

MARKETING RULES

I. GENERAL PROVISIONS

1. The Marketing Rules (hereinafter referred to as the "Rules") of MB "Grožio ir Sveikatos Tarnyba" (hereinafter referred to as the "Company") establishes the principles, purposes and data protection requirements of the Company's marketing and advertising and related personal data processing and their implementation.

2. The Rules have been prepared in accordance with the General Data Protection Regulation (EU 2016/679) (hereinafter referred to as the GDPR), the Law on Legal Protection of Personal Data (03/07/1996, No. 63-1479), the Company's personal data protection policy and other legal acts regulating the protection of personal data.

3. The definitions that are used in the Rules:

3.1. **Direct marketing** – an activity that is intended to offer goods or services to individuals by mail, telephone or other direct means and (or) to inquire about their opinion on the goods or services offered;

3.2. **Advertising** – activities that increase the awareness of the services provided by the Data Controller using visual tools (photos, videos, etc.);

Further in the Rules, the definitions of "direct marketing" and "advertising", together will be called "marketing".

3.3. **Data controller** – MB "Grožio ir Sveikatos Tarnyba" (company code: 305541621, address: Vingio g. 27, Dauparai, LT-96169 Klaipėda district, Lithuania) – a legal entity that acts as a controller of Personal Data;

3.4. **Personal data** – information about a natural person whose identity has been established or whose identity can be identified (data subject) in the course of marketing by the Data Controller, including, but not limited to, the person's name, surname, position, image (photo), videos (footage);

3.5. **Data subject** – a natural person from whom the Company receives and processes personal data;

3.6. **Data processing** – any operation or sequence of operations performed by automated or non-automated means with personal data or sets of personal data, such as collection, recording, sorting, structuring, storage, adaptation or alteration, retrieval, access, use, disclosure by transmission, dissemination or otherwise making it possible to use them, as well as collation or combination with other data, restriction, erasure or destruction;

3.7. **Data processor** – a natural or legal person, public authority, agency or other body that processes personal data on behalf of the data controller;

3.8. **Data recipient** – a natural or legal person, public authority, agency or other institution to which personal data are disclosed, whether it is a third party or not. However, public authorities which, under Union or Member State law, may obtain personal data in the context of a specific investigation shall not be considered to be recipients of the data; when processing the data, those authorities shall comply with applicable data protection rules consistent with the purposes of the processing;

3.9. **Third party** – a natural or legal person, public authority, agency or other institution that is not a data subject, data controller, data processor, or persons who are allowed to process personal data under the direct authority of the controller or processor;

3.10. **Data subject's consent** – given by free will, specific and unambiguous expression of the will of the duly informed data subject by a statement or by unambiguous actions by which he consents to the processing of personal data related to him/ her.

II. PRINCIPLES OF PERSONAL DATA PROCESSING

4. The Data Controller shall ensure that by adopting and implementing the Rules, it aims to implement the following fundamental principles related to the processing of personal data:

4.1. Personal data are processed in a lawful, fair and transparent way in relation to the Data Subject (principle of lawfulness, fairness and transparency);

4.2. Personal data is collected for specified, clearly defined and legitimate purposes and is not further processed in a manner incompatible with those purposes;

4.3. Further processing of personal data for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes is not considered incompatible with the original purposes (principle of purpose limitation);

4.4. Personal data are adequate, relevant and only as necessary to achieve the purposes for which they are processed (principle of data minimisation);

4.5. Efforts are made to ensure that the personal data are accurate and, if necessary, are updated within a reasonable time from the fact of the change;

4.6. All reasonable measures shall be taken to ensure that personal data that are not accurate, taking into account the purposes of their processing, are deleted immediately or rectified within a reasonable time (principle of accuracy);

4.7. Personal data shall be stored in a form that can be identified by data subjects for no longer than is necessary for the purposes for which the personal data are processed;

4.8. Personal data may be stored for longer periods if personal data will be processed only for archiving purposes, for the benefit of the public interest, for scientific or historical research purposes or statistical purposes, after the implementation of appropriate technical and organizational measures necessary to protect the rights and freedoms of the Data Subject (principle of limitation of storage duration);

4.9. Personal data, taking into account the general nature of the personal data processed by the Data Controller, are processed in such a way as to ensure the proper security of personal data by applying appropriate technical or organizational measures, including protection against unauthorised or unlawful processing of personal data and against accidental loss, destruction or damage (principle of integrity and confidentiality);

4.10. The data controller is responsible for ensuring compliance with the above principles and must be able to prove that they are being complied with (principle of accountability).

III. PURPOSES OF THE PROCESSING OF PERSONAL DATA AND CATEGORIES OF DATA PROCESSED

5. MB "Grožio ir Sveikatos Tarnyba" processes personal data for the following purposes:

5.1. For conducting direct marketing;

5.2. For publicizing and raising awareness of the activities and services provided by MB "Grožio ir sveikatos tarnyba".

6. MB "Grožio ir Sveikatos Tarnyba", for the above purposes, processes the following personal data:

6.1. For the purposes of conducting direct marketing, publicizing the company's activities and raising awareness, personal data of customers and third parties:

6.1.1. Name;

6.1.2. Surname;

6.1.3. E-mail address;

6.1.4. Telephone number.

IV. RECEIPT, STORAGE AND DESTRUCTION OF PERSONAL DATA

7. The personal data specified in paragraph 6 of these Rules are received and processed only with the consent of the Data Subject:

7.1. The customer's consent to participate in the marketing of the Company is obtained directly from the customer in writing, informing the client about the collected personal data, the purposes of data use and about his rights as a Data Subject and their implementation.

8. Customers whose consent is based on the processing of their personal data for the purpose of marketing are informed that they have the right to withdraw their consent to the processing of personal data for marketing purposes at any time, without prejudice to data lawfully processed on the basis of consent before its withdrawal:

8.1. Persons who receive newsletters by e-mail or reminders / notifications by text messages may at any time withdraw their consent to direct marketing by contacting the Company directly by e-mail (info@purles.lv), as well as by clicking on the link provided in the newsletter or logging in to their personal account on the website <https://purles.lv/>.

9. Personal data processed for the purposes specified in paragraph 5 of these Rules shall be stored in accordance with the General Index of Document Storage Terms approved by the Chief Archivist of Lithuania, but not longer than required by the implementation of the personal data processing purposes specified in paragraph 6 of these Rules:

9.1. Consents to the processing of personal data – 1 year (after the end of the period of storage of personal data, the processing of which consent was given);

9.2. Contracts for supplies, works, services, acts of acceptance of goods, works and services – 10 years (after the end of the contract).

10. Personal data provided in consents, contracts and other documents are stored on the server used by the Company and / or paper versions - in the lockable office located in the Company's administration.

11. After the end of the storage period, personal data contained in the above-mentioned documents are transferred to the archive and stored in accordance with the terms specified in the Index of General Documents Storage Terms approved by the Chief Archivist of the Republic of Lithuania on the 9th March 2011 (Order No V-100), after the expiration of the deadlines – destroyed.

12. Data destruction is carried out by deleting paper copies of documents with special paper shredders, and deleting electronic versions from all programs and systems used by the Company, without the possibility of their restoration.

V. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

13. Personal data processed for the purposes of marketing activities specified in these Rules are (may be) transferred to recipients, such as:

13.1. State institutions and institutions, other persons performing the functions assigned to them by law (for example, the State Tax Inspectorate, SODRA, law enforcement agencies and other institutions performing supervision of MB "Grožio ir Sveikatos Tarnyba");

13.2. Parties managing registers and /or IT systems (where personal data are processed) or which mediate in the provision of personal data from such registers;

13.3. Companies and / or persons providing advertising, marketing services;

14. Other persons related to the activities carried out by MB "Grožio ir Sveikatos Tarnyba", such as archiving, postal service providers, Partners, Suppliers, other authorized parties related to the marketing process of MB "Grožio ir Sveikatos Tarnyba".

VI. RIGHTS OF DATA SUBJECTS AND THEIR IMPLEMENTATION

15. Data protection legislation grants data subjects whose personal data are processed for the purposes specified in these Rules the rights related to the processing of personal data:

15.1. The right to access the processed personal data: The data subject has the right to request confirmation from the Company of whether his personal data are being processed and in such cases to request access to the processed personal data. In order to exercise the specified right, the Data Subject may submit a written request to the person responsible for data protection in the Company by e-mail info@purles.lv;

15.2. The right to request the correction of inaccurate personal data: if the Data Subject considers that the information about him or her is incorrect or incomplete, he has the right to request its correction. In order to exercise the above right, the Data Subject may submit a written request to the Company by e-mail info@purles.lv;

15.3. The right to disagree with the processing of personal data: The data subject has the right to object to the processing of personal data when personal data is not processed on the basis of the legitimate interests of the Company. However, despite the data subject's objection, in case of justified reasons for the further processing of data, the Company will continue the processing of your data. In order to exercise the above right, the Data Subject may submit a written request to the Company by e-mail info@purles.lv;

15.4. The right to request the erasure of personal data (right to be forgotten): under certain circumstances, the Data Subject has the right to request the Company to delete your personal data. However, this provision shall not apply if, in accordance with the law, the Company is obliged to protect personal data. In order to exercise the above right, the Data Subject may submit a written request to the Company by e-mail info@purles.lv;

15.5. The right to restrict the processing of personal data: in certain circumstances, the Data Subject also has the right to restrict the processing of his personal data. In order to exercise the specified right, the Data Subject may submit a written request to the Company by e-mail info@purles.lv;

15.6. The right to contact the local state data protection inspectorate with a complaint about improper processing of personal data.

16. Upon receipt of a request to terminate the processing of optionally processed personal data, the Company shall, within 30 calendar days, from the request of the Data Subject, terminate the processing of such data, unless this is contrary to the requirements of the legislation, and inform the Data Subject thereof in writing.

VII. FINAL PROVISIONS

17. These Rules apply to all data subjects of MB "Grozio ir Sveikatos Tarnyba", whose personal data is processed for the purposes of marketing activities specified in the Rules.

18. The Company has the right to change / update these Rules at any time in the event of a change in the marketing process and / or legal acts regulating the activities and / or marketing of the Company. Data subjects can get acquainted with the changes in the Rules by visiting the Company or on the Company's website at the address <https://purles.lv/>.

19. These Rules shall enter into force on 31 March 2023.