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By order of GrECo International LT, UADBB
director
in 14 March 2023 No. 2023/ V-05



**GrECo International LT, UADBB
PRIVACY POLICY**

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Privacy Policy Information

GrECo International LT, UADBB, company code 110801410 (hereinafter - „**the Company**” or „**we**”), registered at Laisvės pr. 3, 5 floor Vilnius, LT-04215 Republic of Lithuania, is an insurance brokerage company included in the list of insurance brokerage companies maintained by the Bank of Lithuania (<https://www.lb.lt/lt/finansu-rinku-dalyviai?list=75>).

When collecting and using Personal Data (hereinafter - the “Personal Data”), we are obliged to use and process your Personal Data in accordance with this Privacy Policy hereinafter - (the “Privacy Policy”) and applicable laws, including the 2016 April 27 Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EB (General Data Protection Regulation) (hereinafter - "the Regulation"), The Law on the Legal Protection of Personal Data of the Republic of Lithuania, the Law on the Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania and other legal acts regulating the protection and processing of personal data.

Please note that if you provide us with information about anyone other than yourself, your employees, partners, insured persons, you must make sure that they are informed of how their data will be used.

This Privacy Policy defines how we process Your personal data and our other customers: what personal data we collect and process, to whom we transmit it, from where we receive it, for what purposes we use it, how we ensure its security, and Your right to privacy.

This Privacy Policy is valid from 14 March 2023.

Definitions

The following definitions should help you to understand our Privacy Policy and all terms used:

1. **‘performance of contract’** - means the processing of Your Personal Data in order to fulfill a contract signed between You and us (eg to provide you with services) or, at Your request, to take appropriate measures before concluding such a contract;
2. **“legal obligations”** - means the processing of Your Personal Data where necessary to fulfill legal or regulatory obligations that apply to us (eg to respond to court orders, to comply with legal requirements);
3. **'legitimate interests'** - means the legal basis for the use of Your Personal Data, for example for the provision and improvement of services, the improvement of business relations and / or marketing;
4. **‘services’** - means our products and services that we provide as an insurance brokerage company included in the list of insurance brokerage companies maintained by the Bank of Lithuania;



5. **'we', 'us', 'our' or 'Company'** - means GrECo International LT, UADBB, company code 110801410, registration address Laisvės pr. 3, 5 floor, Vilnius, LT-04215 Republic of Lithuania;
6. **'You'** - means you as a candidate for the Company's employees, potential, current and / or former customer, our customer's employee or other parties, such as beneficiaries, authorized representatives, other related parties and / or persons who contact us by e-mail or other means of communication.

Privacy Policy Updates

We review this Privacy Policy regularly and reserve the right to change it at any time in accordance with applicable laws and regulations. Any changes and revisions will take effect immediately from the date we post the amended terms on the websites we manage.

Personal data processing principles

Principles we follow when processing your Personal Data:

1. **'Principle of lawfulness, fairness and transparency'** - Your Personal Data is processed lawfully, fairly and in a transparent manner in relation to the data subject;
2. **'Principle of purpose limitation'** - Your Personal Data is collected for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes;
3. **'Principle of data minimization'** - Your Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. **'Principle of accuracy'** - Your Personal Data shall be accurate and, where necessary, kept up to date; all reasonable steps must be taken to ensure that your inaccurate Personal Data is erased or rectified without delay for the purposes for which it is processed;
5. **'Principle of retention limitation principle'** - Your Personal Data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
6. **'Principle of integrity and confidentiality'** - Your Personal Data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

Your Personal Data is considered confidential information and may only be disclosed to third parties in accordance with the rules and procedures set forth in this Privacy Policy and applicable law.

Processing of personal data of customers or other participants in insurance relationships

Categories of personal data processed by customers or other participants in the insurance relationship



Depending on the insurance products, we collect and process various types of personal data. Below are the main, but not all, categories of personal data processed by the Company:

1. **Personal identification data:** person's name, surname, personal identification code (if the client is a natural person) or date of birth (age);
2. **Insurance policy data:** type of insurance, insurance policy series and number, policyholder's code, effective date, insurance policy term expiration date, insurance amount, premium amount, insurance premium payment date, received insurance premiums, premium payment document number and other data;
3. **Data of other participants in the insurance relationship:** beneficiaries, insured persons, injured third parties;
4. **Data of the insured object and data related to the insured event:** depending on the insurance contract, the information relates to life insurance, non-life insurance, such as property insurance, motor insurance, civil liability insurance, travel insurance, suretyship, cargo insurance, etc., as well as data that are processed in the event of an insured event;
5. **Data about the person's profession;**
6. **Data related to the provision of services:** data on the performance or non-performance of contracts, valid or expired contracts, submitted requests, complaints, insured events, etc.;
7. **Financial data:** payer's name, surname, purpose of payment, payment term, payment amount, payment date, payment order number, whether the payment is paid directly to the insurer, bank account number, policyholder's debt or payment is deferred, bank card number, bank cards term of validity, amount of insurance benefit;
8. **Contact details:** correspondence address, telephone number, e-mail mail address.

Please note that data not listed above, which You have provided to us or which are provided on your behalf, or which we have generated in the course of providing you with services, may also be collected and processed.

Purpose and legal basis of data processing of customers or other participants in insurance relations

We collect personal data of customers or other participants in insurance relationships only for pre-determined, defined purposes:

Purpose of data processing	Legal basis for data processing	Categories of personal data
Concluding contracts with potential customers and performing other actions before concluding a contract (in order to know, identify and confirm the customer)	The aim is to take action at the request of a potential customer before concluding a contract; Ensuring the legitimate interests of the company; Fulfillment of legal obligations provided to the Company.	Personal identification data; Data of the Insured Object; Financial data; Contact details; Other information provided;

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Fulfilling a contract	The purpose is to perform a contract to which the customer is a party; Ensuring the legitimate interests of the company; Fulfillment of legal obligations provided to the Company.	Personal identification and activity data; Insurance policy details; Data of the Insured Object and data related to the Insured Event; Financial data; Contact details; Other personal data provided by the customer or on behalf of the customer or generated by the Company in the course of providing services to the customer.
Fulfilment of legal requirements	Fulfillment of legal obligations provided to the Company.	Personal identification and activity data; Insurance policy details; Data of the Insured Object and data related to the Insured Event; Financial data; Contact details; Other personal data provided by the customer or on behalf of the customer or generated by the Company in the course of providing services to the customer.
Provide an answer to your request submitted on our website or through other means of communication	Your consent; Ensuring the legitimate interests of the company.	Personal identification data; Contact details; Other personal data provided by the customer or on behalf of the customer or generated by the Company in the course of providing services to the customer.



Processing of personal data of candidates for the Company's employees

Categories of personal data processed by candidates for the Company's employees

Depending on the job position, we collect and process various types of personal data. The following are the main, but not all, categories of personal data processed by the Company:

1. **Personal identification data:** name, surname, date of birth (age) of candidates for employees;
2. **Data on qualifications and experience:** information on the candidate's work experience (workplace, period of work, position, responsibilities and / or achievements), information on the candidate's education (educational institution, period of training, education and / or qualifications), information on in-service training (training, certificates obtained), information on language skills, information technology, driving skills, other competencies, other information provided by the candidate in the curriculum vitae (CV), motivation letter or other application documents;
3. **Personal data of impeccable reputation:** data processed by the Company when implementing the control of impeccable reputation of an insurance broker provided for in the Law on Insurance of the Republic of Lithuania, including data on criminal record;
4. **Contact details:** address of residence, correspondence address (if different from permanent residence), telephone number, e-mail mail address.

Purpose and legal basis of data processing of candidates for the Company's employees

We collect personal data of candidates for the Company's employees only for pre-determined, defined purposes:

Purpose of data processing	Legal basis for data processing	Categories of personal data
Carrying out the selection of candidates for employees	Consent given by the candidate to the employees	Personal identification data; Data on qualifications and experience; Personal data of impeccable reputation *; Contact details; Other information provided. <i>* Personal data of candidates of impeccable reputation is collected and processed by the Company only if and to the extent necessary and necessary for the selection of an insurance broker to the extent permitted by applicable law.</i>

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Administration of the database of candidates for employees	Consent given by the candidate to the employees	Personal identification data; Data on qualifications and experience; Contact details; Other information provided.
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Direct marketing

We may also process Your personal data for direct marketing purposes - to provide service offers, to ask Your opinion on the quality of services and to conduct market research.

The following personal data of You is processed for the purpose of direct marketing: name, surname, e-mail address, telephone number.

We may use Your e-mail to market our own similar goods or services unless You object that your e-mail would be used to market similar goods and services. You will be given a clear, free and easy-to-implement option to object or refuse to use Your contact details with every newsletter you send.

In other cases, we may use Your Personal Data for direct marketing purposes if we have Your prior consent to such use.

For direct marketing purposes, we may offer You services provided by our business partners or other third parties or ask You to provide our views on various issues related to our business partners or other third parties with Your prior consent.

If You do not agree to receive these marketing communications and / or calls offered by us, our business partners or third parties, it will not affect You as a customer in receiving our services.

You have the right to object or at any time withdraw your consent to the processing of Personal Data for direct marketing purposes without giving reasons for the objection in the manner indicated in the newsletter.

Withdrawal of consent shall not affect the lawfulness of the processing of data carried out prior to the withdrawal of consent.

Methods of obtaining personal data

We receive your Personal Data when you provide it directly to us, for example by becoming our customer and / or providing us with information electronically (e.g. by filling out a form on our managed websites), visiting and using our website or subscribing to our electronic publications (e.g. ., newsletters), etc.

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We also collect personal data about You from third parties and / or publicly available registers or other sources to the extent permitted by applicable law, such as from state registers, institutions, bodies, other legal entities, etc.

In certain cases, we may receive Your data when You insure another person. In this case, You are obliged to inform and obtain the consent of such person, and upon receipt of such data we consider that You do so with the knowledge and consent of that person.

We receive Your data as a candidate for the Company's employees directly from you, for example, when you send a curriculum vitae (CV) and / or motivation letter and other application documents.

Information about Your candidacy, Your curriculum vitae (CV) and (or) other application documents can also be obtained from job search, selection and / or mediation services providers, such as the Labor Exchange of the Republic of Lithuania, employment agencies, and (or) career portals.

We may obtain certain information from third parties, such as those who refer You, current or former employers, but we will collect such information if we have a legal basis to do so, for example, if you give your consent to contact your designated employer and / or other person.

Transfer of personal data to third parties

We may disclose and / or transfer your Personal Data only in accordance with legal requirements and the principles of confidentiality for the following categories of recipients:

1. State and municipal institutions, establishments, organizations, and other entities of public administration;
2. Pre-trial investigation institutions, courts, bailiffs, notaries;
3. Commercial banks, other financial institutions;
4. Legal, financial, tax, business management, personnel administration, accounting advisers, etc.;
5. Our partners, insurance companies or other persons who are a necessary part of the supply of our products and services;
6. Other persons with whom we intend to enter into or have entered into a contract (s).

We may also disclose your Personal Data if we are required to disclose or share your personal information in order to comply with any legal or regulatory obligations or requirements

International transfer of personal data

We inform you that Your Personal Data may be transferred and processed outside the European Union (hereinafter - „the EU“) and the European Economic Area (hereinafter - „the EEA“).

The transfer of personal data may be considered necessary in situations such as:

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1. to enter into an agreement between You and us and / or to fulfill any obligations under such agreement;
2. to protect our legitimate interests in cases specified by law, such as to bring an action in court / other bodies;
3. for the fulfillment of legal requirements or in the public interest.

When transferring your Personal Data internationally, we ensure the implementation of appropriate security measures in accordance with legal requirements.

When transferring data to countries outside the EEA, for which the European Commission has not made a decision on the adequacy of data protection, we will ensure data protection by signing standard contract terms approved by the European Commission or obtaining a special permit from the Inspectorate.

Before signing a contract with the Data Controller or processors outside the EEA for the provision of Personal Data in accordance with the standard contract terms approved by the European Commission, the Company evaluates it according to the technical organizational security measures applied by the Data Controller / Processor. country, its reputation, financial situation and other circumstances.

We may transfer Personal Data to a third party by taking other measures if this ensures the appropriate safeguards set out in the GDPR.

Automated decision making

In some cases, we may use automated decision making, which means a decision made based solely on the automated processing of Your Personal Data. Automated decision making refers to processing using, for example, software code or an algorithm that does not require human intervention.

For some services and products, we may use automated decision forms to process Your Personal Data. When we use automated decision making, we will provide you with more information about the logic of use, the important and foreseeable consequences for you.

Please note that You may request a manual review of the accuracy of the automated solution if you are dissatisfied with it and have the right not to be subject to a decision based solely on such automated processing.

How do we protect your Personal Data?

We take various security measures to guarantee the security of Your Personal Data. In our practice, we use the latest technical and organizational data protection measures in accordance with data protection practices to protect against unauthorized access, loss, misuse, accidental or unlawful destruction, alteration, disclosure or any other unlawful processing of Personal Data. These measures include a firewall, secure equipment, access control and restriction of rights, monitoring of data storage systems, staff training and diligence in the selection of subcontractors.



We and any third party service providers who may process the Personal on our behalf are also contractually obligated to comply with the principles and requirements for the confidentiality of Personal Data.

Principles and terms of personal data storage

We retain personal data for as long as it is needed for the purposes for which it was collected or to the extent required by law. This means that we will protect your Personal Data for as long as it is needed for the purposes for which your data was collected and processed, but for no longer than required by applicable laws and regulations. The period of storage of personal data depends on the concluded agreements, legal requirements or the legitimate interest of the Company.

If the legal acts of the Republic of Lithuania do not establish any period of storage of Personal Data, we will determine this period, taking into account the legitimate purpose of data storage, the legal basis and the principles of lawful processing of Personal Data.

The following are the main terms of personal data storage applied by the Company:

- 1) we store Personal Data processed on the basis of consent for as long as Your consent is valid, unless there are any other objective circumstances to keep this Personal Data longer;
- 2) will destroy Your (as candidates for the Company's employees) all your personal data collected for the purposes of selection without your consent for further data processing at the end of the selection process. The date of completion of the selection shall be considered the date of concluding the employment contract with the person for the published position;
- 3) Your (as a candidate for the Company's employees) curriculum vitae (CV), applications and other submitted documents for the purpose of providing information on future employee searches and selections will be kept for 1 year from the date of selection, if your consent is obtained. further processing of personal data. The date of completion of the selection shall be considered the date of concluding the employment contract with the person for the published position;
- 4) Your Personal Data, which is processed for the purpose of concluding contracts with you and performing other actions prior to the conclusion of the contract (to get to know and identify you), is stored for 1 year from the date of receipt of the offer, unless we have a legitimate interest in keeping such data longer;
- 5) Your Personal Data, which is processed during the performance of the contract, is stored for 10 years after the end of the contract;
- 6) Your Personal Data provided by you through our website is stored for as long as necessary to fulfill your request and support further cooperation, but not longer than 6 months from the last day of communication, unless there are legal requirements to keep it longer.

Other data not specified here are stored in accordance with the legal acts of the Republic of Lithuania.

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We also inform you that in certain cases your Personal Data may be stored longer:

- 1) if it is necessary for the Company to be able to defend itself against claims, claims or claims and to exercise its rights;
- 2) there are reasonable suspicions of an illegal act which is the subject of an investigation;
- 3) Personal data is necessary for proper resolution of a dispute or complaint;
- 4) a request of the Data Subject to access his / her Personal Data is received;
- 5) in case of other grounds provided for in legal acts.

What rights do you have with respect to Personal Data?

As a data subject, you have the following rights:

1. The right to receive information on whether the Company processes your personal data and, if so, to get acquainted with your personal data

You have the right to receive information about what Personal Data we process, from where it is collected, for what purposes it is processed, how long it is stored, to whom it is provided, and so on. It should be noted that your right of access may be limited by law, the protection of the privacy of others, and reasons related to our business and practices.

2. The right to request the correction of inaccurate Personal Data relating to you

If it turns out that we process inaccurate, incomplete Personal Data about you, you have the right to request the correction of the Personal Data.

3. Right to have data erased ("right to be forgotten")

You have the right to request the deletion of some or all of your Personal Data processed if we no longer have a legal basis to process it or there are other grounds provided for by law.

4. The right to demand restrictions on the processing of personal data

You also have the right to request a time limit on the processing of your Personal Data. This could be, for example, a situation where you think such processing is illegal and / or your data is inaccurate and we need to check it.

5. The right to object to the processing of Personal Data when it is based on our legitimate interests

When we process your data in the light of our legitimate interests, you have the right to object to us processing your Personal Data, unless our data processing interests take precedence over yours.



6. Right to Portability of Personal Data

In certain cases, you have the right to request the transfer of personal data relating to you that you have provided to us in a commonly used and computer-readable format, and you have the right to request that it be transferred to another controller.

7. Right to withdraw consent

You have the right to withdraw your consent to the processing of personal data if the Personal Data has been processed on the basis of consent. Withdrawal of consent shall not affect the lawfulness of the processing of data carried out prior to the withdrawal of consent.

8. Right to complain to the supervisory authority

If you believe that the processing of our Personal Data is being processed in violation of your rights and legitimate interests as set out in applicable law, you may lodge a complaint with the supervisory authority, the State Data Protection Inspectorate. The complaints procedure of the State Data Protection Inspectorate can be found here: <https://vdai.lrv.lt/lt/atmintines/atmintine-asmenims-ketinantiems-kreiptis-i-valstybine-duomenu-apsaugos-inspekcija-del-skundo-pateikimo/kaip-kreiptis-i-inspekcija>.

Execution of your rights

The above mentioned Your rights will be executed only upon our written request to execute the above rights and only upon confirmation of your identity. Such a written request is submitted to us in person at our registered office address, by regular mail or e-mail: dpo.lt@mai-cee.com.

Your requests will be processed within **30 (thirty)** calendar days from the date of receipt of the request. In special cases, depending on the complexity of the requests and the amount of Personal Data, the term of 30 (thirty) calendar days may be extended by notifying you in advance. The reply to your request shall be in the same form as the request unless you wish to receive the information electronically.

Cookie Policy

The cookies used on our website are small files that are transferred to the cookie file of your computer or other device via a web browser. They allow the systems of a website or service provider to recognize the client's browser, capture and remember certain information. For more information about how to manage cookies and browser settings, or how to delete cookies on your hard drive, please read the cookie policies on our managed sites.

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