

UAB iTree Lietuva Privacy Policy and Data Subject Rights Statement

1. Purpose and scope

This Policy determines the main principles of privacy and rules, which are applied by UAB iTree Lietuva in general.

This Policy covers information about the data controller(s) and data processor(s), and the data protection officer, the business purpose and legal basis for processing, categories of personal data, information about data recipient(s), details of transfers to third countries, data protection controls, retention periods or criteria used to determine the retention period, information about data subject's rights, and the sources of the personal data.

2. Terms and definitions

GDPR – 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 and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

PII – personally identifiable information

Supervisory authority – an independent public authority which is established by a Member State pursuant to GDPR Article 51

Other terms and definitions used in this policy have the same meaning as in International standard ISO/IEC 27000 "Information technology - Security techniques - Information security management systems-Overview and vocabulary".

3. Policy

UAB iTree Lietuva shall process personal data lawfully, fairly and in a transparent manner in relation to the data subject and shall collect PII only for specified, explicit and legitimate purposes. Personal data shall be

- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed,
- accurate and kept up to date and in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed,
- protected with appropriate technical or organisational controls.

3.1. About UAB iTree Lietuva

UAB iTree Lietuva is a data controller and processor of personal data.

Main contact details of UAB iTree Lietuva:

Company Code: 302249829 registered in the Lithuanian State Enterprise "Centre of Registers"

Address: Konstitucijos pr. 7, Vilnius Lithuania

Telephone: +37052487506

E-mail: infolt@itreegroup.eu

3.2. Purposes and legal basis for data processing

UAB iTree Lietuva process the following personal data for the purposes listed below:

PII	Purpose of data processing	Legal basis
Personal data on employees and former employees.	Human resources management and compliance with regulations	Employment and other applicable laws and regulations
Personal data on prospective employees.	Hiring process	Employment and other applicable laws and regulations
Personal data on customers and customer representatives.	Service Delivery management	Contracts and work orders from customers.
Personal data on employees of contractors	Service Delivery management	Confidentiality and secrecy requirements enshrined in applicable laws, regulations and contractual agreements.
Data of customers included in the information systems we develop and maintain.	Service Delivery	Contracts and work orders from customers. Data processing agreements with customers.
Personal data of prospective customers	Sales	Consent of the data subject when submitting an enquiry about our services.

3.3. PII actors

Information about who controls, processes, provides and gets personal data:

PII	Data controller	Data processor	Data provider	Data recipient
Personal data on employees and former employees.	Finance director	Office administrator	Employee	Lithuanian government agencies, accounting services providers
Personal data on prospective employees.	Office administrator	Office administrator	Prospective employee	Hiring team (internal)
Personal data on customers and customer representatives.	Director	Project manager of that particular project	Customer authorised representatives	Project team

Personal data on employees of contractors	Finance director	Office administrator	Authorised representative of the contractor	Customer (if required by contract)
Data of customers included in the information systems we develop and maintain	Director	Project Team	Customer	Data returned to customer at the end of the project. No external recipients.
Personal data of prospective customers	Director	Sales Director	Prospective customer	No external recipients.

3.4. PII source and retention period

Information about how long personal data is stored and from where this personal data is collected:

PII	Source	Data retention
Personal data on employees and former employees.	Employees and the State social insurance fund board of Lithuania	As required by employment law in Lithuania.
Personal data on prospective employees.	Prospective employees	If the employee is hired, the personal data is retained according to the requirements of employment law in Lithuania. Data on candidates who are not hired is deleted at the end of the hiring process, which takes no longer than 60 calendar days.
Personal data on customers and customer representatives.	Authorised representatives of the customer	Data is retained in accordance with the financial accounting standards of Lithuania. Unneeded data is deleted at the conclusion of service provision.
Personal data on employees of contractors	Authorised representatives of the contractors	Data is retained in accordance with the financial accounting standards of Lithuania and applicable confidentiality agreements with our customers.
Data of customers included in the information systems we develop and maintain	Authorised representatives of our customers.	Data is retained only for the period it is needed for service delivery. Personal data in information systems we maintain or develop is deleted at end of our contractual relationship with that customer.
Personal data of prospective customers	Prospective customers	Data is retained for the duration of the sales process and/or until the customer request removal of this data.

3.5. Personal Data Protection Controls

UAB iTree Lietuva applies these technical and organisational controls to ensure appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage:

1. Identity and access management processes ensure that only those who have a legal basis for accessing personal data may access that personal data. Information systems are protected by robust firewalls, encryption and user identification systems. Physical access to data is controlled by a personal electronic keycard access system matching the access rights of employees and contractors to enter areas of our offices where personal data is stored.
2. Data loss prevention processes ensure that both electronic and hardcopy data is securely backed up. The level of protection for backups is maintained at the same level as for the original data.
3. Where possible, personal data is pseudonymized (in the case of test data required for information system development and maintenance). All data is encrypted by default.
4. Incident response plans are in place covering the preparation for, identification of, containment and eradication of incidents involving personally identifiable information. These plans include recovery and lessons learned.
5. Third-party risk management is applied to all contractors and other third parties who may have access to personal data. UAB iTree Lietuva requires contractors and other third parties to have at least the same level of protection as we do in order to participate in data processing activities.
6. Policies and applicable laws and regulations are reviewed no less than annually and updated as required.

Data is stored only on our own servers and in servers co-located at our hosting provide UAB Baltnetos Komunikacijos in Lithuania. No data is transferred outside of the EU.

3.6. Rights of the data subject

An individual (data subject) has the right to access his or her personal data, processed by the UAB iTree Lietuva and to obtain information, free of charge once per year, on the sources and the type of personal data that has been collected, the purpose of processing and the data recipients to whom the data are disclosed or have been disclosed and other information according to GDPR Article 15.

An individual must provide an identity document, or verify his or her identity according to applicable laws, or through electronic means of communication, which provide reliable identification of the person, to verify his or her identity.

UAB iTree Lietuva shall reply not later than 30 calendar days from receipt of the request in writing and shall provide the requested data or justification for the refusal to grant the request of the data subject. Upon the request of the data subject, such data must be provided in writing.

If the data subject finds out that his personal data is incorrect, incomplete or inaccurate, he or she must contact UAB iTree Lietuva (in writing, by e-mail, via websites or any other form). UAB iTree Lietuva then must check such data and rectify the incorrect, incomplete and inaccurate personal data without delay and/or suspend processing of such personal data, except storage. UAB iTree Lietuva may keep archive copies of such data, if it is necessary to fulfil contractual obligations to the data subject, and / or if it is required by applicable law (for accounting purposes, cybercrime investigation, etc.)

An individual may appeal against any actions of the company, acting as data controller and/or processor, to the appropriate supervisory authority according to GDPR Article 77 and 79.