

**PUBLIC LIMITED LIABILITY COMPANY “LIETUVOS PAŠTAS”  
PRIVACY NOTICE**

Valid from 1 February 2022

**I. GENERAL PROVISIONS**

1. This Privacy Notice provides main information on the processing of your personal data when using the services of Public Limited Liability Company “Lietuvos paštas”.
2. Information on the processing of personal data may also be provided in service agreements, other documents related to the provision of services or activities and on the website [www.lietuvospastas.lt](http://www.lietuvospastas.lt)
3. This Privacy Notice is available on the website [www.lietuvospastas.lt/privatumo-pranesimas](http://www.lietuvospastas.lt/privatumo-pranesimas) and in place of provision of services (post offices – Information Folder).
4. The LP EXPRESS Self-Service Privacy Notice is available at [www.lpexpress.lt](http://www.lpexpress.lt)
5. **PLEASE NOTE** that the Privacy Notice may be amended, supplemented and updated at any time. We will inform you about the material corrections in a separate message on the website [www.lietuvospastas.lt](http://www.lietuvospastas.lt) and/or in other ways. If you continue to use the services of “Lietuvos paštas” after the amendments have been made, we will consider that you confirm that you have read the amendments, supplements and updates. We encourage you to review the Privacy Notice regularly.

**II. CONTACT INFORMATION**

6. Personal Data Controller – Public Limited Liability Company “Lietuvos paštas”, legal entity code 121215587, address: J. Jasinskio Str. 16, 03500 Vilnius, e-mail: [info@post.lt](mailto:info@post.lt), tel. Nr. 1842.
7. For personal data matters, please contact the Data Protection Officer of the Company directly by e-mail [duomenusauga@post.lt](mailto:duomenusauga@post.lt) or by post, address: J. Jasinskio Str. 16, 03500 Vilnius, indicating the Data Protection Officer as the recipient.
8. **PLEASE NOTE** if you did not find the information relevant to you in this Privacy Notice, please contact the Data Protection Officer.

**III. SERVICES AND RELATED PERSONAL DATA PROCESSING**

PURPOSE	LEGAL GROUNDS	PROCESSED PERSONAL DATA	TERM
<b>Postal Service</b>			
Postal service provision	Execution of the contract (written or oral) and compliance with the legal requirements applicable to the postal service provider	Name of the sender and recipient of the parcel, registration number of the parcel, signature and, in certain cases, e-mail address, telephone number	18 months after the last action with the parcel
<b>Cash On Delivery Service</b> (postal service, when the recipient of the parcel pays a redemption fee to the sender of the parcel in the specified amount. The service consists of two parts: the postal service and the payment service - money transfer)			
Cash on delivery service provision	Execution of the contract (written or oral) and compliance with the legal requirements applicable to the postal service provider/payment service provider	Name of the sender and recipient of the parcel, registration number of the parcel, signature and, in certain cases, e-mail address, telephone number Also the bank account number of the sender of the parcel, the personal number of the recipient of the parcel, the identity document name, document data and, in some cases, document copy	Referred to the postal service – 18 months after the last action with the parcel Referred to the money transfer – 8 months after the transfer
<b>Service of submitting an international postal item for customs inspection (declaration) to the customs authorities of the Republic of Lithuania</b>			

Provision of the service of submitting an international postal item for customs inspection (declaration) to the customs authorities of the Republic of Lithuania	Execution of the contract and compliance with the legal requirements applicable to the customs broker	Name, surname and address of the sender and the recipient, information on the parcel, such as the value, weight, content, quantity, as well as real e-mails of both the sender and the recipient, telephone number or other information required for the declaration	8 years
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**Relevant additional information:**

1. A part of the personal data may be provided by the sender of the parcel, by postal service providers of other countries, and the other part - by the customer of the company, who uses the declaration service of the company and confirms the accuracy of the preliminary data of the company. These data are transferred to the customs of the Republic of Lithuania for the purpose of declaring an international postal item.
2. If you submit an application for tax recalculation related to the declaration of an international postal item, the company shall process the data provided in the application (for example, name, surname, e-mail address, parcel number, circumstances of the application for tax recalculation, bank account number to which the funds may be transferred after tax recalculation, personal number, as well as other documents required for this process) on the legal basis of the performance of the contract and the fulfilment of the requirements provided by law. These data are transferred to the customs of the Republic of Lithuania.
3. If you are declaring a gift, we may, in certain cases, ask you to provide correspondence between the sender and the recipient confirming the fact of the gift. In this case, please provide only the minimum information required for the declaration. Please do not provide unrelated, private information or personal data that is not related to the declaration.

**Subscription service**

(by ordering the service at the place of provision of services of the company, through a postman, the Company's tel. 1842 or website [www.prenumeruok.lt](http://www.prenumeruok.lt))

Subscription service provision	Execution of the contract	Name, surname, address, e-mail address, telephone number of the subscriber, subscription period, ordered publication, order amount	1 year after the service provision
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**Relevant additional information:** In order to ensure the proper execution of orders of the publication subscription service, the personal data of the subscriber (name, surname, address, subscription period, e-mail address, telephone number) may be processed together with the publisher of the subscription (the company and the publisher may be joint data controllers).

**Philatelic service** (philatelic subscription service and sale of goods in the e-shop <http://eparduotuve.post.lt/>)

Philatelic service provision	Execution of the contract	In case of a philatelic subscription: name, surname, e-mail address, address, telephone number, ordered philatelic products In case of philatelic e-shop <a href="http://eparduotuve.post.lt/">http://eparduotuve.post.lt/</a> : data of the subscriber (name, surname, e-mail address, telephone number), data of the buyer (when it does not match with the data, name, surname, e-mail, telephone number of the subscriber – with the purpose of sending an order confirmation), delivery details (address), purchased products, payment information	10 years after issue of an invoice to the customer
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**Money transfers (local and international)**

Provision of money transfer service	Execution of the contract and compliance with the legal requirements applicable to the payment service provider	For example, name, surname, personal number, identity document name, its data and its copy (when the amount exceeds EUR 600), telephone number, address, account number, bank, purpose of payment, amount, signature Specific details are given on the money transfer form for specific money transfers (local/international/cash/to account/on demand/Western Union, etc.)	8 years after making a money transfer
<b>“Know your customer” (for example, in case of a payment acceptance and administration service contract with a payment recipient)</b>			
Provision of payment services	Compliance with the legal requirements applicable to the payment service provider	Information about the customer (for example, name, surname, personal number, for a foreigner - date of birth, address of permanent residence, telephone, e-mail, citizenship), name of identity document of the customer, its details, copy, as well as information on politically vulnerable persons, information on the activities of the customer and the nature of the goods, information on the turnover of the customer, information on the beneficial owner of the funds, information on the beneficiaries (name, surname, personal number/date of birth, citizenship, number of shares), signature and other information required to identify the customer	If the “Know your Customer” form is a part of a service contract – the term of processing depends on the type of contract and is set in the legal acts
<b>Legal obligations for the payment service provider</b>			
Payment acceptance service and payment of pensions and social benefits	Compliance with the legal requirements applicable to the payment service provider	In case of payment acceptance services: for example, the identification data of the payer (for example, name, surname, payer’s code), the recipient, the amount, the date of payment, and if the payment to the recipient exceeds EUR 600 - the identity document copy  In case of payment of pensions and social benefits: for example, name, surname of the beneficiary, payer of the benefit, amount, method and date of payment of the benefit  The specific data also depends on the Company’s contract under which the services are provided	8 years after a payment
<b>Payment account service (has not been provided since 01-06-2019)</b>			
Provision of payment account service	Execution of the contract and compliance with the legal requirements applicable to the payment service provider	Name, surname, address, personal number, e-mail address, telephone number, identity document name, its data and a copy thereof, data on income, financial liabilities and other data related to the provision of the payment account service	8 years after expiry of business relationship (termination of a contract)
<b>Video data processing</b>			

Protection of the health and property of the company, employees, customers, partners and third parties and prevention of illegal activities	Legitimate interest	Video data of natural persons who visited the service provision points of the Company (post offices, PayPost customer service departments) and the head office and used the parcel self-service terminals	No longer than 60 calendar days
<b>Relevant additional information:</b> We inform about the video surveillance by a special message.			
<b>Examination of an application, complaint, inquiry or other request</b> (including those submitted by e-mail, in social networks, using <a href="http://www.lietuvospastas.lt">www.lietuvospastas.lt</a> )			
For the purpose of examining and responding to an application, complaint, inquiry or other request	The legal grounds depend on the content, in some cases it is a legitimate interest, in other cases it is compliance with legal requirements (for example, when we are required to deal with complaints about the provision of services), in other cases it is performance of a contract that includes a pre-contractual relationship (for example, when you file a request to provide you with a contract proposal)	Name, surname, address and other details provided in your application, complaint, inquiry or other request, as well as the company's response to you	Depending on the content of the application, but not longer than 3 years from the submission of the company's response
<b>Recording a conversation when calling to Lietuvos Paštas Contact Centre</b>			
Service quality assurance	Legitimate interest	Voice, telephone number, of the caller, call record, date and duration of the call and personal data provided during the call	6 months
<b>Relevant additional information:</b> we inform about the recording of the conversation before the conversation and provide information related to the processing of personal data.			
<b>Litigation documents</b>			
Participation in court or pre-trial proceedings and defence of rights of the Company	Compliance with the requirements of legal acts	Personal data specified in the litigation document: name, surname, personal number, address, contact details, circumstances related to a specific litigation document	Until the dispute is fully settled and to the extent necessary to achieve the relevant objectives (for example, to file a document for enforcement of the court decision)
<b>Direct marketing</b>			
Direct marketing (for example,	Consent	Name, e-mail address, telephone number, as well as other details that may be included in the consent	The term referred to the specific consent and not

advertising, request for an opinion on goods and/or services, newsletters)			exceeding 2 years after it
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#### IV. OTHER RELEVANT INFORMATION

9. **PLEASE NOTE**, that by providing services not covered by the Privacy Notice, the Company may be a processor of your personal data. For example, in cases of the payment acceptance and administration service, the payment of pensions and social benefits, the conclusion consumer credit contracts, the conclusion of insurance contracts. In such cases, in order to exercise the rights granted by GDPR, you must contact the business partner of the Company, on whose behalf the Company provides services. This partner is the controller of your personal data. If you do not have the details or contact details of this partner, you may contact the Company at the contact details provided in the “Contact Information” section of this Notice with a request to provide contact information of the partner or forward your request to the partner.

10. **If the business partners of the Company provide personal data of their employees in contracts with the Company** (for example, as contact persons, persons responsible for the provision of services or persons meeting the specific qualifications, experience, education requirements that the Company imposes for the provision of services), the Company becomes the controller of such data specified in the contracts and processes them for the period provided by law for that particular type of contract (as these data are inseparably included in the document we are required to store for the term provided for in legal acts). Specific personal data depends on the specific case and the type of public procurement being made, and may include name, contact details, qualifications, educational experience (for example, educational institution, professional experience, certificate details) and other details.

11. **The Company may record audio of negotiations with partners or potential partners** on the basis of the legal requirement to record the negotiations (paragraph 9 of Article 34 of the Law on Procurement Entities in the Field of Water Management, Energy, Transport or Postal Services of the Republic of Lithuania). Such an audio recording shall be treated as the minutes (protocol) of the meeting and shall be stored together with the documents of the specific procurement - for the term provided by the legal acts. The Company shall inform about this method of recording prior to the negotiations and provide the relevant information required by legal acts.

12. **The Company may process personal data** (for example, name, surname, personal number or date of birth, in specific cases – position or other data) **of a third party related to the customer (for example, representative, authorised person of the customer)** to conclude or perform a contract with the customer, or to fulfil the requirements of legal acts, or on legal basis of the lawful interest of the Company, to provide specific service to the customer or for other lawful purposes.

13. **The Company does not process special categories of personal data of customers** that reveal the customer’s racial or ethnic origin, political views, religious or philosophical beliefs, trade union membership, health data or data on sexual life or sexual orientation.

14. We hereby remind you not to send to the employees of the Company exclusively private, personal information not related to the provision of the services of the Company and ongoing activities by e-mail, as in specific cases, for example, to ensure the continuity of the Company’s business upon termination of employment relationship, an automatic temporary e-mail forwarding to another employee is possible.

#### IV. PROCESSING OF PERSONAL DATA OF CANDIDATES

15. The Company processes personal data of candidates for trainees, employees of the Company and members of the collegial management bodies of the Company or their advisory bodies (hereinafter referred to as candidates).

PURPOSE	LEGAL GROUNDS	PROCESSED DATA	PERSONAL	TERM
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Assessment of the candidate's suitability for the position	Legitimate interest in recruiting employees for vacant positions	Name, surname, contact information (for example, telephone number, e-mail address, address), curriculum vitae, cover letter or other data provided in the documents of the candidate (for example, work experience, education, qualification)	No longer than 3 months after the end of recruitment  The data of candidates for non-managerial positions of Lietuvos paštas Operations Division and/or the Network Division (for example, postman, distributor), for which the recruitment takes place regularly and continuously, shall not be processed for more than 1 year from the date of receipt of this data
Assessment of the candidate's compliance with the requirements provided for in legal acts	Fulfilment of the obligations provided for in legal acts <sup>1</sup>	The specific legal act provides for personal data, which may also include special categories of personal data (for example, personal data set in the questionnaire of the Bank of Lithuania for a person fulfilling key functions in the financial market participant)	Together with the employee's file - 10 years after the termination of the employment relationship
Offer another job to the candidate	Consent	Name, surname, contact information (for example, telephone number, e-mail address, address), curriculum vitae, cover letter or other data provided in the documents of the candidate (for example, work experience, education, qualifications)	1 year after receipt of the consent
Prepare the documents required for employment, conclude an employment contract, if necessary - adapt the workplace	Fulfilment of the obligations provided for in legal acts	Data required for concluding an employment contract (name, surname, address and other data); the data contained in the certificate of compulsory medical examination or in the medical book of the person; data justifying the right to the social guarantees provided for in legal acts; data on the right to fulfil the functions provided for in the specific job description and other data	Together with the employee's file - 10 years after the termination of the employment relationship

<sup>1</sup> Resolution No. 03-181 of the Board of the Bank of Lithuania as of 14 November "On the Approval of the Regulations on the Valuation of the Managers and Persons Performing the Main Functions of Financial Market Participants Supervised by the Bank of Lithuania", Law on the Prevention of Corruption of the Republic of Lithuania, Law on the Protection of Objects Important for Ensuring the National Security of the Republic of Lithuania.

## **WHERE DO WE GET THE DATA OF THE CANDIDATE?**

16. We usually receive information directly from the candidate. We can also obtain information about the candidate from the Employment Service under the Ministry of Social Security and Labour of the Republic of Lithuania, job search service providers, career social networks (for example, LinkedIn) and/or other entities providing job search, selection and/or mediation services, as well as from a friend or acquaintance of the candidate who recommends a particular person as a candidate. In such cases, we consider that the above-mentioned entities have already provided the candidate with all the information required by legal acts regarding the processing of the candidate's personal data, including the transfer of his data to the Company.

## **TO WHOM DO WE TRANSFER THE DATA OF THE CANDIDATE?**

17. In compliance with the requirements of legal acts, we may transfer the data of candidates for specific positions specified in legal acts to the competent authorities provided for in those legal acts (for example, the Bank of Lithuania, the Special Investigation Service), which have the obligation to assess the candidate's compliance with requirements provided for in legal acts (for example, candidate's reputation, education, qualifications, experience).

## **REQUEST FOR A CANDIDATE TO PROVIDE ADDITIONAL INFORMATION**

18. As indicated in the table above, in order to comply with the legal requirements, candidates for specific pre-established positions for which they intend to conclude a contract may be requested to provide additional information required by the legal acts in the table above in order to enable the Company and the competent authorities to assess the compliance of the specific candidate with the requirements laid down in legal acts.

19. In addition, in order to ensure that the Company employs reliable, honest and reputable individuals, the candidates for the positions related to cash handling, credit transfers from the Company's accounts, driving the Company's vehicles, granting privileged rights in the company's IT systems to conclude employment contracts, the Company may also request additional information specified by the Company. The candidate providing this information will also be provided with information on the processing of this personal data.

## **V. RETENTION OF PERSONAL DATA**

20. The Privacy Notice provides the main information on the personal data processed by the Company and the retention of it.

21. The Company shall define and determine the term of personal data processing considering the requirements of legal acts, the nature of the contracts concluded with the customer, the Company's legitimate interest, including, but not limited to the processing personal data due to a possible claim, complaint or other requirement, as well as other legal grounds.

22. **PLEASE NOTE**, that the storage of personal data for a longer period than specified in the Privacy Notice may be carried out only if:

22.1. There are reasonable grounds for suspecting an illegal activity under investigation;

22.2. Your data is necessary for the proper conduct of the dispute, complaint resolution and, if necessary, submission and execution;

22.3. Necessary for backup and other purposes related to the operation and maintenance of information systems or for similar purposes;

22.4. This is necessary in the case of other grounds, conditions or cases provided for by legal acts.

## **VI. SOURCES OF YOUR PERSONAL DATA**

23. When providing the services, the Company usually receives personal data directly from the customer (for example, when a customer provides personal data on postal items, files in money transfer forms, enters data into contract or order forms on a website, using the services of the Company, making phone calls and by other means).

24. **PLEASE NOTE** that when providing postal services and some payment services, the Company receives personal data on the recipient from the sender of the item or, for example, from the payer of the money transfer. This data is necessary for the proper provision of the service. In addition to these specific cases, the Company may also receive personal data from other entities, such as customers of the Company (natural persons and legal entities, including other postal service providers using the postal network of the Company) to whom the Company provides its services.

25. When it is necessary for the services provided by the Company or the activities of the Company, the Company may receive data from the registers administered by the State Enterprise Centre of Registers and other registers or databases (for example, to check the accuracy of data, to update data).

26. The Company may receive personal data from other data controllers, for example, payment service providers, state institutions and authorities (for example, law enforcement institutions, tax administration, financial market, institutions supervising postal service providers, customs of the Republic of Lithuania, bailiffs, notaries), as well as judicial and out-of-court dispute examination institutions.

27. The list of data sources in this section is not exhaustive.

## **VII. TRANSFER, PROCESSING AND PLACE OF PROCESSING OF YOUR PERSONAL DATA**

### **DATA TRANSFER.**

28. In some cases, the Company may or must transfer personal data to third parties (independent data controllers) in accordance with the requirements of legal acts, such as:

28.1. Payment service providers, if you use the services of the Company to transfer or remit money to selected beneficiaries or to pay for the services of the Company (for example, you buy in the e-shop of the Company or use the LP EXPRESS self-service);

28.2. State institutions and authorities fulfilling the functions assigned to them by legal acts (for example, law enforcement institutions, tax administration, financial market, institutions supervising postal service providers, the customs of the Republic of Lithuania, bailiffs, notaries, etc.), as well as courts and out-of-court dispute examination institutions;

28.3. As well as in other cases, in accordance with the requirements of legal acts.

29. In addition, when the Company sends an international postal item outside the European Economic Area (EEA) or the Company sends an international money order outside the EEA for the purpose of providing a postal service or money transfer service, the Company may transfer personal data (Chapter III of this Statement “Services and related processing of personal data”) outside the EEA for postal mail carriers, postal service providers of the receiving country or payment service providers. Such a transfer may be made on the following grounds: it is necessary for the performance of the contract between the data subject (sender or payer) and the Company, in the interest of the data subject (beneficiary) for the performance of the contract between the company and the sender and/or for an overriding reason related to the public interest (universal postal service provision). Please note that countries outside the EEA may have lower data protection requirements than the EEA.

### **DATA PROCESSING.**

30. The Company may use data processors to process personal data. In such cases, the Company shall take the necessary measures to ensure that such processors process personal data in accordance with the instructions of the Company and the requirements of the applicable legal acts, implementing appropriate technical and organisational measures for the protection of personal data. The Company may use the following data processors: companies providing parcel delivery, marketing, including marketing messaging, archiving, accounting, server rental, IT infrastructure, including its creation and maintenance, call centre, recruitment, consulting, and other services; companies and other processors of personal data that create, provide, maintain and develop software.

### **JOINT DATA CONTROLLERS.**

31. When administering its accounts on the social networks Facebook and LinkedIn, the Company acts together with them as joint data controllers to the specific extent provided by the said social networks. The Company has no option to influence the data processing activities of these social networks. More details about the processing of data by these social networks are available by link <https://www.facebook.com/policy> and <https://www.linkedin.com/legal/privacy-policy>

### **WHERE DO WE PROCESS YOUR PERSONAL DATA?**

32. We usually process personal data within the European Economic Area, but in specific cases they may be processed and transferred outside this area, when the protection measures provided for in legal acts have been implemented, such as a contract that includes standard terms and conditions adopted by the EU Commission, or the data are processed in a non-EEA country, but an adequate level of protection of personal data is ensured upon a decision of the EU Commission.

## **IX. YOUR RIGHTS**

33. You have the following rights:

33.1. Receive information about the processing of your personal data;

- 33.2. Get acquainted with your personal data processed by the Company;
- 33.3. Require the Company to correct incorrect, inaccurate or incomplete personal data;
- 33.4. Restrict the processing of your personal data;
- 33.5. Require the Company to delete your personal data;
- 33.6. Require the Company to transfer your personal data;
- 33.7. Withdraw your consent, without prejudice to the processing of your personal data prior to the withdrawal of consent;
- 33.8. Not to give consent to the processing of your personal data if they are processed on the basis of a legitimate interest, unless there are legitimate reasons for such processing or in order to assert, enforce or defend legal claims;
- 33.9. Submit a complaint to the State Data Protection Inspectorate (more details on the Internet, at <https://vdai.lrv.lt/>, at L. Sapiegos Str. 17, 10312 Vilnius or by e-mail [ada@ada.lt](mailto:ada@ada.lt)). Before submitting a complaint to the supervisory authority, we recommend to contact the Company listed in the “Contact Information” section of this Notice to find a suitable solution to your issue.

## **X. EXERCISING OF YOUR RIGHTS**

34. You can apply to the exercise of the above rights:
  - 34.1. Upon arrival at any place of service of the Company and submit a written application;  
**PLEASE NOTE** that the employee of the Company will ask you to provide proof of identity in order to verify your identity and confirm that you are submitting the application on your behalf;
  - 34.2. An application signed with an electronic signature by sending an e-mail to [duomenusauga@post.lt](mailto:duomenusauga@post.lt);
  - 34.3. By mail, together with a notarized copy of your identity document, by sending a letter to the Data Protection Officer at the address: J. Jasinskio Str. 16, 03 500 Vilnius.
35. Upon receipt of your application, we may ask you to clarify it, provide additional information so that we can properly identify you and provide you with a response, or define another method of identification that is appropriate for you.
36. **PLEASE NOTE** that in the exercise of your rights, we will not be able to provide information about ordinary postal items (unregistered), as such items are not registered and information about their senders, recipients and their addresses is not processed by the Company.
37. The Company has the right to refuse to provide the information you request if the application is unreasonable, disproportionate, as well as in other cases specified in legal acts.
38. We will provide a response to your application no later than within 1 (one) month from the date of receipt of the application that meets the content requirements. In exceptional cases, we may extend this term for another 2 (two) months by notifying you and indicating the specific circumstances.

### ***RELEVANT ADDITIONAL INFORMATION***

**Regarding printing of National Certificates:** In order to check and print the National certificate, the Company acts as a sub-manager (additional service provider) used by the State Enterprise Centre of Registers. The Company processes the following personal data required to verify the possession of a National Certificate: name, surname, personal number. The Company processes this data when printing a National Certificate: general personal data - name, surname, date of birth and special data - start and end dates of the National Certificate (year, month, day) and time (hours, minutes), QR code for which the general data is encoded and start and information on the start and end dates of the National Certificate (year, month, day) and time (hours, minutes) or information that contact activities for a person (name, surname, date of birth) are limited. The Company does not store this data. Detailed information on the processing of personal data in the National Certificate, as well as your related rights, is provided in the National Certificate Privacy Policy by link: [https://eimin.lrv.lt/uploads/eimin/documents/files/GP\\_Privatumo\\_politika.pdf](https://eimin.lrv.lt/uploads/eimin/documents/files/GP_Privatumo_politika.pdf)