GS1 LITHUANIA ASSOCIATION PRIVACY POLICY

GENERAL PROVISIONS

The association GS1 Lithuania, legal entity code 302642800, registered at J. Jasinskio g. 14B-102, LT-01112 Vilnius (the "Association"), represents in Lithuania GS1, a global, neutral, user-governed organisation that develops and promotes standards.

The Association complies with the EU General Data Protection Regulation (EU) 2016/679 (the "Regulation"), the Law on Legal Protection of Personal Data of the Republic of Lithuania and other legal acts governing the protection and processing of personal data.

The purpose of this Privacy Policy (the "Policy") is to explain what personal data of data subjects the Association collects, for what purposes and on what legal bases it uses them, how long the data are kept, to whom they are disclosed, what rights data subjects have and whom to contact to exercise them.

The Policy applies to the Association's clients, client representatives (employees), business partners, suppliers (and their representatives), and anyone who contacts the Association.

The Association regularly reviews and updates this Policy. The latest version is available on the Association's website at https://www.gs1lt.org/. We recommend checking the Policy regularly to stay up to date.

DEFINITIONS

Data controller – the association GS1 Lithuania (the "Association"), legal entity code 302642800, registered address J. Jasinskio g. 14B-102, LT-01112 Vilnius.

Data subject – any natural person whose data the Association processes. The data controller collects only the data it needs to carry out the Association's activities and/or in connection with a data subject visiting, using or browsing the Association's websites, Facebook page, etc. (the "Website"). The Association ensures that the personal data it collects and processes are kept secure and used only for a specific purpose.

Personal data – any information relating, directly or indirectly, to a data subject who is identified or who can be identified, directly or indirectly, from that information.

Processing of personal data – any operation performed on personal data (including collection, recording, storage, editing, alteration (supplementing or correcting), giving access, querying, transfer, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination with other data, restriction, archiving, etc.).

Consent – any freely and knowingly given, specific and unambiguous indication of the wishes of a properly informed data subject, by which they agree to the processing of their personal data for a specific purpose.

PRINCIPLES OF PERSONAL DATA PROCESSING

The Association follows these key principles of data processing:

- lawfulness, fairness and transparency – personal data are processed lawfully, fairly and transparently in relation to the data subject;
- purpose limitation – personal data are collected for specified, explicit and legitimate purposes and are not further processed in a way that is incompatible with those purposes;
- data minimisation – personal data are adequate, relevant and limited to what is necessary for the purposes for which they are processed;
- accuracy – personal data are accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate for the purposes for which they are processed are erased or corrected without delay;
- storage limitation – personal data are kept in a form that allows data subjects to be identified for no longer than necessary for the purposes for which the data are processed;
- integrity and confidentiality – personal data must be processed using appropriate technical or organisational measures that ensure their security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

WHAT PERSONAL DATA ARE PROCESSED

Personal data of clients (natural persons) and of representatives of clients (legal entities)

Purpose of processing	Legal basis for processing	Personal data
Entering into a contractual relationship with a view to concluding a contract	Taking steps at the request of a prospective client before entering into a contract	Client (natural person): first name(s), surname(s), personal identification number or, if there is none, date of birth, telephone number, e-mail address; Representative of a client (legal entity): first name, surname, telephone number, e-mail address, authorisation details, workplace and position.
Providing the Association's services	Performance of a contract	Client (natural person): first name(s), surname(s), personal identification number or, if there is none, date of birth, telephone number, e-mail address, username, workplace and position, signature, home address, bank account details, bank, business address, details of the document confirming business activity, date, amount and currency of payments, communications, correspondence, other data provided by the individual that are needed to properly perform the contract and/or legal obligations, and other data related to the provision of services. Representative of a client (legal entity): first name, surname, telephone number, e-mail address, authorisation details, workplace and position, signature, communications, correspondence.

Purpose of processing	Legal basis for processing	Personal data
Compliance with international sanctions and anti-money laundering and counter-terrorist financing requirements	Compliance with a legal obligation	First name(s), surname(s), date of birth (personal identification number), citizenship, position, workplace, contact details (telephone number, e-mail address), role in ownership and control, bank account and payment details, sanctions screening results, data obtained from public registers, sanctions lists, PEP lists and other lawful sources, and other data needed to meet legal obligations and manage risks.
Debt recovery and administration	Legitimate interests of the Association	First name(s), surname(s), personal identification number or date of birth, home address, telephone number, e-mail address, amount owed, date, amount and currency of payments; workplace and position, authorisation details, signature, bank account details, the bank where the account is held, business address, information about goods and/or services provided, other data provided by the individual that are needed to properly perform the contract and/or legal obligations, and other data related to the provision of services and the debt.
Promoting the Association's services through posts on social networks, the website and other publicly available channels	Consent	First name(s), surname(s), workplace and position, photograph, business activity and other information covered by the consent.
Handling enquiries, comments and complaints	Legitimate interests of the Association Consent of the data subject	First name(s), surname(s) and/or username, e-mail address, telephone number, address, subject and text of the message, comment, feedback or complaint, signature, image (if provided).
Recording telephone calls to ensure service quality	Consent	Call recording, calling and called telephone numbers, date, duration and content of the call.
Organising games and competitions	Consent	First name(s), surname(s) and/or username, telephone number, e-mail address, home address, business address, signature.

Personal data of partners and/or their representatives

Purpose of processing	Legal basis for processing	Personal data
Entering into a contractual relationship with a view to concluding a contract, and performing the contract	Taking steps before entering into a contract, and performance of a contract	Partner (natural person): first name(s), surname(s), personal identification number or date of birth, home address, telephone number, e-mail address, workplace, position, authorisation details, signature, business address, bank account and the bank where it is held, date, amount and currency of payments or transactions, and other data provided by the individual, received by the Association under legal acts in the course of its activities and/or that the Association is required by law to process. For example, data in a business certificate (type, group, code and name of activity, periods of activity, date of issue, amount), individual activity certificate number, whether the data subject is registered for VAT, data in an identity document, and other data needed to properly perform the contract and/or legal obligations. Representative of a partner (legal entity): first name, surname, telephone number, e-mail address, authorisation details, workplace and position, signature, citizenship, communications, correspondence.
Compliance with international sanctions and anti-money laundering and counter-terrorist financing requirements	Compliance with a legal obligation	First name(s), surname(s), date of birth (personal identification number), citizenship, position, workplace, contact details (telephone number, e-mail address), role in ownership and control, bank account and payment details, sanctions screening results, data obtained from public registers, sanctions lists, PEP lists and other lawful sources, and other data needed to meet legal obligations and manage risks.

SOURCES OF PERSONAL DATA

The Association receives personal data directly from data subjects, for example when they become a client of the Association, provide information to the Association electronically (such as by filling in a form on the website), or visit and use the Association's website.

The Association may also receive personal data of data subjects who are representatives (employees) of clients or partners from those clients, partners or other sources.

Personal data may also come from other sources, for example from banks and/or other financial institutions when payments are made.

For sanctions screening, personal data are obtained from state and supervisory authorities, law enforcement authorities, providers of sanctions screening, risk assessment and compliance services (registers), and other publicly available sources.

USE OF SOCIAL NETWORKS

All information you provide through social media (including messages, use of the "Like" and "Follow" buttons, and other communications) is controlled by the operator of the social

network concerned.

The Association currently has an account on Facebook, whose privacy policy is available at https://www.facebook.com/privacy/explanation.

The Association currently has an account on LinkedIn, whose privacy policy is available at https://www.linkedin.com/legal/privacy-policy.

We recommend reading these third parties' privacy notices and contacting them directly if you have any questions about how they use your personal data.

DISCLOSURE OF PERSONAL DATA

The Association is committed to keeping data subjects' information confidential. Personal data may be disclosed to third parties only where necessary to conclude and perform a contract for the benefit of the data subject, to comply with legal requirements, or for other legitimate reasons.

The Association may share personal data with its data processors, which provide services to the Association and process personal data on its behalf – for example, debt administration providers, the company that manages the Association's IT infrastructure, etc. Data processors may process personal data only on the Association's instructions and only as far as necessary to properly perform their contractual obligations. The Association uses only data processors that provide sufficient guarantees that they will implement appropriate technical and organisational measures, so that the processing meets the requirements of the Regulation and the data subject's rights are protected.

The Association may also share personal data with other recipients, such as the State Tax Inspectorate or other public administration bodies, when responding to requests from courts or state authorities, to the extent necessary to comply with applicable law and the instructions of state authorities.

The Association may share personal data with GS1 organisations worldwide and with the GS1 head office in Brussels where this is necessary for the Association to perform its functions.

TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

Your data may be transferred to third countries or international organisations where the transfer is necessary:

- to perform a contract between the data subject and the data controller, or to implement pre-contractual measures taken at the data subject's request;
- to conclude or perform a contract between the data controller and another natural or legal person in the interest of the data subject.

If your personal data are transferred outside the European Economic Area, the Association will take the necessary measures to ensure that your data are processed securely and in line with this Policy, and that they are protected and transferred in compliance with applicable data protection law. Personal data may be transferred to third countries on various grounds, for example:

- the European Commission has recognised the country, a territory or one or more specified sectors within it as ensuring an adequate level of data protection;
- standard data protection clauses approved by the European Commission have been signed;

- specific authorisation has been obtained from the supervisory authority;
- derogations apply;
- other measures provided for in the Regulation apply.

The Association may also transfer personal data to a third country using other measures, provided it ensures appropriate safeguards as set out in the Regulation.

HOW LONG PERSONAL DATA ARE KEPT

Personal data are processed for no longer than necessary to achieve the purposes of processing, or for no longer than data subjects request and/or the law requires.

Where Lithuanian law does not set a retention period, the Association determines it at its own discretion, taking into account the legitimate purpose of retention, the legal basis and the principles of lawful data processing. Even if a data subject terminates the contract and stops using the Association's services, the Association must continue to keep their data as far as necessary to carry out its activities (the GS1 system, consulting, barcode registration) and to maintain the registration of international standards data in the international system, or for a reasonable period in case of possible future claims or legal action, until the retention periods expire.

The main retention periods for personal data are:

- for as long as the data subject's consent is valid, unless there are other legitimate requirements relating to the personal data that must be met;
- contracts and documents related to their performance, including data from checks on data subjects – 10 years after the end of the contractual relationship;
- accounting documents confirming a business transaction or event (invoices, payment orders, etc.) – 10 years after the document was created;
- telephone call recordings – 2 weeks.

Personal data may be kept for longer if:

- the Association needs to defend its rights in response to claims, demands or actions;
- there is a reasonable suspicion of unlawful activity;
- the personal information is needed to properly resolve a dispute or complaint;
- there are other legal grounds or legitimate interests of the Association.

RIGHTS OF THE DATA SUBJECT

- **Right to be informed about data processing.** Data subjects have the right to receive clear, transparent and easy-to-understand information about how the Association processes their personal data.
- **Right of access.** Data subjects may request access to their personal data and information on what data have been collected and from which sources, for what purpose they are processed, to which recipients they are disclosed and how long they are expected to be kept.
- **Right to rectification.** If personal data are incorrect, incomplete or inaccurate, data subjects may ask for them to be corrected and updated.
- **Right to erasure ("right to be forgotten").** This right does not apply if the personal data concerned are also processed on another legal basis, for example where processing is necessary to perform a contract or to comply with an obligation under applicable law.

- **Right to restriction of processing.** If data subjects contest the accuracy of their data, processing is restricted until the Association can verify their accuracy. This right may also apply where data subjects consider the processing unlawful but do not want the data erased.
- **Right to object.** In certain cases, data subjects may object to the processing of their personal data; in that case, the grounds for the objection and whether services can continue to be provided must be assessed.
- **Right to data portability.** Under certain conditions, data subjects may ask for their data to be transferred to other organisations or to themselves. This right must not adversely affect the rights and freedoms of others. It does not apply to personal data processed by non-automated means in structured filing systems, such as paper files.
- **Right not to be subject to a decision based solely on automated processing, including profiling.** Data subjects have the right not to be subject to decisions based solely on automated processing that produce legal or other significant effects. In particular, they have the right to obtain human intervention, to express their point of view, to receive an explanation of a decision made by automated processing, and to challenge such a decision.
- **Right to withdraw consent.** Where personal data are processed on the basis of consent, data subjects may contact the Association at any time to withdraw the consent they gave. Withdrawal does not affect the lawfulness of processing carried out on the basis of consent before it was withdrawn.
- **Right to lodge a complaint with the State Data Protection Inspectorate.** Data subjects have the right to lodge a complaint with the State Data Protection Inspectorate in Lithuania if they have reasonable grounds to believe that their personal data are being processed in breach of their rights and applicable law. Complaints may be lodged in accordance with the Inspectorate's rules and procedures, available at https://vdai.lrv.lt/lt/veiklos-sritys-1/skundu-nagrinejimas. Other contact details: State Data Protection Inspectorate, L. Sapiegos g. 17 (2nd floor), 10312 Vilnius, tel. (8 5) 271 2804, 279 1445, e-mail ada@ada.lt.

The Association must enable data subjects to exercise the rights listed above, except in cases established by law where this is necessary to safeguard national security or defence, public order, the prevention, investigation, detection or prosecution of criminal offences, important economic or financial interests of the state, the prevention, investigation and detection of breaches of official or professional ethics, or the rights and freedoms of the data subject or others.

HOW TO EXERCISE YOUR RIGHTS

To exercise their rights, data subjects may contact the Association:

- by submitting a written request in person, by post, through a representative or electronically – by e-mail to gs1@gs1lt.org;
- in writing – at J. Jasinskio g. 14B-102, LT-01112 Vilnius.

To protect data from unauthorised disclosure, the Association must verify the data subject's identity when it receives a request for data or to exercise other rights.

The Association will respond within one month of receiving the data subject's request, taking into account the specific circumstances of the processing. Where necessary, this period may be extended by a further two months, depending on the complexity and number of requests.

RESPONSIBILITIES OF THE DATA SUBJECT

Data subjects must:

- inform the Association of any changes to the information and data they have provided, as it is important for the Association to have correct and up-to-date information about them;
- provide the information the Association needs, when they make a request, to identify them and be sure it is dealing with the right person (by presenting an identity document or by other means established by law or electronic means that allow proper identification). This is necessary to protect the data of the data subject and of others, so that information about the data subject is disclosed only to that person and the rights of others are not infringed.

FINAL PROVISIONS

As its activities develop and improve, the Association regularly reviews this Privacy Policy and may amend it unilaterally, in part or in full, at any time in accordance with legal requirements, by giving notice on its website www.gs1lt.org.

Additions or amendments to the Privacy Policy take effect on the date they are published, i.e. the date they are posted on www.gs1lt.org.