

## **UAB INTELLECTUS KALBŲ CENTRAS PERSONAL DATA PROCESSING POLICY**

We hereby inform you in detail about the processing of your personal data, irrespective of whether you communicate with us in person, by phone, by electronic means (e-mail or on the Website) or in any other way of your choice.

The protection and privacy of your personal data is important to us.

This Personal Data Processing Policy (the “Policy”) is intended to inform you how we collect and use your personal data provided by you or otherwise collected by us in our company.

Your personal data are processed in accordance with the General Data Protection Regulation (EU) 2016/679 (the “General Data Protection Regulation”), the Law on the Legal Protection of Personal Data, as well as other legislation.

**Personal data** shall mean any information about you that you provide yourself or that we obtain from other sources and that allows you to be identified. This may include your name, surname, personal identification number, contact information, information about your agreements with us and the history of their performance, data on your use of our services (directly or online or by any other means), learning progress, attendance, etc.

**The data subject (you)** shall mean a natural person (customer, his/her representative, family member, etc.) whose personal data we receive and continue to use.

**The Company** shall mean UAB Intellectus kalbų centras.

**The Website** shall mean the Company’s website and user account with teaching materials.

Other terms used in the Policy shall be understood as defined in the General Data Protection Regulation and other legislation.

### **Contact details of the Data Protection Officer**

If you have any questions regarding the processing of your personal data, please contact the Company’s Data Protection Officer by phone +37068501923, by e-mail: [info@intellectus.lt](mailto:info@intellectus.lt), or by mail at the address Laisvės pr. 88, Vilnius.

### **What data do we collect about you?**

We collect the following personal data of yours:

**Basic personal data**, such as name, surname, personal identification number, date of birth, phone number, e-mail address, address, name and surname, date of birth of the person (child) you represent;

**Identification data**, such as IP address and other browsing information, including when you accessed our Website;

**Data on English language proficiency and course attendance**, such as English language test data, attribution to the English language proficiency level, attendance of courses in the Company, course time, certificates granted, etc.;

**Details of your payments and financial obligations to the Company under agreements with the Company**, such as the amount to be paid for the courses, the amount paid, the debt, the company you work for when you enter into an agreement with us on behalf of your company, the person you represent when you pay for a child or another person.

**Important:** We do not collect other **personal data of specific categories** that reveal your racial or ethnic origin, political views, religious or philosophical beliefs or trade union membership, or data about your sexual life or sexual orientation, unless you or your covenantees reveal them and request to take them into account, believing that this will help us to better achieve our common goals (for example, that you are not a Lithuanian speaker and are asking to communicate with you not in Lithuanian).

**Important:** If you provide us with the details of other persons related to you, you should obtain the consent of those persons and acquaint them with this Policy. You take responsibility for these individuals.

We may also collect your personal data if you are related to our customers, i.e. legal entities to whom we provide services, for example, if you are:

- Head of the company;
- A representative of the company acting under a power of attorney;
- Financial officer of the company;
- An employee of the company.

### **For what purposes do we collect and use your personal data?**

We collect and use your personal data which you provide yourself or which we obtain from other sources. We process your personal data for the following main purposes:

**In order to identify you and to contact you**, we collect your name, surname, personal identification number, date of birth, address, phone number, e-mail address and other contact details. We need a personal identification number because it is the only identifier that allows us to identify a person individually and that does not change, since we have customers with the same name and surname and the address or phone number change frequently, so these data may not be enough to identify a person.

**In order to consult you and assess your needs and provide you with proper services**, we collect information about your English language proficiency, your experience of learning English, your age, your goals for learning English, and your free time that you can dedicate to improve your English.

**In order to consult you, provide you with the services and properly fulfil our contractual obligations as well as our obligations under the law**, we use the data about your transactions with us and the information we receive from you when you are using our services. In some cases, we **analyse** your usage habits **by automated means** for this purpose (for example, so that we could properly inform you about service disruptions, cancelled lessons, to introduce service improvements or new similar services or products, etc.). If you have any questions or you are not satisfied with the way we fulfil our obligations to you, please let us know immediately.

**In order to improve the quality of our services.** To this end, we analyse, by automated means, your personal data, including information about the services you have ordered from us and your use of them, i.e. what courses you purchased from us and when you attended them. We collect and analyse these data about you for internal purposes, such as auditing, data analysis or research, to

help provide and improve our electronic platforms, content and services. We collect and analyse these data of yours in order to monitor and analyse the trends, use and performance of our products and services, in order understand which parts of our products and services are most relevant to users and to improve our services, electronic platforms and their content.

The use of this personal information of yours helps us to manage, improve and develop our services and to reduce disruptions to the services we offer. It also allows us to make our communication more relevant and to facilitate it, as well as to direct it personally to you. By analysing your experience with our products and services, we gain a better understanding of what you need, which makes our business more efficient and useful.

**In order to be able to send general direct marketing offers**, we collect and use your name and surname, phone number and e-mail address.

**If you do not consent** to your personal data being used for direct marketing purposes, please let us know immediately.

**In order to be able to communicate with you**, among other things:

- to answer your questions and respond to your requests for services, as well as to receive your feedback;
  - to send important messages, for example, regarding cancellation of courses, new courses, changes to this Policy or other documents; and
  - to send technical notices, updates, security alerts, support and administrative messages,
- we process your contact details and the content of incoming and outgoing messages.

**In order to ask your opinion on the quality of our services**, we collect and use your name and surname, e-mail address and phone number. If you do not consent to the use of your personal data for this purpose, please let us know immediately.

### **What gives us the right to obtain and use your personal data?**

We obtain and use your personal data under at least one of the following conditions:

- You intend to enter into or have entered into an agreement with our Company;
  - You have given your consent (including orally, online or by other express means);
  - The processing of personal data is possible on the basis of legislation;
  - In pursuit of our legitimate interests, such as
- in order to improve the quality of our services, ensure the consistency and sustainability of our operations, the comprehensiveness of the services provided to you that meet your expectations, and your maximum satisfaction with our services;
  - in order to lodge and defend legal lawsuits, and to take other lawful actions to prevent or reduce damages.

**Important:** if you do not provide us with personal data that are necessary for the conclusion and/or performance of the agreement, or the provision of which is required by law or the agreement, we will not be able to provide you with the services.

### **Where do we get your personal data from?**

We use the personal data that you provide to us when you apply for and use our services, fill out data forms upon completion of the test, register by phone or on the Website, make requests or claims, and which we record on the Website.

We may also obtain your personal data from other sources:

- From natural persons when they provide the data of their spouses, children, other persons related by kinship or in-law relations, co-debtors, guarantors, collateral providers, etc.;

- From documents addressed to us or provided to us by natural or legal persons in fulfilment of contractual or legal requirements;
- From legal entities, when you are the representative, employee, financial officer, etc. of these legal entities;
- From partners or other legal entities that rely on us when they provide services to you.

We may collect your personal information by monitoring our technological tools and services, including e-mail correspondence sent to or from the Company. Otherwise, we collect and generate information about you when you provide it to us, for example, by registering or providing feedback electronically.

We may combine available information about you from a variety of sources.

### **Whom do we provide your personal data?**

We provide your personal data in accordance with legal requirements. Your personal data may be transferred to:

- law enforcement institutions, other registers and state institutions in accordance with the requirements of the legislation;
- companies providing message forwarding, direct marketing, event management and related services;
- companies that run or administer loyalty programs;
- our professional advisors, auditors;
- courts, tribunals, arbitrators or other dispute resolution bodies;

We also use the following data processors to process the personal data specified in this Policy: companies providing data centre, hosting, cloud, website administration and related services, document archiving companies, advertising, marketing companies, companies creating, providing, supporting and developing software, companies providing information technology infrastructure services, companies providing communication services, consulting companies, companies performing analysis of Internet browsing or activity on the Internet and providing related services. We may use other service providers to process the personal data specified in this Policy. We strive to ensure that service providers would comply with the requirements of the General Data Protection Regulation, laws, this Policy and other binding legislation. The relationship between us as a data controller and a particular data processor, unless such relationship is established by laws or other legislation, is established in a written agreement or in the terms set out in writing.

We normally process and store your personal data within the territory of the European Union or European Economic Area (EU/EEA), but we also may transfer your personal data outside the EU/EEA, for example, when it is necessary for the conclusion and performance of an agreement or if you have consented to such transfer. We shall transfer your personal data outside the EU/EEA if at least one of the following measures is implemented:

- The European Commission has recognised that the state ensures an adequate level of protection of personal data;
- The recipient of the data located in the United States of America is certified in accordance with the requirements of the EU-US agreement called the “Privacy Shield”;
- There is an agreement concluded in accordance with the standard conditions approved by the European Commission;
- Codes of conduct or other safeguards under the General Data Protection Regulation are complied with.

### **How long do we store your personal data?**

We store your personal data for no longer than is necessary for the purposes for which they were collected or for such period as is required by law, for example:

- We process data collected during the provision of our services for as long as you use our services and store them for a period of 10 years after you stop using them;
- as long as it is necessary for the archiving of documents within the time limits laid down by law;
- In all cases, we will no longer store data after your request to erase them if they are no longer necessary to complete administrative steps (such as final payment).

## **Website cookies**

We collect information about you using cookies and similar technologies. Cookies are small files that are temporarily stored on the hard drive of your device and allow you to be identified during other visits to the Website, save your browsing history, preferences, customise content, they speed up searches on the Website, create a more convenient and friendly Website environment, present it in a more efficient and reliable manner. Cookies are a common web browsing practice that make it easier to use the website.

We use the information we receive from cookies for the following purposes: to ensure the functionality of the Website (for example, so that you could use the personalised Website); to improve and develop the Website to better meet your needs; for the development of services and analysis of the use of the Website; targeted marketing.

The Website may use the following cookies:

- necessary technical cookies, which are cookies that are necessary for the operation of the Website: DFP, Adform, Gemius Statistics, Google Analytics.
- functional cookies, which are cookies that, although not necessary for the operation of the Website, significantly improve its performance, quality and user experience: Google Optimize, Gemius Panel.
- statistical cookies, which are cookies used to generate statistical analysis of the navigation methods of the Website visitors; the data collected by these cookies are used anonymously: Chartbeat, TNS Metrics.
- targeting or advertising cookies, which are cookies that are used to display offers or other information that may be of interest to you: FB pixel, Google Tag Manager.

You may consent to the use of cookies without deleting them and/or changing the settings of your web browser so that it would not accept cookies. You can withdraw your consent to use cookies at any time. You can do this by changing your web browser settings so that it would not accept cookies. How you do this depends on your operating system and web browser. You can find detailed information about cookies, their use, and opt-out options at <http://AllAboutCookies.org> or [http://google.com/privacy\\_ads.html](http://google.com/privacy_ads.html).

In some cases, especially if you turn off technical and functional cookies, do not accept cookies or delete them, the speed of browsing the Internet may be slowed down, certain functions of the Website may be restricted, and access to the Website may be blocked.

## **How secure is your personal information?**

We use a variety of security technologies and procedures to protect your personal information from unauthorised access, use, or disclosure. Our suppliers are carefully selected and we require them to use appropriate measures to protect your confidentiality and ensure the security of your personal information. However, the security of information transmission via the Internet, e-mail, or mobile

communications may sometimes be unsafe for reasons beyond the Company's control, so you should exercise caution when providing us with confidential information.

### **What are your rights?**

You have the following rights:

- the right to request access to your personal data;
- the right to request to rectify the incorrect, inaccurate or incomplete data;
- the right to restrict the processing of your personal data until, upon your request, the lawfulness of data processing is verified;
- the right to require to erase personal data;
- the right to object to the processing of personal data for direct marketing purposes, including profiling, and when personal data are processed in pursuit of our legitimate interests;
- the right to request the transfer of your personal data to another data controller or to provide them directly in a form convenient to you (applies to personal data provided by you and processed by automated means on the basis of consent or on the basis of the conclusion and performance of an agreement);
- the right to withdraw your consent, without prejudice to the use of your personal data prior to the withdrawal of consent;
- the right to lodge a complaint with the State Data Protection Inspectorate (for more information, see [www.ada.lt](http://www.ada.lt)).

### **How will you exercise your rights?**

We make every effort to exercise your rights and to answer any questions you may have about the information provided in this Policy. You may submit a request for the exercise of the above rights, as well as complaints, notifications or requests (the "Request") by e-mail [info@intellectus.lt](mailto:info@intellectus.lt), by mail at the address Laisvės pr. 88, Vilnius or upon arrival at the nearest division of the Company. We will provide a response to your Request no later than within 30 (thirty) calendar days from the date of receipt of the Request. In exceptional cases requiring additional time, we will, after notifying you, have the right to extend the time limit for submitting the requested data or examining other demands specified in your Request to 60 (sixty) calendar days from the date of your Request. We shall refuse to satisfy your Request with a reasoned reply in writing when the circumstances set out in the General Data Protection Regulation and other legislation are identified.

### **What are the personal data protection principles we follow?**

We follow the following principles when collecting and using personal data entrusted to us by you or obtained from other sources:

- Your personal data shall be processed lawfully, fairly and in a transparent manner ("lawfulness, fairness and transparency").
- Your personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ("purpose limitation").
- Your personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ("data minimisation").
- The personal data processed shall be accurate and, where necessary, kept up to date ("accuracy").

- 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 (“storage limitation”).
- Your personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (“integrity and confidentiality”).

### **Our obligations**

When collecting and using personal data entrusted to us by you or obtained from other sources, we undertake the following:

- To process your personal data only for clearly defined and legitimate purposes.
- Not to process your personal data for purposes other than those specified in this Policy, except as required by law.
- To process your personal data lawfully, accurately, transparently, fairly and in such a way as to ensure the accuracy, authenticity and security of the personal data processed.
- To ensure that excess personal data are not processed.
- To process your personal data for no longer than is necessary for the purposes for which the personal data are processed.
- To be responsible for ensuring that the principles set out in this Policy are followed and to be able to prove that they are being followed.
- To perform other duties provided for in the legislation.

### **Validity and changes to the Privacy Policy**

This Policy shall come into effect as of 25 May 2018. It is subject to change due to changes in legislation and our operations. We will announce the changes on the website [www.intellectus.lt](http://www.intellectus.lt) and by other means.

Andrej Ingelevič, Director of UAB Intellectus kalbų centras

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