PRIVACY POLICY

This Privacy Policy is intended to inform you on how Sunwind Energy UAB (hereinafter referred to as **we** or **Company**) handles your personal data.

Personal data is processed in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) and the requirements of the Law on Legal Protection of Personal Data of the Republic of Lithuania.

The provisions of the Privacy Policy apply when we process your personal data. If you are browsing this website, you are deemed to have read the Privacy Policy. We may amend the Privacy Policy at any time at our own discretion or as required by the law. Please make sure you have read the latest version of the Privacy Policy before browsing the website.

This website may contain links to other websites. This Privacy Policy does not apply when you browse other websites, and you should always read the privacy notices of other service providers and contact them directly regarding the use of personal data.

INFORMATION ON THE DATA CONTROLLER

The Controller of your personal data is Sunwind Energy UAB, registration No.: 306095474, address: Vytenio str. 46, Vilnius, phone: +370 5 213 7577, email: info@sunwind.lt

PURPOSES OF THE PROCESSING OF PERSONAL DATA

We use personal data to provide services to you or our business customers, to enter into agreements with business partners and for the following purposes:

- Identification;
- Management of inquiries and complaints;
- Implementation of the Know Your Customer principle in the Company;
- Implementation of the Know Your Customer principle with respect to the Company's (potential) business partners, when the Company is providing information to (potential) business partners;
- Presenting offers to potential business partners or customers;
- Protecting people and property;
- Defending its rights, legitimate interests;
- Conducting incident investigations;
- Executing obligations provided for by the law;
- Provision of Company services;
- Improvement of Company services, development of new services and business;
- Internal Company administration, accounting;
- Employee selection;
- Fulfilment of our obligations to third parties, including our business customers, partners;
- Debt recovery and administration, filing of legal claims for the purpose of the exercise or defence thereof, defending against claims, lawsuits and complaints filed against us;
- Statistics;
- Maintenance and improvement of the Company website;
- Management of social media accounts;
- Communication.

We process personal data when (i) we are required to do so by the law, (ii) you intend to or have entered into an agreement with us, (iii) there is a legitimate interest of our company or third parties, or (iv) we have

obtained your consent to the processing of personal data, (iv) processing is necessary to protect the vital interests of the data subject or another natural person.

EMPLOYEE SELECTION

During the employee selection process, we process your personal data for the purpose of selecting the most suitable candidate for the vacancy announced by Company. For this purpose, we usually process personal data such as name, surname, date of birth, address, e-mail address, telephone number, information about the candidate's work experience, information about the candidate's education, qualifications and training, information about valid licenses, as well as other details provided in your resume, cover letter or other documents provided to us, including the information provided on your LinkedIn profile and information related to the evaluation of the selection interview.

After selecting a suitable candidate for the purpose of concluding an employment contract, additional data may be collected, such as personal identification number, bank account number.

If required by the law, to comply with the mandatory requirements set out therein, we may also ask you to provide the following special category personal data: data concerning your health and criminal records (for example, where the law requires us to assess the information on good repute).

We process the candidate's personal data during the selection process. After selecting a suitable candidate, the personal data of the candidates will be deleted.

SOURCES AND TYPES OF DATA WE ACQUIRE

Personal Data Obtained Directly from the Data Subject

We receive personal data when you make inquiries, various complaints or claims related to the provision of services of Company or Company partners (including complaints related to lost or missing luggage), provide data during the employee selection process, browse our website, interact with us on social media, follow us on social media or contact us on behalf of the organization or company you represent, video surveillance in the premises we use.

We process the personal data including but not limited to:

- Identity-related data: name(s), surname(s), date of birth, gender,
- Website browsing data (for more details, see sections *Browsing Statistics* and *Cookies*), data related to your behaviour on social networks, as far as Company is concerned, e.g. your visits to social media accounts managed by Company;
- Contact details: address, correspondence address, telephone number, e-mail address;
- information related to the employee selection process (see section *Employee Selection* of the Privacy Policy);

All data is provided to us of your own free will. If you do not provide certain personal data, we may be unable to take appropriate action.

Personal Data Obtained from Other Persons

We may obtain information about you, including but not limited to, indirectly from the organizations and individuals you are representing, from the legal entities in which you are a representative, a manager, a person responsible for accounting, a member of the board or the final beneficiary.

When we are contacted by legal entities, for the purposes of entering into agreements with such legal entities and submitting our proposals, we may receive the following personal data related to you as a representative, manager, owner, venturer, shareholder, beneficiary or holder of voting rights at such legal entity:

- Identification-related data: name(s), surname(s), date of birth, gender;
- Contact details: address, correspondence address, telephone number, e-mail address;

We may also obtain the data of you as a representative of an organization or a company from publicly available sources or search engines.

We may obtain the information listed in the *Employee Selection* section of the Privacy Policy from Company Business Partners.

We may also receive the same direct data indirectly, from third parties, as described above.

SHARING OF INFORMATION

We do not usually share your personal information with other parties. However, in order to fulfil our obligations to our business partners, customers, to comply with the legal requirements or on the basis of a legitimate interest of Company or a third party, your personal data may be transferred to the following persons:

- Any company of the Company Group to the extent necessary for the provision of services, for the purposes of financial accounting, auditing and corporate governance of Company, as during the use of integrated information systems and equipment by Company Group companies;
- Government and law enforcement institutions, authorities;
- Other persons or authorities, if required to do so by the law;
- Company service providers, such as:

  lawyers, auditors, insurance companies,

  other persons to the extent necessary for the respective service to be provided to us properly;
- Data processors involved;
- Data controllers when Company processes your personal data as a data processor;
- Company business partners,
- (Potential) Company partners (business customers) in their implementation of the Know Your Customer principle, in which case information related to the structure, management and final beneficiaries of Company (or Company group) is provided.

In accordance with the legal requirements, we may transfer your personal data to other persons not specified in this Privacy Policy.

We will only transfer your personal data to persons other than those indicated in this Privacy Policy with your consent to such personal data transfer or upon receipt of your request to transfer your personal data to specific persons.

When transferring your personal data to other persons, we always follow the principle of data minimization and ensure the confidentiality and security of the personal data transferred.

PERSONAL DATA PROCESSORS

In order to fulfil our obligations, as well as to ensure the operations of Company and for other legitimate purposes, we may use data processors (e.g. persons providing us with data centre, server, website administration, document archiving, accounting and other services) who process the personal data in accordance with our instructions and within the scope determined by us to the extent necessary to achieve the purposes of the processing of personal data. Any company in the Company group can also act as a data processor.

When selecting the data processors, we require that the data processors have appropriate organizational and technical safeguards in place to ensure the security and confidentiality of personal data.

COMPANY AS A DATA PROCESSOR

When we provide certain services related to the personal data we process, we may also act as a personal data processor. In such cases we act in accordance with the lawful instructions and requirements of the personal data controller, including those related to organizational and technical safeguards, and process your personal data in accordance with the lawful instructions of such personal data controller.

TIME LIMITS FOR THE STORAGE OF PERSONAL DATA

We ensure that your personal data is processed for no longer than is necessary to achieve the purposes for which the data is processed, no longer than provided for by the legislation.

We will usually store the personal data during the provision of services and the term of the agreement, and for 10 years after the provision of the services or the end of the agreement, except when longer terms are required to comply with the document archiving or other legal requirements or longer terms are specified by the data controller.

If an agreement with a potential business partner or customer is not concluded, we will store the information related to the implementation of the Know Your Customer principle for 6 months from the end of the contract negotiations.

Upon the expiration of the storage period, the personal data collected will either be deleted, destroyed or anonymised. Some personal data stored in computer files may still be available for a period of time on data backup systems after the expiration of the storage period, but access to such personal data is strictly limited.

SECURITY AND CONFIDENTIALITY OF PERSONAL DATA

Since we especially value the security of your personal data, we use appropriate technical and administrative safeguards to protect the personal data collected against loss, unauthorized use and alteration.

Your privacy is of the utmost importance to us, which is why we handle all personal data strictly in accordance with the principle of confidentiality.

YOUR RIGHTS

As a data subject, you have the following rights listed below in this section.

The right to know (be informed) about the processing of your personal data.

The right to access your data and to be informed on how it is being processed.

The right to request the rectification of incorrect, incomplete or inaccurate personal data.

The right to require the destruction of personal data or **the restriction of the processing of data if it is established that personal data is processed unlawfully or fraudulently**.

The right to object to the processing of personal data, except in cases where such personal data is processed in the legitimate interest of our company or a third party, and your interests are not overriding.

The right to withdraw consent to the processing of your data.

You can request the erasure of all data we have collected about you in order to exercise your ***"right to be forgotten"***. We have the right to refuse your request *"to be forgotten"* in cases provided for by the law.

You have the right to request that the personal data you have provided, if it is processed on the basis of consent or agreement and the processing is performed using automated means, be **transferred**, i.e.

forwarded to another controller or provided to you in a structured, commonly used and machine-readable format, if technically possible (this applies if you have provided the personal data yourself and if the personal data is processed using automated means on the basis of consent or conclusion and performance of an agreement).

You have the right **not to be subject to solely automated processing of your data, including profiling.**

We will normally provide you with the requested information free of charge, unless your requests are manifestly unfounded or disproportionate, in particular because of their repetitive content. Furthermore, if your requests are manifestly unfounded or disproportionate, we have the right to refuse to comply with your request. If you do not provide a form for submitting the information in your request, we will provide you with the information in the same form as the request was received.

If you have doubts about the lawfulness of the processing of your personal data or you are not satisfied with the solution to the situation, you have the right **to submit a complaint regarding such processing of personal data** with the State Data Protection Inspectorate (address: L. Sapiegos 17, Vilnius, e-mail: ada@ada.lt, website: https://vdai.lrv.lt/) or a competent court. You have the right to complain about our actions or omissions.

If you are dissatisfied with the solution to the situation, we encourage you to contact Company first, using the contact details indicated in this Privacy Policy. Upon receipt of your request, we will respond to you within one month. In exceptional cases, for valid reasons, we may extend the deadline for our response by informing you hereof. In that case, the extended period shall not exceed three months from the date of receipt of the request, unless otherwise provided for in the legislation.

If you suffer material or non-material damage as a result of our breach of your rights as a data subject, you are entitled to receive **a compensation**.

DATA ON THE WEBSITE SERVER

The server hosting our website may record the requests you present to the server (address of the website opened, your IP address, session duration, browser description, protocol version and request method). This data is used to ensure safe and proper functioning of the website. In addition to that, if necessary, the data is used to investigate potential security breaches.

We process this data on the basis of the principle of legitimate interest, to ensure the technical availability and security of the website. The data is stored for no longer than seven days.

WEBSITE USAGE STATISTICS

To improve our website, we collect various data related to website visitors. It is important for us to know which information is interesting to our website visitors, how often they connect, which browsers and devices they use.

We collect statistical information using Google Analytics tools which allow us to capture and analyse the reported data. For more information on how Google Analytics works and the information these tools allow to collect and analyse, please visit

https://support.google.com/analytics/answer/1012034?hl=lten&ref_topic=6157800.

You can turn off the function allowing us to collect data about you using Google Analytics at any time. To do that, follow the detailed instructions below: https://tools.google.com/dlpage/gaoptout/.

Google Analytics is powered by Google Inc. based in the US. This means that the data collected using this tool is transmitted outside the European Economic Area.

Website traffic statistics are stored for a maximum of two years.

COOKIES

Some data on the website is collected using cookies.

What Are Cookies?

Cookies are small files that a website stores on your device and uses each time you visit that website. Such practice is common on most websites. Stored cookies allow the website to ensure functionality, e.g. to remember your actions and selected settings, e.g. language, for a certain period of time. This makes it easier to use the website, as you don't have to reselect the settings every time you open the website or visit a different page.

What Types of Cookies Do We Use and Why?

We use the following cookies on the website.

Name	Provider	Description, Purpose	Duration
_ga	Google Analytics	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	2 years
_gid	Google Analytics	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	1 day
_gat	Google Analytics	Used by Google Analytics to throttle request rate.	Until the moment the site window is closed
_allowcookies	Company	A system cookie that identifies and collects information about visitor consents in privacy settings.	1 month

How Can You Manage the Cookies?

You can disable the cookies or delete those already stored on your browser using the browser's *Help* function. In addition to that, most browsers offer tools that prevent the cookies from being installed. If you disable the cookies by preventing their installation, it may restrict the proper functioning of our website and may require you to reset the preferences (settings) of the website.

Cookies are installed on your device only with your consent, except for cookies that are necessary for ensuring the proper technical functioning of the website. Without your cookie consent, some features of the website may be partially or completely unavailable. For this reason, we advise our website visitors to accept the use of the cookies.