

Privacy and Cookie Policy of the INFOBALT Association

1. General provisions

1.1. The privacy and cookie policy (hereinafter, “**the Policy**”) of the INFOBALT association, legal entity code 122361495, office address Mokslininkų g. 2A, Vilnius, the Republic of Lithuania (hereinafter, “**INFOBALT**”) establishes how INFOBALT collects, processes and stores personal data about representatives of INFOBALT members, board members, persons interested in INFOBALT activities, visitors to the INFOBALT website www.proptech.lt , as well as visitors to INFOBALT accounts on social networks (hereinafter, “**the Subjects**”). The Subjects are requested to read this Policy carefully in order to understand correctly the approach and practice of INFOBALT regarding the data of the Subjects, and conditions for processing the data.

1.2. Personal data of the Subjects is collected and processed only for the purposes indicated in this Policy.

1.3. The Subjects may access the Policy at any time by visiting the website www.proptech.lt (“**the Website**”). By visiting these Websites, the Subjects acknowledge that they are aware that INFOBALT will use and process Subjects’ data according to the means, purposes and procedures established in this Policy.

1.4. INFOBALT is considered to be the controller of the Subject’s personal data.

1.5. Besides this Policy, INFOBALT also complies with the European Union and Lithuanian laws regulating personal data protection.

2. Data of the Subjects collected by INFOBALT

2.1. INFOBALT may collect and process the following data of the Subjects:

2.1.1. Data necessary for INFOBALT activities: names, names of workplaces, email addresses, phone numbers of representatives of the members and board members, data of persons providing services to or cooperating with INFOBALT, to the extent required to comply with the requirements of the laws and to ensure the operation of INFOBALT;

2.1.2. Personal data contained in inquiries and/or communication between the Subjects and INFOBALT when exchanging documents/other information, also in

communication via the INFOBALT Facebook account, Twitter account, LinkedIn account, as well as in text messages to the mobile phones owned by INFOBALT.

2.1.3. Information regarding visitors of the Website and its IP addresses collected by cookies;

2.1.4. Images (i.e. photos, videos) of INFOBALT employees, board members and other persons related to INFOBALT activities when the Subjects give their consents.

2.1.5. Personal data of the participants of events organized by INFOBALT for the purpose of communication with them (including but not limited to the listed personal data): names, email addresses, phone numbers.

2.1.6. Images (i.e. photos, videos) of the participants of events organized by INFOBALT (public and private) when the Subject has given his/her prior consent.

2.2. The Subjects' responsibility is to provide correct and accurate data to INFOBALT. In case INFOBALT has any doubt regarding the accuracy of the data provided by the Subjects, INFOBALT shall have the right to suspend the processing of the data of the Subject, to verify such data and/or to correct it.

3. Cookies and purposes for its use

3.1. When the Subject is browsing the Websites, cookies can be saved on the Subject's computer (device). INFOBALT uses information stored on the Websites by cookies in order to mirror the technical structure and content of the Websites and to allow INFOBALT to understand how the Subjects use the Websites. The Subject, browsing the Websites, has the right to see what information (cookies) is recorded by INFOBALT and may delete part or all of the cookies. In case the Subject does not want cookies to be stored on its computer or another device, a notification can be set on the browser settings to be shown before cookies are saved. Moreover, the Subject may set the browser to selectively reject all or some of the cookies immediately. Also, the Subject may remove the cookies that have already been stored on the computer or another device.

3.2. The Website use the following cookies:

ESSENTIAL COOKIES (2)

Name of the cookie	Provider	Purpose	Used Data	Expiry date	Type
PHPSESSID	thisisdoa.eu	This cookie is created for the PHP programs. The cookie is used to save and identify the unique user's session ID to manage the user's session on the website. The cookie is a session cookie and deleted when all browser's windows are closed.	Unique identifier	During browsing	HTTP
_GRECAPTCHA	google.com	Google reCAPTCHA service sets this cookie to identify bots and protect the website from malware attacks.	Unique identifier	5 months, 27 days	HTTP

ANALYTICAL COOKIES (5)

Name of the cookie	Provider	Purpose	Used data	Expiry date	Type
_ga	Google Analytics	Tracking cookies of Google Analytics. The cookie collects the information about users' behaviour on the website and used to store the statistical information.	Unique identifier	24 months	HTTP
_ga_6Z74VH6YF7	Google Analytics	Tracking cookies of Google Analytics. The cookie collects the information about the users' behaviour on the website and used to store the statistical information.	Unique identifier	24 months	HTTP
_ga_6DRPM3J1P4	Google Analytics	Tracking cookies of Google Analytics. Th cookie collects the information about the users' behaviour on the website and used to store the statistical information.	Unique identifier	24 months	HTTP
_gid	Google Analytics	Tracking cookies of Google Analytics. Th cookie collects the information about the users' behaviour on the website and	Unique identifier	24 hours	HTTP

		used to store the statistical information.			
_gat	Google Analytics	The Google Analytics cookie that is used to limit the number of requests to Google service.	Numerical value	1 minute	HTTP

4. Security of the Subject data

4.1. Data that is collected by INFOBALT from the Subjects is processed by INFOBALT or its supplier staff. In cases when the Subject data is processed by INFOBALT suppliers (i.e. data processors), INFOBALT has agreements with them which regulate the obligations of data processors. Data processors have the right to process personal data only in accordance with INFOBALT instructions and to the extent it is required for the proper performance of the obligations established in the agreement.

4.2. Data provided by the Subjects is stored on INFOBALT servers or hard copies of documents and/or cloud service providers suitable for work in the EU in accordance with its privacy policies.

4.3. By processing and storing the Subject data, INFOBALT implements organizational and technical data protection measures which ensure the protection of personal data from accidental or illegal erasure, modification, disclosure, as well as other illegal processing.

5. Purposes for processing the Subject data

5.1. INFOBALT processes personal data of the Subjects for the following purposes:

5.1.1. for the purpose of carrying out INFOBALT activities, organizing events and informing the public;

5.1.2. to reflect the technical structure of the Website and to collect information about how the Subjects use the Website;

5.1.3. for the purpose of responding and administering Subjects' inquiries about the provision of information about INFOBALT activities and for communication with the Subjects.

6. Terms for storing the Subject data

6.1. Personal data of the Subjects shall be stored insofar it is necessary to perform obligations regarding the above mentioned data processing purposes.

6.2. When paper or electronic documents are required to be stored by law (e.g. legal acts approved by orders of Chief Registrar of the Republic of Lithuania) for a specific period of time, such documents shall be stored for no longer than required.

6.3. Images of the Subjects (photos, videos) shall be stored for 3 (three) years from the date of consent.

7. Disclosure of data

7.1. Data of the Subjects may be disclosed to third parties if such transfer or sharing of data of the Subjects is required in accordance with the requirements of legal acts (e.g. courts, Lithuanian police, Prosecutor's Office of the Republic of Lithuania, other authorities, public registers, etc.).

7.2. Data of the Subjects may be provided to data processors that provide services (perform works) and process personal data of the Subjects on behalf of INFOBALT, as a data controller, after signing a data processing agreement with them.

7.3. INFOBALT undertakes not to transfer data of the Subjects to third countries in the regular course of activities. In cases where for specific activities (e.g. business mission organization outside the EEC) data of the Subjects needs to be transferred, it is performed in accordance with the requirements of the GDPR and subject to the Subject's consent.

8. Rights of the Subjects

8.1. The Subjects have the following rights:

8.1.1. to be informed about the processing of their data;

8.1.2. upon request, to obtain information about the sources from which the data is collected and what kind of personal data is collected, for what purposes it is processed, the recipients to whom the data is provided and has been provided within the last year. Information is provided to the Subjects by email addresses specified by them, no later than 30 days after the Subject requests provision of such data. The following data shall be provided free of charge by INFOBALT to the Subject once per calendar year:

8.1.3. upon request, to demand correction of incorrect, incomplete, inaccurate data of the Subjects and/or to suspend processing of such personal data, except for storage, if the Subject determines that its personal data is incorrect, incomplete or inaccurate, or is processed in an illegal or unfair way. INFOBALT shall immediately notify the Subject about whether the requested correction,

erasure or suspension personal data or its processing has been conducted.

8.1.4. upon request, the Subject shall have the right to obtain its personal data which it has provided to INFOBALT in a systematic, commonly used and computer-readable format so that such data could be forwarded to another data controller (the right to data portability);

8.1.5. upon request, the Subject shall have the right to require INFOBALT to erase personal data related to the Subject, when the person does not consent or withdraws its consent for data processing (the right to be forgotten), except cases when INFOBALT is unable to erase data of the Subject due to its necessity for the performance of activities or due to obligatory execution of legal acts;

8.1.6. The Subject shall have the right to withdraw its consent when such processing is carried out with its consent (e.g. regarding the use of an image), by submitting a request to office@infobalt.lt or to the INFOBALT administration directly.

8.1.7. The Subject shall have the right to be informed about any data security breach (incident) that has endangered and/or prejudiced Subject's rights and freedoms. INFOBALT shall undertake to notify the Subject by email (if it is known to INFOBALT) or to publish a notification about the incident on the Website within 72 hours of becoming aware of the threat and/or the damage to the data of the Subject (e.g. the server of INFOBALT has been hacked into, etc.); If the Subject disagrees with the actions by INFOBALT or its omission, it shall have the right to lodge a complaint with the State Data Protection Inspectorate. Tel. (8 5) 271 28 04, (8 5) 279 1445, email: ada@ada.lt).

8.2. Any inquiries and requests regarding the Subject data need to be send to INFOBALT by email office@infobalt.lt. The Subject may also submit the request to the INFOBALT administration directly. In all cases, both by sending the request by email and submitting the original request, a representative of INFOBALT accepting the request shall have the right to request an identification document or a certified copy of the document.

8.3. INFOBALT shall respond to requests and inquiries of the Subjects no later 30 days after its receipt (in cases provided for in relevant legal acts, the term may be extended).

9. Policy coming into force and its amendments

9.1. The Policy shall come into force on April 12, 2022.

9.2. Any changes to this Policy shall be published on the websites.

10. Contact information

10.1. The Subjects may submit questions, comments, and requests regarding the Policy by email office@infobalt.lt.