APPROVED

By Order No. AL-V-2021/02 of 23 April 2021

of the Managing Director

of Abipa Logistics UAB

**PRIVACY POLICY OF**

**ABIPA LOGISTICS UAB**

23 April 2021

Vilnius

**PURPOSE OF THE PRIVACY POLICY OF**

**ABIPA LOGISTICS UAB**

1. The Privacy Policy of Abipa Logistics UAB (hereinafter referred to as Privacy Policy) is purposed to inform you, visitors of the website and social networks of Abipa Logistics UAB, about your personal data collected by Abipa Logistics UAB, purposes of processing of personal data, conditions of legality, time limits for storing the data, your (as of the data subjects) rights, and procedure for enforcement of these rights.

**WHO PROCESSES YOUR PERSONAL DATA?**

1. Abipa Logistics UAB (legal entity code 301498546, head office at Jasinskio g. 12, 01112 Vilnius), as the controller, processes your personal data specified in this Privacy Policy. The Privacy Policy has been prepared pursuant to the following legal acts: Regulation (EU) 2016/679 of the European Parliament and Council 2016/679 of 27 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) (hereinafter referred to as GDPR), the Law on Legal Protection of Personal Data of the Republic of Lithuania (hereinafter referred to as LLPPD), and **other legal acts establishing processing of personal data.**

**WHERE TO APPLY IN THE EVENT OF QUESTIONS REGARDING**

**PERSONAL DATA PROCESSED BY ABIPA LOGISTICS UAB**

1. In the event of questions regarding processing of your personal data you can apply to Abipa Logistics UAB by email aurelija.kasetiene@abipa.lt and registered mail at the address Jasinskio g. 12, 01112 Vilnius.

**WHAT IS PERSONAL DATA AND WHAT**

**DOES MEAN DATA PROCESSING?**

1. In order to give you, as the data subject, better understanding of the concepts “personal data” and “data processing” used frequently in this Privacy Policy, they are defined as follows:
   1. **Personal data** means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name and surname, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
   2. **Data processing** means any operation which is performed on personal data such as collection, recording, accumulation, storage, classification, grouping, combining, alteration (supplementing or rectifying), disclosure, making available, use, logical and/or arithmetic operations, retrieval, dissemination, destruction or any other operation or a set of operations.
2. In addition, we inform you that other concepts used in this Privacy Policy have the same meaning as those established in the GDPR (access online [https://eur-lex.europa.eu/legal-content/LT/TXT/?uri=celex%3A32016R0679](https://eur-lex.europa.eu/legal-content/LT/TXT/?uri=celex:32016R0679))

**The BASIC principles of personal data PROCESSING**

1. GDPR provides certain basic principles that must be adhered by each controller in the course of processing of personal data. Accordingly, Abipa Logistics UAB, as your personal data processor, adheres to the following principles:
   1. personal data must be collected for purposes explicitly specified in the records of data processing operation of the controller and for legitimate purposes and not processed in a manner that is incompatible with those purposes (“purpose limitation”);
   2. personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject (“lawfulness, fairness and transparency”);
   3. personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (“data minimisation”);
   4. personal data must be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (“accuracy”);
   5. personal data must 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 have been collected and are processed (“storage limitation”);
   6. personal data must 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 for it appropriate technical or organisational measures (“integrity and confidentiality”);
   7. personal data must be processed in compliance with requirements for data processing established in GDPR and other legal acts (“accountability”).

**Purposes, LEGAL GROUNDS FOR PERSONAL DATA PROCESSING, CATEGORIES OF PERSONAL DATA, TIME LIMITS FOR storING PERSONAL DATA**

1. Abipa Logistics UAB, as the controller, shall process your (as the data subject) personal data for the following purposes, on the following legal grounds and within the following time limits for storage of personal data:
   1. when replying to your question provided in the enquiry “write a message” on the website of Abipa Logistics UAB to satisfy your interest to obtain a written consultation. **Personal data to be processed**: name, phone number, email address. **Legal ground for data processing**: data processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (Article 6(1)(f) of GDPR). **Foreseen time limit for storing personal data**: until your provided personal data are relevant to fulfil the purpose of processing;
   2. when calling the phone number specified in the query “request a call” of the website of Abipa Logistics UAB to satisfy your interest to obtain an oral consultation. **Personal data to be processed**: name, phone number. **Legal ground for data processing**: data processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (Article 6(1)(f) of GDPR). **Foreseen time limit for storing personal data**: until your provided personal data are relevant to fulfil the purpose of processing;
   3. when offering you the most suitable our services with regard to your information provided in the enquiry “application for cost calculation” on the website of Abipa Logistics UAB (<https://abipa.net/en/company/raschet-stoimosti/>). **Personal data to be processed**: name and/or surname, phone number, email address. **Legal ground for data processing**: data processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (Article 6(1)(f) of GDPR), processing is necessary for the performance of a contract to which the data subject is party (Article 6(1)(b) of GDPR). **Foreseen time limit for storing personal data**: the time limit for storing is established in the Index of Retention Periods of General Documents approved by Order No V-100 of the Chief Archivist of Lithuania of 9 March 2011 on the Approval of the Index of retention periods of general documents.
   4. when executing your order after you fill up an enquiry for service order on the website of Abipa Logistics UAB (<https://abipa.net/en/services/>). **Personal data to be processed**: name, phone number, email address. **Legal ground for data processing**: data processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (Article 6(1)(f) of GDPR), processing is necessary for the performance of a contract to which the data subject is party (Article 6(1)(b) of GDPR). **Foreseen time limit for storing personal data**: the time limit for storing is established in the Index of Retention Periods of General Documents approved by Order No V-100 of the Chief Archivist of Lithuania of 9 March 2011 on the Approval of the Index of retention periods of general documents;
   5. when implementing your project after you fill up an enquiry for goods order on the website of Abipa Logistics UAB (<https://abipa.net/en/services/>). **Personal data to be processed**: name, phone number, email address. **Legal ground for data processing**: data processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (Article 6(1)(f) of GDPR), processing is necessary for the performance of a contract to which the data subject is party (Article 6(1)(b) of GDPR). **Foreseen time limit for storing personal data**: the time limit for storing is established in the Index of Retention Periods of General Documents approved by Order No V-100 of the Chief Archivist of Lithuania of 9 March 2011 on the Approval of the Index of retention periods of general documents;
   6. when sending newsletters to you. **Personal data to be processed**: email address. **Legal ground for data processing**: consent (Article 6(1)(a) of GDPR) or on the grounds of Article 69(2) of the Law on Electronic Communications providing you are a current client. **Foreseen time limit for storing personal data**: until your provided personal data are relevant to fulfil the purpose of processing or until your withdrawal of the consent to receive newsletters;
   7. for the purposes of selection to free vacancies after you fill up the enquiry “send resume” on the website of Abipa Logistics UAB (<https://abipa.net/en/company/vacancy/>). **Personal data to be processed**: name, surname, email address (if specified), personal data provided in the resume. **Legal ground for data processing**: consent (Article 6(1)(a) of GDPR). **Foreseen time limit for storing personal data**: until selection to free vacancies is carried out;
   8. for the purposes of compilation of database of candidates to employees of the company, when you fill up the enquiry “send resume” on the website of Abipa Logistics UAB (<https://abipa.net/en/company/vacancy/>) and give consent for processing of such data. **Personal data to be processed**: name, surname, email address (if specified), personal data provided in the resume. **Legal ground for data processing**: consent (Article 6(1)(a) of GDPR). **Foreseen time limit for storing personal data**: until selection to free vacancies is carried out and **1** year after the end of the selection;
   9. when communicating publicly with you via social networks (comments, etc.). **Personal data to be processed**: the personal data that you decide to provide us (e.g. you write on the wall of our Facebook account). **Legal ground for data processing**: data processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (Article 6(1)(f) of GDPR). **Foreseen time limit for storing personal data**: until your provided personal data are relevant to fulfil the purpose of processing but no longer than 3 years;
   10. when communicating privately with you via social networks (when you write a personal message to us). **Personal data to be processed**: the personal data that you decide to provide us in your private message. **Legal ground for data processing**: data processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (Article 6(1)(f) of GDPR). **Foreseen time limit for storing personal data**: until your provided personal data are relevant to fulfil the purpose of processing but no longer than 2 years;

**Are your personal data**

**disclosed to the third parties?**

1. Abipa Logistics UAB shall not transfer your personal data to the third parties, except for the cases when the company is obliged to do it by legal acts or courts or such transfer is necessary for achieving goals of the contract or you have given an explicit consent to do it.

**HOW WE OBTAIN YOUR PERSONAL DATA?**

1. We can obtain your personal data directly from you (when you connect to the website of Abipa Logistics UAB and use functions foreseen in the website (filling up enquiries, subscribing newsletters), communicate with Abipa Logistics UAB via social networks) or from your representative.

**HOW WE PROTECT YOUR PERSONAL DATA?**

1. Abipa Logistics UAB seeks to protect your collected personal data against any impact, e.g. accidental or intentional manipulation, loss, destruction, or unsanctioned access; therefore, the company implements the following organizational and technical measures for protection of personal data:
   1. ensured protection, management and control of access to personal data;
   2. ensured protection against unlawful connection to the intranet by electronic means of communication;
   3. the areas of intranet where personal data are stored are secured by passwords;
   4. hardware is secured against malicious software (e.g. antivirus program is installed);
   5. documents that include personal data and copies hereof are destroyed in the manner that they could not be restored and their content could not be identified;
   6. employees and other authorised persons of Abipa Logistics UAB are obliged to preserve secrecy of personal data;
   7. other organization and technical measures for protection of personal data.

**SENDING AND WITHDRAWAL OF NEWSLETTERS**

1. In order to receive the latest information from Abipa Logistics UAB, you can subscribe to a free newsletter on our website. In the subscription of the newsletter, we use the so-called double registration procedure. It means that after registration we send to you an email by your specified email address with a request to confirm that you want to receive the newsletter. The purpose of this procedure is to prove your registration and, where necessary, to inform you about possible misuse of your personal data.
2. To ensure sending the newsletters to you, we transfer your email address to our contractual partners. Therefore, we recommend considering their privacy policies: <https://www.nutshell.com/support/privacy/>; <https://www.mailerlite.com/legal/privacy-policy>.
3. **Should you desire to withdraw a given consent** regarding receipt of the newsletters of Abipa Logistics UAB, you must simply press a link “withdraw”, which is at the end of each newsletter, or write to us by email **aurelija.kasetiene@abipa.lt. The consent regarding receipt of the newsletters can be withdrawn at any time.**

**COOKIES USED BY ABIPA LOGISTICS UAB:**

**WHAT IS IT? HOW TO REMOVE THEM?**

1. When you use our website, your computer saves cookies. Cookies are small text files that are stored on your computer and provide us with certain information about your browsing. Cookies cannot run computer software or transfer viruses to your computer. Their use ensures appropriate operation of the website, more convenient and efficient use of the website by you, and enables us to improve the website. **The following personal data are usually processed with the help of cookies:** IP address, data and time of the enquiry, difference of time zone compared with Greenwich Mean Time (GMT), requested content (particular page), access status (HTTP status code), amount of all transferred data, website from which the enquiry is given, web browser, operating system and its interface, language and version of the web browser.
2. **Removal of cookies.** In the settings of your browser, you can foresee not to accept cookies or delete existing ones. Guidelines for deletion and setting of cookies are provided here:
   1. when using the Internet Explorer browser: [Delete and manage cookies (microsoft.com)](https://support.microsoft.com/en-us/topic/delete-and-manage-cookies-168dab11-0753-043d-7c16-ede5947fc64d#ie=ie-10);
   2. when using Firefox browser: [Cookies - Information that websites store on your computer | Firefox Help (mozilla.org)](https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer?redirectlocale=en-US&redirectslug=Cookies);
   3. when using Google Chrome browser: [Clear, enable, and manage cookies in Chrome - Computer - Google Chrome Help](https://support.google.com/chrome/answer/95647?hl=en&ref_topic=14666).
3. It must be noted that removal of cookies can affect operation of the website.
4. Detailed information on the cookies used by Abipa Logistics UAB, their purpose, and storage terms is provided in the Cookie Policy of Abipa Logistics UAB (access online: <https://abipa.net/upload/privacy/cookies.pdf>).

**ACCOUNTS OF ABIPA LOGISTICS UAB**

**ON SOCIAL NETWORKS**

1. Abipa Logistics UAB has accounts on social networks Linkedin, Instagram, Facebook; however, personal data that you provide us in the accounts of social networks are also processed and stored by controllers of social networks. Abipa Logistics UAB does not control your personal data transferred to controllers of social networks; therefore, we recommend you to consider privacy policies of controllers of social networks:
   1. the privacy policy of the social network Facebook: <https://lt-lt.facebook.com/privacy/explanation>;
   2. the privacy policy of the social network Instagram: <https://lt-lt.facebook.com/help/instagram/519522125107875>;
   3. the privacy policy of the social network Linkedin: <https://www.linkedin.com/legal/privacy-policy> .

**YOUR RIGHTS (AS OF THE DATA SUBJECT)**

**AND THEIR ENFORCEMENT**

1. You, as the data subject, have the following rights:
   1. **right to obtain information about data processing.** Information about processing of your personal data by Abipa Logistics UAB is provided in this Privacy Policy;
   2. **right to access the processed personal data.** After submitting your personal identity document to Abipa Logistics UAB or proving your identity in accordance with the procedure established in legal acts or by electronic means of communication that allow proper identification of a person, you have the right to access your personal data and obtain information on what kind of your personal data is collected and from which sources, for what purposes they are processed, to which data recipients they are provided and have been provided during recent 1 year. You also have the right to request to be provided with a copy of your being processed personal data in any other form than it is provided by Abipa Logistics UAB; however, that is charged in accordance with administrative costs;
   3. **right to require rectification of personal data.** If, after access to your personal data, you determine that your personal data are incorrect, incomplete or inaccurate and apply to Abipa Logistics UAB, the latter shall check your personal data and after your written request provided personally, by mail or electronic means of communication, shall rectify, without due delay, incorrect, incomplete your personal data. In order to make sure that the processed personal data are incorrect or incomplete, Abipa Logistics UAB has the right to request you to provide the company with proving evidence;
   4. **right to require erasure of personal data.** In accordance with the cases provided in Article 17(1) of GDPR, you have the right to apply to Abipa Logistics UAB regarding erasure of your personal data. In the cases provided in Article 17(3) of GDPR, Abipa Logistics UAB has the right to refuse erasing personal data of the data subject;
   5. **right to restrict data processing**. In pursuance of Article 18(1) of GDPR, you have the right to require from Abipa Logistics UAB to restrict processing of your personal data;
   6. **right to data portability**. You have the right to obtain personal data related to you, which you provided to Abipa Logistics UAB in structured, commonly used and machine-readable format, and have the right to transmit these data to another processor. You don’t have the right to portability in respect to those personal data that are processed in non-automated manner in the structured files, for example, in the paper files. Your personal data transmitted according to your request shall not be automatically erased. If you desire such erasure, you shall have to apply to Abipa Logistics UAB regarding exercise of the right to require erasure of the data.
   7. **right to object to data processing.** In pursuance of Article 21 of GDPR, you have the right to object to processing of your personal data by Abipa Logistics UAB. You can provide a written notice about your objection to processing of your personal data to Abipa Logistics UAB in person, by mail or electronic means of communication. In order to enforce your right to object to processing of your personal data, Abipa Logistics UAB shall apply to you in writing and determine the time period during which you shall have the right to express your objection. In the event that your objection is legally grounded, Abipa Logistics UAB shall, without due delay, terminate processing of your personal data. If you fail to provide a written notice on your objection to process your personal data by the time limit set by Abipa Logistics UAB, it shall be considered that you have not exercised your right to object to processing of your personal data.
2. You have to apply regarding enforcement of the rights specified in the Privacy Policy by submitting an application in person, by mail or electronic means (email, phone).
3. If you submit a written application regarding enforcement of rights of the data subject in person, you shall have to prove your identity by providing a personal identity document. In the event of failure to do it, your rights (as of the data subject) shall not be enforced. This provision is not applied when you apply regarding information on personal data processing.
4. If you apply regarding enforcement of rights of the data subject in writing by submitting the application by mail, the application must be accompanied by a notary certified copy of your personal identity document. When the application is submitted by electronic means, it has to be signed by the qualified electronic signature or has to be formed by electronic means that allow ensuring integrity and irreplaceability of the text. This provision is not applied when you apply regarding information on processing of your personal data.
5. If you, as the data subject, want to exercise rights provided in the Privacy Policy, you have to submit a written application specifying in it a right you desire to exercise, your name, surname, and contact data for communication. If your representative applies regarding enforcement of your rights, he/she has to specify his/ her name, surname, place of residence, and the name, surname, place of residence of the represented person and to add a document proving the representation.

**WHEN YOU CAN APPLY TO THE STATE DATA**

**PROTECTION INSPECTORATE WITH COMPLAINT?**

1. You have the right to apply to the Inspectorate when you consider that Abipa Logistics UAB unlawfully processes (processed) your personal data or when you consider that Abipa Logistics UAB has infringed your rights, as of the data subject, established in Chapter III of GDPR (the complaint template is provided here: <https://vdai.lrv.lt/lt/veiklos-sritys-1/skundu-nagrinejimas>). Procedure for submission of the complaint to the State Data Protection Inspectorate is regulated by [LLPPD](https://www.e-tar.lt/portal/lt/legalActEditions/TAR.5368B592234C?faces-redirect=true).

**HOW OFTEN THE PRIVACY POLICY**

**IS REVIEWED?**

1. The Privacy Policy is regularly, at least once a year, reviewed and, if necessary, updated.
2. Date of last update: **23.04.2021**