



## PRIVACY POLICY

UAB Merko statyba (“We” or “Data Controller”) cares about your privacy. With this Privacy Policy (“Privacy Policy”), we aim to explain in detail how we handle your personal data in our business irrespective of whether you provided them personally or we received them through automated processes, in public sources, social networks or otherwise.

### General information

Data Controller’s details:

UAB Merko statyba

Legal entity code: 111610080

Address: Laisvės ave. 3, Vilnius

E-mail: [merko@merko.lt](mailto:merko@merko.lt)

### How do we collect information about you?

Your personal data, i. e. any information about you that allows us to identify you is obtained in various ways:

- You may provide information (your personal data) yourself (for example, by signing an agreement with us, making an inquiry through the website or Facebook account, taking part in surveys, making claims and requests, calling us, subscribing to our newsletter, or otherwise contacting us);
- information about you may be collected automatically (when you visit our website (with the help of cookies and similar technologies), on social accounts in Facebook, LinkedIn, Twitter, etc.) when visiting our construction sites; making public posts on the social networking platforms we follow;
- to the extent permitted by applicable law, we may obtain information about you from third parties. This information may be provided by a digital marketing services company that provides maintenance services for our website; by our clients – legal entities – when you are their representative, and by our partners we co-operate with to provide services to you.

We may link information about you we receive from you and from public and commercial sources to other information we receive from you or about you.

We may collect information about you also in other cases, not covered by this Privacy Policy. If this happens, we will inform you further.

### What information (personal data) about you do we handle, on what basis, and for what intentions?

Although we try to collect as little as possible information about you to run our business and achieve our goals, we collect the information as shown in the following table:

Goal	Legal basis	Personal data
Provision of services*	Execution of the agreement with you Compliance with legal requirements	First name, last name, personal identification number, telephone number, e-mail, address, payment information and other information that may be relevant to the provision of services.
Conclusion and execution of sales, lease and other agreements	Execution of the agreement Compliance with legal requirements	First name, last name, personal identification number, telephone number, address, bank account number, e-mail, data in the cadastral certificate.



Goal	Legal basis	Personal data
Information related to the maintenance of your home, requests for services, etc.;	This information is provided to you because we have a legitimate interest in providing accurate information about our services	In order to answer your inquiries by phone, e-mail, in social networks and other ways, we may ask for your phone number, e-mail, first name, last name, data of a specific real estate object.
Ensuring the security of property and individuals (video surveillance)	A legitimate interest of ensuring the security of property and individuals	Video data
Quality assurance of customer service;	A legitimate interest of quality assurance of customer service	Phone call transcript. E-mail and content of correspondence.
To find out how people use online services we provide, so that we can improve them and develop new content, products and services.	For this goal, we process your personal data with a legitimate interest to monitor the quality of our services, create and improve the content of our website, and ensure the security of the website.	The IP address, OS version and settings of the device you use to access the content, the time and duration of your session, and any information stored in cookies that we have set on your device.
To defend our interests in courts or other institutions	Compliance with legal requirements. A legitimate interest is to defend against filed actions and claims.	Depending on the nature of the action or claim, all of your personal data, collected by us as listed in this Privacy Policy, may be processed for this goal.

**\*We inform you that we have the right to send to our present customers promotional information about other similar products or services by e-mail, and you have the right to refuse now, or at any time later, to receive direct marketing content from us by notifying us of your decision by email [merko@merko.lt](mailto:merko@merko.lt) or by using the unsubscribe link in the newsletter itself.**

In cases where we won't be able to rely on any of the legal bases as stated in the table above, we will ask for your consent before processing your personal data (such cases will be clear from the circumstances and context).

In cases where we'll be processing your personal data for intentions other than those stated in the table above, we will inform you by sending you a separate notice.

#### **To whom do we transfer customer data?**

We may transfer your personal data to:



- Credit and other financial institutions operating in Lithuania;
- Insurance and reinsurance companies operating in Lithuania;
- *Merko group* companies: *UAB Merko būstas*, *UAB MN projektas*, *UAB Timana*, *UAB Statinių priežiūra ir administravimas*, *UAB MB projektas*;
- State, municipal and law enforcement institutions;
- State enterprise Center of Registers, notary offices, law firms, bailiffs;
- Other business partners responsibly selected by us to provide warranty services. These companies have limited access to your personal data; they are not authorized to use this information for purposes other than providing services to us;
- Any other parties when required by law or it is necessary to protect our legitimate interests: the authorities, pre-trial investigation officers, courts, etc.

In order to send you direct marketing offers from our business partners we will ask for your separate consent.

#### **To which countries is your personal data transferred?**

Sometimes we may need to transfer your personal data to other countries (for example, by uploading information to virtual servers) where a lower-level policy of data protection may apply. In such cases, we will do everything we can to ensure that the personal data are safe and that one of the following security measures is applied:

- A contract signed with the data recipient is based on the Standard Contract Terms and Conditions approved by the European Commission.
- The data recipient should be located in a country recognized by the European Commission as applying adequate data protection standards.
- Permission from the Data Protection Inspectorate.

#### **What do we do to protect your information?**

We have introduced reasonable and appropriate physical and technical measures to protect the information we collect for our business purposes. However, you should keep in mind that, although we are taking appropriate steps to protect your information, none of the sites, an online operation, a computer system or a wireless connection is completely secure.

#### **How long will we keep your personal data?**

We will keep your personal data to the extent necessary to achieve our goals. After reaching the goals, your personal data will be deleted, except the cases when the law requires us to retain the information for tax purposes or the data may be necessary for a pre-trial investigation, but in any case, the retention period won't exceed 10 years. At the end of this period, the data will be deleted so that they can't be restored.

Generally, personal data is stored for the following periods of time:

<b>Personal data</b>	<b>Storage period</b>
Data on payment, sale and other agreements	10 years after the payment transaction
Personal data used for marketing purposes	As long as you are our active customer and for 2 more years after your last action on our site
IT system records (logs)	At least one year
Analytical data	This data is usually collected automatically when you are using the website and anonymized/ aggregated shortly after receiving.



## Your rights

The data subject, whose data is processed for the purpose of the Data Controller business, has the following rights, depending on the situation:

- Know (be informed) about the processing of your data (right to know).
- Access to your data and how it is processed (right of access).
- Require to amend or, depending on the purposes of the personal data processing, to supplement incomplete personal data (right to rectify).
- Destroy your data or suspend the processing of your data (excluding storage) (right to destroy and right to be “forgotten”).
- the right to require that the Data Controller restricts the processing of personal data for one of the existing legitimate reasons (right to restrict).
- the right to transfer data (right to transfer).
- the right to object at any time to the processing of your personal data where such data processing is carried out in the public interest or the data processing is necessary for the legitimate interests of the Data Controller or of a third party. In order to process personal data, the Data Controller has the burden of proof that the data is processed for compelling legitimate reasons which outweigh the interests of the data subject (right to object).
- File a complaint with the State Data Protection Inspectorate.

We are entitled to prevent from exercising the above rights when, in accordance with legal acts, it is necessary to ensure the prevention, investigation and detection of criminal offenses, violations of official or professional ethics, and also the protection of the rights and freedoms of the data subject or others.

Your rights will be exercised after the prior confirmation of your identity live, by an electronic signature or, if these two options are not possible, remotely via Skype or any other video chat platform.

Your right	Certain restrictions
Know (be informed) about the processing of your data (right to know)	You have the right to receive information about the processing of your personal data in concise, simple and comprehensible language before it starts.
To access your data and know how it is processed (right of access);	<p>This right means:</p> <ul style="list-style-type: none"> <li>- Confirmation whether we process your personal data,</li> <li>- Providing a list of your personal data we process</li> <li>- Providing of purposes and legal basis for the processing of your data</li> <li>- Confirmation whether we are sending data to third parties and, if so, what security measures we have taken</li> <li>- Providing the source of your personal data</li> <li>- Information whether profiling is applied</li> <li>- Provision of data storage time</li> </ul> <p>After your identity is established, we'll provide you with the information listed above, provided that this doesn't violate the rights and freedoms of others.</p>
Require to amend or, depending on the purposes of the processing of	Applicable if the information we have is incomplete or inaccurate



Your right	Certain restrictions
personal data, to supplement of incomplete personal data (right of rectification);	
Destroy your data (right to be "forgotten");	<p>Applicable when:</p> <ul style="list-style-type: none"> <li>- The information we have is no longer relevant to achieve the stated goals</li> <li>- we process the data on the basis of your consent and you revoke the consent</li> <li>- we process the data on the basis of a legitimate interest and, upon your request, it is established that your private interests prevail</li> <li>- the information was obtained illegally</li> </ul>
Suspend your data processing (except storage)	<p>This right may be exercised for as long as we analyze the situation, i. e.:</p> <ul style="list-style-type: none"> <li>- when you dispute the accuracy of the information</li> <li>- when you object to the processing of personal data when it's done on the basis of a legitimate interest</li> <li>- when we use the information illegally but you object to its deletion</li> <li>- when we no longer need the information but you require to store it for legal litigation.</li> </ul>
Require the Data Controller to restrict the processing of personal data for one of the legitimate reasons (right to restrict);	You are entitled to prevent us from using your personal data for direct marketing purposes.
The right to data transfer	This right can be exercised if you provided your data and we process it automatically based on your consent or an agreement with you.
Right to object	This right may be exercised where such data processing is carried out for the sake of the public interest or data processing is necessary for the legitimate interests of the Data Controller or of a third party. In order to process personal data, the Data Controller has the burden of proof that the data is processed for compelling legitimate reasons which outweigh the interests of the data subject (right to object);
File a complaint with the State Data Protection Inspectorate.	<a href="http://www.ada.lt">www.ada.lt</a>

### How can you exercise your rights?

You can submit a request for the exercise of the above rights, as well as complaints, notifications or other requests ("the Request") to us by e-mail [merko@merko.lt](mailto:merko@merko.lt), by mail to Laisvės ave. 3, Vilnius, or by coming to our office.

### Cookies, signals and similar technologies

In this Privacy Policy, we use the term "cookies" to describe cookies and other similar technologies, such as pixel tags, web beacons, and clear GIFs.



For your visits to our website, we want to provide content and features that are tailored to your needs. This requires cookies. These are small pieces of information stored in your web browser. They help the Data Controller to identify you as a previous visitor to a particular website, save the history of your visit to the website and adapt the content accordingly. Cookies also help to ensure the smooth operation of websites, allow you to monitor the duration and frequency of visits to websites and collect statistical information about the number of website visitors. By analyzing this data, we can improve our websites and make them more convenient for you to use.

When you use a browser to access the content we provide, you can configure your browser to accept all cookies, reject all cookies, or be notified when a cookie is sent. Every browser is different, so if you don't know how to change your cookie settings, check out its help menu. OS on your device may contain additional cookie controllers. If you don't want information to be collected through cookies, use the simple procedure available in most browsers allowing you to disable the use of cookies. To learn more about how to manage cookies, visit: <http://www.allaboutcookies.org/manage-cookies/>

However, please, remember that some services may be designed to work only with cookies, and disabling them will prevent you from using these services or some parts of them.

In addition to the cookies used by the Data Controller, our websites allow certain third parties to set and access cookies on your computer. In this case, the use of cookies is subject to the privacy rules of the third parties.

Please note that our social network accounts are subject to the appropriate social network cookie policy.

#### **Contact us**

If you noticed a non-compliance with this Privacy Policy, a security vulnerability on our website or have any other questions about the processing of your personal data, please contact us as indicated above.

#### **Final Provisions**

These privacy rules are reviewed at least every two years. Once we have updated our privacy policy, we will notify you of what we think to be important changes by posting a notice on a specific website.

The document was approved by the order of CEO of the company on 21 May 2018.

*Privacy Policy last reviewed: 28 March 2019.*