

## **PRIVACY POLICY**

Lifosa AB (hereinafter – the Company) shall carry out processing of personal data in accordance with the requirements of EU General Data Protection Regulation No 2016/679 and the laws of the Republic of Lithuania regulating protection of personal data and related other legal acts, and the instructions of the supervisory authorities.

The Company values and protects the privacy of individuals, therefore this Privacy Policy (hereinafter – the Policy) sets out the principles applicable to the Company and its website for the collection and use of information related to personal data, as well as the Company's general provisions for personal data protection.

This Company Policy shall apply in cases where the Company is provided with any type of information that contains personal data, when any correspondence, commercial offers or other economic financial activities are carried out, and when individuals visit the Company's website. This Policy is also intended to inform the persons in the Company about other personal data processing operations performed by the Company and the main provisions aimed at ensuring the privacy of data subjects.

### **PROCESSING OF PERSONAL DATA BY THE COMPANY**

In order to ensure responsible processing of personal data, the Company shall process your personal data for the following purposes:

- when the processing is necessary for the performance of the contract or before the conclusion of the contract (when the processing is related to the existing employment relationship and/or personnel selection, job application);
- when the processing of data is necessary to fulfil the legal obligation of the Company to provide data and information about the Data Subject to state authorities and to ensure the safety and health of employees (when collecting data on the size of the Data Subject's work clothes, special clothing, protective equipment and footwear, etc.);
- when the processing of data is necessary in order to protect the vital interests of the Data Subject or another natural person (surrounding residents) due to a possible danger due to the Company's activities, such as explosion, ammonia spillage, contamination, etc.;
- when the processing of data is necessary for the legitimate interests of the Company or a third party in order to ensure the protection of the Company and its assets, security of technological processes, occupational safety and health, internal administration, etc.;
- when the Data Subject has consented to the processing of his/her Personal Data for one or more specific purposes.

### **What personal data are collected and processed?**

The Company collects and processes the following categories of personal data:

- basic data required for the above purposes: name, surname, personal identification number and date of birth, contact details, etc.;
- data necessary for the performance of works, provision/receipt of services or sale/purchase of goods: personal data contained in contracts and in contract-related and accounting documents, other data related to the economic and financial activities of the Company;

- data generated using electronic means of communication (telephone number, IP address, e-mail address, etc.);
- video data recorded by the Company's video surveillance equipment on the Company's territory;
- other data which are collected with the consent of the Data Subject and which are detailed at the time the consent is requested.

#### **What are the legal grounds for collection of personal data?**

- The Company may collect your personal data only on legal grounds specified in regulatory enactments, in order to ensure the contractual relationship between the Company and employees, purchase/sale of goods and services, and ensuring other economic and financial activities of the Company.
- Your consent is another ground on which the Company may process your personal data.
- The Company may process your personal data in compliance with legal obligations established by legal acts (provision of data to state authorities).  
The Company shall take all possible measures to ensure that personal data are processed accurately, fairly and lawfully, that they are processed only for the specified purposes, in accordance with the requirements for the processing of personal data established by legal acts.

#### **How long will your data be stored?**

- The Company shall store your personal data no longer than required by the purposes of data processing or provided by law.
- The Company's documents containing personal data shall be processed and stored in accordance with the terms of archiving and retention of documents regulated by the legal acts of the Republic of Lithuania and local legal acts.
- Curricula vitae (CVs) of persons applying for vacancies shall be processed by the Company with their consent and may be stored for a period of 10 years.
- The data of the video surveillance system of the Company's territory and premises shall be stored on the Company's server for 10 days and deleted automatically.
- Inactive users of the working time and entry/exit control systems for persons and vehicles shall be automatically deleted after one calendar year.

#### **To whom does the Company provide or may provide your personal data?**

- The Company may provide your personal data to those data processors who perform certain tasks in the Company and provide services to the Company (information technology companies that process data to ensure the development, improvement and maintenance of information systems, companies that provide legal, audit and financial services, as well as security and other services).
- To sellers/buyers, manufacturers, logistics, mail and parcel delivery companies, when it is related to the economic and commercial activities of the Company.
- To law enforcement and order authorities or state institutions in accordance with the requirements of legal acts.
- To EuroChem Group companies and partners outside the EU in accordance with the provisions of the contracts concluded between them and the Regulation.
- To other persons with your consent, when such consent is obtained due to a specific reason.

## **SECURITY OF PERSONAL DATA**

- Your Personal Data shall be handled by the Company in a responsible and secure manner. During the processing of personal data, the Company shall implement the technical and organisational measures of data protection established by legal acts in order to protect your personal data processed from illegal or accidental disclosure, destruction or loss, and from any other illegal processing.
- The Company has established restrictive access to personal data (only employees of the respective positions are assigned to process certain personal data and only for the purposes of the Company's activities). The Company's employees undertake not to disclose or disseminate information received in the workplace pertaining to the Company's employees, partners, customers and visitors.
- The security measures for personal data shall be determined taking into account the risks that may arise from the processing of personal data.

## **DATA COLLECTED ON THE COMPANY'S WEBSITE**

- The company has its own website [www.lifosa.com](http://www.lifosa.com). When visiting the website, visitors leave their personal data – computer IP addresses (IP address is a unique code that identifies a computer on networks). These automatically collected website data are managed by the Company's employees responsible for administration of the website.
- The website is protected from unauthorised access and management, and data pertaining to website visitors are protected from unauthorised use. The cookie system is not used on the website, the collected data are not used for marketing or other purposes.
- The Company's partners and service providers who provide the website content management tools to the Company may also have access to the technical records. The Company has entered into agreements with partners obliging to ensure data privacy.

## **YOUR RIGHTS AND OTHER RELEVANT INFORMATION**

### **You have the right to:**

- contact the Company with a request to provide information about your personal data processed by the Company;
- receive information on where and how the Company collected personal data, how they are processed and used, and who they are transmitted to;
- contact the Company with a request to correct your personal data (or suspend the processing of such personal data), if, upon familiarisation with your personal data, you become aware that the data are incorrect, incomplete or inaccurate;
- contact the Company with a request to delete your personal data or restrict the processing of such data (or suspend the processing of such personal data) if, upon familiarisation with your personal data, you become aware that the processing of your personal data are processed illegally or excessive personal data are processed, or that there are other grounds for deletion of personal data established by legal acts;
- refuse processing of your personal data if you believe that these data may be processed for direct marketing purposes, or if you believe that such data may be processed in prejudice to your interests or transferred to third parties;
- contact the Company with a request to prepare for transfer or transfer your personal data to another data controller, if it is technically possible;

- not to provide your personal data to the Company, however, in this case, the Company will not be able to provide the services for which you have not agreed to provide your personal data or to maintain those relationships for which your personal data are necessary.

### **Where to apply for possible violations and information?**

If you believe that your personal data are being processed in prejudice to your rights, please contact the Company's employee responsible for the protection of personal data at the contacts below. If a mutual solution cannot be achieved, you have the right to contact the State Data Protection Inspectorate ([www.ada.lt](http://www.ada.lt)), which is responsible for the supervision and control of legal acts regulating the protection of personal data. You can find out all the information about the protection of personal data carried out in the Company by visiting the Company's website at [www.lifosa.com](http://www.lifosa.com).

If you have any questions about the information provided in this Privacy Policy, please contact the Company in any way convenient for you:

- by post: Juodkiškio g. 50, LT-57502, Kėdainiai;
- by e-mail: [info@lifosa.com](mailto:info@lifosa.com) or [v.kondratjevas@lifosa.com](mailto:v.kondratjevas@lifosa.com)
- by phone: +370 347 66510;
- in person at the Company's office: Vitaly Kondratyev, the employee responsible for personal data protection.