

# **PRIVACY POLICY**

## **of Klaipėda Stevedoring Company (AB „Klaipėdos jūrų krovinių kompanija“), Klasco Towage Assistance**

**Klaipėda Stevedoring Company** (hereinafter referred to as the “Company”) seeks to protect the privacy of individuals and respects their rights, therefore, this Privacy Policy clearly and transparently describes the principles of information collection and use applicable to the Company and its website, as well as presents other information about Company’s provisions and principles concerning the protection of personal data, including but not limited to video data. The Company points out that this Privacy Policy is not applicable when persons visit websites of other companies or use third party services through the Company’s network.

When processing personal data, the Company follows the General Data Protection Regulation 2016/679 of the European Parliament and of the Council, the Law on Legal Protection of Personal Data of the Republic of Lithuania, the Law on Electronic Communications of the Republic of Lithuania and other related legal acts.

This Privacy Policy applies to the protection of personal data in respect of the following natural persons: prospective employees and participants of public tenders organized by the Company, including any potential, former and current persons, as well as the persons present in the area and / or premises of the Company, visitors of the Company’s website, and other interested persons (hereinafter referred to as the “Individuals” or “Data Subjects”).

Please read this Privacy Policy carefully in order to understand correctly the Company’s attitude and practices regarding the data of the Individuals and how the Company processes and stores the data of the Individuals.

The Data Controller: the Company, registered office at J.Zauerveino g. 18, Klaipėda, e-mail address: [info@klasco.lt](mailto:info@klasco.lt)

### **I. Data Processing Activities Performed**

#### **1. The purpose of the selection of employees (candidates for vacancies in the Company):**

1.1. The following data of the Individuals are processed for this purpose: identification data, contact details, the data contained in the curriculum vitae, cover letter and any accompanying documents, a photo (if submitted by the candidate) and other personal data related to the selection of personnel.

1.2. The Company processes these data on a legitimate interest basis.

1.3. The personal data collected for this purpose will be stored for a maximum of 3 months from the date when the candidate is informed that he / she will not be employed and, in cases where the job advertisement indicated that only the selected candidates would be informed, from the closing date of the selection. The term may be extended if personal data are used or may be used as evidence or source of information in a pre-trial or other investigation, including an investigation carried out by the State Data Protection Inspectorate, civil, administrative or criminal proceedings, or other cases prescribed by law. In such a case, personal data may be stored for as long as is necessary for such data processing purposes and destroyed as soon as they become redundant.

#### **2. The purpose of providing answers and information to the Individuals:**

2.1. In the event that the Individuals submit a request/complaint using the contact information indicated on the Company’s website: by e-mail, phone, registered mail or by filling in a request of the set form on the website, then, for the purpose to deliver a proper response to the request/complaint, the Company collects and processes the following personal data: name, surname, e-mail address, registered address

(place of residence) and, if the request/complaint is submitted to the Company by registered mail, the phone number, specified topic and/or comment, correspondence and the Individual-related data contained therein.

2.2. The Company processes these data on a legitimate interest basis.

2.3. Please be advised that your personal data will be stored for 1 year. The term may be extended if personal data are used or may be used as evidence or source of information in a pre-trial or other investigation, including an investigation carried out by the State Data Inspectorate, civil, administrative or criminal proceedings, or other cases prescribed by law. In such a case, personal data may be stored for as long as is necessary for such data processing purposes and destroyed as soon as they become redundant.

2.4. The Company uses data of the Individuals solely for the purpose of properly and objectively examining queries of the Individuals, improving the quality of customer service, serving customers and other persons, providing required information to the Individuals, answering questions of the Individuals, resolving requests or claims of the Individuals, and providing advice. The Company may also analyse the data of a request in order to improve the quality of the Company's activities and services provided to the Individuals, taking into account the opinions and proposals of the Individuals.

2.5. The Company does not make its correspondence with the Individuals publicly available. However, where any query or claim of the Individuals is received in a form of a public comment posted on a website or comments in social networks, the Company reserves the right to provide a publicly available response/comment in the same form as the query received.

### **3. The purpose of ensuring the safety of Company's assets, as well as employees, customers and other persons:**

For this purpose, video surveillance (sound is not recorded) is carried out in the Company's area and premises, as well as on board of vessels.

No.	Address of video surveillance area	Number of video cameras	Areas under surveillance	Video data storage term
1	Vētros g. 9, Klaipēda	7	Perimeter of the area, storage site	30 days
2	Zauerveino g. 18, Klaipēda	12	Perimeter of the administrative building, parking lots	30 days
3	Perkēlos g. 10, Klaipēda	45	Area, perimeter and quays of the Terminal	30 days
4	Naujoji uosto g. 23, Klaipēda	43	Area, perimeter and quays of the Terminal	30 days
5	Naujoji uosto g. 23, Klaipēda	1	Vitē grain discharge station	30 days
6	Naujoji uosto g. 23, Klaipēda	12	Fertilizer Terminal (old)	30 days
7	Naujoji uosto g. 23, Klaipēda	14	Grain Terminal (old)	30 days
8	Naujoji uosto g. 23, Klaipēda	32	Fertilizer Terminal (new)	30 days
9	Klasco 1 port tugboat	2	Internal premises and surroundings of the tugboat	3 hours
10	Klasco 2 port tugboat	2	Internal premises and surroundings of the tugboat	3 hours
11	Klasco 3 port tugboat	4	Internal premises and surroundings of the tugboat	14 days
12	Naujoji uosto g. 23, Klaipēda	15	Grain Terminal (new)	30 days

3.2. The legal basis for video surveillance: the legitimate interest to ensure the security of assets, employees and customers.

3.3. Upon expiration of the video data storage period, the data are automatically destroyed. Where any video data is used or may be used as information or evidence in a pre-trial or other investigation, civil, administrative or criminal proceedings and other legal proceedings in order to defend the legitimate rights and freedoms of the Company and / or third parties or in other cases prescribed by law, the video data may be stored for as long as is necessary to achieve such data processing purposes and are destroyed as soon as they become redundant.

3.4. Video data is provided solely to Budrus sakalas UAB, the processor of video data engaged by the Company, and to the institution, agency, prosecutor or court carrying out a pre-trial investigation or other investigation based on the administrative, civil and criminal cases or other legal proceedings at their disposal as evidence or information, as well as in other cases prescribed by law.

4. The data will not be used for automated decision-making in your respect, including profiling.

5. Personal data may be provided to:

5.1. Data processors that perform certain works and provide services (the intermediaries that process data for the purpose of concluding and managing customer contracts; the information technology companies that process data to ensure the development, upgrading and maintenance of information systems; the companies that ensure the delivery of notices to customers, provide security services and other services, including legal, financial, tax, business management, personnel administration and accounting services);

5.2. Courts, law enforcement agencies or state institutions to the extent that such provision is determined by requirements of legal acts (e.g., to bailiffs, courts, etc.);

5.3. Other persons with the consent of the Individual, if such consent is obtained for a specific instance.

In the event where any personal data recipients located in a State outside the European Economic Area are present on the above list, the personal data shall only be transferred to the States approved by the decision of the Commission as a State ensuring the appropriate level of data protection, or only to the States in respect of which the security measures established by Article 46 (2), 46 (3) or Article 49 (1) of the General Data Protection Regulation are applied (you can find out more about the mentioned security measures by contacting us using the contact details provided for in this Privacy Policy).

## **II. Cookie Policy**

6. A cookie is a small set of data that a website records in the browser of a personal computer, mobile device, or other device. This file can be scanned the next time you visit the website for the website to recognize your computer, mobile device or other device.

7. The Company's website uses technical cookies that help to display the Company's website and ensure its functionality. These technical cookies are essential for the proper functioning of the website.

8. The consent to the use of cookies may be obtained in the following ways: browser settings and information line on the website. Cookies may be managed and / or deleted based on your preferences. Web browser settings allow you to choose which cookies to accept and which to reject. Most browsers provide the opportunity to check which cookies are stored and delete individual cookies, block third-party cookies, block cookies from specific websites, block all cookies, and delete all cookies when closing the browser.

9. Where a visitor to the website is against the recording of cookies on his / her computer or other device, he / she may revoke his / her consent to the use of cookies at any time by changing the settings and deleting the cookies that have been recorded. Please be advised that if the cookies are blocked completely, the Company's website may not function properly.

10. Details of the cookies used:

Name	Description	Creation moment / Validity period	Personal data processed and collected
<b>CMSSESSID#</b>	To maintain a user session.	Created when opening the page and valid until the browser is closed.	Personal data are not collected. Only unique ID number is stored.
<b>CONSENT</b>	Used by google.com to detect if the visitor has accepted the marketing category in the cookie banner. This cookie is necessary for GDPR-compliance of the website.	Created when opening the page and valid 6854 days.	Neither Klaipeda Stevedoring Company, nor Klasco Towage Assistance does not collect any personal data.
<b>NID</b>	Cookie by google.com registers a unique ID that identifies a returning user's device. The ID is used for targeted ads.	Created when opening the page and valid 6 months.	Neither Klaipeda Stevedoring Company, nor Klasco Towage Assistance does not collect any personal data.

### III. Rights of Data Subjects

11. Individuals have the following rights:

- 11.1. The right to access the data and receive the information on how they are processed;
- 11.2. The right to request the rectification of the data;
- 11.3. The right to request the erasure of the data;
- 11.4. The right to restrict data processing;
- 11.5. The right to data portability;
- 11.6. The right to object to data processing;
- 11.7. The right not to be subject to automated individual decision-making and profiling;
- 11.8. The right to revoke the consent to data processing at any time, where the data are processed on the basis of the consent. The revocation of the consent shall not affect the validity of the consent-based processing of personal data that have been processed prior to the revocation of the consent. You may revoke your consent by contacting the Company using the above-indicated contact details or in any other manner convenient to you.

12. The requests concerning the exercise of rights submitted to the Company must be made in writing (including in electronic format) and it must be possible to establish the identity of the person submitting the request and the data subject. The identity of the data subject shall be established by means of a document evidencing the identity or by means of electronic communications that enable the identification of an individual. If a data subject' request is sent by post or by courier, the request must be accompanied by a copy of the document evidencing the identity of the data subject that must be certified in accordance with the procedure established by legal acts. Where a request for information about an individual is submitted by the individual's representative, such representative must provide a document certifying the representation and a document evidencing the identity of the data subject and the representative, if there are no other reasoned means to identify the representative and the data subject.

13. You may contact the Company using the above-indicated contact details concerning the issues of exercise of the rights of data subjects.

### IV. Security of Personal Data

14. The Company processes personal data in a responsible, lawful, fair and transparent manner. When establishing the means of the personal data processing, as well as during the processing of such data, the Company implements appropriate technical and organizational measures concerning personal data

protection in order to protect the personal data being processed against accidental or unlawful destruction, damage, alteration, loss, disclosure, as well as any other unlawful processing.

#### **V. Procedure for Defending Rights**

15. Please be advised that individuals have the right to submit complaints concerning the actions (or omissions) of the Company to the State Data Protection Inspectorate and the court in accordance with the procedure established by legal acts, as well as to submit complaints to the court concerning the actions (or omissions) of the State Data Protection Inspectorate.

#### **VI. Final Provisions**

16. The Company's website may contain links to websites of other persons, companies or organizations. Please note that the Company is not responsible for the content of such websites or the privacy protection policies applicable to them. Therefore, if, while browsing the website of the Company, you click on a link and open any other websites, you should additionally familiarise yourself with the privacy policies applicable to such websites.

17. In the event that this Privacy Policy is updated, the relevant information will be provided on the Company's websites: [www.klasco.lt](http://www.klasco.lt), [www.towage-klasco.lt](http://www.towage-klasco.lt).

18. Should you have any questions related to the personal data processing in the Company, please contact the Company using the Company's contact details indicated in this Privacy Policy.