

DESCRIPTION OF IMPLEMENTATION PROCEDURE OF THE RIGHTS OF DATA SUBJECTS OF UAB “TUTUTIS”

I. CONCEPTS

1. The main concepts used in the Description of Implementation Procedure of the Rights of Data Subjects (hereinafter – Description) are the following:

1.1. **LLPPD** means Law on Legal Protection of Personal Data of the Republic of Lithuania;

1.2. **Personal data** means any information relating to an identified or identifiable natural person;

1.3. **Data subject** means a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

1.4. **Data 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;

1.5. **Data recipient** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not;

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

1.7. **Data controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

1.8. **Regulation** means Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016;

1.9. **SDPI** means State Data Protection Inspectorate;

1.10. **Other concepts** are defined in the Regulation, LLPPD, and other legal acts regulating processing and security of personal data.

II. GENERAL PROVISIONS

2. The Description of UAB “Tututis” (hereinafter – Company) sets the rights of data subject established in the Regulation, scope of these rights, implementation conditions and restrictions, procedure for submission of requests regarding rights of the data subject, their examination procedure, and examination procedure of complaints of the data subject.

3. The Description was prepared in accordance with chapter 3 of the Regulation.

4. The Description determines general implementation procedure of rights applicable for all categories of the Company’s data subjects:

4.1. employees;

4.2. candidates to job vacancies in the Company;

4.3. shareholders and their representatives;

4.4. company’s clients;

4.5. representatives of suppliers – legal entities;

4.6. visitors of the Company’s websites www.tutis.lt, www.aerotutis.lt, www.noordi.lt;

4.7. natural persons, who receive the Company’s newsletters;

4.8. other natural persons, whose personal data are processed by the Company.

5. Purpose of the Description – to secure comprehensive implementation of the data subjects’ rights with regard to the scope, categories of the processed personal data, processing purposes and grounds, to create conditions for the data subjects to file requests and complaints regarding implementation of their rights, and to set the terms of response to the requests and complaints of the data subjects that cannot be longer than permitted by paragraph 3 of article 12 of the Regulation.

6. In order to safeguard implementation of the transparency principle, the Company has to provide information needed for implementation of their rights (established in chapter 3 of the Regulation) to the data subjects in the form that must be easy to access, comprehensive and resented in clear and simple language.

III. RIGHTS OF DATA SUBJECT

7. The data subjects have the following rights:

7.1. right to access processed personal data;

7.2. right to request rectification of personal data;

7.3. right to request erasure of processed personal data ("right to be forgotten");

7.4. right to restrict personal data processing;

7.5. right to object to processing of personal data;

7.6. right to receive personal data concerning him or her which he or she has provided to the Company in a structured, commonly used, machine-readable and interoperable format, and to transmit it to another controller ("right to data portability");

7.7. right to withdraw the granted consent at any time.

8. The rights of data subject are not absolute. They shall be restricted by the provisions of the Regulation, laws and legal acts of the Republic of Lithuania.

IV. SCOPE OF RIGHT TO ACCESS PERSONAL DATA PROCESSED BY THE COMPANY

9. Any data subject of the Company shall have the right to obtain from the Company confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data.

10. The data subject has a right to access the following information:

10.1. the purposes of the processing;

10.2. the categories of personal data concerned;

10.3. the recipients or categories of recipient to whom the personal data have been or will be disclosed;

10.4. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

10.5. the existence of the right to request from the Company rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing, or to implementation procedure of such rights;

10.6. the right to lodge a complaint with a supervisory authority;

10.7. where the personal data are not collected from the data subject, any available information as to their source.

11. In implementation of the right established herein, the data subject shall state his/her name, surname in the request, as well as particular information provided in clause 10 of the Description that s/he wants to access, or shall state that s/he wants to access all the data described in clause 10 of the Description. The request has to be signed physically or electronically by the data subject. If the data subject cannot approve the request by signature because of transmission mode or other reasons, the Company shall identify the data subject using other methods, for example, when the data subject e-mails the request to the Company from the known e-mail address. The data subject may indicate in the request, how s/he prefers to receive the reply.

12. The implementation procedure of the data subject's right to access the personal data processed by the Company is described in chapter XI of the Description.

V. SCOPE OF RIGHT TO REQUEST RECTIFICATION OF PERSONAL DATA

13. Any data subject of the Company shall have the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning him or her. Besides, the data subject of the Company shall have the right to request to add new data to the processed data, even though they are not necessary to achieve the Company's goals, for the purpose of which certain personal data of the data subject are processed.

14. When the data subject requests rectification of inaccurate personal data or to have incomplete personal data completed, the data subject shall state his/her name, surname, the inaccurate and incomplete personal data processed by the Company, and provide accurate or additional personal data. The request has to be signed physically or electronically by the data subject. If the data subject cannot approve the request by signature because of transmission mode or other reasons, the Company shall identify the data

subject using other methods, for example, when the data subject e-mails the request to the Company from the known e-mail address. The data subject may indicate in the request, how s/he prefers to receive the reply.

15. The implementation procedure of the data subject's right to request rectification of inaccurate personal data or to have incomplete personal data completed is described in chapter XI of the Description.

VI. SCOPE OF RIGHT TO REQUEST ERASURE OF PROCESSED PERSONAL DATA ("RIGHT TO BE FORGOTTEN"), ITS CONDITIONS AND RESTRICTIONS

16. Any data subject of the Company shall have the right to obtain from the Company the erasure of personal data concerning him or her and the Company shall have the obligation to erase personal data where one of the following grounds applies:

16.1. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

16.2. the data subject withdraws consent on which the processing of personal data is based in the Company;

16.3. the data subject objects to the processing of his/her personal data and the conditions provided in clause 25 herein for the data subject to object to the processing are satisfied, and no restrictions of this right established in clause 26 are present;

16.4. the Company has no legitimate grounds for the processing of personal data of the data subject;

16.5. the personal data have to be erased for compliance with a legal obligation in the European Union or law of the Republic of Lithuania to which the Company is subject.

17. The data subject's right to obtain from the Company the erasure of personal data concerning him or her shall be restricted in the following cases:

17.1. processing of personal data is necessary for occupational medicine, in order to assess the employee's working capacity;

17.2. the Company stores personal data of the data subject in order to implement its legal obligations established by laws and other legal acts of the Republic of Lithuania;

17.3. the Company attempts to lodge, execute or defend its legitimate demands.

18. When the data subject requests erasure of personal data concerning him or her, the data subject shall state his/her name, surname, one of the conditions listed in clause 16 herein, the particular personal data that have to be erased or state that the Company has to erase all the processed personal data. The request has to be signed physically or electronically by the data subject. If the data subject cannot approve the request by signature because of transmission mode or other reasons, the Company shall identify the data subject using other methods, for example, when the data subject e-mails the request to the Company from the known e-mail address. The data subject may indicate in the request, how s/he prefers to receive the reply.

19. The implementation procedure of the data subject's right to request erasure of personal data concerning him or her is described in chapter XI of the Description.

VII. SCOPE OF RIGHT TO RESTRICT PERSONAL DATA PROCESSING, ITS CONDITIONS AND RESTRICTIONS

20. Any data subject of the Company shall have the right to obtain from the Company restriction of processing where one of the following applies:

20.1. the data subject requests to rectify or specify inaccurate or incomplete personal data. In this case, the personal data processing shall be restricted for the period until the Company rectifies or completes inaccurate or incomplete data of the data subject;

20.2. the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

20.3. the Company no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;

20.4. the data subject has objected to processing pursuant to Article 21(1) of the Regulation pending the verification whether the legitimate grounds of the Company override those of the data subject.

21. The requested restriction of personal data of the data subject cannot affect storage of these data in the Company.

22. When the Company satisfies the data subject's request to restrict processing of personal data concerning him or her, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest. The Company has to inform the data subject about the reasons allowing the Company to continue processing of the restricted personal data not later than in 10 days.

23. When the data subject requests restriction of processing of personal data concerning him or her, the data subject shall state his/her name, surname, one of the conditions listed in clause 20 herein, the particular personal data that the Company has to restrict or state that the Company has to restrict all the processed personal data, and to set the restriction period of processing. The restriction period of processing has to be defined by particular term or other criteria. The restriction period of processing cannot be longer than needed for the data subject to achieve the goals, for which restriction of processing has been restricted. The request has to be signed physically or electronically by the data subject. If the data subject cannot approve the request by signature because of transmission mode or other reasons, the Company shall identify the data subject using other methods, for example, when the data subject e-mails the request to the Company from the known e-mail address. The data subject may indicate in the request, how s/he prefers to receive the reply.

24. The implementation procedure of the data subject's right to request restriction of processing of personal data concerning him or her is described in chapter XI of the Description.

VIII. SCOPE OF RIGHT TO OBJECT TO PROCESSING OF PERSONAL DATA, ITS CONDITIONS AND RESTRICTIONS

25. Any data subject of the Company shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her. The Company's data subject may use this right when at least one of the following conditions applies:

25.1. The Company processes personal data of the data subject on the ground of legitimate interest of the Company or third parties. On the ground of this condition, the data subject's right to object to processing of personal data shall be restricted as specified in clause 26 of the Description;

25.2. The personal data of the data subject are processed for direct marketing purposes. Where personal data are processed not only for direct marketing, but also for other purposes, the data subject's objection to personal data processing for direct marketing purposes shall not affect personal data processing for other purposes.

26. The data subject's right to object to personal data processing on the ground described in clause 25.1 may be restricted if the Company demonstrates its or third parties' compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or if the personal data of the data subject processed by the Company, with further processing of which the data subject does not agree, are needed for the Company to establish, exercise or defend its legal claims.

27. When the data subject objects to personal data processing, the data subject shall state his/her name, surname, one of the conditions listed in clause 25 herein, the particular personal data with processing of which the data subject does not agree any more or state that the data subject objects to processing of all personal data concerning him or her. The request has to be signed physically or electronically by the data subject. If the data subject cannot approve the request by signature because of transmission mode or other reasons, the Company shall identify the data subject using other methods, for example, when the data subject e-mails the request to the Company from the known e-mail address. The data subject may indicate in the request, how s/he prefers to receive the reply.

28. The implementation procedure of the data subject's right to object to personal data processing is described in chapter XI of the Description.

IX. SCOPE OF RIGHT TO DATA PORTABILITY, ITS CONDITIONS AND RESTRICTIONS

29. Any data subject of the Company shall have the right to receive the personal data concerning him or her, which he or she has provided to the Company, in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller. If the Company has

technical possibilities, the data subject may demand that the Company would transmit his/her personal data to another data controller directly. The Company's data subject may use this right when at least one of the following conditions applies:

29.1. the processing is based on consent or contract entered into between the data subject and the Company;

29.2. the processing is carried out by automated means, i.e. in digital form.

30. When the data subject requests to receive the personal data concerning him or her in a structured, commonly used and machine-readable format, the data subject shall state his/her name, surname, the particular personal data that the data subject wants to receive or state that the data subject wants to receive all personal data concerning him or her. If the data subject requests the Company to transmit the personal data concerning him or her directly to another data controller, s/he has to indicate the data controller, to whom the personal data should be transmitted. The request has to be signed physically or electronically by the data subject. If the data subject cannot approve the request by signature because of transmission mode or other reasons, the Company shall identify the data subject using other methods, for example, when the data subject e-mails the request to the Company from the known e-mail address. The data subject may indicate in the request, how s/he prefers to receive the reply.

31. The procedure of the data subject's right to portability is described in chapter XI of the Description.

X. SCOPE AND CONDITIONS OF RIGHT TO WITHDRAW THE GRANTED CONSENT

32. If the Company processes personal data of the data subject on the ground of consent, the data subject has the right to withdraw that consent at any time.

33. The consent withdrawn by the data subject for processing of personal data shall not affect the legitimacy of processing of personal data of the data subject during the consent's validity period.

34. When the data subject requests the Company to withdraw consent to processing, the data subject shall state his/her name, surname, date of the consent's signing, purpose of data subject's personal data processing indicated in the consent or other information that would help to identify the consent that the data subject wants to withdraw. The request has to be signed physically or electronically by the data subject. If the data subject cannot approve the request by signature because of transmission mode or other reasons, the Company shall identify the data subject using other methods, for example, when the data subject e-mails the request to the Company from the known e-mail address. The data subject may indicate in the request, how s/he prefers to receive the reply.

35. The procedure of the data subject's right to withdraw the granted consent is described in chapter XI of the Description.

XI. PROCEDURE OF SUBMISSION AND EXAMINATION OF THE DATA SUBJECTS' REQUESTS

36. The rights of the data subject established in chapter III herein shall be implemented under the terms and conditions of this chapter.

37. In order to implement one or several rights established in chapter III herein, the data subject shall submit a request to the Company. The data subject may submit a free-form requestor complete the Company's form that is available for visitors of the websites www.tutis.lt, www.aerotutis.lt, www.noordi.lt. the data subject's request has to meet the requirements set for the request's content and described in chapters IV-X herein:

37.1. the content of the request to access personal data has to be in compliance with clause 11 of this Description;

37.2. the content of the request to rectify personal data has to be in compliance with clause 14 of this Description;

37.3. the content of the request to erase personal data has to be in compliance with clause 18 of this Description;

37.4. the content of the request to restrict processing of personal data has to be in compliance with clause 23 of this Description;

37.5. the content of the request to object to processing of personal data has to be in compliance with clause 27 of this Description;

37.6. the content of the request regarding right to data portability has to be in compliance with clause 30 of this Description;

37.7. the content of the request to withdraw the granted consent has to be in compliance with clause 34 of this Description.

38. The request shall be e-mailed to the following address: support@tutis.lt.

39. The data subject may submit the request personally or through the representative. When the representative of the data subject files a request in the name of the data subject, s/he has to submit the valid power of attorney that would be in compliance with the requirements of the Civil Code, other laws and legal acts of the Republic of Lithuania.

40. The Company shall examine the received request of the data subject not later than in 1 month after its receipt. The Company is entitled to extend the examination period up to 2 months if it is not able to examine the received request within 1 month because of important reasons. The Company has to notify the data subject about extended examination term not later than in 1 month after the request's receipt, stating the important reasons, why the request of the data subject could not be examined in 1 month.

41. The Company shall reply to the data subject's request in the mode indicated by the data subject in such a request. If the data subject does not indicate the preferred method of reply or if the Company is not able to reply using the method preferred by the data subject because of technical hindrances or other reasons, the answer to the data subject shall be given using the data subject's e-mail or other contact details of the data subject.

42. The Company shall reply to the data subject's requests free of charge. If the data subject submits clearly groundless or disproportionate requests or their content is repetitive, the Company may:

42.1. refuse to reply to groundless or disproportionate requestor to the request of repetitive content. In such a case, the data subject has to be notified about the Company's refusal to reply to his/her request in 1 month after its receipt;

42.2. demand for reasonable fee before replying to the data subject's request that would cover administrative expenses incurred by the Company while collecting the information requested by the data subject, while examining the requestor responding to it.

43. The Company has to verify the data subject's identity before implementation of his/her rights. If the Company cannot verify the data subject's identity from the submitted request, it may ask the data subject to provide additional information or verify his/her identity otherwise in 10 days after receipt of the data subject's request. When the Company asks the data subject to provide additional information or verify his/her identity otherwise, the Company shall specify the needed additional information or measures that the data subject has to undertake in order to have his/her identity verified properly. It shall also set a reasonable term for submission of additional information or implementation of other measures. If the data subject does not provide additional information or does not undertake other measures that would help to identify the data subject within the set term, the Company has a right to refuse examination or response to the data subject's request. The data subject shall be informed about the Company's refusal to accept the request and about the reasons of refusal in 10 days after the deadline set by the Company for the data subject regarding additional information or implementation of other measures.

44. If the data subject's representative, who submits a request in the name of the data subject, does not submit a power of attorney or if the submitted power of attorney is invalid or does not satisfy requirements of the Civil Code, other laws or legal acts of the Republic of Lithuania, the Company has the right to refuse to accept such a request. The data subject's representative shall be informed about refusal to accept the request and its reasons in 10 days after receipt of the request.

45. The responsible employee of the Company shall examine requests of the data subjects, prepare replies to them, notify the data subjects in the cases described herein, ask them for additional measures or determine implementation of other measures.

46. Upon having examined the data subject's request, the Company shall give reply to the data subject stating whether the request was satisfied or rejected. If the request is satisfied, it is stated in the reply in what scope it is satisfied and the term is set for implementation of the requested demands, with regard to the request's complexity. If the request is satisfied partially or rejected, the reasons have to be stated, why the request was rejected or satisfied partially. If the request is satisfied partially or rejected, the data subject may lodge a complaint to the Company as described in chapter XII of the Description.

XII. LODGING AND EXAMINATION OF COMPLAINTS OF THE DATA SUBJECTS

47. In order to safeguard comprehensive implementation of the data subjects' rights, the Company provides opportunity to the data subjects to lodge complaints regarding review of partially unsatisfied or rejected requests. The data subjects may also lodge complains if the Company does not undertake any actions regarding the data subject's request in 1 month after its receipt, i.e. does not reply, does not notify the data subject about refusal to reply and does not carry out other actions described in chapter XI of the Description.

48. The complaint must contain one of the reasons established in clause 47 herein for lodging of complaint. If the complaint is lodged because of partial satisfaction or rejection of the data subject's request, the reasons have to be stated, why the data subject considers that his/her complaint has to be satisfied in full scope. The copy of the partially satisfied or rejected request of the data subject has to be enclosed to the complaint.

49. The complaint shall be lodged by e-mail support@tutis.lt.

50. The data subject may lodge a complaint personally or through the representative. When the data subject's representative lodges a complaint, s/he also has to submit a valid power of attorney that would satisfy requirements of the Civil Code, other laws or legal acts of the Republic of Lithuania.

51. The examination terms of the data subject's complaints are the same as the examination terms of the data subject's requests established in clause 40 herein.

52. The response modes to the data subject's complaints are the same as the response modes to the data subject's requests established in clause 41 herein.

53. The Company shall reply to the data subject's complaints free of charge.

54. The Company shall refuse examining a complaint of the data subject if it has already examined and responded to the data subject's complaint regarding the same reasons and regarding the same request of the data subject. The data subject shall be informed about refusal to accept the repeated complaint and its reasons in 10 days after receipt of the repeated request.

55. If the data subject's representative, who lodges a complaint in the name of the data subject, does not submit a power of attorney or if the submitted power of attorney is invalid or does not satisfy requirements of the Civil Code, other laws or legal acts of the Republic of Lithuania, the Company has the right to refuse to accept such a complaint. The data subject's representative shall be informed about refusal to accept the complaint and its reasons in 10 days after receipt of the complaint.

56. The responsible employee of the Company shall examine complaints of the data subjects and prepare replies to them. The complaint cannot be analysed by the same employee who was examining the data subject's request under appeal.

57. Upon having examined the data subject's complaint, the Company shall give reply to the data subject stating whether the complaint was satisfied or rejected. If the complaint is grounded and satisfied, the data subject's request should be reviewed and it should be stated in the reply in what scope the request is satisfied and the term should be set for implementation of the requested demands, with regard to the request's complexity. If the complaint is rejected, the reasons of rejection have to be stated in the Company's reply.

XIII. FINAL PROVISIONS

58. In implementation of their rights established in chapter 3 of the Regulation, all the Company's data subjects and employees examining requests and complaints of the data subjects have to act in compliance with the implementation procedure of the rights of data subjects established herein.

59. The Description of Implementation Procedure of the Rights of Data Subjects is available for the Company's data subjects on the websites www.tutis.lt, www.aerotutis.lt, www.noordi.lt.