

PRIVACY POLICY

This Privacy and Cookie Statement was last updated on 29th of October 2019.

Primus Derling – Derling Primus law alliance collects personal data and uses cookies. **Primus Derling – Derling Primus** law alliance is committed to upholding its customers' privacy and we strictly abide by privacy laws and regulations. This means that your personal data is safe in our hands and is used in a proper manner. In this privacy statement, we will explain what we do with your personal data.

If you have any questions about the types of data that we monitor, please get in touch with **Primus Derling – Derling Primus** law alliance using the contact details at the bottom of this Privacy and Cookie Statement.

Purposes of the data processing

Your personal data is processed for the following purposes:

- to provide access to our website;
- to allow use of the features on our website;
- to enter into and implement agreements relating to our various services;
- to provide a login environment, which allows you to review your choices;
- to contact you, if you have indicated you wish to be contacted;
- to gain insight into how our website is used;
- to improve and evaluate our website and services, including through customer satisfaction surveys;
- to process potential participation in competitions, promotional campaigns, loyalty programs and other matters;
- to identify out target group and corresponding interests, for example, in order to make our offers more attractive to you by showing advertising that matches your interests through both our own websites and third-party websites;
- to send you (one of) our general and/or personalized newsletters, if you have subscribed to such newsletters.

Your personal data will not be processed for any other purposes than those outlined above, unless you have given us permission in advance to do so or unless this is required under the agreement, which we entered into with you, or unless we are permitted or required to do so by law.

Categories of personal data

We use the following data for the purposes referred to in the Privacy and Cookie Statement:

name and address details;

- date of birth;
- nationality;
- sex;
- email address;
- telephone number;
- customer reference number;
- household composition;
- login details for our website (email address and password);
- information about the services you have chosen;
- IP address;
- cookie IDs;
- any personal details that you have provided as the content of a message, for example, via Facebook, the contact form, online chat or via social media;
- any medical details you have provided when using our services.

Provision of your personal data to third parties

We do not share your personal data with third parties without your prior consent or unless this is required for the execution of our services, or unless we are permitted or required to do so by law. We may provide your personal data to the following companies who process that data on our behalf:

- external ICT service providers;
- the parties that provide the cookies, see below.

We have written agreements in place with these companies on how your personal data is handled, what they are allowed to do and what they are not allowed to do.

In addition, we may also share your personal data with third parties who independently determine how your personal data is handled. We are not able to influence the way your personal data is used by these parties, given that they independently determine the data processing purpose as well as who they, in turn, share that data with. These may include the following companies:

- payment services (if you make payments through our company);
- claim (if you submit a claim as a result of difficulties you experienced with any services);
- companies administrating claims for provided services;

We may be required to release your personal data to government agencies in countries outside your country of residence. The legislation in some countries may force us to access your personal data or other provided information. This will involve releasing information we have about you and your services to the competent institutions and state authorities that are entitled to receive such data. In addition, under the legislation applicable in various countries, our company is obliged to collect your ID data and corresponding details. If necessary, we provide that information to the competent the institutions and state authorities. In addition, we will release your personal details to government agencies as required by the applicable law.

Emails

We send several types of emails from our company. These emails have been split into two categories: service notifications and newsletters.

Service notifications

These emails are only used to notify you of any important changes taking place or updates related to the services you have ordered or purchased from us. Notifications may relate to disasters, changes to your chosen services, important supplemental information, account confirmations for our company, changes to our terms and conditions, and terminations of collaborations with partners that are relevant to your chosen services.

Newsletters

If you have given us prior consent for this, we will send you our newsletter to keep you up to date of our latest offers, promotions and various services. Our newsletters are put together based on your personal data, such as previous services you have ordered or purchased, surfing behaviour and click behavior on our website and within our newsletter. In order to identify your click behavior within our newsletter, we make use of invisible codes, if you have consented to our doing so separately. These codes allow us to monitor how many subscribers read our newsletter and what stories our subscribers click on. This allows us to make the newsletter more attractive for you. If you no longer wish to receive our newsletters, please unsubscribe. The option to unsubscribe is provided at the bottom of each newsletter.

Competitions

If you take part in a promotional campaign or competition, we will ask you to provide a number of personal details, such as your name, address and email address. In addition, we ask for your permission to allow the processing of that data, possibly by third parties, for the purposes of the promotional campaign/competition and so we can conduct analyses based on the information that was collected. This allows us to carry out the campaign and announce the winner(s) of the competition. We also use that data to measure the response to our campaigns.

Supplementing of your personal data, profiling and personalized ads

We are able to combine the personal data we receive from you through the various channels. For example, we

are able to combine the information we collect about you online (such as via an online login or acceptance of cookies) with information that we have received from external sources. We are able to combine all that data based on the consent you provided, which allows us to develop a customer profile of you. These customer profiles are spread across a number of categories so we can analyze your interests, for the purpose of personalizing the products we offer to you even further by way of personalized advertising through various channels, including newsletters, our website(s) and third-party websites.

Retention periods

We retain your data no longer than is necessary to achieve the purposes stated in this Privacy and Cookie Statement. We maintain the follow retention periods:

- newsletter: until termination;
- choices and purchase: as stipulated by law;
- insurance: as stipulated by law;
- chat conversations: 1 year;
- company (login details + data provided after login): to terminate my environment;
- customer satisfaction surveys: 1 month after conclusion of the research;
- competitions: to pay to the winner (s).

For the retention period of our cookies, we would kindly refer you to the Cookies section of this Privacy and Cookie Statement.

Security

We take appropriate security measures to limit and prevent the misuse of, and any unauthorized access to, your personal data, thereby ensuring that only the necessary parties have access to the data, that access to the data is protected and that our security measures are regularly checked. In addition, we use special certificates (TLS) to ensure the safe transfer of your data and secure communication.

Cookies

Our website uses cookies and similar technologies whereby a small text file is sent to your computer, tablet and/or mobile phone and stored there when you visit our website. All information stored in that file is then sent back to our own secure servers or those of the relevant third parties when you visit the website next. For the reader's convenience, we will refer to all such techniques here as 'cookies'.

The following types of cookies are used on our website:

- designed to enable the features of the website (technical and functional cookies);
- designed to analyze use of the website and improve the website based on that data (analytical cookies);
- designed to make our offerings to you more attractive by showing you advertising that matches your interests (advertising cookies);
- designed to allow you to email, print or share a page on social media networks (social media cookies);
- designed to enable the extra features of our website (miscellaneous cookies).

You can view and change your cookie settings at company's website.

Enabling and disabling cookies

You can set your browser to accept the storage of cookies only if you agree to do so. Please consult the manual of your web browser for more information on this topic. Please note that many websites will not function optimally if you have disabled cookies.

Deleting cookies

A lot of cookies have an expiry date. If the cookies have been given an expiry date, they will be automatically removed once the expiry date has lapsed. You may also opt to delete cookies manually before the expiry date

has lapsed. Please consult your browser's user guide for this purpose.

Third-party websites

This privacy and cookie statement does not apply to third-party websites that are connected to our web page through links. We cannot guarantee that these third parties will handle your personal data in a reliable or secure manner. We therefore recommend that you read the privacy statements relating to these websites before using them.

Your privacy rights

If you have any questions regarding what personal data we have collected from you, please do not hesitate to get in touch. Please see the contact details at the bottom of this Privacy and Cookie Statement. Under current privacy laws, you have the right to:

- receive an explanation of what personal data we have collected about you and how we use that data;
- access the specific personal data that we have collected;
- have any errors rectified;
- have outdated personal data erased;
- withdraw your consent;
- object to a specific type of use of the data;
- the transfer of data.

Please always ensure that you make your identity clearly known, so we, in turn, can ensure that we do not modify or delete the data of the wrong person.

Complaints and the Lithuanian Protection Authority

You can submit a request/complaint regarding a service purchased on our website to the State Consumer Rights Protection Authority (Vilniaus 25, 01402 Vilnius, e-mail: tarnyba@vvtat.lt, tel. +370 5 262 67 51, online: www.vvtat.lt; territorial subdivisions: [/index.php?470187665](http://index.php?470187665)) or fill in an application form in the EGS platform at <http://ec.europa.eu/odr>

Changes to this Privacy and Cookie Statement

We reserve the right to make changes to this Privacy and Cookie Statement. Any changes will be published on this website. We therefore recommend that you check this Privacy and Cookie Statement regularly to ensure that you are aware of these amendments.

Contact details

If you have any questions regarding your privacy and our Privacy and Cookie Statement, please include them in an email to vilnius@primus.legal or a letter sent to the following address:

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