

PRIVACY POLICY

GENERAL INFORMATION

UAB "DLG", company code 126004149, registered address - Perkūnkiemio g. 5, LT-12129 Vilnius (hereinafter referred to as **the Data Controller**), under this Privacy Policy (hereinafter referred to as **the Privacy Policy**) sets out the conditions for the processing of personal data using the Data-Managed Web site at <https://www.dlg.lt> (hereinafter referred to as **the Website**). The terms of the Privacy Policy apply every time you visit the Website, regardless of which device (computer, mobile phone, tablet, TV and etc.) you are using.

It is very important that you carefully read the Privacy Policy, because each time you visit the website owned by the Data Controller, you agree to the terms and conditions set out in this Privacy Policy. If you do not agree to these terms and conditions, please do not visit this website and do not use its content and/or services.

The Data Subject agrees and does not contradict the Data Controller to provide and process his/her personal data (including data provided directly or indirectly by the Website and using its services) in order to manage and maintain it in this Privacy Policy, in accordance with the purposes and procedure specified in the Data Subject's consent and Legal Acts.

Persons under the age of 16 years can not provide any personal data through the Data Controller's Website. If you are under 16, you must obtain the consent of your parent or other legal guardians before submitting personal information.

Representative - a person representing the Data Controller's partners (service providers), both natural and legal persons.

The Data Subject in this Privacy Policy is considered to be a Representative, Applicant, Customer, Candidate, Telephone Caller, or any other natural person whose personal data is managed by the Data Controller.

The Applicant is a natural person who is interested in the services provided by the Data Controller or who wants to contact the Data Controller on other issues.

Candidate - a person who participates or intends to participate in the selection of personnel executed by the Data Controller.

Customer – is a Legal Entity or a Representative who purchases services from the Data Controller or who has entered into an agreement with the Data Controller regarding the provision of services.

Caller by Phone – is a person calling on a publicly available contact number regarding the provision of Data Controller services and/or other matters.

The Data Controller will collect personal data in accordance with the requirements of the valid Legal Acts of the European Union and the instructions of the controlling institutions of the Republic of Lithuania. All reasonable technical and administrative measures are applied in order to protect personal data from loss, unauthorized use and alteration.

This Privacy Policy is based on Regulation (EU) 2016/679 of the European Parliament and 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 (hereinafter the "Universal Data Protection Regulation"), the Personal Data Protection Act of the Republic of Lithuania as well as other legal acts of the European Union and the Republic of Lithuania. The concepts used in the Privacy Policy shall be understood in accordance with the definitions contained in the General Data Protection Regulation and the Law on the Legal Protection of Personal Data of the Republic of Lithuania.

WHAT INFORMATION ABOUT YOU WE COLLECT?

Information provided directly by you.

Information how you use our website.

If you visit our website, we also collect information that reveals the peculiarities of using our services or automatically generates visits statistics. Read more about "Cookies here".

Information from third party sources.

We may receive information about you from public and commercial sources (to the extent allowed by enforced legal acts) and associate it with other information that we receive from you or about you. We may also receive information about you from third party social networking services (e.g. Facebook) when you log in to your respective accounts.

You may choose not to provide us with certain information, but in such a case you may not be allowed to use our provided service.

PERSONAL DATA PROCESSING FOR THE PURPOSES OF CONSULTATION AND INQUIRY

For the purpose of providing personal data to and from the Data Controller for the provision of services, and/or other matters, for callers, including callers by telephone. The Data Controller handles the below listed personal data of callers, including callers by phone:

First name;
Last name;
Telephone number;
E-mail address;
Occupation;
Workplace.

Personal data of the addressees is not forwarded to third parties.

Personal data for the purposes of consultation is processed on the basis of explicit consent (Article 6 (1) (a) of the General Data Protection Regulation).

PERSONAL DATA PROCESSING FOR THE PURPOSE OF SERVICE PROVISION

Personal data processing of customer representatives. The Data Controller manages the following personal data of Customer Representatives:

First name;
Last name;
Occupation;
Workplace;
Telephone number;
E-mail address;
Other information related to the purchased service.

The data is received directly from the Customers, the Customer representatives, or in the performance of the Contract with the Customer, and/or from other third parties who have contacts with the Data Subject.

We undertake not to transfer your personal data to any unrelated third parties except in the following cases:

If the Customer's explicit consent to the disclosure of personal data is available;
For the provision of services - to the Data Controller's partners, to other recipients, both within the European Union and outside the European Economic Area, in order to execute the services ordered by the Customer. For these service providers the Data Controller provides as much personal information of the Customer, as it is necessary to perform a particular service;
Implementing the legitimate interests of the Data Controller (eg in the case of recovery of debts);
To the authorized institutions, according to the procedure provided by the Legal Acts of the Republic of Lithuania.

The Data Controller may provide personal data of Customers and other Data Subjects to Data Processors not specified in this Policy, who provide services (performs work) to the Data Controller and handle personal data of Customers and Data Subjects on behalf of the Data Controller. The Data processors shall act only on instructions from the Data Controller and only to the extent necessary for the proper fulfillment of the obligations laid down in the Contract. With the help of Data Processors, the Data Controller shall, in particular, take all appropriate measures in order to ensure that Data Processors shall implement the necessary organizational and technical security measures and maintain the confidentiality of personal data.

Personal data is processed on the basis of the Data Subject consent and/or Contract with the Data Subject (Article 6 (1) (a) and (b) of the General Data Protection Regulation).

PERSONAL DATA PROCESSING FOR AGREEMENTS WITH PARTNERS/SERVICE PROVIDERS

The Data Controller in cooperation with partners (service providers) manages the following personal data of natural persons or Representatives:

First name;
Last name;
Personal code;
Address (if applicable);
Number and date of issue of Individual activity certificate (if applicable);
Current account number (if applicable);
A Power of Attorney;
Authorization time;
Represented person (relation with a represented person);
Occupation;
Workplace;
Telephone number;
E-mail address.

Data is obtained directly from natural persons, Representatives, and/or individuals represented.

We undertake not to transfer your personal data to any unrelated third parties except in the following cases:

While performing contracts with the Data Controller's Clients, partners, other recipients, both within the European Union and outside the European Economic Area, in order to execute the services ordered by the Client. For these Clients, partners, and other recipients, the Data Controller provides as much personal information of the natural person as well as representatives, as it is necessary for the performance of a specific service or contract;

If the Data Subject agrees to disclose personal data;

Implementing the legitimate interests of the Data Controller (eg in the case of recovery of debts);

To the authorized institutions, in accordance with the procedure provided by the Legal Acts of the Republic of Lithuania.

The Data Controller may provide personal data of natural persons and Representatives to the Data Handlers not provided in this Privacy Policy, who provide services (performs work) to the Data Controller and handle personal data of natural persons and Representatives on behalf of the Data Controller.

Personal data is contracted with partners (service providers) for the purpose of performance of the contract and/or of the Data Controller's legitimate interest (Article 6 (1) (b) and (f) of the General Data Protection Regulation).

PROCESSING OF PERSONAL DATA FOR THE PURPOSE OF DIRECT MARKETING

The Data Controller seeks to share only relevant news and other useful information with newsletter recipients. This procedure is implemented in accordance with this Privacy Policy.

The Data Controller shall process personal data for direct marketing purposes only with the explicit consent of the Data Subject. For the purpose of direct marketing, the following personal data of the Clients and other Data Subjects are processed:

First name;
Last name;
Telephone number;
E-mail address.

After sending a newsletter, the Data Controller can collect statistical data on the behavior of the Data Subject in relation to the use and content of the newsletter (for example, if the newsletter has been read, which links have been opened by the Data Subject and etc.).

Email address of the Data Subject can be used while serving ads through Facebook, Google, and other advertising platforms, by adapting the ad to target audiences.

According to your personal data, for direct marketing purposes, your personal data may be profiled in order to offer tailor made solutions and suggestions. You can at any time cancel your consent to process personal data in an automated manner, including profiling, handling or contradiction (if applicable).

Personal data is obtained directly from Data Subjects. Personal data may be transferred by the Data Controller to third parties, who provide specialized services, and for this purpose they could send emails and apply the type of ad ordered through advertising platforms.

The personal data of the Clients and other Data Subjects are processed on the basis of the consent expressed by submitting their data and giving consent to process personal data for the purpose of direct marketing (Article 6 (1) (a) of the General Data Protection Regulation).

We hereby inform you that the Data Subject shall have the right to withdraw his or her consent at any time to process his personal data for direct marketing purposes without specifying reasons for disapproval:

- by clicking on the "unsubscribe" link at the end of the newsletter; or
- by sending an email to office@dlg.it or info@dlg.it or by calling +370 5 232 0000.

The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

PROCESSING OF PERSONAL DATA FOR THE PURPOSE OF RECRUITMENT OF PERSONNEL

The Data Controller manages the personal data submitted by the Candidate voluntarily for the purpose of personnel selection, to the extent that personal data has been submitted.

Data is obtained directly from Candidates and/or third parties providing recruitment mediation services. This data is not forwarded to third parties.

Candidates' data is processed on the basis of consent given by submitting their data and/or the Candidate's pre-contractual application (Article 6 (1) (a) and (b) of the General Data Protection Regulation).

HOW TO KEEP YOUR PERSONAL INFORMATION SECURE?

Personal data is protected against accidental loss, alteration, unauthorized or unlawful disclosure or access. We have implemented appropriate technical and organisational measures so that to ensure all information we gather about you for the purposes of our service provision. We remind you that while we are taking appropriate measures to protect your information, no website, online transaction, computer system or wireless connection is completely safe.

The Data Controller applies different terms for the storage of personal data in accordance with the requirements of the legislation and taking into account the purpose for which their personal data are processed.

Terms of personal data storage:

Purpose of personal data processing	Storage term
Processing of personal data for the purpose of consultation and inquiry.	Until the day of consultation or when the inquiry is completed. Unless the Data Subject applies for the services provided by the Data Controller. In such a case the general 10-year term is applied
Processing of personal data of customer representatives for the purpose of service provision	10 years from the last contact
Processing of personal data of natural persons and representatives for the purpose of executing contracts with partners	During the term of the Contract and 10 years after the termination of the Contract
Processing of personal data for the purpose of direct marketing	5 years from the date of receipt of the consent, unless the Data Subject desires to extend this expiry date
Processing of personal data for the purpose of recruitment of personnel	4 months after the candidate is recruited. The Candidate's consent is required if a period for storage of the Candidate's curriculum vitae and other data needs to be extended.

Exceptions to the terms of storage may be determined to the extent that they do not violate the rights of the Data Subjects, comply with legal requirements and are properly documented.

After the deadlines expire, if they were not extended, the data will be destroyed in such a way that they can not be reproduced.

YOUR RIGHTS

The Data Subject, whose data is processed by the Data Controller, has the following rights:

- The right to know (be informed) about the processing of your data;
- The right to access data and see how data is processed;
- The right to rectify or, taking into account the purposes of the processing operation, supplement incomplete personal data;
- The right to erase personal data and the right to "be forgotten", that is, to stop the processing of your data (except for storage);

- The right to restrict the processing of personal data for one of the legitimate reasons;
- The right to data transfer, where the Data Subject has submitted his/her personal data to the Data Controller in a structured, commonly used and computer-readable manner;
- The Data Subject shall have the right to object free of charge to the processing of his/her personal data for the purpose of direct marketing, including profiling, as far as it is related to such direct marketing;
- The right to lodge a complaint with the State Data Protection Inspectorate of the Republic of Lithuania.

The Data Subject has the right to submit his/her claim related to the processing of personal data to the Data Controller in writing in one of the following ways: delivering directly to the address- UAB "DLG", Perkūnkiemio g. 5, LT-12129 Vilnius; by post: UAB "DLG", Perkūnkiemio g. 5, LT-12129 Vilnius; by email: office@dlg.lt or info@dlg.lt.

Upon receipt of such claim or instruction, the Data Controller shall, within one month from the date of receipt of the claim, submits a response and performs the actions, specified in the claim, or refuses to perform them. If necessary, the specified period may be extended by additional two months, taking into account the complexity and number of claims. In such a case, within one month of the claim received the Data Controller shall inform the Data Subject about such extension and provide the reasons for delay.

The Data Controller may not allow Data Subjects to exercise the above rights, with the exception of the refusal to process personal data for direct marketing purposes, in cases provided for by law, when it is necessary to ensure prevention of crimes and professional ethics violations, investigation and detection, as well as the protection of the Data Subject or of the rights and freedoms of others;

THIRD PARTY WEBSITES, SERVICES AND PRODUCTS ON OUR WEBSITE

The website of the Data Controller may contain third-party banners, links to their websites and services which are not controlled by the Data Controller, for example, a link to Facebook profile. The Data Controller is not responsible for the safety and privacy of information collected by third parties. You must read the privacy provisions applicable to third-party websites and services that you use.

If you submitted your personal data with "Facebook", we understand that you agree that we contacted you on the provided phone number and email, in order to offer you our services.

COOKIES

When you visit the Data Controller's website, we want to provide you with content and features that are tailored to your needs. This requires cookies - small pieces of information that are automatically generated while you browse the website, and are stored on your computer or other terminal device. They help the Data Controller identify you as a previous visitor of a particular website, save your history of visiting the website, and tailor the content accordingly. Cookies also help ensure the smooth operation of websites, enable to monitor the duration and frequency of website visits, and collect statistical information about the number of website visitors.

Descriptions of cookies used on our website

Name of cookie	Description/Purpose	Moment of creation	Validity period	Used data	How to manage and delete cookies
_utm.gif, _utmb, _utmc, _utmt, _dc_gtm_UA-#, _gali, _gat, _gid	Statistical data on website traffic is collected using Google Analytics (information is collected about your browser, computer, visits and duration thereof)	When visiting the website for the first time	Until the website window is closed	Data on the used browser, computer, visits and duration thereof	The user can read the "help" section in his browser settings and delete cookies manually. Information on how to manage and delete cookies can be found at https://www.aboutcookies.org . Cookie management depends on the used browser.
_utma	Information is collected using Google Analytics on how many times the user has visited the website	When visiting the website for the first time	2 years	Number of visits in the browser	The user can read the "help" section in his browser settings and delete cookies manually. Information on how to manage and delete cookies can be found at https://www.aboutcookies.org . Cookie management depends on the used browser.
_utmz	Information is collected using Google Analytics on how the user found the website and what type of search led him thereto	When visiting the website for the first time	6 months	Data on how the user ended up on the website	The user can read the "help" section in his browser settings and delete cookies manually. Information on how to manage and delete cookies can be found at https://www.aboutcookies.org . Cookie

					management depends on the used browser.
_ga	Google Analytics is used to assess the purpose of the user's visit, prepare reports on website activity for website operators, and improve user experience on the website	When visiting the website for the first time	2 years	Data on the user's actions carried out on the website	The user can read the "help" section in his browser settings and delete cookies manually. Information on how to manage and delete cookies can be found at https://www.aboutcookies.org . Cookie management depends on the used browser.
collect	Information is collected using Google Analytics about the device used by the visitor	When visiting the website for the first time	Until the website window is closed	Data on the user's device	The user can read the "help" section in his browser settings and delete cookies manually. Information on how to manage and delete cookies can be found at https://www.aboutcookies.org . Cookie management depends on the used browser.

How to manage and delete cookies

When you use your browser to access our content, you can configure your browser to accept all cookies, reject all cookies, or be notified when a cookie is downloaded. Each browser is different, therefore if you do not know how to change your cookie settings, check out its Help menu. Your device's operating system may contain additional cookie controls. If you do not wish for your information to be collected through cookies, use a simple procedure available in most browsers that allows you to refuse the use of cookies. To learn more on how to manage cookies, go the following website: <http://www.allaboutcookies.org/manage-cookies/>.

Please note that in some cases deleting cookies may slow down the Internet browsing speed, limit certain website functionalities, or block access to the website altogether.

FINAL PROVISIONS

The additions or amendments to the Privacy Policy shall come into force on the day they are published on the Website. When the Data Subject uses the Website or provided services after the Privacy Policy is updated or amended, it is considered that the Data Subject shall not be deemed to object to such additions and / or amendments.

CONTACT US

If you require any more information or have any questions about our privacy policy, please feel free to contact us by:

Phone: +370 5 232 0000

Email: office@dlg.lt or info@dlg.lt

Post: UAB "DLG", Perkūnkiemio g. 5, LT-12129 Vilnius

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