

# UAB INTEGRE TRANS

## WEBSITE PRIVACY POLICY

**Last updated: 11/07/2023**

This privacy policy (hereinafter – **the Privacy Policy**) is intended for all visitors of the website [www.integretrans.com](http://www.integretrans.com) (hereinafter – the **Website**), users of the services of UAB Integre Trans (hereinafter – the **Company** or **We**), persons who have been active on the Company's social media accounts, and persons who have consented to receive the marketing material of the Company.

The Privacy Policy sets out the main rules for personal data processing and defines the conditions that the above-referred persons shall comply with.

We care about your privacy, therefore, we process your personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter – the Regulation), the Law on Legal Protection of Personal Data, and other legal acts regulating personal data protection. Take time to read the Privacy Policy and, if you have any questions, do not hesitate to contact us at the contact details below.

When you visit the Website and/or purchase our services, are active on the Company's social media accounts or consent to be contacted by and/or receive marketing materials from the Company's representatives, we will assume that you have read and understood this Privacy Policy. From the Website, you can access other web pages operated by us or by other data controllers, therefore, we recommend that you always consult the current Privacy Policy of the web page you are visiting.

### **1. About us**

We – UAB Integre Trans, legal entity code: 301888546, reg. address Sporto g. 18, LT-09238 Vilnius, are your data controller who processes your personal data for the purposes and on the grounds set out below. The data about the Company are stored and processed in the Register of Legal Entities of VĮ Centre of Registers.

If you have any questions or complaints on how we process your personal data, please contact us by e-mail: [bdar@integre.lt](mailto:bdar@integre.lt).

### **2. What is personal data?**

Personal data is any information we collect about you that can be used to identify you and is stored electronically or otherwise. Personal Data include any information, including your name, surname, address, IP address and other information that the Company collects about you for the purposes set out in this Privacy Policy or in your separate consent or contract with the Company.

### **3. Data subject rights and their implementation**

As a data subject, you have the following rights:

- **Request access your personal data.** You can find out whether we process any of your personal data. If your

personal data are processed by us, you have the right to access.

- **Request rectification of your personal data.** If you notice that the personal data we process are incomplete and/or inaccurate, you can request us their correction. We may ask you to provide supporting documents;
- **Request erasure of personal data (right to be forgotten).** Please note that we will be able to erase your data only if: (1) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (2) you have withdrawn your consent to the processing of your personal data and we have no other legal basis for processing such personal data; (3) you have expressed your objection (disagreement) to the processing of your personal data and there are no overriding legitimate grounds to process your data; (4) your personal data were processed unlawfully; (5) such personal data must be erased (i. e. cannot be further collected, used or stored) in accordance with our statutory obligation;
- **Request restriction on the processing of personal data.** You can request that we restrict the handling of your personal data for a certain period of time when: (1) the accuracy of your personal data must be verified (where the data accuracy is contested); (2) the processing (collection, use) of your personal data is unlawful, but you choose not to request the erasure of the personal data; (3) your personal data are no longer necessary for the specific purpose, however, they can be necessary for the establishment, exercise or defence of a legal claim; (4) it is necessary to determine whether we have an overriding legal basis to continue processing your personal data (after you have exercised your right to object to processing of personal data).
- **Object to the processing of personal data and/or withdraw your consent.** You may, at any time, object to the processing of specific personal data where such processing is carried out on the basis of our legitimate interest (Article 6(1)(f) of the Regulation), including profiling. Nevertheless, we may continue to process such personal data about you if we can demonstrate that such data are processed for compelling legitimate reasons which override your (the data subject's) interests, rights and freedoms or for the establishment, exercise or defence of legal claims. Where your personal data are processed on the basis of your consent (Article 6(1)(a) or Article 9(2)(a) of the Regulation), you may withdraw your consent to such processing at any time;
- **Request to export your personal data.** You may request that the personal data you have provided which are processed by automated means be made available to you in a structured, commonly used and machine-readable format and/or to transfer such data to another data controller (where technically feasible). This right can only be exercised if: (1) such processing of personal data is based on consent (Article 6(1)(a), Article 9(2)(a) of the Regulation) or contract (Article 6(1)(b) of the Regulation); and (2) where the exercise of this right does not adversely affect the rights and freedoms of other persons;
- **Submit a complaint to the State Data Protection Inspectorate.** We always make effort to answer your questions and/or resolve the issues of personal data processing as well as find a mutually satisfactory solution, therefore, if you have any questions and/or complaints about the protection of personal data, we encourage you to contact us directly by email: [bdar@integre.lt](mailto:bdar@integre.lt). If you disagree with our replies and/or proposed solutions and continue to believe that the processing of your personal data violates applicable law, you have the right to make a complaint with the State Data Protection Inspectorate (email: [ada@ada.lt](mailto:ada@ada.lt)).

In order to exercise the rights of the data subject, please contact us by e-mail [bdar@integre.lt](mailto:bdar@integre.lt) or by post address Sporto g. 18, LT-09238 Vilnius.

In order for us to accept and implement the data subject's rights you request, you must verify your identity in one of the following ways at the time of your request:

- where your request is submitted by post or courier – by enclosing a copy of a valid identity document certified under the procedure set out by law;
- where your request is submitted electronically – by certifying it by means of electronic communications that allow proper identification (e.g. mobile signature, qualified electronic signature, etc.).

We will reply to your request regarding the exercise of data subjects' rights as soon as possible, but no later than within 1 month from the date of its receipt. This period may be extended by one more month if necessary, depending on the complexity and number of requests. You will get an additional notification of such extension during the first month. The information you request will be provided free of charge. However, if we see that your requests are manifestly unfounded or disproportionate, in particular because of their repetitive content, we have the right to charge you a reasonable fee (i.e. request reimbursement of administrative costs) or to refuse to act on such a request.

The answer will be provided in the way you choose in your request. If your request does not specify the way you want to receive a reply, the reply will be sent to you in the same way as the request was made.

#### **4. What personal data are processed and for what purposes?**

Your personal data may be processed for the following purposes:

- Conclusion and performance of contracts with customers;
- Administration of the Website [www.integretrans.com](http://www.integretrans.com) (administration of customer/carrier accounts);
- Management of enquiries;
- Selection of candidates for vacant positions; Asset protection (video surveillance);
- Publishing of customer feedback;
- Direct marketing;
- Use of cookies.

##### **4.1. Drawing up and performance of contracts with customers:**

In order to enter into and perform a contract with our customers, we will ask you to provide personal data. Such personal data include the customer's identification data, contact details, bank account number and other personal data necessary to make and perform the contract.

Such personal data will be processed with reference to Article 6(1)(b) of the Regulation, i.e. to enter into and perform a contract with you, as well as Article 6(1)(c) of the Regulation, i.e. the legal obligation us store contracts and records (provided in the Civil Code of the Republic of Lithuania and other related legal acts). Retention period of personal data – once the transaction has been completed agreement, the personal data shall be retained for 10 years after the last contract agreement, except for cases where the applicable legal acts provide for

another storage period (data storage is guided by the General Document Storage Term Index approved by Order No. V-100 of the Chief Archivist of Lithuania).

#### **4.2. Administration of the Website [www.integretrans.com](http://www.integretrans.com) (administration of customer / carrier accounts):**

You are given access to the logistic system of Integre Trans (customer/carrier account). For this purpose, we must process the following personal data: login data, name and surname of the natural person or name of the legal entity, address, e-mail, telephone number; in the cases of an inquiry for logistic services – loading address, date of shipment, unloading address, etc.; other data provided on your initiative.

You are not required to submit anything in order to log in to the logistic system. In order to fulfil our contractual obligations, we will provide you with a login name and password.

The processing of personal data for the purposes set out in this clause is carried out in accordance with Article 6(1)(b) of the Regulation, i. e. in order to conclude a service provision contract. The retention period after an account has been created – the data shall be stored for 5 years after the last visit in the account.

#### **4.3. Processing of enquiries:**

We process the enquiries, requests and complaints received by e-mail, via the website or social networks. For this reason, we process the following personal data:

- identification data (name, surname, company, etc.);
- contact details (e-mail address, etc.);
- additional data required (for inquiries for logistic services – loading address, date of shipment, unloading address, etc.);
- any other data provided on your initiative, which you consider as relevant in the context of the inquiry or quote.

These personal data may be processed on the basis of Article 6(1)(b) of the Regulation, i. e. in order to enter into and perform a service provision contract; and also on the basis of Article 6(1)(c) of the Regulation, i. e. for the performance of a legal obligation. (provided in the Civil Code of the Republic of Lithuania, the Law on the Protection of Consumer Rights of the Republic of Lithuania). When you use the chat tool on our page, you are using the tawk.to program. This application is a free live chat with consultants and/or message administration tool, owned by the United States company tawk.to Inc., acting as Our manager, enabling you to use this tool and conveniently manage your messages and provide consultations. Such processing of personal data is subject to the Standard Contractual Conditions (SCC) approved by the European Commission, which ensure the legal transfer of personal data outside the EU/EEA.

We will process this personal data until the full investigation of the inquiry and 3 months from the date of investigation or until the full execution of the contract and 10 years after its end, together with the contract and other documents (when the inquiry is related to the execution of the contract).

#### **4.4. Data processing of candidates for vacant positions:**

When you apply for a job with us, we must to assess your suitability for the position we offer. For this purpose, we must process your identification, contact details, as well as the personal data provided in your CV, LinkedIn account (after you specify your LinkedIn profile) and/or motivation letter during the selection process and the

personal data provided during vacant positions a job interview on the basis of your consent, i. e. Article 6(1)(a) of the Regulation. With your consent, we may also process your personal data after the end of the relevant selection process in order to provide other job offers; such data are processed for 1 year from the moment we receive your consent.

If you do not submit your CV, links to your LinkedIn profile and/or motivation letter, we will be unable to assess your suitability for the position offered.

Please note that, in order to assess your suitability, we may contact the former employers indicated by you for references and seek information about your qualifications, professional skills and qualities, after having informed you in advance. We may also ask for your consent to receive such information from your current employer.

If you have uploaded your CV to the portals of recruitment agencies, job postings, LinkedIn and/or other related portals - we may get information about you from them in accordance with their Privacy Policy.

In case you do not express a separate consent for the processing of your personal data after the end of the respective job selection, we undertake to delete and/or destroy your personal data within 5 (five) working days after the successful candidate has signed a contract of employment.

#### **4.5. Asset protection (video surveillance):**

Video surveillance may be carried out on the premises of the Company's driving school for asset protection purposes. Information about video surveillance is provided before entering the area covered by video recording.

The video data are be stored for 14 days on the basis of the legitimate interest of the Company (Article 6(1)(f) of the General Data Protection Regulation). The legitimate interest means the intention to ensure the protection of the Company's assets.

#### **4.6. Publishing of customer feedback:**

We may, with your consent, process and publish feedback from our customers on our website [www.integretrans.com](http://www.integretrans.com). For this purpose, we will process the name, surname of our customer or his/her representative and the feedback text for 10 years from the moment of receipt of the consent or until the consent is withdrawn.

#### **4.7. Direct marketing:**

If you consent to receive our direct marketing communications, including commercial offers, we will process your company name, e-mail address and/or telephone number for general direct marketing (e.g. services, offers, news, surveys, and other direct marketing) to be sent to you by e-mail, post, telephone and will contact you for these purposes. Please note that, in order to receive our direct marketing communications, you are not required to provide all of the personal data indicated in this clause, but only those which will be required for the chosen type of direct marketing (e. g. to receive communications by e-mail, you should provide us with your email address only).

Your personal data processed for direct marketing purposes may be transferred to third parties engaged to provide services to the Company (data processors), including marketing companies, information technology service providers. Your data will be processed for direct marketing purposes on the basis of Article 6(1)(a) of the Regulation, i. e. based on your consent, for a period of 3 years from the date of receipt of consent and then will be deleted or a new consent will be obtained and the data will be processed further.

The fact of obtaining your consent will be stored as evidence for the validity period of the consent and for 1 year after the end of the processing of the data specified in the consent. Please note that, in this case, the personal data will not be processed for direct marketing purposes and the fact of your consent will be processed in order to assert, exercise or defend our legal claims.

If you have already purchased goods and/or services from us and have not expressed an objection to the sending of direct marketing messages, including commercial offers, we may send you direct marketing messages about similar goods or services, including commercial offers, to the email address you provided without your prior consent. In this case, your e-mail data will be processed for the purpose of direct marketing, Article 6 of the Regulation. 1 d. p. f. on the basis specified, i.e. based on our legitimate interest to inform customers about our services, increase our brand awareness, promote sales.

If at any time you decide that you no longer wish to receive marketing communications, you may opt out at any time. You can do this by clicking on the link contained in the marketing message or by contacting us by the following contact e-mail address: [bdar@integre.lt](mailto:bdar@integre.lt).

#### **4.8. Use of cookies:**

When you visit our website, your browsing data, etc., are collected using cookies.

We use essential/technical cookies to ensure the proper functioning of the website, as well as other cookies to improve your browsing experience (i. e. to take into account your needs, to keep improving the website and to provide offers that match your interests, etc.).

The processing of data using cookies and similar technologies related to web browsing, etc. is carried out under Article 6(1)(a) of the Regulation, i. e. based on your consent (except for essential cookies). More information on cookies is available in the Cookie Policy, which you can find in the cookie tool (Cookie Policy button).

### **5. Transfer of personal data**

Your personal data are transferred in order to ensure the continuity of our business and the proper provision of our services, therefore, we may disclose/transfer information about you to contractors, insurers, carriers, service providers (IT service providers, debt collection companies, marketing service providers, for recruitment service providers (e.g. Jobilla, Jobrely) and etc.) or to our other partners, provided that such transfer is necessary for the purposes set out in this Privacy Policy.

In certain circumstances, we may be obliged to transfer personal data when:

- we are required to disclose information by law, including where we are required to disclose personal data to tax authorities and law enforcement authorities for crime prevention and detection purposes;
- we are required to disclose personal data in connection with legal proceedings or in order to obtain legal advice, or when disclosure is necessary to establish, exercise or defend our rights;
- disclosure is necessary in order to protect our interests or the interests of third parties;
- disclosure is necessary to protect your vital interests;
- the information must be disclosed to a third party that provides data processing services on our behalf, i. e. to data processors. In such circumstances, we undertake to take measures to ensure that data processors protect personal data in the same way as we do and to notify you of changes to this privacy notice;



- disclosure is necessary to a potential purchaser of our business assets or organisation.

## **6. Ensuring the security of personal data**

We understand that you provide your personal data to us in good faith and expect it to be protected. For this reason, we take the security of your personal data seriously. This means that we take appropriate organisational and technical security measures to adequately protect your personal data in our systems:

- we ensure strict access controls and restrict access to data to those who have a need to know;
- access to personal data is protected by passwords of an appropriate level;
- we make confidentiality agreements with persons who have access to your data on a need-to-know basis;
- we make personal data processing agreements with data processors;
- we monitor access to personal data;
- we have other organisational and technical security measures in place.

## **7. Personal data transfers outside the EU and EEA:**

Personal data are not transferred to third countries (all Member States of the European Union, Iceland, Liechtenstein and Norway) and/or international organisations, except for the case specified in point 4.4 of this Privacy Policy.

In case it is necessary to transfer your personal data to a third country or international organisation for the purposes set out in this Privacy Policy, one of the following conditions will apply: (i) the data will be transferred to a country for which an adequacy decision has been made (third countries that meet the required level of protection are approved by the Commission of the European Union); (ii) the data transfer will be subject to appropriate safeguards as specified in the legislation (e.g. a legally binding and enforceable document between public authorities or bodies; rules binding for businesses in accordance with Article 47 of the General Data Protection Regulation; standard data protection clauses adopted by the Commission of the European Union in accordance with the examination procedure referred to in Article 93(2) of the General Data Protection Regulation); (iii) other derogations provided for in legal acts will be complied with if it is not possible to transfer data in accordance with the above sub-clauses.

## **8. Final Provisions:**

If you have any questions about the processing of your personal data, we will be pleased to reply or provide you with any additional information that we may disclose. You can always contact our Data Protection Officer by e-mail [bdar@integre.lt](mailto:bdar@integre.lt).

We have the right to change this Privacy Policy in part or in full. You will not be additionally notified of changes to this Privacy Policy, i. e. an updated version of this Privacy Policy will be posted on the Website. Therefore, we recommend and encourage you to periodically visit our Website to review the most current version of the Privacy Policy.

## **Previous versions:**

**25/07/2022**

28/04/2021

10/09/2018