

Privacy Policy

1. GENERAL INFORMATION

- 1.1. This Privacy Policy contains information about how AQ Wiring Systems UAB processes your personal data.
- 1.2. AQ Wiring Systems UAB (hereinafter referred to as the Data Controller) sets out in this Privacy Policy the conditions for the processing of personal data when using the website operated by the Data Controller. The terms of the Privacy Policy shall apply each time you access the content and/or service provided by us, regardless of the device (computer, mobile phone, tablet, TV, etc.) that you use. If you do not agree with these terms and conditions, please do not visit our website or use our content and/or services.
 - Data Controller's details: AQ Wiring Systems UAB
 - Registered office address: Pažalvaičių St. 1, Panevėžys, LT-36224
 - Tel. No.: +370 640 31201
 - E-mail: info.aqwp@aqgroup.com
 - Legal entity code: 148427212
- 1.3. We hereby confirm that the data of the Data Controller's website visitors will be collected in accordance with the requirements of the legal acts of the European Union and the Republic of Lithuania, and the instructions of the controlling institutions. All reasonable technical and administrative tools are used to protect the data we collect from our website visitors from its loss, unauthorised use or modification.
- 1.4. This Policy has been drawn up in accordance with 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 – GDPR), the Republic of Lithuania Law on Legal Protection of Personal Data, and other legal acts of the European Union and the Republic of Lithuania.
- 1.5. The website contains links to websites that are not owned by the Data Controller. The Data Controller is not liable for the privacy policies applied by these websites, so we recommend that you be proactive and get acquainted with the privacy policies of the websites to which you are directed.

2. COLLECTION OF INFORMATION

2.1. Personal data is any information that AQ Wiring Systems UAB collects about a natural person that can be used to identify that person, including that person's name, surname, address, IP address.

2.2. We collect data on:

2.2.1. Candidates for job vacancies.

We receive personal data:

- directly from the Candidate, who provides it when he/she sends/presents his/her curriculum vitae (CV);

- from publicly available sources such as job search portals, professional social networks such as LinkedIn, on which the Candidate posts his/her curriculum vitae (CV) and declares himself/herself open to job offers;
- by the Employment Service under the Ministry of Social Security and Labour of the Republic of Lithuania, after the Candidate has submitted his/her CV via the portal of this Service or by the specialists of this Service, with the Candidate's consent, by submitting the Candidate's curriculum vitae (CV) to the selection specialists of the Company's Personnel Department;
- recruitment agencies;
- persons recommending candidates.

The Company shall not be responsible for the processing of personal data by the Employment Service under the Ministry of Social Security and Labour of the Republic of Lithuania, job search portals, the LinkedIn social network and other data controllers of other sources where Candidates publish their personal data. Candidates are advised to consult the privacy policies or other documents of these individual data controllers for information on their processing of personal data.

We shall collect the following personal data of Candidates: name, surname, current/former employer(s), education, contact details (telephone number and/or e-mail address, address), information on language skills, salary expectations and other information provided in the curriculum vitae (CV), as well as the date of receipt of the curriculum vitae (CV), and the source of the curriculum vitae (CV).

IMPORTANT: Candidates are requested to take care to protect their personal data and not to provide the Company with any superfluous information that is not necessary for the Company to make a decision on the Candidate's suitability for the position. We do not need information about your racial or ethnic origin, health, political, philosophical or religious beliefs, trade union membership, marital status, gender, sexual orientation, sexual life.

On what legal basis do we process Candidates' personal data?

a) We shall process the Candidate's personal data on the basis of the Candidate's consent (Article 6(1)(a) of the GDPR), which he/she expresses:

- by sending his/her curriculum vitae (CV) to the Company, either directly or via the Employment Service portal;
- by registering with the Employment Service online or by filling in the Jobseeker's card, indicating on the forms that his/her curriculum vitae (CV) may be published on the Employment Service's website and sent to the employer, or visible to the employer who is a user of the Employment Service's electronic services.

The Candidate shall not be obliged to provide the Company with his/her personal data and curriculum vitae (CV), but

if he/she fails to provide them and his/her curriculum vitae (CV), the Company shall not be able to assess his/her suitability for the position offered.

b) on the basis of the Company's legitimate interest (to find a suitable potential Candidate for a vacancy in the Company's workplace in order to ensure the performance of the Company's activities) (Article 6(1)(f) of the GDPR), where we collect personal data of a potential Candidate from persons who recommend him/her in order to contact the potential Candidate to submit him/her a job offer for a job position or to invite him/her to a job interview. The potential Candidate shall be informed of the right to object to the processing of his/her personal data at the time of first contact and, in the event of such objection, his/her contacts shall be deleted by

the Company.

Term of retention of personal data:

a) In the event that the Candidate does not express his/her individual consent to the processing of his/her personal data at the end of the specific selection process for the job for which he/she has applied, his/her personal data shall be erased after the signature of the contract with the successful Candidate or the adoption of the decision to close the selection process, unless the Candidate's individual consent is given to the retention of the Candidate's personal data for a specified period.

b) With the Candidate's consent, his/her personal data shall be retained by the Company for a period of 2 years from the completion of the specific selection for the purpose of offering future employment with the Company.

c) In the event of withdrawal of consent by the Candidate, the personal data shall be destroyed/erased without delay, irrespective of the retention periods indicated above.

To whom will we transfer Candidates' personal data?

Candidates' personal data shall not be shared with anyone.

Do we transfer your personal data outside the EU/EEA?

The Company shall not transfer Candidates' personal data outside the EU/EEA.

Do we use automated decision-making/profiling in the selection process?

The Company shall not make automated decisions and shall not carry out profiling in the selection of Candidates.

The Candidate may withdraw the consent given for the processing of his/her personal data at any time. Withdrawal of the consent shall not affect the lawfulness of the data processing carried out prior to the withdrawal of the consent.

By submitting his/her personal data, the Candidate hereby confirms by sending/delivering his/her curriculum vitae (CV) to the Company's Personnel Department that he/she has read this Privacy Policy, understands its provisions, and is aware of the fact that in case of any questions regarding the processing of his/her personal data in the Company he/she can contact the Company.

2.2.2. Video surveillance:

Video surveillance shall be carried out on the Data Controller's premises and on the premises located at:

Pažalvaičių St. 1, Panevėžys

Nemuno St. 29, Panevėžys

Pramonės St. 3E, Panevėžys.

For the purpose of ensuring the safety of the company's employees, the security of the company and its employees' property (video surveillance), AQ Wiring Systems UAB shall process the following personal data: the image and movements of the person entering the field of surveillance of the video cameras. This personal data shall be processed on the basis of a legitimate interest to ensure the security of property and the safety of others and shall be retained for 7 (seven) days after the recording. Data subjects shall be informed of the locations where video surveillance is carried out on the territory of AQ Wiring Systems UAB by means of warning signs.

2.2.3. For the purpose of concluding and executing purchase, sale and service contracts, AQ Wiring Systems UAB shall process the following personal data: name, surname, personal identification number, personal document data, e-mail address, residential address, telephone number, bank account number, VAT

identification number, details of transactions concluded and their execution. This personal data shall be processed on the basis of the conclusion and performance of the contract and shall be retained for 10 (ten) years after the end of the contract.

2.2.4. For the purpose of granting payment provisions to customers, the following personal data shall be processed: name, surname, bank account number, payment schedule. This personal data shall be processed on the basis of the performance of the contract and shall be retained for 10 (ten) years after the end of the contract.

2.2.5. For the purpose of debt administration, AQ Wiring Systems UAB shall process the following personal data: name, surname, address, date of birth, amount and circumstances of the debt. This personal data shall be processed on the basis of legitimate interest to ensure the performance of contracts and shall be retained for 10 (ten) years after the contract is fulfilled/expires.

2.3. Where contracts are concluded with natural persons, the purpose of the processing of personal data contained in or relating to such contracts shall be for the purpose of the proper performance of the contracts in question (Article 6(1)(b) of the GDPR). In such a case, we shall process the following personal data: name, surname, personal identification number, address, business license/individual activity certificate number (of the service provider), bank account number, and information related to the performance of the contract. The data are necessary for the performance of the contract and without them we cannot perform the contract properly.

2.4. In the case of contracts with legal entities, the purpose of the processing of personal data contained in or relating to such contracts shall be for the purpose of the proper performance of the contracts in question (Article 6(1)(f) of the GDPR – our legitimate interest in the proper performance of the contract). In such a case, we shall process the following personal data: name, surname, e-mail address, telephone number, content of correspondence.

2.5. In the case of contracts, we shall process data for 10 (ten) years after the end of the contractual relationship. You hereby authorise us to collect, manage, process and store your Personal Data to the extent and for the purposes set out in this Privacy Policy.

2.6. For accounting purposes, the Data Controller shall process personal data for 10 (ten) years.

3. PRINCIPLES OF DATA PROCESSING:

3.1. Personal Data of the data subject must be processed in a lawful, honest and transparent manner (legality, fairness and transparency principle);

3.2. Personal Data must be collected for specified, clearly defined and legitimate purposes and not further managed in a way incompatible with those purposes; further processing of data for archiving purposes in the public interest, for scientific or historical research purposes or for statistical purposes, is not considered to be incompatible with the primary purpose (purpose limitation principle);

3.3. Personal Data must be adequate, appropriate and only necessary for the purpose for which they are processed (data minimization principle);

3.4. Personal Data must be accurate and, if necessary, updated; all reasonable steps must be taken to ensure that personal data which are not accurate considering the purposes for which they are processed are immediately erased or corrected (accuracy principle);

3.5. Personal Data must be stored in such a way that the identity of the data subjects can be determined for no longer than it is necessary for the purposes for which personal data are processed; personal data may be stored for longer periods if personal data are only processed for archival purposes in the public interest, for scientific or historical research purposes or for statistical purposes, by implementing the appropriate technical and organizational measures necessary to safeguard the rights and freedoms of the data subject (principle of

limitation of retention period);

3.6. Personal Data must be processed in such a way as to ensure the proper security of personal data, including protection against unauthorized processing or unlawful processing of data, and accidental loss, destruction or damage, by applying appropriate technical or organizational measures (a principle of integrity and confidentiality);

3.7. The Data Controller shall be responsible for ensuring compliance with the abovementioned principles and must be able to prove that they are being complied with (the principle of accountability).

4. PROCESSING OF PERSONAL DATA BY THIRD PARTIES

4.1. In certain cases, we may disclose your information to entities other than those described above:

4.1.1. To comply with the law or in response to a mandatory requirement of court proceedings (e.g. a court order, search warrant or summons);

4.1.2. To confirm the legitimacy of our actions;

4.1.3. To protect our rights, property and to ensure their safety;

4.1.4. In other cases – with your consent or your legitimate request.

4.2. Any personal data you provide to us may be transferred to the competent authorities in cases directly provided for by law.

4.3. We may disclose your personal data to personal data processors who provide us with services (perform work), i.e. auditors, lawyers, consultants, and process your data on behalf of AQ Wiring Systems UAB as the data controller.

5. COOKIES

5.1. When you visit the AQ Wiring Systems UAB website, we may place a cookie on your device. Cookies help us to recognise your device and help us to improve the functionality of our website and make it easier to use.

5.2. We use the following cookies:

5.2.1. Strictly necessary cookies.

These cookies are necessary for our website to work. The basis of the data processed by such cookies is the proper execution of the contract when you visit the website, and we ensure the quality and security of the visit. Without these cookies, the website will not function properly.

5.2.2. Preference cookies.

Preference cookies allow a website to remember information that changes the way the website works or looks, such as the language you choose or the region you are in.

5.2.3. Statistical cookies.

Statistical cookies help us understand how you interact with a company's website by collecting and providing information anonymously.

5.2.4. Marketing cookies.

Marketing cookies are used to collect information about users' browsing habits. The aim is to show ads that are relevant to the individual user. They help us to optimise our advertising resources and compete more effectively in the market

5.2.5. Unclassified cookies.

Unclassified cookies are cookies that we classify together with the providers of individual cookies.

5.3. Cookies can be deleted or blocked by selecting the appropriate settings in your browser to refuse all or part of the cookies. Please be aware that if you use browser settings that block cookies (including necessary cookies), you may have problems using some or all of the features of the website.

6. WHAT ARE YOUR RIGHTS?

6.1. Information about your rights in relation to the processing of your personal data by AQ Wiring Systems UAB and when you can exercise these rights is provided below. If you would like further information about your rights or you want to exercise them, please contact us at the e-mail address provided in this Privacy Policy:

- 6.1. To know (be informed) about your data processing (right to know);
- 6.2. To get to know your data and how it is being processed (right to access);
- 6.3. To require a rectification or, in light of the purposes of the processing of the personal data, a supplementation of the personal data of the individual (right to rectification);
- 6.4. To destroy or suspend your data processing (except for its storage) (right to erasure and right to be forgotten);
- 6.5. To have the right to require that the Data Controller restrict the processing of your personal data for one of the legitimate reasons (right to restrict);
- 6.6. To have the right to transfer your data (right to transfer);
- 6.7. To disagree with the processing of your personal data when this data is processed, or is intended to be processed for direct marketing purposes, including profiling, as far as such direct marketing is concerned.

7. HOW CAN YOU EXERCISE YOUR RIGHTS?

7.1. To exercise your rights, please submit requests, complaints or claims to us in writing:

- by e-mail: info.aqwp@aqgroup.com
- by post: AQ Wiring Systems UAB, Pažalvaičių st. 1, LT-36224 Panevėžys
- on arrival at the Company: AQ Wiring Systems UAB, Pažalvaičių st. 1, LT-36224 Panevėžys

7.2. We will respond in writing to any requests, complaints or claims we receive in accordance with the procedures and deadlines set out in the law. We will endeavour to provide you with the information as soon as possible, but at the latest within 30 (thirty) days of receiving your request.

7.3. If you contact us, we may process the data you provide to us, i.e. name, surname, e-mail address, telephone number, date and text of the correspondence in accordance with the procedures set out in this Privacy Policy. Please note that we may need to contact you by post, e-mail or telephone. Please notify us of any changes to your personal data.

7.4. If, following a request, complaint or demand, we have any suspicions about the identity of the person making the request, we have the right to ask for the identity document of the person making the request.

7.5. In cases where you exercise your rights by submitting a written request to the address of the Data Controller's registered office by post, a notarised copy of a personal document (passport, personal identity card) must be submitted with the request.

7.6. If we fail to provide you with the necessary information and/or you have a complaint about the processing of your personal data, you shall have the right to contact the State Data Protection Inspectorate (www.vdai.lrv.lt) by filing a complaint.

8. LIABILITY

8.1. You are responsible for ensuring that the data you provide to us is accurate, correct and complete. If the data you have provided changes, you must inform us thereof immediately by e-mail. In no event shall we be liable for any damage caused to you as a result of your provision of incorrect or incomplete personal data or your failure to inform us of any change in such data.

8.2. AQ Wiring Systems UAB shall not be liable for damages, including damages caused by interruptions in the use of the Website, loss or damage to data caused by the actions or omissions of the Visitor or third parties acting with the Visitor's knowledge, including incorrect data entry, other errors, intentional damage, or other misuse of the Website. The Data Controller of the Website shall also not be liable for any interruptions in access to and/or use of the Website and/or any damage caused by such interruptions due to the acts or omissions of third parties not related to the Visitor, including interruptions in electricity, Internet access, etc.

Ensuring Data Security

The Company shall implement appropriate organisational and technical data security measures to protect personal data against accidental or unlawful destruction, alteration, disclosure or any other unlawful processing. All personal data and other information provided by individuals shall be treated as confidential. Access to personal data shall be limited to those employees and service providers who need it to carry out their job functions or to provide services.

9. CHANGES TO THE PRIVACY POLICY

9.1. AQ Wiring Systems UAB may update or change this Privacy Policy at any time. Such updated or amended Privacy Policy shall become effective upon its posting on the AQ Wiring Systems UAB website.

9.2. The "Date Updated" at the bottom indicates when the Privacy Policy was last updated.

Date Updated:
December 2024