

PRIVACY NOTICE

1 INTRODUCTION

We, public institution Kaunas Science and Technology Park (hereinafter - the Company), take serious care of the security of your personal data (personal data means any information that is related to an identified or identifiable living person, such as name, surname, address, e-mail address, website behavior, etc.). The privacy notice below is intended for all persons who contact, work, seek to run or otherwise cooperate with the Company, use the Company's services, or otherwise provide their personal data to the Company.

This privacy notice is developed in accordance with applicable legislation and guidelines, such as the General Data Protection Regulation (hereinafter - GDPR), the national Law on Legal Protection of Personal Data, and the guidelines of the national State Data Protection Inspectorate. The purpose of the privacy notice is to specify the rights and obligations of data subjects, as well as other information that is required to be provided under the BDAR.

Company's services are not intended for children (i.e. persons under 14 years of age).

2 DATA CONTROLLER

Data controller for the personal data specified in this privacy notice is Public institution Kaunas Science and Technology Park (address: K. Petrausko str. 26, 44156 Kaunas, Lithuania, code 303562022).

3 DATA PROTECTION OFFICER

The Company has appointed a data protection officer (hereinafter - DPO) in accordance with Article 37 of Section 4 of the BDAR, who can be contacted by e-mail, email: dap@techpark.lt.

4 WHY WE COLLECT YOUR PERSONAL DATA?

Personal data is processed when:

- You provide the data by yourself, for example, for employment purposes, browsing a website or social networks, requesting information by e-mails, SMS or by post;
- The data is provided by your employer, which has a contractual or other legal relationship with the Company;
- Data is generated when you use our services;
- We receive data from other sources, which transmit them in accordance with the instructions of the authorities, etc. ;
- We request information from national social insurance fund (i.e. Sodra, credit rating companies, public registers, etc.) on the basis of legitimate interest;
- Other reasons

5 WHAT PRINCIPLES DO WE FOLLOW WHEN PROCESSING YOUR DATA?

Data processing is carried out in accordance with the following principles, as set forth in GDPR Article 5:

- a. Lawfulness, fairness and transparency principle;
- b. Purpose limitation principle;
- c. Data minimization principle;
- d. Accuracy principle;
- e. Storage limitation principle;
- f. Integrity and confidentiality principle

The Company also took appropriate technical and organizational measures to ensure compliance with the accountability obligation.

6 HOW DO WE PROTECT YOUR DATA?

We have taken organizational and technical measures in order to properly protect your data. Such measures include but are not limited to national State Data Protection Inspectorate guidelines, information security management standard ISO 27001 / ISO 27002, EDPS (European Data Protection Supervisor) and WP29 (Working Party 29) guidelines and recommendations.

Organizational measures for the protection of personal data include, but are not limited to: personal data processing policy, data subject rights implementation procedures, risk assessment, information security incident management procedures, information security policy, records of personal data processing activities, data processing agreements with data processors and data controllers, human resources arrangements, staff training, etc.

Personal data protection technical measures are implemented in accordance with the information security policy. Data processing agreement is always concluded when we work with data processors.

7 WHAT DATA DO WE PROCESS?

The Company processes the following personal data as a data controller:

Purpose of personal data processing	Personal data categories	How long personal data is stored	Legal basis for the processing of personal data
Execution of service contracts concluded by the Company	Name, surname, address, telephone number, e-mail address, order information, information on the concluded contract	10 years	Execution of a contract, GDPR Article 6 clause 1b

Job applicants	CV (<i>curriculum vitae</i>), partner / employment agency information, other information provided by the candidate	Until the end of the selection process, usually no longer than 3 months. Information may be kept for a longer period (3 years) with the consent of the data subject	Consent, GDPR Article 6 clause 1a Legitimate interest, GDPR Article 6 clause 1f
Response to requests and queries	Name, surname, telephone, e-mail email, address, message, organization represented, title, other information provided	2 years after the answer to the request	Legitimate interest, GDPR Article 6 clause 1f
Registration and organization of events, seminars, webinars, live trainings, hackatons, consultations, etc.	Name, surname, name of the organization, address of the organization, citizenship, telephone, e-mail, address, signature, correspondence with the participant (message content and metadata), training data (name, email, phone, training topic), participant's children's data if care is provided (name, food	2 years after the end of the event	Legal obligation, GDPR Article 6 clause 1c Legitimate interest, GDPR Article 6 clause 1f

	preferences, other comments chosen by the mother).		
Communication of KaunasMTP activities	Name, position, e-mail of the responsible person. email, phone number, organization name description, services provided, solution, visuals	2 years after the end of the event	Legitimate interest, GDPR Article 6 clause 1f Consent, GDPR Article 6 clause 1a
COVID-19 prevention and control measures	Name, surname, name of the organization, address of the organization, telephone, e-mail, address, message, event date and time, location	21 day after the end of the event	Legal obligation, GDPR Article 6 clause 1c
Organization of electronic training	Name, surname, name of the organization, address of the organization, telephone, e-mail. email, address, message Additional data stored in the information system, such as login name, password, login date, time, viewed material, description, IP address	5 years after the end of the project	Consent, GDPR Article 6 clause 1a Legitimate interest, GDPR Article 6 clause 1f

Registration to Company's programs	Name, position, e-mail of the responsible person. email, phone number, organization name description, services provided, location, city of registration	1 month after decision	Consent, GDPR Article 6 clause 1a
Registration for entry to Kauno MTP	Name of the organization, legal status, date of establishment, contact person (position, name and surname, telephone number, e-mail), details of the legal / natural person, activity codes, founders (holding more than 25% of shares) (name / surname / company name, number of shares held, %), description of company activities, number of employees, the need for premises in square meters, planned turnover, number of employees	1 month after decision	Consent, GDPR Article 6 clause 1a
Newsletter, notices to the technology park community about our and our partners' events, ongoing projects,	Name, surname, organization / company represented, address of the organization / company represented,	Until withdrawal of consent or objection	Consent, GDPR Article 6 clause 1a Legitimate interest, GDPR

knowledge relevant to business, science, innovators and start-ups	contact e-mail, mail address		Article 6 clause 1f
Gathering evidence for European Union funds reporting	Name, surname, organization / company represented, address of the organization / company represented, contact e-mail, postal address, photo / video material	5 years after the end of the Project	Legal obligation, GDPR Article 6 clause 1c
Video monitoring while ensuring property and personal security, incident prevention, incident investigation	Video data, date, time, location	14 days	Legitimate interest, GDPR Article 6 clause 1f
Website traffic data	Cookies collect information about page visitors Common data, collected by webserver like IP address, browser, device data, etc.	According to Google's privacy policy, Facebook privacy policy 6 months	Consent, GDPR Article 6 clause 1a
Social network traffic data	Data provided in the privacy policy	Terms specified in the social network privacy policy	Consent, GDPR Article 6 clause 1a

8 JOINT DATA CONTROLLERS

When the Company carries out activities financed by the European Union Structural Funds or the European Commission or other financing bodies together with foreign partners (in the European Union), the Company acts as a joint data controller. In such a case Company concludes joint data controller agreement. This is reported in the privacy notices posted on the websites of each such project.

9 SOCIAL NETWORKS

We may process your data on the following social networks::

- Youtube, <https://www.youtube.com/channel/UCkCUQ2XFWSfRoCUqnjFdsxA>;
- Instagram, <https://www.instagram.com/techparkkaunas/>
- LinkedIn, <https://www.linkedin.com/company/techparkkaunas/>
- Facebook, <https://www.facebook.com/techparkkaunas>

We encourage you to review the privacy policies of the following social networks:

- Youtube: <https://policies.google.com/privacy>
- Instagram: <https://help.instagram.com/519522125107875>
- LinkedIn: <https://www.linkedin.com/legal/privacy-policy>
- Facebook: <https://www.facebook.com/privacy/explanation>

10 WEBSITES

The company operates these websites:

- kaunomtp.lt (peradresuojama į techpark.lt)
- techpark.lt
- ktc.lt (peradresuojama į techpark.lt)
- stpkaunas.com (peradresuojama į techpark.lt)
- medaccelerator.lt

These websites use cookies. Cookies are text files that, with your consent, are stored in the browser of your device (i. e. computer, mobile phone, tablet) when you browse a website and collect information about your browsing.

When you first visit the website, cookies are transferred to your computer and later used to distinguish your computer from other computers, they ensure more convenient use of the website and allow us to improve the website. This is a common practice for browsing websites, making it easier to navigate the website you have already visited and simplifying access to the information published.

Cookies are used to manage your IP address, browsing information, such as areas of the website you have visited, time spent on the website, and so on.

10.1 Details about the data processed by cookies in the website <https://techpark.lt/>:

Cookie name	Purpose of the cookie	Expiry date	Basis of data processing
PHPSESSID	Visitor session identification	Until the end of the session	Legitimate interest, GDPR Article 6 clause 1f
cookiesaccepted	Records whether the user has read the cookie policy	1 month	Legitimate interest, GDPR Article 6 clause 1f
_gid	This cookie collects and updates information about the pages you visit on this website	1 day	Consent, GDPR Article 6 clause 1a
_ga	Statistical, used IP addresses and unique ID numbers. Accounting result statistical Counter accounting is done through Google analytics	2 years	Consent, GDPR Article 6 clause 1a
_gat	A statistic that limits the number of queries made through Google	1 day	Consent, GDPR Article 6 clause 1a

11 KOKIAS TEISES IR PAREIGAS JŪS TURITE?

You have the right to be informed about the rights you have:

- The right to be transparently informed. That is accomplished with this privacy notice.
- The right to be informed about the data we process, as well as to know what specific data we process. You can request a copy of your data by contacting DPO.
- The right to correct / rectify your personal data. If you notice that the data is incomplete, inaccurate - you can contact the DPO and we will investigate your inquiry. You can also request the removal of your data. We will be able to do this if there is no other legislation that obliges data to be stored.
- You have the right to request a restriction on data processing. For example, until we find out inaccuracies.
- You have the right to request the transfer of data.
- You have the right to object to our processing of your data and to withdraw your consent at any time.
- You have the right to object to automatic decision-making, including profiling, which may have significant consequences for you. At present, the Company does not apply such decision-making.

Please note that in order to exercise your rights, we will need to identify you. Also, if the volume of the information you've requested is very large, we may charge a fee for the execution of the request.

When the company acts as a data processor, we act in accordance with the instructions of the data controller and the provisions of the data processing agreement.

You are responsible for ensuring that the information you provide to us is accurate, correct and complete. If the data you provide changes, you must notify us immediately. In no event will we be liable for any damages incurred by you as a result of you providing incorrect or incomplete personal information or not informing us of any changes.

The information published on the Company's websites, its copying, reproduction, references to it are allowed only with the written permission of the Company. It can be obtained by contacting info@techpark.lt.

12 TO WHOM AND WHEN MAY WE TRANSFER YOUR DATA?

We may transfer your personal data when:

- You have consented to the transfer;
- We must do this in accordance with the law, when required by a government / law enforcement authority / pre-trial investigation authority, a court or their representatives in case of suspicion of a criminal offense, e.g. Tax Inspection Office, Register Center, Bureau of Financial Crime Investigation, Police, Dispute Commission, other.
- We use a data processor for certain data processing operations:
 - o audit firms;
 - o activities, security, processes, etc. consultants;
 - o entities providing legal and debt collection / takeover purchase services, a central mortgage institution;
 - o banks, credit unions and other financial services companies;
 - o insurance companies;
 - o companies providing information technology services;
 - o archiving service entities;
 - o accounting service entities;
 - o communication service entities;
 - o entities providing physical security services;
 - o sale, reorganization or other reorganization of the company's business or a part thereof - to the interested parties;
 - o other.

All your data is processed within the European Economic Community and is not transferred to third countries. If there is a need to transfer to other countries, we can rely on the European Commission's decision on adequacy (if the European Commission's decision ensures an adequate level of data protection in the specific country where the recipient is established and / or operates). Other mechanisms to ensure adequate data protection may also be used, such as standard contractual clauses according to personal data protection law.

13 CONTACT INFORMATION?

You can exercise your rights in a way which is convenient for you::

- By e-mail dap@techpark.lt
- By mail to K. Petrausko g. 26, LT-44156 Kaunas
- Upon arrival at our headquarters at K. Petrausko g. 26, LT-44156 Kaunas

Please note that in order to exercise your rights, we will need to identify you. If the scope of the request is unreasonable or repetitive, we may charge a fee for the execution of the request.

We will always try to find a solution that is suitable for both parties, but if our actions or omissions still raise questions for you, you can always contact the national State Data Protection Inspectorate (for more information, visit <https://vdai.lrv.lt>).

14 PRIVACY NOTICE REVIEW

We regularly review the compliance of this Privacy Notice with the law and the personal data processed by the Company.

We may update or change this Privacy Notice at any time. Such updated or amended Privacy Notice will be effective upon posting on our Website or software.

This privacy statement was last edited on 2023-10-16.