Company, when you directly submit your information to the Company, when we directly receive the information related to you from the governmental institutions or other sources and for the purpose to perform contractual obligations when you happen to be one of the Parties. This Policy is also made to inform you about other data processing operations performed by the Company and essential provisions which ensure your privacy. This Policy is not applicable when you browse other websites or use the services of third parties.

We process personal data in accordance with the Regulation No. 2016/679 of the European Union on Data Protection, The Law on Legal Protection of Natural Person's Personal Data of the Republic of Lithuania, other applicable requirements of the legislation and guidelines of the supervising institutions.

PERSONAL DATA MANAGEMENT PERFORMED BY INTI LTD

In order to ensure transparent and proper personal data management, we inform you that the Company manages personal data to:

- provide services, in order to conclude and perform the agreements, manage clients' database;
- identify you in the informational systems and the Company website;
- respond to your enquiries, comments, and requests;
- solve problems related to the implementation of the services, delivery, and use;
- contact you when the provisions of the ordered services change;
- evaluate client's solvency and manage possible leverage;
- carry out online marketing, including sending newsletters;
- improve the quality of the services;
- perform analytical and market analysis;
- ensure the safety of clients, employees, premises, and work objects (video surveillance);
- for other purposes related to inner administration, for example, managing the employees' data;
- for auditing;
- commit duties and perform rights determined by the law.

By providing your personal data to the Company, you confirm and willingly agree that the Company manages and processes your personal data in accordance with this Privacy Policy, applicable laws, and other legal regulations.

PERSONAL DATA WE COLLECT AND MANAGE

The Company collects and processes personal data of these categories:

- key data, which is necessary to perform the purposes mentioned above: name, surname, personal code, date of birth, health insurance information, your photo, the data (date of issue, place, expiration date, number) of your personal ID document confirming your identity (passport, ID card), contact information, place of residence, sex, signature, name of the workplace, names of close relatives, phone numbers, email addresses, post addresses, their places of residence, credit/debit card data and other payment data;
- the data which is necessary to deliver services and sell products: order data, the account information, payment information, the information indicating your ordered services and products (their quantity, purchase dates, purchase history and other information necessary to acquire service) et cetera;
- the data which we can manage about you while you are visiting the website of the Company: the information about the media program you use, your IP address, the date and time spent while browsing the Company website, the links you clicked on the websites you were redirected from, the information about your computer operating system, versions of mobile apps, language preferences;
- if you use a mobile device, your data may be collected as well, which allows us to identify the type of the mobile device, device parameters, as well as geographical (longitude and latitude) coordinates;
- the video data recorded by the surveillance equipment of the Company or the freelance service providers hired by the Company;
- other data which is collected in accordance with your consent and which is described in detail when your consent is required.

THE LEGAL BASIS IN ACCORDANCE YOUR PERSONAL DATA IS COLLECTED WITH

The Company may collect your personal data only in accordance with the basis of legal management determined in the legislation. This is the legal basis of the conclusion and performance of the agreement, when you conclude the service provision agreement or another agreement with the Company or you pose respective enquiries for the Company, and visit the Company website. The legitimate interest of the Company may also enable the Company to manage the data, for example, when the Company reviews solvency, controls and (or) recovers debts. Your consent is another basis which allows the Company to manage personal data (for instance, (for example, when conducting online marketing, when individual offers based on the individual analysis of a client are delivered or other cases). The Company may also manage your personal data while performing legal duties (in order to comply with the requirements of acts, as well as to respond to the governmental and municipal legitimate enquiries, et cetera) or according to another basis determined in the legislation on legitimate management.

THE TERMS OF PERSONAL DATA STORAGE

The personal data collected by the Company is stored in printed documents and in the informational systems of the Company. The Company stores your personal data no longer than it is needed for the purposes of data management or determined by the legislation, if it determines a longer period of such data storage. The personal data is stored for such period of time until

based claims may occur from the contractual relationship or as long as it is needed to implement and protect the legitimate interests of the Company. Unnecessary personal data is eliminated.

The Company shall take all necessary measures to ensure that the personal data is managed exclusively according to the determined purposes, precisely, responsibly and legitimately, strictly complying with the clear and transparent requirements of personal data management determined in the legislation.

PERSONAL DATA MANAGEMENT AND COOPERATION WITH THIRD PARTIES

The Company may provide personal data to the data managers, who perform certain work and provide services for the Company. The Company does not grant permission to any of the providers or third persons to use your personal data for any other way and require them to take measures of your personal data protection. Personal data may be transferred to the third persons of these categories:

- intermediaries, who manage the data to conclude and manage the agreements with the clients and partners;
- the companies of informational technologies, which manage the data to ensure the creation, development, and maintenance of informational systems;
- the companies which ensure that the clients receive notifications, provide protection and other services;
- accounting firms;
- the companies managing joint debtors' files and debt managing companies;
- court, law enforcement institutions or governmental institutions at the extent determined in the requirements of the legislation;
- partners, for example, in that case when proper management of debt recovery must be ensured, the Company transfers the right of claim to the sum payable by the client to subrogation firms;
- other persons on the basis of your consent, if it is granted regarding the specific case.

THE DATA COLLECTED ON THE COMPANY WEBSITE

The Company collects this data on its website:

- in order to manage the website and determine malfunction on the server of the Company, we may use visitors' IP addresses. IP address is a unique code which identifies a specific computer on the network. It may be used to identify a visitor and collect various demographic information;
- by using cookies we collect data about the usage of services. The information on cookies, their types and their purpose is disclosed below.

We responsibly protect the collected data about the visitors on the website of the Company from loss, unauthorised use, and modification. The premises, where the collected data is stored, is physically sealed not to let non-employees of the Company to use the data. In addition, the database storing the data of the visitors of the Company website is protected against unauthorised access via the Internet network.

NEWSLETTERS

By using the services of the Company and concluding the service provision agreement, you may willingly agree that your personal data is used by the Company for marketing purposes; you may grant your consent by leaving your signature in a specific field in the service/product provision agreement and or in a separate written consent.

After subscribing to newsletters, the Company will use your email address and phone number on the basis of your consent which you can dismiss at any time. We may transfer your email address and phone number to third parties which provide specialized services only to send you your newsletter.

After sending the newsletter, the Company may collect statistical data about your behaviour, for instance, whether you opened the email letter, what specific links you clicked on.

We will manage your email address and phone number for sending newsletters only up to the point when we receive your refusal to receive the offers of the Company. You can unsubscribe the newsletters of the Company by clicking on a specific link at the bottom of a newsletter or in other ways described in this Policy or a newsletter.

USING COOKIES

WHAT ARE COOKIES?

A Cookie is a small text file which a website records into the browser of your computer or mobile device when you use the website. Next time you visit the same website this file will be read in order for the website to identify your computer or mobile device.

THE COOKIES USED BY THE COMPANY

The information collected by the cookies allows us to make your browsing easier, send relevant offers, enlightens us about the behaviour of the visitors on the website, allows us to analyse trends, and improve the website, customer service, and the services provided by the Company.

The Cookies on the Company website are used for these purposes:

- **Technical Cookies:** we aim to offer an advanced, and easy-to-use website for our visitors, which automatically adapts to their needs and desires. In order to accomplish that we use technical cookies which helps us display our website to you and ensure its functionality. These technical cookies are vital for the proper functionality of our website.
- **Functional Cookies:** we also use functional cookies to memorise your wishes and help you to use the website and the apps effectively. For instance, these cookies memorise your language preferences and searches. These functional cookies are not necessary for the website to function; however, they enhance the functionality and improve your experience of using our Company website.
- **Analytical Cookies:** these cookies are used to gain insights about how visitors use the Company website. Thus, we can optimise and improve our website, understand the effectiveness of ads and communication tools, and ensure that we are still interesting and relevant. We may collect data about your browsed web pages, the web pages you were redirected from, the emails you opened and responded to, as well as the information about the date and time. It also refers to the fact that we can use the information about

you and also the fact how you use this website, for example, visiting frequency, the number of clicks on a certain page, used keywords, etc. As a part of our ad campaign, we may use the analytical cookies, to find out the way our visitors browse the website after they see a banner. It also applies to ads on third party websites.

- **Commercial Cookies:** we use our and third-party cookies in order to display personalised ads on our and third party websites. It is called ‘remarketing’ which is based on browsing actions, for example, the products you were looking for and reviewed ones.

The cookies are also used to record whether you agree on the usage of cookies on our Company website and avoid posing this question every time you visit the website.

Only the Company employees responsible for the analysis of such data and development of the website have access to the statistical data about the visitors of the Company website.

The partners of the Company who provide website operation tools and similar services to the Company may also have access to the technical records.

DISABLING COOKIES

Upon visiting the Company website, you may choose whether you want to enable cookies. You can manage the cookies and (or) remove them at your discretion. In Internet Explorer, Safari, Firefox, Chrome settings you can select which cookies you want to enable and which ones to disable. You can delete all the cookies which are present on the computer; in most browsers, you can opt out of enabling cookies. The location of such setting depends on the browser you use.

If you disagree on enabling cookies on your device, you can cancel the previous consent of enabling them at any time by changing settings and deleting the recorded cookies on your computer. If you choose to delete cookies, keep in mind that all selected options will be deleted as well. Besides, after blocking all cookies, the majority of websites (including the Company website) will not function properly. Due to these reasons, we do not recommend to disable cookies when using the Company website.

There are also links to other persons, companies, and organisations on our website. Note that the Company is not liable for the content and the applicable principles of privacy protection of such websites. Thus, if you click on a link which redirects you to other websites, you should take a look at their privacy policies.

If you want to know more about cookies, their management and removal, visit this website www.allaboutcookies.org and Support page of your browser.

PERSONAL DATA SAFETY

Your Personal Data is managed with responsibility and safety. In order to determine the measures of personal data management as well as during the personal data managing process, we implement proper data protection technical and organisational measures determined in the legislation to protect your data from accidental or illegal elimination, corruption, modification, loss, disclosure, as well as from any other illegal management.

The Company employees who manage personal data are committed in written form not to disclose the information about the Company clients and potential clients including the visitors of

the Company website received in the workplace, and other persons whose information is transferred to the Company, to third parties.

The measures of personal data protection are determined according to the risks which arise while managing personal data.

The Company is not able to guarantee that the functionality of the Company website will remain constant without any malfunction or errors, the Company website will be fully protected against viruses and other malware. A visitor of the website is informed that any material they read, download, or receive in any way while using the Company website is at their own full discretion and risk and only they are liable for the damage sustained by them and their computer operating system.

YOUR RIGHTS AND RELEVANT INFORMATION

You have the right to:

- contact the Company to disclose the information about your personal data managed by the Company, where the Company received it from and how the Company manages the it. In order to make a request we ask you to fill the Request Form to Access the Managed Personal Data which is available on the Company website at <https://inti.lt>;
- contact the Company to correct your personal data and (or) cease the management of such personal data, except the storage, in case after accessing the personal data, you determine that the data is false, insufficient or misleading;
- contact the Company to delete your personal data after accessing your personal data, you determined that the data is managed illegally or irresponsibly and you discovered other occurrences determined in the legislation. In order to make a request we ask you to fill the Request Form to Delete the Managed Personal Data which is available on the Company website at <https://inti.lt>;
- disagree on managing your personal data, when such data is managed and is about to be managed for the online marketing purposes, or due to a legitimate interest sought by the Company or third person, who receives the personal data.
- request that only automatized data management for your personal data including profiling will be applied;
- receive your personal data or any data related to you which you submitted to the Company in data in a systemised, usual, computer-read format, and transfer this data to another data manager, or demand that the Company would directly transfer such personal data to another data manager when it is technically possible (the claim of data transfer).
- refuse to submit personal data. In that case, you automatically waive your claim regarding the quality of services provided by the Company, since the required data may be necessary to deliver desired/ordered services/products to the Data Subject. In that case, the Company has the right to refuse to deliver services to you if the delivery of the services is related to receiving your personal data.

Regarding the enforcement of your rights and complaints, you can contact the Company employee responsible for the protection of personal data at inti@inti.lt. You may also contact the State Data Protection Inspectorate, however, we will always try to solve the issues directly with you.

By submitting a request, you must confirm your identity the following ways: 1) if a request is submitted directly arriving at the Company – submit the document confirming person's identity or the copy authorised according to the arrangement under the legislation of the Republic of Lithuania; 2) if a request is submitted via mail or email – submit a copy of the document confirming person's identity according to the arrangement under the legislation of the Republic of Lithuania; 3) if a request is submitted via a representative – submit the copy of the document confirming person's identity according to arrangement under the legislation of the Republic of Lithuania including the document confirming the representational basis (or the copy of power of attorney authorised according to the arrangement under the legislation of the Republic of Lithuania).

After receiving your written request, the Company submits the requested data in the written format (including electronic communication measures) or indicates the reason behind the refusal to respond to such request no later than within 30 calendar days since receiving your request.

The 30-days period may be extended for two more months if necessary taking into account the complexity and number of the requests. The Company within the month after receiving the request will inform the applicant regarding such extension of the period, the Company will also submit the reasons explaining such delay.

Should you have any questions regarding the information provided in this privacy policy, we kindly ask you to contact the Company in any below-indicated way convenient for you:

- in written form – Email: inti@inti.lt;
- at the address Draugystės str. 8H, LT-51264 Kaunas;

UPDATING THE PRIVACY POLICY AND COOKIES

After the Company updates this privacy and the cookie policy, the new version of the policy will be published on the website www.inti.lt

Updated on 01/06/2018