

# KCT PRIVACY POLICY

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JSC Klaipėdos Konteinerių Terminalas (KCT or the Company) seeks to protect privacy of individuals and respects their rights. This Policy clearly and transparently declares the principles of personal data collection, use and protection applied by the Company as well as other information about the Company's approach to data protection assurance.

## PERSONAL DATA PROTECTION POLICY

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Last revision date: July 9, 2018.

JSC Klaipėdos Konteinerių Terminalas (KCT or "Company") retains information about you and your privacy. We collect, use and retain your personal data in compliance with the General Data Protection Regulation 2016/679 of the European Parliament and of the Council of the 27 April 2016 (hereinafter "GDPR") and data protection laws of Lithuania and other applicable legal regulations.

### 1. What will I find in this Policy?

In this Policy you will find answers to the main questions about how we collect, use and retain your personal data. It is important for you – please carefully read this information. This Policy may change. Therefore, we are asking you to visit the Company's website at [www.terminalas.lt](http://www.terminalas.lt) from time to time, where **you will find the latest version of the Policy.**

### 2. Who is responsible for protecting my personal data?

JSC Klaipėdos Konteinerių Terminalas  
Company code: 240854850  
Address: Minijos 180, LT-93269 Klaipėda, Lithuania  
E-mail: [info@terminalas.lt](mailto:info@terminalas.lt)  
Telephone: +370 46 355311

### 3. Why and what information do you collect about me?

We collect, use and retain such information about you, which is necessary:

- for assuring safety of health and life of your person, the Company's employees or other persons including persons present on the Company's premises as well as safety of the Company's property and public order - in cases when you are present on the Company's premises covered by video surveillance or when you want to access the Company's premises;
- for providing you cargo handling and storage services;
- for communicating with private persons or legal entities represent by you;
- for processing and managing the received inquiries, requests and claims;
- for protecting the Company's rights and interest in legal proceedings, if necessary.

You will find detailed information about it in the [Description of Processed Personal Data](#).

4. Does your website leave cookies in my personal computer or other gadgets?

Yes, we use cookies as described in our [Cookies Policy](#).

### 5. What information must I provide to you?

Please refer to the Description of Processed Personal Data – you must provide such personal data, which is necessary for us for providing cargo handling and storage services to you, which we must collect following legal requirements, or which is necessary for assuring safety of health and life of your person, the Company's employees or other persons including persons present on the

Company's premises, as well as safety of the Company's property and public order. We will not be able to provide the indicated services and you will not be able to access the Company's premises unless you provide the requested personal data.

#### **6. What is the legal background for collecting my personal data?**

- We enter into and execute contracts with you (Art 6, Part 1, b p of GDPR)
- We have a lawful interest (Art 6, Part 1, f p of GDPR)
- We have legal and regulatory obligations to collect personal data (Art 6, Part 1, c p of GDPR)

You will find detailed information about it in the Description of Processed Personal Data.

#### **7. To whom do you disclose my personal data?**

When it is permitted by the law and when it is necessary for reasons stated in the answer to Question 3, we disclose your personal data to:

- JSC "AVILURA"
- JSC security service "ARGUS"
- JSC "Ruptela"
- State enterprise Klaipeda State Seaport Authority
- Customs Department at the Ministry of Finance of the Republic of Lithuania
- State Border Guard Service at the Ministry of Internal Affairs of the Republic of Lithuania
- Seaport Police Department of Klaipeda Principal Police Commissariat
- Courts of justice, and other regulatory state institutions
- Attorneys, auditors, consultants, providers of IT services, providers of electronic communication services, insurance companies, companies providing archive services and other services to the Company.

#### **8. How long do you retain my personal data?**

As long as the information is necessary for our goals, or as long as permitted by the law. You will find detailed information about it in the Description of Processed Personal Data.

#### **9. What rights do I have?**

GDPR and other applicable legal regulations provide you the rights and stipulate the cases when you may execute them as well as the order you must adhere to and exceptions when you will not be able to do it. When stipulated by the law, you may:

- Apply to us for a confirmation that the Company uses your personal data and if confirmed, ask for disclosure of the processed data and information related to it;
- Apply to us asking to correct inaccurate or improperly used information, or to supplement it when it is not profound;
- Apply to us asking to delete the information we have about you in case we have been using it illegally;
- Apply to us asking to restrict processing of your personal data when you argue exactness of the data or disagree with processing of the data, or disagree with deletion of illegally processed data, or when you need the data for claiming, execution or protection of legal requirements;
- Declare your disagreement with use of your personal data – in case when we do it in lawful interests of the Company and/or third parties;
- Apply to us asking to transfer (receive) the data which you have provided to us by agreement or by your consent and which we process with the help of automated devices in a commonly used electronic format;
- Recall your consent to use your personal data – when we use the data based on your consent;
- Submit a claim to the State Inspection of Data Protection (see [www.ada.lt](http://www.ada.lt) )

## DESCRIPTION OF PERSONAL DATA PROCESSED BY JSC KLAIPEDOS KONTEINERIU TERMINALAS

Why do you collect information about me?	What information do you collect about me?	What is the legal background for collecting information about me?	How long do you retain information about me?
Because we assure safety of health and life of your person, the Company's employees or other persons including persons present on the Company's premises as well as safety of the Company's property and public order.	Video material.	We have a lawful interest (to assure safety of health and life of persons and safety of the Company's property and public order (Art. 6, Part 1, f p of GDPR)	30 days or until the end of investigation (in cases when investigation is performed in the established order).
	Your name and surname, identity card number, organisation you represent, your request for single-time/annual permit to the premises; single-time/annual permit to the premises, term of the annual permit to the premises, plate number, brand, model and photograph of your personal vehicle, the date/time of access to the premises and leaving the premises.	We have a legal obligation (the law obliges us to collect the information) (Art. 6, Part 1, c p of GDPR)	2 years.
	Information about your relation to the breaches of occupational safety, security and data security requirements, incidents, violations or offences occurring on the premises of the Company or addressed to the Company.		10 years or until the end of investigation.
Because we provide to you cargo handling and storage services.	Name and surname, data of personal identity document, ID number, e-mail address, signature, telephone number, communication, service provided, invoice, cash receipt, provided documents, VAT code (if the person is a VAT payer), amount payable for the services, settlement information, agreement, its number, date and place, container ID, container arrival and dispatch date, signature, represented organisation.	We conclude and execute an agreement with you for providing services ) (Art. 6, Part 1, b p of GDPR)	During the term of agreement and 2 years after the end of transaction with you.
Because we are in relationship with private persons or organizations represented by you.	Name and surname, personal ID number, address, authorization, its validity term, signature, your relation to the represented person/organization, the name of represented person, telephone number, e-mail address, communication with the Company, information about your represented person/organization, etc.	We have a lawful interest (to keep a relationship with your represented persons/organizations) (Art. 6, Part 1, f p of GDPR)	During the term of agreement and 2 years after the end of transaction with your represented person/organization.
Because you apply to us with an inquiry, request or claim	Name and surname, e-mail address, state, telephone number, subject and content of the inquiry, date of the inquiry, supplement to the inquiry, response to the inquiry.	We have a lawful interest (to respond to your inquiries) (Art. 6, Part 1, f p of GDPR)	10 years after the last application.