

# PRIVACY POLICY FOR PERSONAL DATA PROTECTION

## I. General Provisions

This Privacy Policy is intended for persons who purchase goods from the ENERSTENA Group, use the services of the Company of the ENERSTENA Group, visit a territory and premises of the Company of the ENERSTENA Group, and who are interested in employment opportunities in the Company of the ENERSTENA Group and/or visit websites [www.enerstena.lt](http://www.enerstena.lt), [www.nakkilaboilers.fi](http://www.nakkilaboilers.fi), [www.calidumember.lt](http://www.calidumember.lt), [www.termotechnika.lt](http://www.termotechnika.lt) or other websites of the ENERSTENA Group.

The Controller is responsible for the processing of personal data for the purposes of the Company, such as performance of the contract or management of relations with a customer or a supplier on the legal bases provided for in this Privacy Policy. For these purposes, the Company may process personal data collected for the same purposes by any Company of the ENERSTENA Group.

## II. Key Definitions

**Personal Data** is any information about an identified natural person or a natural person who can be identified and whose data is processed in accordance with this Privacy Policy.

**The Company** is each or any company of the ENERSTENA Group.

**Data subject** is a person who purchases goods of the Company, uses or intends to use the services of the Company, provides services to the Company, visits a territory or premises of the Company, is interested in employment opportunities in the Company, is a representative of a legal entity, or a person who visits the websites [www.enerstena.lt](http://www.enerstena.lt), [www.nakkilaboilers.fi](http://www.nakkilaboilers.fi), [www.calidumember.lt](http://www.calidumember.lt), [www.termotechnika.lt](http://www.termotechnika.lt) or other websites of the ENERSTENA Group.

**The ENERSTENA Group** is UAB Enerstenos grupė and its legal entities directly and indirectly controlled by it, including UAB Enerstena, UAB Enerstenos Projektavimas, UAB Enerstenos gamyba, UAB Enerstena VS, UAB Termotechnika, UAB Calidum Ember Alytus, SIA Enerstena Latvia, and Nakkila Boilers Oy.

**Privacy Policy** is the privacy policy for personal data protection of the ENERSTENA Group.

**The Regulation** is the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

**The Controller:** a controller of Personal Data is the Company of the ENERSTENA Group which receives personal data on basis of contractual or pre-contractual relations between the controller and the data subject or which services you (or legal entity or entity whose ultimate beneficial owner is considered as you) intend to use.

## III. Principles of Processing Personal Data

The ENERSTENA Group processes personal data in accordance with the requirements of the legislation regulating the processing of personal data.

The volume of processed personal data depends on the services and goods you order or use and the information provided by the person when orders and/or uses services, provides services, visits or registers on the website, submits own or third party (family member) data for the purposes of the employment in the Company or visits a territory or premises of the ENERSTENA Group.

The data is processed only under the criterion of lawful processing in order to ensure the provision of services; with the consent of the person; when the Company is obliged to process personal data by the relevant legislation; when personal data have to be processed for the legitimate interest of the controller or a third party.

The Company endeavours to ensure that personal data would be processed accurately, fairly and lawfully, only for the purposes for which they were collected, that they would be processed in accordance with the clear and transparent principles and requirements of personal data processing determined in the legislation.

Using the services of the Company/the ENERSTENA Group, purchasing goods, providing services, submitting data, sending or otherwise presenting a resume (CV), visiting a territory or premises of the ENERSTENA Group, the Data Subject shall confirm that he/she is familiarized with this Privacy Policy, understand its terms and conditions and agree to comply with it.

#### **IV. Personal Data and Purposes of their Processing**

The Company, depending on the type of services or relationship with the Company, processes the following Personal Data, including but not limited to: name, surname, workplace, position, personal code, address of residence, a copy of the submitted personal document, photo of the person, mobile phone number, information provided in a resume ( CV), e-mail address, videos, visits to the Company/ENERSTENA Group, vehicle registration numbers, IP address, history and date of the website browsing, and other information required for product sales and providing services, maintenance of the relations, contract management, purchase-sale transactions, and for personnel management.

The Company processes personal data for the following purposes: performance of contractual obligations, monitoring and control of vehicles (GPS monitoring), administration of reports of road traffic offences, debt recovery, request administration, website traffic statistics, protection of property and persons, identification of persons, sale of property , submission, execution and defense of legal requirements, recruitment, conclusion, execution, administration of the employment contracts and other purposes related to the management of personnel, companies and services of the Company/the ENERSTENA Group, as provided for in internal documents.

#### **V. Video Surveillance**

Video surveillance in the Company is carried out in premises and/or territories operated by the Company/the ENERSTENA Group. Video surveillance is carried out for the protection of persons and assets of the Company.

The Company endeavours to organize video surveillance in such way that the area of observation would not exceed the necessary area (a facility, a part of the facility). Video surveillance in premises and/or territories for the private use of persons, i.e. toilets, showers, changing rooms, etc. are not carried out.

Videos may only be used to disclose suspected violations of the law or to prove and disclose the damage caused by employees of the Company, service providers, third parties to the assets of the Company and the data can be transferred only to persons having the right to receive such data in the manner determined by the law.

#### **VI. Term of Storage of Personal Data**

Personal data shall be processed for no longer than it is necessary for the purposes for which the processing is carried out and shall depend on the specific conditions of the contract and the basis on which the personal data are processed or no longer than it is required by the data subjects and/or provided for by the legislation.

#### **VII. Providing Processed Data to other Subjects**

The Company does not provide the processed data to third parties without the prior consent of the person (data subject), except in accordance with the procedure established by the legislation, and with the exception of data sharing among the joint controllers.

#### **VIII. Rights of Data Subjects**

Each Data Subject shall have the following rights:

(a) the right to know (to be informed) of the processing of his/her personal data;

- (b) the right to familiarize with the processed personal data and how they are processed, i.e. to obtain the information on the period of retention of personal data, applied technical and organizational measures to ensure the security of the data, the information from which sources and which personal data are collected, for what purpose they are processed, to whom they are provided;
- (c) the right to require to correct, destroy his/her personal data, or suspend, except their storage, the processing of his/her personal data when the data is not processed in compliance with the legislation.
- (d) the right not to give the consent to process his/her personal data, except, when such personal data are processed for a legitimate interest pursued by the controller or a third party to whom the personal data are disclosed and when the interests of the data subject are not more important;
- (e) the right to require that the submitted personal data would be destroyed;
- (f) the right to require that the processing of personal data would be restricted;
- (g) to require that his/her submitted personal data, if they are processed on the basis of his/her consent or contract, and, if processed by automated means, would be transferred to the other controller if this is technically possible (data portability);
- e) the right to submit a complaint to the State Data Protection Inspectorate regarding the processing of personal data.

## **IX. Cookies**

In order to improve the visit of the website there are used *Cookies*, these are small pieces of text information which are automatically generated by browsing the website and stored on a computer or another terminal device. The information collected by Cookies allows to make the website more user-friendly, offer suggestions and learn more about the behavior of our users, analyze trends and improve both the website and provided services.

If you do not agree that cookies would be stored on your computer or on another terminal device, you can change settings of your browser and turn off all cookies or turn them on/off one by one. However, we should note that in some cases this may slow down the speed of the Internet browsing, limit the functionality of certain websites, or block access to the website. For more information, see [AllAboutCookies.org](http://AllAboutCookies.org) or [www.google.com/privacy\\_ads.html](http://www.google.com/privacy_ads.html).

## **X. Other Provisions**

If you have any questions or uncertainties about how the ENERSTENA Group processes your Personal Data, or if you want to exercise any of your rights, the ENERSTENA Group invites you to contact them by e-mail [info@enerstena.lt](mailto:info@enerstena.lt) or to come to Ateities pl. 30A, LT-52163 Kaunas, Lithuania.

The Company may, at its sole discretion, amend this Privacy Policy, which shall take effect upon its publication at [www.enerstena.lt](http://www.enerstena.lt). Last updated on 16/01/2019.