

## **UAB EKOBAZĖ**

### **DESCRIPTION OF THE PROCEDURE FOR IMPLEMENTATION OF THE RIGHTS OF DATA SUBJECTS**

#### **I. TERMS AND DEFINITIONS**

1. Terms and definitions used in the Description of the Procedure for Implementation of the Rights of Data Subjects are as follows:

- 1.1. **LLPPD** means the Republic of Lithuania Law on Legal Protection of Personal Data;
- 1.2. **Personal data** means any information relating to an identified or identifiable natural person;
- 1.3. **Data Subject** means a natural person who can be identified directly or indirectly, in particular by an identifier such as name and surname, personal ID number, location data and Internet identifier, or by one or several physical, physiological, genetic, mental, economic, cultural or social identification signs;
- 1.4. **Data processing** means any operation or sequence of operations performed by automated or non-automated means regarding personal data or sets of personal data, such as collection, recording, sorting, systematization, storage, adaptation or modification, retrieval, access, usage, or disclosure by transfer, distribution or otherwise making them available as well as collating or merging them with other data, restricting, deleting or destroying them;
- 1.5. **Data Recipient** means a natural person or legal entity, public authority, agency or any other body to whom personal data are disclosed (whether a third party or not);
- 1.6. **Data Manager** means a natural person or legal entity, public authority, agency or any other body that processes personal data on behalf of the Data Controller;
- 1.7. **Data Controller** means a natural person or legal entity, public authority, agency or any other body that (alone or with others) determines the means and purposes of data processing;
- 1.8. **Regulation** means the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016;
- 1.9. **SDPI** means the State Data Protection Inspectorate;
- 1.10. **Other terms and definitions** as defined in the Regulation, LLPPD and other legal acts of the Republic of Lithuania regulating the processing and protection of personal data.

#### **II. GENERAL PROVISIONS**

2. The Description of UAB Ekobazė (hereinafter referred as the "Company") establishes the Data Subject's rights provided for by the Regulation, the scope of these rights, conditions and restrictions for implementation, the procedure for submitting and considering requests regarding the Data Subject's rights, and the procedure for examining the Data Subject's complaints.

3. The Description was prepared in accordance with the provisions of Chapter 3 of the Regulation.

4. The Description establishes the general procedure for the implementation of rights of all categories of the Company's Data Subjects:

- 4.1. employees;
- 4.2. candidates for vacancies in the Company;
- 4.3. shareholders;
- 4.4. representatives of legal entities of the Company's suppliers;
- 4.5. representatives of legal entities of clients;
- 4.6. visitors to the Company's website [<http://www.ekobaze.eu/>];
- 4.7. other natural persons whose personal data are processed by the Company.

5. The purpose of the Description is ensuring full implementation of the rights of Data Subjects, taking into account the scope, categories, purposes and grounds for processing of Personal Data; allowing Data Subjects to submit requests and complaints about the implementation of their rights and setting deadlines for responding to the said requests and complaints, which should not be longer than those permitted by the provisions of Part 3 Article 12 of the Regulation.

6. In order to ensure a concise, transparent, comprehensible and accessible implementation of the principle of transparency, the Company shall provide Data Subjects with all information necessary for them to exercise their rights under Chapter 3 of the Regulation in a clear and simple language.

### **III. RIGHTS OF THE DATA SUBJECTS**

7. The Data Subject shall have the following rights:

7.1. the right to access his (her) Personal Data processed by the Company;

7.2. the right to have his (her) Personal Data rectified;

7.3. the right to have his (her) Personal Data deleted (i.e. the right to be forgotten);

7.4. the right to restrict the processing of his (her) Personal Data;

7.5. the right to object to the processing of his (her) Personal Data;

7.6. the right to receive related Personal Data provided to the Company in a structured, commonly used and computer-readable format, and to transfer the received data to another Data Controller (i. e. the right to data portability);

7.7. the right to withdraw his (her) consent at any time.

8. The rights of Data Subjects are not absolute, they shall be limited by the provisions of the Regulation as well as the laws and other legal acts of the Republic of Lithuania.

### **IV. SCOPE OF THE RIGHT TO ACCESS PERSONAL DATA PROCESSED BY THE COMPANY**

9. Any Data Subject of the Company shall have the right to receive the Company's confirmation regarding whether his (her) Personal Data are processed, and if so, the Data Subject shall have the right to access his (her) processed Personal Data.

10. The Data Subject shall also have the right to access the following information:

10.1. for the purpose of processing Personal Data;

10.2. by categories of the processed Personal Data;

10.3. if Personal Data shall be transferred to the Data Recipients – Data Recipients or their categories;

10.4. his (her) processed Personal Data during the intended storage period that may be defined by a specific term or other criteria;

10.5. the right to request that the Company rectify or delete Personal Data, restrict the processing of Personal Data related to the Data Subject, or object to such processing as well as the procedure for implementing these rights;

10.6. the right to lodge a complaint with the supervisory authority;

10.7. if Personal Data were not submitted by the Data Subject him- or herself – information about the person who submitted the Personal Data.

11. When exercising the right specified in this Chapter, the Data Subject shall indicate his (her) name, surname and specific information, described in Chapter 11 of the Description, with which he (she) wishes to familiarize him- or herself, or shall indicate that he (she) wishes to be granted access to all information described in Chapter 11 of the Description. The request must be confirmed by the Data Subject's signature. The Data Subject must also prove his (her) identity by presenting an identity document. In the request, the Data Subject may specify in what manner he (she) wishes to receive a response to the said request.

12. The procedure for exercising the Data Subject's right to access his (her) Personal Data processed by the Company is established by Chapter XI of the Description.

### **V. SCOPE OF THE RIGHT TO HAVE PERSONAL DATA RECTIFIED**

13. Any Data Subject of the Company shall have the right to demand that the Company rectify the Data Subject's inaccurate Personal Data it processes. In addition, the Data Subject of the Company shall have the right to demand that the Company update his (her) incomplete Personal Data. The Data Subject may not demand that the Company supplement the Data Subject's Personal Data it already processes with new data that are not required to achieve the Company's goals for which the respective Data Subject's Personal Data are being processed.

14. When submitting a request for rectification of inaccurate Personal Data or updating incomplete Personal Data, the Data Subject must provide his (her) name, surname and the Personal Data processed by

the Company that are inaccurate or incomplete as well as provide accurate or additional Personal Data. The request must be confirmed by the Data Subject's signature. The Data Subject must also prove his (her) identity by presenting an identity document. In the request, the Data Subject may specify in what manner he (she) wishes to receive a response to the said request.

15. The procedure for exercising the Data Subject's right to request for rectification or updating of inaccurate or incomplete Personal Data is established by Chapter XI of the Description.

## **VI. SCOPE, CONDITIONS AND RESTRICTIONS OF THE RIGHT TO HAVE PERSONAL DATA DELETED (I.E. THE RIGHT TO BE FORGOTTEN)**

16. Any Data Subject of the Company shall have the right to demand that the Company delete the Data Subject's Personal Data it processes. The Data Subject may only exercise this right if at least one of the following conditions is met:

16.1. the processed Personal Data of the Data Subject are no longer necessary for the purposes for which they were collected and processed;

16.2. the Data Subject withdraws his (her) consent on which the Company's processing of his (her) Personal Data is based;

16.3. the Data Subject objects to the processing of his (her) Personal Data in accordance with the procedure established in Paragraph 25 of the Description and there are no restrictions on this right established in Paragraph 26 of the Description;

16.4. the Company has no legal basis for processing the Data Subject's Personal Data.

17. The Data Subject's right to request that the Company delete his (her) Personal Data may be restricted in the following cases:

17.1. working capacity;

17.2. the processing of Personal Data is necessary for the purposes of occupational medicine, to assess the employee, the Company processes the Data Subject's personal data while fulfilling its legal obligations prescribed by the laws and other legal acts of the Republic of Lithuania;

17.3. The Company seeks to assert, enforce or defend legal claims.

18. When submitting a request to delete Personal Data, the Data Subject must indicate his (her) name, surname, one of the conditions described in Paragraph 16 of the Description as well as specific Personal Data which the Company must delete, or specify that the Company must delete all of the Data Subject's Personal Data it processes. The request must be confirmed by the Data Subject's signature. The Data Subject must also prove his (her) identity by presenting an identity document. In the request, the Data Subject may specify in what manner he (she) wishes to receive a response to the said request.

19. The procedure for exercising the Data Subject's right to request the deletion of Personal Data processed by the Company is established by Chapter XI of the Description.

## **VII. SCOPE, CONDITIONS AND RESTRICTIONS OF THE RIGHT TO RESTRICT THE PROCESSING OF PERSONAL DATA**

20. Any Data Subject of the Company shall have the right to demand that the Company restrict the processing of his (her) Personal Data. The Data Subject of the Company may only exercise this right if at least one of the following conditions is met:

20.1. the Company accepts the Data Subject's request for rectification or updating of inaccurate or incomplete Personal Data. In this case, the processing of Personal Data shall be limited to the period until the Company rectifies or updates inaccurate or incomplete Personal Data of the Data Subject;

20.2. the Company has no legal basis for processing the Data Subject's Personal Data and the Data Subject has not submitted a request for the Company to delete his (her) illegally processed Personal Data;

20.3. the processed Personal Data of the Data Subject are no longer required for the purposes for which they were collected and processed, but they are necessary for the Data Subject to make, enforce or defend his (her) legal claims.

21. The restriction of processed Personal Data requested by the Data Subject shall not affect the storage of these data by the Company.

22. Once the Company has granted the Data Subject's request to restrict the processing of his (her) Personal Data, the Company may no longer process the Data Subject's restricted Personal Data for any other purposes than storage, unless the Company obtains the Data Subject's written consent or seeks to assert, enforce or defend its legal claims, seeks to protect the rights of another natural person or legal entity,

or may justify further processing of restricted Personal Data by the public interest. The Company must inform the Data Subject about the existing reasons that allow the Company to further process the Data Subject's restricted Personal Data not later than within ten (10) days.

23. When submitting a request to restrict the processing of his (her) Personal Data, the Data Subject must indicate his (her) name, surname, one of the conditions described in Paragraph 20 of the Description, which processed Personal Data of the Data Subject the Company must restrict, or specify that the Company must restrict all of the Data Subject's Personal Data it processes as well as set a period during which the processing of the Data Subject's Personal Data shall be restricted. The period of restriction of Personal Data may be defined by a specific term or other criteria. The period of restriction of Personal Data cannot exceed that required to achieve the Data Subject's goals for which the restriction of processing of Personal Data has been requested. The request must be confirmed by the Data Subject's signature. The Data Subject must also prove his (her) identity by presenting an identity document. In the request, the Data Subject may specify in what manner he (she) wishes to receive a response to the said request.

24. The procedure for exercising the Data Subject's right to request the restriction of Personal Data processed by the Company is established by Chapter XI of the Description.

## **VIII. SCOPE, CONDITIONS AND RESTRICTIONS OF THE RIGHT TO OBJECT TO THE PROCESSING OF PERSONAL DATA**

25. Any Data Subject of the Company shall have the right to object further processing of his (her) Personal Data performed by the Company. The Data Subject of the Company may exercise this right if the Company processes the Data Subject's Personal Data on the basis of a legitimate interest of the Company or third parties. The Data Subject's right to object to the processing of his (her) Personal Data shall be restricted in accordance with the procedure established in Paragraph 26 of the Description;

26. The Data Subject's right to object to the processing of his (her) Personal Data established in Paragraph 25 of the Description, may be restricted if the Company proves that its or third parties' legitimate interests outweigh the Data Subject's interests, rights and freedoms; also, if the Data Subject's Personal Data processed by the Company, to further processing of which the Data Subject objects, are necessary for the Company to assert, enforce or defend its legal claims.

27. When submitting a request for objecting to the further processing of his (her) Personal Data, the Data Subject must indicate his (her) name, surname, the basis for the processing of Personal Data established in Paragraph 25 of the Description, to further processing of which Personal Data does the Data Subject object, or indicate that the Data Subject objects to the processing of all of his (her) Personal Data. The request must be confirmed by the Data Subject's signature. The Data Subject must also prove his (her) identity by presenting an identity document. In the request, the Data Subject may specify in what manner he (she) wishes to receive a response to the said request.

28. The procedure for exercising the Data Subject's right to object further processing of his (her) Personal Data is established by Chapter XI of the Description.

## **IX. SCOPE, CONDITIONS AND RESTRICTIONS OF THE RIGHT TO DATA PORTABILITY**

29. Any Data Subject of the Company shall have the right to receive related Personal Data provided to the Company in a structured, commonly used and computer-readable format. If the Company has technical capabilities, the Data Subject may request that the Company transfer his (her) Personal Data directly to another Data Controller. The Data Subject of the Company may exercise these rights only if both of the following conditions are met:

29.1. the processing of the Data Subject's Personal Data is based on the Data Subject's consent or execution of the agreement signed between the Data Subject and the Company;

29.2. the Data Subject's Personal Data are processed automatically, i.e. in digital form.

30. When submitting a request for obtaining his (her) Personal Data in a structured, commonly used and computer-readable format, the Data Subject must indicate his (her) name, surname, which Personal Data he (she) seeks to obtain, or indicate that the Data Subject seeks to obtain all of his (her) Personal Data processed by the Company. If the Data Subject requests that the Company transfer his (her) Personal Data directly to another Data Controller, the Data Subject must additionally specify in such request to which Data Controller the Personal Data indicated by the Data Subject shall be transferred. The request must be confirmed by the Data Subject's signature. The Data Subject must also prove his (her) identity by

presenting an identity document. In the request, the Data Subject may specify in what manner he (she) wishes to receive a response to the said request.

31. The procedure for exercising the Data Subject's right to data portability is established by Chapter XI of the Description.

## **X. SCOPE AND CONDITIONS OF THE RIGHT TO WITHDRAW CONSENT**

32. If the Company processes the Data Subject's Personal Data on the basis of consent, the Data Subject shall have the right to revoke his (her) consent at any time.

33. The Data Subject's revocation of consent to the processing of his (her) Personal Data shall not affect the lawfulness of processing of the Data Subject's Personal Data during the period of validity of the said consent.

34. When submitting a request to revoke his (her) consent to the Company, the Data Subject must indicate his (her) name, surname, the date of consent, the purpose of processing of the Data Subject's Personal Data specified in the consent, or other information provided in the consent which may help identify the consent the Data Subject wishes to revoke. The request must be confirmed by the Data Subject's signature. The Data Subject must also prove his (her) identity by presenting an identity document. In the request, the Data Subject may specify in what manner he (she) wishes to receive a response to the said request.

35. The procedure for exercising the Data Subject's right to withdraw consent is established by Chapter XI of the Description.

## **XI. PROCEDURE FOR SUBMITTING AND CONSIDERING REQUESTS OF DATA SUBJECTS**

36. The rights of Data Subjects provided for in Chapter III of the Description shall be implemented in accordance with the terms and procedure established in this Chapter.

37. In order to exercise one or more of the rights provided for in Chapter III of the Description, the Data Subject must submit a free-form request to the Company. The Data Subject's request must comply with the requirements of Chapters IV–X of the Description for the request content:

37.1. the content of the request for access to Personal Data must comply with the requirements of Paragraph 11 of the Description;

37.2. the content of the request for rectification of Personal Data must comply with the requirements of Paragraph 14 of the Description;

37.3. the content of the request to delete Personal Data must comply with the requirements of Paragraph 18 of the Description;

37.4. the content of the request for restriction of processing of Personal Data must comply with the requirements of Paragraph 23 of the Description;

37.5. the content of the request for objection to processing of Personal Data must comply with the requirements of Paragraph 27 of the Description;

37.6. the content of the request for the right to data portability must comply with the requirements of Paragraph 30 of the Description;

37.7. the content of the request for consent withdrawal must comply with the requirements of Paragraph 34 of the Description;

38. The request must be submitted by email [info@ekobaze.eu](mailto:info@ekobaze.eu) or upon direct arrival to the Company.

39. The Data Subject may submit the request him- or herself or through a representative. When submitting the request on behalf of the Data Subject, the representative must also submit documents confirming his (her) rights and obligations as a representative.

40. The Company shall consider the received request of the Data Subject not later than within one (1) month from the date of receipt of the said request. The Company shall have the right to extend the Data Subject's request processing period to two (2) months, if processing the received request within one (1) month is impossible for important reasons. The Company must inform the Data Subject about extending the period of processing of the Data Subject's request not later than within one (1) month from the date of receipt of the said request, also providing important reasons for not being able to process the Data Subject's request within one (1) month.

41. The Company shall provide the response to the Data Subject's request in the manner specified by the Data Subject in the said request. If the Data Subject does not specify in his (her) request how exactly

he (she) would like to receive the Company's response or if the Company is unable to provide a response in the manner specified by the Data Subject in his (her) request due to technical obstacles or other reasons, the response shall be sent to the Data Subject via email or other contact details of the Data Subject processed by the Company.

42. The Company shall provide answers to requests of Data Subjects free of charge. If the Data Subject submits manifestly unfounded or disproportionate requests and the content of these requests is repetitive, the Company may:

42.1. refuse to respond to an unfounded or disproportionate request as well as to a request having repetitive content. In this case, the Data Subject shall be informed about the Company's refusal to respond to his (her) request within one (1) month from the date of receipt of the said request;

42.2. before providing a response to the Data Subject's request, demand a reasonable fee corresponding to the administrative costs that the Company will incur while collecting the information requested by the Data Subject, considering the request and providing the response.

43. The Company must confirm the identity of the Data Subject before implementing his (her) rights. The Company may request that the Data Subject provide additional information or otherwise confirm his (her) identity within ten (10) days after receiving the Data Subject's request. When requesting the Data Subject to provide additional information or otherwise confirm his (her) identity, the Company shall specify what additional information the Data Subject must provide or what other measures the Data Subject must take for the Company to properly confirm his (her) identity, and shall set a reasonable time period for providing such information. If the Data Subject fails to provide additional information within the time period specified by the Company or take other measures specified by the Company, which might help identify the Data Subject, the Company shall have the right to refuse to consider and respond to the Data Subject's request. The Data Subject shall be informed about the Company's refusal to accept the request and the reasons for such refusal within ten (10) days after the end of the period set by the Company for the Data Subject to provide additional information or take other measures.

44. If the Data Subject's representative fails to submit documents confirming his (her) rights and obligations as a representative, the Company shall have the right to refuse to accept the request submitted by such representative of the Data Subject. The Data Subject's representative shall be informed about the Company's refusal to accept the request and the reasons for such refusal within ten (10) days from the date of receipt of the request by the Company.

45. The Data Subjects' requests shall be considered, responses to such requests shall be prepared, Data Subjects (in cases prescribed in this Chapter of the Description) shall be informed, additional information shall be requested, and implementation of other means shall be carried out by a responsible employee of the Company.

46. Having considered the Data Subject's request, the Company shall provide the Data Subject with a response. The response shall indicate whether the request has been granted or rejected. If the request is granted, the response shall specify the extent to which the request shall be granted. In addition, a deadline shall be set taking into account the complexity of the request, in the course of which the Company undertakes to meet the demands listed in the request. If the request is only granted in part or rejected, the response must state the reasons why the request has only been granted in part or rejected. If the request has only been granted in part or rejected, the Data Subject shall have the right to file a complaint with the Company in accordance with the procedure established in Chapter XII of the Description.

## **XII. PROCEDURE FOR SUBMITTING AND CONSIDERING COMPLAINTS OF DATA SUBJECTS**

47. In order to ensure the full implementation of the rights of Data Subjects, the Company shall allow the said Data Subjects to file complaints about reviewing partially unmet or rejected requests. Data Subjects may also submit complaints if within one (1) month from the date of submission of the request the Company does not take any action on the submitted request of the Data Subject, i.e. does not provide a response in accordance with the procedure established by Chapter XI of the Description, does not inform the Data Subject about the refusal to provide a response, or perform any other actions prescribed in Chapter XI of the Description.

48. The complaint must contain one of the reasons established in Paragraph 47 of the Description, which is the object of the complaint. If the complaint is made because the Company only partially granted the Data Subject's request or rejected it, such complaint must state the reasons why the Data Subject considers that his or her complaint should be satisfied in full. The complaint shall be accompanied by a copy of the Data Subject's partially granted, rejected or pending request.

49. The complaint must be submitted by email [info@ekobaze.eu](mailto:info@ekobaze.eu) or upon direct arrival to the Company.

50. The Data Subject may submit the complaint him- or herself or through a representative. When submitting the complaint on the Data Subject's behalf, the representative must also submit documents confirming his (her) rights and obligations as a representative.

51. The deadlines for considering the Data Subject's complaint coincide with the deadlines for considering the Data Subject's request established in Paragraph 40 of the Description.

52. The methods of providing a response to the Data Subject's complaint coincide with the methods of providing a response to the Data Subject's request established in Paragraph 41 of the Description.

53. The Company shall provide answers to complaints of Data Subjects free of charge.

54. The Company must confirm the identity of the Data Subject that submits the complaint. When identifying the Data Subject, the Company shall have the rights established in Paragraph 43 of the Description.

55. The Company shall refuse to consider the Data Subject's complaint if it has considered and provided a response to the Data Subject's complaint for the same reasons and regarding the same request of the Data Subject. The Data Subject shall be informed about the Company's refusal to consider the Data Subject's repeated complaint and the reasons for such refusal within ten (10) days from the day of receipt of the repeated complaint by the Company.

56. If the Data Subject's representative fails to submit documents confirming his (her) rights and obligations as a representative, the Company shall have the right to refuse to accept the complaint submitted by such representative of the Data Subject. The Data Subject's representative shall be informed about the Company's refusal to accept the complaint and the reasons for such refusal within ten (10) days from the day of receipt of the complaint by the Company.

57. Complaints of Data Subjects shall be considered and answers to such complaints shall be prepared by a responsible employee of the Company. The complaint must not be considered by the same employee who dealt with the Data Subject's request on the basis of which the Data Subject has filed the complaint.

58. Having considered the Data Subject's complaint, the Company shall provide the Data Subject with a response. The response shall indicate whether the complaint has been upheld or rejected. If the complaint is valid and upheld, the request submitted by the Data Subject shall be reviewed and the response shall specify the extent to which the request shall be granted. In addition, a deadline shall be set taking into account the complexity of the request, in the course of which the Company undertakes to meet the demands listed in the request. If the complaint is rejected, the response shall state the reasons for such rejection.

### **XIII. FINAL PROVISIONS**

59. All Data Subjects of the Company, exercising their rights established in Chapter 3 of the Regulation, and employees considering requests and complaints of the Data Subjects must comply with the procedure for implementation of the rights of Data Subjects established in this Description.

60. The description of the procedure for implementation of the rights of Data Subjects shall be available to the Company's Data Subjects at <http://www.ekobaze.eu/lt/>.

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