

# PRIVACY POLICY

This Privacy policy (hereinafter – the “**Privacy Policy**”) provides the rules, requirements and conditions on collecting, storing, using and disclosing Personal Information submitted through domain or any of its sub-domains (hereinafter – the “**Site**”). This Privacy Policy is an integral and inseparable part of Site Usage Policy of Site. Privacy Policy forms a part of the contract concluded between the User and the Owner. Please note that the definitions used herein have the meaning described in the Site Usage Policy of the Site, unless provided otherwise.

This Privacy Policy is effective as of [2019-08-27].

## 1. GENERAL

- Owner is responsible for, and is the Data Controller of your personal information that it receives through the Site.
- All Personal Information are processed in accordance with the General Data Protection Regulation (EU) 2016/679, Law on the Legal Protection of Personal Data of the Republic of Lithuania and other legal acts.
- This Privacy Policy applies to all Users which use the Site or Site Services.
- By browsing the Site or using Site Services, you agree with Site Usage Policy of the Site, including the terms of this Privacy Policy and you expressly consent to the processing of your Personal Information according to this Privacy Policy.
- Whenever User submits its Personal Information through the Site, Owner shall not exclusively ask for the permission to collect, store, use and disclose Personal Information in accordance to this Privacy Policy.
- Failure to provide Owner with the Personal Information required will negatively affect Owner’s ability to communicate with you, and ability to provide you with Site Services as well as to conclude contractual relationship between you and the Owner.
- Owner may update this Privacy Policy from time to time in order to reflect changes according to privacy practices or for other operational, legal, or regulatory reasons. However, if there are any changes to the use of Personal Information that is different from that stated at the time of collection, Owner will notify Users by posting a notice on the Site, and where appropriate, by other means. Therefore Users shall read any such notice carefully. If User do not wish to continue using the Site or Site Service under

the new version of the Privacy Policy, such User may cease the usage of the Site and Site Service immediately.

## **2. COLLECTION OF PERSONAL INFORMATION**

- Each time when you are visiting the Site, the servers of Owner temporarily store information about the accessing agent in a log file. In the course of this procedure, the following data is automatically collected and stored, without any action on your part, until the time of automatic deletion: the IP address of the accessing computer, the date and time of access, the web page name and URL, the website from which access is made, the operating system of your computer and the browser used by you as well as other technical data, the name of your internet access provider, your language configuration and geographical origin (other related technical data may be collected and stored as well). The data is collected and processed for the purpose of enabling the Users to use the Site, to enable the technical administration of the network infrastructure and the optimization of the Site Services as well as for internal statistical purposes. Also, the IP address may be analyzed and used in case of breach of Site Usage Policy of the Site, attacks against the Site infrastructure and for statistical purposes and in other cases, if prescribed in this Privacy Policy.
- When you voluntarily submit inquiry, submit contact form, submit RFQs or use any other services provided on the Site, Owner may collect and store the following Personal Information (if the User submits such data):
  - Your first name and last name, company name, email address, phone/fax number, physical contact information and other personal information that identifies you;
  - For issuance and acceptance of invoices, financial information, such as credit card or bank account numbers and other financial information you provide. By using Site, you acknowledge and agree that internet transmissions are never completely private or secure;
  - additional information from you or about you in other ways not specifically described here (for example, information related to your contacts with Owner, storing results when respond to a survey, etc.);

- any other information you provide or you are required to provide on the Site, including but not limited to the ability to receive promotional offers from Owner.
- Unless other provisions of this Privacy Policy provide for different method of your acceptance with use, collection and storage of Personal Information, you shall note additionally, that when you intentionally provide Owner with any Personal Information through the Site and/or Site Services available on the Site (e.g. by submitting Item information or RFQs, filling on-line forms, etc.) you automatically consent to the use, collection and storage of Personal Information as indicated in this Privacy Policy.
- Owner reserves the right at any time in the future to include other optional requests for information from the Users to tailor the Site and deliver personalized information to the Users.

### **3. MARKETING AND ONLINE SURVEYS**

- Owner does not make Personal Information available to third parties for their use and also does not sell the data to third parties for their marketing purposes without Users' explicit consent.
- Upon your explicit consent, your email address may be used to receive marketing communications about the Site, available Site Services, current promotions, newsletters, advertising and other.
- Whenever User receives a marketing e-mail (i.e. any marketing communication about the Site, available Site Services, current promotions, newsletters and other) from Owner, User will generally be provided with an automated way to opt out (unsubscribe) from that particular communication or from all marketing e-mails sent by Owner. In this regard, Users should follow the instructions on the email which they receive to opt out. Once the User unsubscribes he/she will not receive any marketing communication from Owner unless User express its explicit consent.
- You may not opt out of receiving administrative communications from Owner regarding the Site and the Site Services. In addition, you may not opt out of Owner sending you legal notices related to the Site and the Site Services.
- Owner may conduct you surveys to collect information about your preferences. These surveys are optional and if you choose to respond, your responses shall be kept anonymous, unless in particular case it is stated otherwise.

#### **4. USAGE OF PERSONAL INFORMATION**

- The main purpose for collecting Personal Information is to provide Users with safe, smooth, efficient and customized services on the Site as well as Owner may use your Personal Information to:
  - provide the Site Services available on the Site and User support if requested;
  - develop and deliver products and/or services upon Users request (if available on the Site);
  - offer other products and services;
  - resolve troubleshooting problems;
  - improve the Site Services to meet the needs and the preferences of the Users;
  - prevent, detect and investigate potentially prohibited or illegal activities on the Site;
  - customize, measure and improve Site Services, content and advertising;
  - fulfill legal and regulatory requirements;
  - inform about the Site Services upon your consent deliver targeted marketing and service updates;
  - for other purposes described in this Privacy Policy, or indicated when the Personal Information is collected.
- Following this Privacy Policy Owner may also use Personal Information for its own internal purposes, including but not limited to contacting Users via email or phone call to inform you about updates to the Site Services and provide you with information relating to e-commerce transactions that may be conducted on Site.
- Owner will ask your consent before using Personal Information for a purpose other than those that are set out in this Privacy Policy.

#### **5. DISCLOSURE OF PERSONAL INFORMATION**

- Owner shall not disclose your Personal Information to any third party without your prior consent or respective legal grounds unless otherwise stated herein. Owner may disclose your Personal Information to respond to legal requirements, enforce its policies, reply to provided claims or other content, that violates the rights of other third parties or protect anyone's rights, property or safety. Such information will be disclosed in accordance with applicable laws and regulations.
- Under this Privacy Policy you agree that Owner may also share your Personal Information with:

- third party contractors and/or partners who work on behalf of or with the Owner to provide you with Site Services, to help the Owner to communicate with you or to maintain the Site;
  - other service providers under contracts concluded with the Owner, who help with Owner's business, Site Services or operations of the Site;
  - other third parties to whom you explicitly ask us to send your Personal Information;
  - the parent company of the Owner (AB Avia Solutions Group, entity code: 302541648, address: Smolensko g. 10-100, LT-03201 Vilnius, Lithuania), its affiliates or associated companies, any subsidiaries, joint ventures, officers, employees, agents, licensors, business partners;
  - other business entities, in case of merger or acquisition of the Owner or transfer of Site or assets. In such case the Owner will require that the new entity will follow this Privacy Policy with respect to Users' Personal Information. If your Personal Information will be used contrary to this Privacy Policy, you will be given the prior notice and we will seek your consent accordingly;
  - law enforcement authorities or government agencies or for other regulatory purposes.
- The Owner through the Site and Site Services is providing global services to its Users. Therefore, your personal information may be accessed by our staff, agents or contractors from a country outside the European Economic Area (EEA) for any of the purposes set out, in which data protection laws may be of a lower standard than in the EEA. However, the Owner will ensure that any of your information that is accessible outside the EEA is handled subject to appropriate safeguards. The Owner will take reasonable measures to ensure that the recipients of the data handle your data in accordance with the mandatory legal requirements (including, if necessary, the conclusion of data transmission agreements in accordance with the standard data protection conditions approved by the European Commission.
  - The Owner will use certain service providers (data processors) for processing your Personal Information. Such data processors are AB Avia Solutions Group (entity code: 302541648, address: Smolensko g. 10-100, LT-03201 Vilnius, Lithuania), UAB Baltnetos komunikacijos (entity code: 125145862, address:

Panerių g. 26, LT-03209 Vilnius, Lithuania) and Telia Lietuva, AB (entity code: 121215434, address: Lvovo g. 25, LT-03501 Vilnius, Lithuania) as well as other an IT-related service providers.

- Subject to your explicit consent to receive any marketing communication about the Site, available Site Services, current promotions, special offers, product launches, newsletters, the Owner may share your personal information with as well as other direct marketing service providers.

## 6. PROTECTION OF PERSONAL INFORMATION

- The Owner is committed to protecting our Users' Personal Information. The Owner is using reasonable and adequate administrative, physical, technical and procedural measures and methods to safeguard Personal Information in our possession against loss, theft, and unauthorized use, misuse, illegal disclosure, modification and destruction.
- Please note that, although we make reasonable efforts to protect your Personal Information, with current technology, **Owner cannot and does not guarantee** the security of your Personal Information as well as any other information that is delivered, received or otherwise used through the Site and Site Services as it is delivered or collected using the internet, which means that such information may be read or intercepted by others, even if there is a special notice that a particular transmission is encrypted. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, the Owner cannot guarantee the absolute security of your personal information.
- With the exceptions described in this Privacy Policy, Owner also cannot and does not guarantee the privacy and security of your Personal information shared through the Site with other Users (if available).

## 7. COOKIES

- Site uses cookies to enable the Owner to improve Site service and to provide certain features that you may find useful ([click here for the Owner's Cookie Policy](#)). This may include cookies of media and advertising partners that are being placed on your computer when visiting Site.
- Cookies are small text files that are transferred to your computer's hard drive through your web browser to enable us to recognize

your browser and help us to track Users to our Site; thus enabling us to understand better the products and services that will be most suitable to you. A cookie contains your contact information and information to allow us to identify your computer when you travel around our Site. Most web browsers automatically accept cookies, but, if you wish, you can set your browser to prevent it from accepting cookies. For more information how to set up your web browser please visit [. However, the cookies we use do not detect any information stored on your computers.](#)

- For more information about cookies and how to stop cookies being installed visit the following website:

## **8. THIRD PARTIES**

- Except as otherwise expressly provided in this Privacy Policy, this document addresses only the use and disclosure of information Owner collects from Users throughout the Site. If you disclose your Personal Information to others, whether they are Users or other third parties on the Site or other sites throughout the internet, different rules may apply to their use or disclosure of the information disclosed to them.
- Owner does not control privacy policies of third parties and you are subject to the privacy policies of those third parties where they are applicable.
- Owner is not responsible for privacy policies or the content of any other websites to which any of the Site's links or which link to the Site. By clicking on a link, logo or the other item, or using certain services available on the Site, including the online communication services, please note that you may no longer be on the Site.

## **9. TERMS OF STORAGE OF PERSONAL INFORMATION**

- Owner shall have the right to store User's Personal Information from the moment such information becomes available to the Owner.
- Owner shall have the right to store the User's Personal Information from the time of User's last visit in the Site for the period not exceeding 1 (one) year which is necessary to achieve all and any goals for collection of Personal Information indicated in this Privacy Policy.
- Notwithstanding the above, Owner reserves the right to store Personal Information for longer or shorter time period in order to comply with laws, prevent fraud, resolve disputes, troubleshoot

problems, assist with any investigations, enforce rights under the Site Usage Policy and take all and any other necessary actions permitted by applicable laws.

## 10. **CHILDREN**

11. The Owner does not knowingly collect information from children under the age of 16 and does not target its Site to children under 16. The Owner encourages parents and guardians to take an active role in their children's online activities and interests. If the Owner learns that a child under the age of 16 has submitted Personal Information on Site without parental consent, the Owner will take all reasonable steps to delete such information from our databases and not to use such information for any purpose (except where necessary to protect the safety of the child or others as required or as allowed by law). If you become aware of any Personal Information we have collected from children under 16, please contact us at **USER'S RIGHTS**
- With respect to your Personal Information you have the following rights:
    - to access to your Personal Information;
    - to require to erase your Personal Information (right to be forgotten);
    - to require to rectify inaccurate or incomplete Personal Information;
    - to restrict processing your Personal Information;
    - to request to transfer your Personal Information to other third party;
    - In case your Personal Information is processed under your consent you have a right at any time to cancel your consent you gave to the Owner.
  - For the purpose to fulfil your request and enforce your rights you must provide the Owner with the following documents:
    - A signed request;
    - A copy of your passport or national ID, so that we can verify your identity;
    - A signed authority from any third party whose data you request on their behalf.
  - If you are unsatisfied with the reply received from the Owner or you deem your Personal Information is being processed unlawfully, you may refer your complaint to the State Data



Protection Inspectorate of the Republic of Lithuania and submit a complaint thereon.

## 12. **DISPUTE RESOLUTION**

The rules applicable with respect to the issues of an applicable law and dispute resolution are indicated in the Site Usage Policy.

## 13. **CONTACT**

To report a violation of the Privacy Policy, to submit a question or in case of necessity of assistance regarding the Privacy Policy or practices, please contact Owner Customer Support Service as follows:

Email: [raj.kumar\\_cs19@gla.ac.in](mailto:raj.kumar_cs19@gla.ac.in)

Phone: 7764904152