



# PRIVACY POLICY

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# 1. INTRODUCTION

## 1.1. Overview of the document

The basic rules of personal data collection, accumulation, processing and storage provided for in the Personal Data Processing Policy (hereinafter referred to as the Privacy Policy) of the private limited liability company iSense Technologies (hereinafter referred to as the iSense Technologies) are applicable to the use of all websites operated by the Company (hereinafter referred to as the Websites).

## 1.2. Amendments to the Document

Version	Date	Description
1.1	25/06/2023	Initial version of the document
1.2.2	29/06/2023	Working version of the document
2.2	01/12/2023	Version for coordination with RRT

## 1.3. Terms and abbreviations used

Abbreviations	Description
Website Administrator	The Company responsible for the administration of the Website.
User	Each person using the Website, regardless of whether he/she is a registered User or whether he/she uses the Website without being registered.
Direct Marketing	All activities that enable the Website Administrator to offer services or transmit any other communication to the User by post, telephone or other direct means for the purpose of informing the User or for the purpose of obtaining a response from the User, as well as any services related thereto. <b>Account</b> – the result of the User's registration on the Website, which results in the creation of a User profile that protects the User's personal data and the use of the Website services.



<b>Account</b>	The result of the User's registration on the Website, which results in the creation of a User profile that protects the User's personal data and the use of the Website services.
<b>EU Regulation 2016/679</b>	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data.
<b>Processing of personal data (EU Regulation 2016/679)</b>	Any operation or sequence of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, sorting, organisation, storage, adaptation or alteration, retrieval, access, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination with other data, restriction, erasure or destruction.
<b>Pseudonymisation (EU Regulation 2016/679)</b>	The processing of personal data in such a way that the personal data can no longer be attributed to a specific data subject without the use of supplementary information, provided that such supplementary information is stored separately and that technical and organisational measures are in place in relation to it in order to ensure that it is not attributable to the identified or identifiable natural person.
<b>Consent of the data subject (EU Regulation 2016/679)</b>	Any freely given, specific and unambiguous indication of the data subject's free will, by means of a statement or unambiguous action, by which he/she consents to the processing of personal data concerning him/her.
<b>Data Protection Regulations</b>	Information Systems Data Security Regulations of the Company.
<b>User Administration Rules</b>	Rules for the administration of users of the Company's information systems.
<b>Information Handling Rules</b>	The Company's Information Systems Rules for the secure handling of electronic information.
<b>ISENSE</b>	UAB iSense Technologies
<b>Customer</b>	Any natural person or legal entity who uses the Services.
<b>Customer Data</b>	Data uploaded or otherwise provided to us.
<b>Services</b>	Services that enable the Customer to upload, store, manage, verify and sign electronically as well as archive documents and validate electronic signatures and seals (including qualified and non-qualified services).



Other terms used in this Policy shall be understood as defined in the Republic of Lithuania Law on Legal Protection of Personal Data and other legal acts regulating personal data processing.

## **2. GENERAL PROVISIONS**

1. This Privacy Policy governs the basic principles and procedures for collecting, processing and storing personal data of Website Users.

2. The Company shall designate a person responsible for ensuring that the rights of Users as data subjects are safeguarded, properly enforced and that all information is provided in an appropriate, timely manner and in a form acceptable to Users.

3. The collection, processing and storage of the User's personal data shall be governed by this Privacy Policy, and insofar as it is not governed by this Privacy Policy – by the EU Regulation 2016/679, the Republic of Lithuania Law on the Legal Protection of Personal Data and other legal acts.

4. The Company shall process Users' personal data only for the purposes defined in this Privacy Policy.

5. By submitting their Personal Data on the Website, Users hereby agree that the Company will manage and process their Personal Data for the purposes, by the means and in accordance with the procedure provided for in this Privacy Policy and the legislation.

6. Users shall be deemed to have read this Privacy Policy when they register with the Websites.

7. The Privacy Policy may be re-accessed at any time on the Website.

8. This Privacy Policy shall automatically apply to Users who do not register to use the Website.

## **3. PURPOSES OF PROCESSING PERSONAL DATA OF USERS**

9. The Company shall collect, store and process any Personal Data provided by the User in the Account and obtained by the Users using the Website for the following purposes:

9.1. The proper performance of the Company's statutory obligations as a service provider;

9.2. Enabling the Users to use the Website;



- 9.3. Where the Customer processes personal data on behalf of a third party and ISENSE is the data processor for the purposes of ISENSE's Terms of Use. The Data Processor shall process and store this Personal Data in accordance with the provisions of the Terms of Use.
- 9.4. For the efficient provision of the Company's services. The Company shall take care to ensure that the use of the Website is efficient and to prevent identity theft and fraud and/or fraudulent behaviour;
- 9.5. To ensure the continuous improvement and development of the Website. The Company shall have the right to use Personal Data also for the purposes of direct marketing of its services, where the User consents to this without objection.

10. Users' personal data shall be stored only to the extent and for the time necessary to achieve the stated purposes.

#### 4. COLLECTION AND PROCESSING OF USERS' PERSONAL DATA

11. The Company shall not transfer or disclose Personal Data to third parties located both in the territory of the Republic of Lithuania and in the countries of the European Union and other foreign countries, except for the following cases;

- 11.1. Law enforcement authorities – in accordance with the procedure provided for by the legislation of the Republic of Lithuania;
- 11.2. Other institutions and organisations – in cases provided for by the laws of the Republic of Lithuania.

12. Information about the cookies used on the Websites:

Name	Description	Moment of creation/Expiry date
TawkConnectionTime	Session management cookie	When the browsing session starts / when the browsing session ends



cookieyes-consent	Customer's consent to this Privacy Policy	When the browsing session starts / after 7 days
twk_idm_key	Session management cookie	When the browsing session starts / when the browsing session ends
twk_uuid	Session management cookie	When the browsing session starts / after 7 days
wp-wpml_current_language	Controls the language selected by the user	When the browsing session starts / when the browsing session ends

13. The User shall authorise the Company to collect, manage, process and store the User's Personal Data to the extent and for the purposes set out in the Privacy Policy and other documents of the Website.

The User shall have the right to:

- 13.1. access the Personal Data provided by him/her at any time by logging into his/her Account;
- 13.2. upon written request to the Company, be informed from what sources and what Personal Data have been collected, for what purpose they are processed, and to which recipients they are and have been provided in the last one year. The information shall be provided to the User in writing at the e-mail address indicated by the User at the latest within 30 calendar days from the date of the User's request to provide such data. The Company shall provide such data to the User free of charge once per calendar year;
- 13.3. by submitting a request to the Company in writing or by e-mail, the User may request the rectification of incorrect, incomplete or inaccurate personal data and/or the suspension of the processing of such personal data, with the exception of the storage of such personal data, if the User establishes that his/her personal data is incorrect, incomplete or inaccurate, or that it is being processed in an illegal and unfair manner. The Company undertakes to notify the User of the rectification, destruction or suspension of the processing of personal data,



whether or not it has been carried out at the User's request, within five days from the date on which it has carried out these actions;

- 13.4. by disagreeing with the Privacy Policy, the User may object to the processing of his/her personal data. In such a case, the User shall not be able to register on the Website;
- 13.5. to object to the processing of his/her Personal Data for Direct Marketing purposes.

## 5. PERSONAL DATA SECURITY MEASURES

14. The Company shall implement and ensure appropriate organisational and technical measures to protect personal data against accidental or unlawful destruction, alteration, disclosure or any other unauthorised processing in accordance with the following documents approved by the Company:

- 14.1. Data Security Regulations which describe the general information security requirements applicable to the Company's information systems;
- 14.2. User Administration Rules which describe the rules for user administration;
- 14.3. Information Handling Rules which describe the basic principles of secure information handling;

15. Basic principles and rules for the secure use of personal data:

- 15.1. The Company shall ensure proper storage of documents and data files and shall take measures to prevent accidental or unlawful destruction, alteration, disclosure or any other unlawful processing of personal data. Copies of documents containing personal data of customers must be destroyed in such a way that they cannot be reproduced and their contents cannot be identified;
- 15.2. The Company shall have access to Users' personal data only by those persons who have been authorised to have access to such data and only when necessary to achieve the purposes set out in this Policy;
- 15.3. The Company shall ensure the security of the premises where personal data are stored, the proper placement and review of technical equipment, the observance of fire safety rules, the proper management of the network, the maintenance of information systems, and the implementation of other technical measures necessary to ensure the protection of personal data;





- 15.4. The Company shall take measures to prevent accidental or unlawful destruction, alteration, disclosure or any other unauthorised processing of personal data by keeping the documents and data files entrusted thereto in an appropriate and secure manner;
- 15.5. If an employee or other responsible person doubts the reliability of the security measures in place, he/she should contact his/her immediate supervisor to assess the security measures in place and, if necessary, initiate the acquisition and implementation of additional measures;
- 15.6. Employees or other responsible persons who automatically process personal data or whose computers have access to areas of the local area network where personal data are stored shall use passwords created in accordance with the relevant rules. Passwords shall be changed periodically, at least once every three months, as well as in certain circumstances, such as a change of employee, a threat of hacking, a suspicion that a password has become known to third parties, etc.;
- 15.7. An employee working on a particular computer may only know his/her own password;
- 15.8. Personal data may only be stored in the Company's service stations, which ensure proper auditing of the processing of personal data (EU Regulation 2016/679);
- 15.9. Personal data may not be used for the purpose of testing updates to information systems. Pseudonymisation (EU Regulation 2016/679) must be used in testing systems;
- 15.10. In the event of a personal data breach, the Company shall take immediate measures to prevent the unlawful processing of personal data.

## 6. FINAL PROVISIONS

16. This Privacy Policy shall come into force from the date of its publication on the Website.

17. This Policy shall be reviewed and updated at least once a year or in the event of changes in the legislation governing the processing of personal data.

18. The Company shall have the right to amend this Policy in part or in full. Users and other responsible persons shall be informed of the changes by means of information technology (e-mail, etc.).

