APPROVED by
2026-11-16VAP-2026/123 of the Head of the Legal and Administrative Department of Public Limited Liability Company Lietuvos Paštas
[data]

PRIVACY NOTICE
FOR CUSTOMERS OF PUBLIC LIMITED LIABILITY COMPANY LIETUVOS PAŠTAS

I. GENERAL PROVISIONS

1. This Privacy Notice for Customers of Public Limited Liability Company Lietuvos Paštas (hereinafter referred to as the "Privacy Notice") provides key information about the processing of Your personal data when You use the services of Public Limited Liability Company Lietuvos Paštas[1].
2. Information on the processing of personal data may also be provided in service contracts, other documents relating to the services provided or the activities carried out, and on the website of the Company at www.lietuvospastas.lt
3. This Privacy Notice is available on the websites of the Company at www.lietuvospastas.lt/privatumo-pranesimas, www.eparduotuve.post.lt and at locations where services are provided (at post offices in the Customer Information Folder).
4. The LP EXPRESS Self-Service Privacy Notice is available on the website of the Company at www.lpexpress.lt.
5. Please note that the Privacy Notice is reviewed regularly and updated as necessary (e.g. due to changes in legislation, services or other circumstances). Changes to the Privacy Notice take effect from the date they are published on the websites of the Company; we therefore encourage you to review the Privacy Notice regularly. The date on which this Privacy Notice was last reviewed and updated is indicated at the top of this notice (see the "APPROVED by" section above).

II. INFORMATION ON THE DATA CONTROLLER AND CONTACT DETAILS FOR THE DATA PROTECTION OFFICER

6. The data controller is Public Limited Liability Company Lietuvos Paštas, company code 121215587, address: 3 J. Balčikonio Street, 03500, Vilnius, email: info@post.lt, tel. 1842 (hereinafter referred to as the "Company").
7. For enquiries regarding personal data, please contact the Data Protection Officer of the Company directly either by email at duomenusauga@post.lt or by post at J. Balčikonio g. 3, 03500 Vilnius, addressing Your letter to "The Data Protection Officer of Public Limited Liability Company Lietuvos Paštas".
8. **PLEASE NOTE** that if You cannot find the information relevant to You in this Privacy Notice, please contact the Data Protection Officer of the Company.

[1] The processing of personal data is a term used in the context of personal data protection which refers to actions carried out on personal data. The GDPR defines this term as follows: *'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;.*

III. CASES IN WHICH WE PROCESS YOUR PERSONAL DATA

PURPOSE	LEGAL BASIS	EXAMPLES OF PROCESSED PERSONAL DATA	TIME LIMIT
Postal services			
Provision of postal services	Performance of contracts (whether concluded in writing or orally) and compliance with the legal requirements applicable to providers of postal services.	The name, surname, address, parcel registration number, signature, email address and telephone number of the sender and recipient of the parcel.	18 months after the last action relating to the parcel.
Control of items (goods) prohibited from being sent	Legitimate interest in ensuring the safety of persons, property and infrastructure.	Name and surname of the person who sent the parcel.	18 months after the last action relating to the parcel.
Cash-on-delivery postal services (a postal service whereby the recipient of a parcel pays the sender a cash-on-delivery fee of an amount specified by the sender. The service consists of two parts: a postal service and a payment service, i.e. a money transfer)			
Provision of cash-on-delivery postal services	Performance of a contract (whether concluded in writing or orally) and compliance with the legal requirements applicable to the postal service provider/payment service provider.	Name, surname, address, parcel registration number, signature and, in certain cases, email address and telephone number of the sender and recipient of the parcel. Also, the bank account number of the sender of the parcel, the personal number of the recipient, the name of the identity document, its details and, in certain cases, a copy of the document, information substantiating the origin of the funds, and any other information necessary to ensure compliance with anti-money laundering and counter-terrorist financing requirements.	Postal service: 18 months from the last action related to the parcel. Money transfer: 8 years from the date of the money transfer.
Services for the submission of international postal parcels for customs inspection (declaration) to Lithuanian Customs			
Provision of services relating to the submission of international postal parcels for customs inspection (declaration) to Lithuanian Customs	Performance of a contract and compliance with the legal requirements applicable to customs intermediaries.	Name, surname and address of the sender and recipient; details of the parcel, e.g. its value, weight, contents and quantity; and, where applicable, the email address and telephone number of the sender and recipient, or any other information required for customs declaration.	8 years.

Further relevant information: 1. Part of the personal data may be provided by the sender of the parcel or by postal service providers in other countries, whilst the remainder may be provided by the customer of the Company who uses the declaration service provided by the Company and who, in certain cases, confirms the accuracy of the preliminary details held by the Company. This data is transferred to the Lithuanian Customs for the purpose of declaring international postal parcels. 2. If You submit a request for the recalculation of charges relating to the declaration of an international postal parcel, the Company processes the data provided in the request (e.g. name, surname, email address, parcel number, the circumstances of the request for recalculation of charges, the bank account number to which funds may be transferred following the recalculation of charges, personal number, as well as other documents required for this process) on the legal basis of the performance of a contract and compliance with legal requirements. This data is transferred to Lithuanian Customs. 3. If You are declaring a gift, in certain cases we may ask You to provide correspondence between the sender and the recipient confirming the gift. In such cases, please provide only the minimum information required for the declaration. Please do not provide any unrelated, private information or personal data that is not relevant to the declaration.			
Subscription services (when ordering the services at the location where the Company provides its services, via a postman, by calling the Company on 1842, or via the website www.prenumeruok.lt)			
Provision of subscription services	Performance of a contract.	Name, surname, address, email address, telephone number, subscription period, publication subscribed to, amount paid for the subscription.	1 year from the date of service provision.
Further relevant information: in order to ensure the proper fulfilment of orders for the publication subscription service, the personal data of the subscriber (name, surname, address, subscription period, email address, telephone number) may be processed jointly with the publisher of the publication being subscribed to (the Company and the publisher of the publication being subscribed to may act as joint data controllers).			
Philatelic subscription services			
Provision of philatelic services	Performance of a contract.	Name, surname, email address, postal address, telephone number, philatelic items ordered.	Data is retained for as long as the customer wishes to remain a subscriber.
Sale and delivery of philatelic items and other goods via the online shop[2]			
Sale and delivery of philatelic items and other goods via the online shop[3]	Performance of a contract.	Details of the recipient (name, surname, address, email address, telephone number), details of the purchaser (where these differ from the details of the recipient: name, surname, email address, telephone number (for the purpose of sending an order confirmation)), delivery details (address), products purchased, payment details.	Data is retained for 14 days from the date the order is fulfilled. Invoices issued to the customer in accordance with the order placed are retained for 10 years.
Money transfers (domestic)			
Provision of money transfer services	Performance of a contract and compliance with the legal requirements	Name, surname, personal number; for foreign nationals: date of birth, country of residence, details of the identity document (name, number,	8 years from the date of the money transfer.

[2] www.eparduotuve.post.lt

[3] www.eparduotuve.post.lt

	applicable to payment service providers.	date of issue, expiry date) and a copy thereof (where the amount in cash exceeds 600 euros), telephone number/email address/postal address, account number, bank, payment purpose, amount, signature. For local money transfers received or disbursed, for which, in accordance with established internal requirements, explanations regarding the origin of the funds, supporting documents and other information necessary to ensure compliance with anti-money laundering and counter-terrorist financing requirements must be provided.	
"Know Your Customer" (e.g. in the case of a contract for payment collection and administration services with the recipient)			
Provision of payment services	Compliance with the legal requirements applicable to payment service providers	Details about the customer as a natural person: name, surname, personal number/for foreign nationals: date of birth, permanent residential address, telephone number, email address, nationality, details of the identity document (name, number, date of issue, expiry date, country of issue), a copy thereof, information on the activities of the customer and the nature of the services/goods, information on the expected turnover of the customer, information on the beneficial owner, signature and other information necessary for the risk assessment of the customer and the transactions carried out by him/her. Details about a customer who is a legal entity: details of the representative/manager of the customer (name, surname, personal number/for foreign nationals: date of birth, position, nationality, basis for representation), details of beneficial owners (name, surname, personal identification number/for foreign nationals: date of birth, nationality, number of shares), signature and other information necessary for assessing the risk associated with the customer and the transactions it carries out.	The "Know Your Customer" questionnaire forms part of the service agreement and is retained for 10 years from the end of the business relationship (termination of the agreement).

Obligations of payment service providers as laid down in legislation			
Payment of contributions and benefits	Compliance with the legal requirements and contractual obligations applicable to payment service providers	For example, the identification data of the payer (e.g. name, surname, address, payer code), the payee, the amount, the date of payment, and, if the payment exceeds 600 euros (in cash), a copy of a document confirming the identity of the person. Payments received for which, in accordance with established internal requirements, explanations of the source of funds, supporting documents and other information necessary to ensure compliance with anti-money laundering and counter-terrorist financing requirements must be provided. For example: the name, surname and address of the payee; the payer; the amount; the method of payment; and the date of payment. The specific details also depend on the contract between the Company and the payee or the payer.	8 years from the date of payment.
Image data processing			
Protection of the health and property of the Company, its employees, customers, partners and third parties, and the prevention of unlawful acts	Legitimate interest in ensuring the protection of the health and property of individuals and the prevention of unlawful acts.	Image data of individuals who have visited the locations where the Company provides its services and its head office, and who have used self-service parcel terminals.	No more than 60 calendar days.
Further relevant information: we provide information about the CCTV surveillance in progress by means of a special sign at the locations where CCTV is in operation.			
Handling of requests, complaints, enquiries or other applications (including those submitted by email, via social media, via a virtual assistant, or via the websites of the Company)			
For the purpose of handling and responding to requests, complaints, enquiries or other applications	The legal basis depends on the content; in certain cases, it is the legitimate interest in handling enquiries and providing responses; in other cases, compliance with legal requirements (e.g. where we are obliged to handle complaints regarding the	Name, surname, address, email address, telephone number and/or other details You provide in your request, complaint, enquiry or other application, as well as the response from the Company to You.	Depending on the content of the enquiry, but for no longer than 3 years from the date of the response provided by the Company.

	provision of services) or the performance of a contract, which includes pre-contractual relations (e.g. when You request a proposal for the conclusion of a contract).		
Recording of a call to the Contact Centre of Lietuvos Paštas			
Ensuring the quality of services	Legitimate interest in ensuring a high standard of service.	The voice of the caller, his/her telephone number, the topic of the conversation selected, a recording of the conversation, the date and duration of the call, any personal data provided during the call, and the post-call feedback provided by the customer.	6 months.
Further relevant information: we provide information about the recording of the call before the call takes place and provide information relating to the processing of personal data.			
Procedural documents			
Participation in court or pre-trial proceedings and the defence of the rights of the Company	Compliance with legal requirements.	Personal data specified in the procedural document: name, surname, personal number, address, contact details, circumstances relating to the specific procedural document, and evidence submitted.	Until the dispute has been fully resolved and to the extent necessary to achieve the relevant objectives (e.g. to submit a document for enforcement).
Direct marketing			
Direct marketing (e.g. advertising, requests for feedback on goods and/or services, newsletters)	Consent.	Name, email address, telephone number, time and date of consent, fact of withdrawal of consent, date and time.	The period of validity of the consent (i.e. the validity period of Your account on the LP EXPRESS self-service portal, or 60 months from the date the consent was given if the consent was not given via the LP EXPRESS self-service portal (e.g. when subscribing to a newsletter on the websites of the Company, etc.) or any other period specified in the consent itself, unless the consent is withdrawn earlier, in which case until the moment of withdrawal) and for the purposes of

			dispute resolution, 18 months after the expiry of the consent.
The awarding of prizes or other incentives for the prompt collection of parcels from parcel lockers			
Awarding of prizes or other incentives for the prompt collection of parcels from parcel lockers	Legitimate interest in ensuring the effective management of the parcel locker network and encouraging the prompt collection of parcels.	Telephone number, email address, postal address and details relating to the delivery and collection of the parcel (e.g. parcel number, the date and time of receipt of the delivery notification, the date and time of collection, and the parcel locker address) to the extent necessary to identify the winners, contact them and present them with their prizes.	Until the prizes or other rewards are presented to the winners.
Fulfilment of tax obligations in respect of prizes or other incentives won by a participant (where applicable)	Compliance with legal requirements (where processing is necessary for the fulfilment of tax obligations).	Where there are obligations relating to tax returns or tax payments, the name, surname, personal number and other personal data of the winner, as specified in legislation and necessary for the fulfilment of these obligations, are processed additionally.	Where winners are subject to obligations relating to tax returns or tax payments, personal data relating to these obligations are processed for the period specified in the legislation governing such obligations.
Feedback surveys following the provision of services			
The collection of feedback on the services provided and, based on the results, the improvement of the quality of the services provided by the Company	Legitimate interest in improving the quality of the services provided by the Company	Parcel number, email address, delivery time, parcel locker	3 months

IV. FURTHER RELEVANT INFORMATION

9. **PLEASE NOTE that when providing services not specified in this Privacy Notice, the Company may act as a data processor in relation to Your personal data.** For example, in cases involving the collection and administration of contributions, the payment of benefits (including pensions), and the conclusion of consumer credit agreements. In such cases, to exercise Your rights under the GDPR, You must contact the business partner of the Company on whose behalf the Company provides the services. This partner is the controller of Your personal data. Should You not have any information about this partner of the Company or lack its contact details, You may contact the Company using the contact details provided in the 'Contact Information' section of this notice, requesting that the Company provide the contact details of the partner or forward Your request to the partner.

10. **Where the business partners of the Company provide the personal data of their employees in contracts with the Company** (e.g. as contact persons, persons responsible for the provision of services, or individuals meeting specific qualification, experience and educational requirements set by the Company for the provision of services), the Company becomes the data controller of the data specified in those contracts and processes it for the period stipulated by legislation for that specific type of contract (as this data is

inextricably linked to the document which we are required to retain for the period specified by legislation). The specific personal data depends on the particular case and the type of procurement being carried out; it may include name, surname, contact details, and information on professional qualifications, education and experience (e.g. educational institution, professional experience, details of certificates) and other data.

11. **The Company may make audio recordings of negotiations with partners or potential partners**, in accordance with the legal requirement to keep minutes of negotiations (Article 34(9) of the Republic of Lithuania Law on Procurement by the Entities, Operating in the Field of Procurement, Waste Water Management, Energy, Transport or Postal Services). Such audio recordings are treated as minutes of the meeting and are retained together with the documents relating to the specific procurement for the period specified in applicable legislation. The Company shall inform the parties of this method of recording prior to the negotiations and shall provide the relevant information as required by applicable legislation.

12. **The Company may process the personal data of a third party associated with the customer (for example, the representative or authorised agent of the customer)** (for example, name, surname, personal number or date of birth, and in certain cases, his/her position or other details) on the legal basis of the conclusion or performance of a contract with the customer, compliance with legal requirements, the legitimate interests of the Company, the provision of a specific service to the customer, or for another legitimate purpose.

13. **The Company does not process special categories of personal data relating to customers** which reveal racial or ethnic origin of the customer, his/her political opinions, religious or philosophical beliefs, trade union membership, health data, or data concerning sex life or sexual orientation.

14. We remind You not to send the employees of the Company, via email, strictly private or personal information that is unrelated to the provision of the services of the Company and its ongoing activities, as in certain cases, for example, to ensure the business continuity of the Company following the termination of an employment relationship, emails may be automatically and temporarily forwarded to another employee.

V. PERIOD OF PROCESSING OF PERSONAL DATA

15. The Privacy Notice sets out key information about the personal data processed by the Company and the periods for which it is processed.

16. The Company defines and determines the period for which personal data is processed, taking into account the requirements of legislation, the nature of the contracts concluded with the customer, and its legitimate interests, including, but not limited to, the interest in processing personal data in relation to a potential complaint, a claim or other legal action, as well as taking into account other legal grounds.

17. **PLEASE NOTE** that personal data may only be retained for longer than the period specified in the Privacy Notice where:

17.1. there are reasonable grounds to suspect unlawful activity giving rise to an investigation;

17.2. Your data is necessary for the proper handling, resolution and, where necessary, submission and enforcement of a dispute or complaint;

17.3. it is necessary for the purposes of creating backup copies and for other purposes relating to the operation and maintenance of information systems or similar purposes;

17.4. this is necessary on other grounds, under conditions or in circumstances provided for by legislation.

VI. SOURCES OF YOUR PERSONAL DATA

18. When providing its services, the Company usually obtains personal data directly from the customer (for example, when a customer provides personal data on parcels, when completing money transfer forms, as well as when providing data on contract or order forms, on the website, whilst using the services of the Company, when calling the Company by telephone, and in other ways).

19. **PLEASE NOTE** that, when providing postal and certain payment services, the Company receives personal data relating to the recipient of the parcel or the recipient of the money transfer, respectively, from the sender of the parcel or, for example, the payer of the money transfer. This data is necessary for the proper provision of the services. Apart from these specific cases, the Company may also receive personal data from other entities, such as the customers of the Company (natural and legal persons, including other postal service providers who use the postal network of the Company), to whom the Company provides services.

20. Where necessary for the services provided by the Company or its operations, the Company may obtain data from registers maintained by the State Enterprise Centre of Registers and other registers or databases (for example, to verify the accuracy of data or to update data).

21. The Company may receive personal data from other data controllers, such as payment service providers, government bodies and agencies (such as law enforcement agencies, tax authorities, financial market regulators, authorities supervising providers of postal services, Lithuanian Customs, bailiffs and notaries), as well as courts and alternative dispute resolution bodies.
22. The list of data sources provided in this Section is not exhaustive.

VII. TRANSFER, PROCESSING AND STORAGE OF YOUR DATA

TRANSFER OF DATA

23. In certain cases, the Company may, or is required to, transfer personal data to third parties (independent data controllers) in accordance with legal requirements, for example:
23.1. to payment service providers, if, whilst using the services of the Company, You wish to transfer or send money to selected recipients or pay for the services provided by the Company (e.g. when making a purchase from the online shop of the Company or using the LP EXPRESS self-service);
23.2. to state authorities and bodies performing the functions assigned to them by legislation (for example, law enforcement agencies, tax authorities, financial market regulators, and bodies supervising providers of postal services, Lithuanian Customs, bailiffs, notaries, etc.), as well as to courts and bodies responsible for the resolution of non-judicial disputes;
23.3. as well as in other cases, in accordance with the requirements of applicable legislation.
24. In addition, where an international postal parcel addressed outside the European Economic Area (EEA) is submitted to the Company for delivery, the Company may transfer the personal data necessary for the provision of this service (as set out in Section III of this Notice, 'Cases in which we process your personal data') outside the EEA, to postal carriers and postal service providers in the country of destination. Such data transfers may be carried out on the following grounds: they are necessary for the performance of the contract between the data subject (the sender) and the Company; in the interests of the data subject (the recipient) for the performance of the contract concluded between the Company and the sender; and/or such a transfer is necessary for reasons of substantial public interest (the provision of universal postal services). Please note that countries outside the EEA may have lower data protection standards than those in the EEA.

PROCESSING OF DATA

25. The Company may engage data processors to process personal data. In such cases, the Company shall take the necessary measures to ensure that such data processors process personal data in accordance with the instructions of the Company and the requirements of applicable legislation, by implementing appropriate technical and organisational measures for the protection of personal data. The Company may engage data processors engaging in the following activities: parcel delivery; marketing, including marketing communication service providers, informational notification service providers; the conducting of surveys; archiving; bookkeeping; server rental; IT infrastructure, including its creation, maintenance and development; call centre services; recruitment; consultancy; and other service providers; companies that develop, supply, support and maintain software; the company providing hosting services for the online shop of the Company (Shopify International Ltd., located at c/o Intertrust Ireland, 2nd Floor, 1-2 Victoria Buildings, Haddington Road, Dublin 4, D04 XN32, Republic of Ireland), the Company's e-commerce order fulfillment and parcel preparation service providers and other personal data processors.

JOINT DATA CONTROLLERS

26. When managing its accounts on the social media platform Facebook, the Company acts jointly with Facebook as joint data controllers to the extent publicly disclosed by the aforementioned social media platforms. The Company has no influence over the data processing activities carried out by these social media platforms. For more information on the data processing carried out by these social media platforms, see https://www.facebook.com/policy.

WHERE DO WE PROCESS YOUR PERSONAL DATA?

We usually process personal data within the European Economic Area; however, in certain cases, it may be processed and transferred outside the EEA where the safeguards provided for in legislation are in place, for example, where a contract has been concluded that incorporates the standard contractual clauses adopted by the European Commission, or where the data is processed in a country outside the EEA but which, by a decision of the European Commission, ensures an adequate level of personal data protection.

VIII. YOUR RIGHTS

27. You have the following rights:
27.1. to obtain information about the processing of Your personal data;
27.2. to access Your personal data processed by the Company;
27.3. to request the Company to rectify any incorrect, inaccurate or incomplete personal data relating to You (You can update or correct the personal data provided in your LP EXPRESS self-service account by logging in to your account);
27.4. to restrict the processing of Your personal data;
27.5. to request the Company to erase Your personal data (You can delete your LP EXPRESS self-service account by logging in to your account and using the account deletion function);
27.6. to request that the Company transfer Your personal data;
27.7. to withdraw the consent You have given, without this affecting the processing of Your personal data carried out prior to the withdrawal of consent (You may withdraw your consent to direct marketing by using the unsubscribe option provided in a direct marketing email sent by the Company or by managing your consent preferences in your LP EXPRESS self-service account);
27.8. to object to the processing of Your personal data where it is carried out on the basis of a legitimate interest, unless there are legitimate grounds for such processing or where it is necessary for the establishment, exercise or defence of legal claims;
27.9. submit a complaint to the State Data Protection Inspectorate (further information is available online at https://vdai.lrv.lt/, at L. Sapiegos g. 17, 10312 Vilnius, or by email at ada@ada.lt). Before lodging a complaint with the supervisory authority, we recommend that You contact the Company using the contact details provided in the "Contact Details" section of this Notice, so that a suitable solution to Your enquiry can be found.

IX. EXERCISING YOUR RIGHTS

28. You may submit a request to exercise the rights set out above by:
28.1. visiting any of the locations where the Company provides its services and submitting a written request; **PLEASE NOTE** that an employee of the Company will ask you to present a document proving your identity so that he/she can verify your identity and confirm that you are submitting the request on your own behalf;
28.2. sending a request signed using an electronic signature to the email address duomenusauga@post.lt;
28.3. post, enclosing a copy of Your identity document certified by a notary, and addressing the letter to "The Data Protection Officer of Public Limited Liability Company Lietuvos Paštas", J. Balčikonio g. 3, 03500 Vilnius.
29. Once we have received Your request, we may ask You to clarify it or provide additional information so that we can properly verify Your identity and provide You with a response, or determine another method of identification appropriate to Your case.
30. **PLEASE NOTE** that, when exercising Your rights, we will not be able to provide information regarding standard (unregistered) parcels, as such parcels are not registered, and the Company does not process information regarding their senders (except as provided for in Section III of this Privacy Notice for the purposes of controlling items (goods) prohibited from being sent), recipients and their addresses.
31. The Company is entitled to refuse to provide the information You request if the request is unfounded or disproportionate, as well as in other cases specified in legislation.
32. We will respond to Your request no later than 1 (one) month from the date of receipt of a request that meets the content requirements. In exceptional cases, we may extend this period by a further 2 (two) months, in which case we will notify You and specify the particular circumstances.