

DESCRIPTION OF THE PROCEDURE FOR PROCESSING PERSONAL DATA AND EXERCISING THE RIGHTS OF DATA SUBJECTS AT AQ WIRING SYSTEMS, UAB

I. GENERAL PROVISIONS

1. The Description of the Procedure for Processing of Personal Data and Exercising the Rights of Data Subjects at *AQ Wiring Systems, UAB* (hereinafter - the Description of the Procedure) sets out the scope and purposes of processing of personal data, means of storing personal data, management of personal data breaches, rights of personal data subjects, the procedure for submitting and processing requests from data subjects regarding the exercise of the right(s) set out in 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 (hereinafter -the Regulation) at *AQ Wiring System, UAB*.

2. The Description of the Procedure applies to the implementation of the rights of data subjects, i.e. persons whose personal data is processed by *AQ Wiring Systems, UAB*.

3. The terms used in the Description of the Procedure shall be understood as defined in the Regulation, the Republic of Lithuania Law on Legal Protection of Personal Data and other legal acts regulating the protection of personal data.

4. The personal data of the data subjects are processed by the data controller, *AQ Wiring Systems, UAB* (hereinafter - the Company), legal entity code 148427212, registered office address: Pažalvaičių st. 1, Panevėžys.

II. DATA SUBJECTS

5. Data subjects:

5.1. Who are employees, trainees and other persons otherwise performing functions or activities for the Company shall be informed of the possibility of exercising their rights in the following possible ways:

5.1.1. By signed access to this Description of the Procedure via the electronic document management system (HCM) or by any other signed access procedure established by the Company;

5.1.2. In the "Protection of personal data" section of the Company's INVID;

5.1.3. On the Company's website www.aqgroup.com by publishing this Description:

5.1.4. At the time of recruitment;

5.1.5. In such other ways and forms as the Company may determine;

5.2. Who are not employees, trainees and other persons otherwise performing functions or activities for the Company (e.g., customers, guests, visitors, partners, employees of service providers, etc.) shall be informed of the possibility of exercising their rights in the following possible ways:

5.2.1. On the Company's website www.aqgroup.com by publishing this Description of the Procedure;

5.2.2. when applying for services or placing an order for services;

5.2.3. using other methods and means.

III. PROCESSED PERSONAL DATA OF DATA SUBJECTS

6. *AQ Wiring Systems, UAB* processes the personal data of the following groups of data subjects for the following purposes:

6.1. Individuals who have submitted a complaint or request to the Company — for the purpose of informing, handling complaints and requests, and internal administration (record-keeping);

6.2. *AQ Wiring Systems, UAB* current and former employees, working under employment contracts (hereinafter - Employees of the Company) — for the purposes of internal administration (structure management, personnel management, fulfilment of the employer's obligations to the employee, document management, accounting, use of material and financial resources, internal communication);

6.3. Applicants for employment with the Company — for the purpose of verifying that the person meets the requirements for the position or job function, for internal administration (personnel management and document management);

6.4. The personal data of individuals entering the Company's video surveillance field, as well as the video data of the vehicles they drive, shall be processed for the purpose of protection of the property of *AQ Wiring Systems, UAB*, ensuring the security of individuals visiting the Company, and safeguarding the security of the employees of *AQ Wiring Systems, UAB*;

6.5. Individuals who visit the Company — for the purpose of ensuring the safety of persons and protecting the property of *AQ Wiring Systems, UAB*;

6.6. The personal data of natural persons who have entered into contracts with the Company for the public procurement of goods, services, works, compulsory and voluntary practices, or other contracts, as well as the personal data of employees of legal entities specified in the contracts, shall be processed for the purposes of internal administration (document management, contract execution, and billing).

7. *AQ Wiring Systems, UAB* shall keep a record of the data processing activities, which shall contain all the information on the processed personal data referred to in Article 30 of the Regulation.

8. *AQ Wiring Systems, UAB* processes personal data on the basis of the grounds referred to in Article 6(1)(b), (c) and (e) of the Regulation or with the consent of the data subject.

9. Where personal data are collected from a data subject, *AQ Wiring Systems, UAB* shall provide the data subject with the information referred to in Article 13 of the Regulation at the time the personal data is collected.

IV. PROCESSING AND STORAGE OF PERSONAL DATA

10. Personal data shall be processed automatically and manually in *AQ Wiring Systems, UAB*.

11. Access to personal data shall be granted only to those employees of the Company who need such data for the performance of their functions, tasks and assignments.

12. Any actions related to personal data are limited to those for which the employees of *AQ Wiring Systems, UAB* have been granted rights.

13. Employees of *AQ Wiring Systems, UAB* who are authorised to process personal data are obliged to comply with the principles and requirements for the processing of personal data set out in

the Regulation and to keep confidential any information relating to personal data which they have become aware of in the course of performing their functions and assignments.

14. *AQ Wiring Systems, UAB*, shall implement and ensure organisational and technical measures when protecting personal data in order to protect personal data against accidental or unlawful destruction, alteration, disclosure or any other unauthorised processing.

15. Documents containing personal data shall be processed, recorded, and stored in accordance with the requirements of the Rules of Document Management and Record Keeping, as approved by the Order of the Chief Archivist of Lithuania No. V-117, *On Approval of the Rules of Preparation of Documents* (dated 4 July 2011, up-to-date version), and the Rules of Document Management and Record Keeping, as approved by the Order of the Chief Archivist of Lithuania No. V-118, *On Approval of the Rules of Document Management and Record Keeping* (dated 4 July 2011, up-to-date version)

16. Personal data shall be kept for no longer than is necessary for the purposes of the processing. The time limits for storing personal data shall be specified in the annual documentation plan approved by *AQ Wiring Systems, UAB*. When such data are no longer needed for processing purposes, they shall be destroyed

V. PROCESSING OF IMAGE DATA

17. To protect property of *AQ Wiring Systems, UAB*, ensure the safety of visitors, and safeguard the security of its employees, the Company implements video and audio surveillance.

18. When implementing video surveillance, the personal data of *AQ Wiring Systems, UAB* employees, visitors, and other individuals entering the surveillance area—such as recorded images, vehicle registration numbers, and other data that can directly or indirectly identify a person—shall be processed.

19. Photography and/or video and audio recording may be used when organising *AQ Wiring Systems, UAB* events, video conferences and other means of communication dissemination. Data subjects shall be informed about photography, video recording, and audio recording before the processing of their personal data begins. If additional personal data of event participants are collected before or during the event (e.g., through participant registration), data subjects must be properly informed about the processing of their personal data by receiving the information specified in Article 13 of the Regulation. This information may be provided in various forms, depending on the nature of the event and the chosen registration method. For example, it can be shared through an invitation, a registration form, a leaflet, or other sources where event details are published.

VI. RIGHTS OF DATA SUBJECTS

20. Every data subject shall have the following rights:

20.1. The right to have access to personal data processed by *AQ Wiring Systems, UAB* and to receive the following information:

20.1.1. purposes of the processing of personal data,

20.1.2. categories of personal data concerned,

20.1.3. the data recipients or categories of recipients to whom personal data have been or are being disclosed in the last one year, in particular recipients of data in third countries or international organisations,

20.1.4 established retention period of personal data,

20.1.5. when personal data is not collected from the data subject, all available information as to their sources;

20.2. The right to request the rectification of inaccurate personal data and/or the completion of incomplete personal data;

20.3. The right to request *AQ Wiring Systems, UAB* to erase personal data concerning the data subject without delay (right to be forgotten) if any of the following conditions apply:

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

20.3.2. the data subject withdraws consent,

20.3.3. the data subject does not consent to the processing of data,

20.3.4. the personal data are processed unlawfully,

20.3.5. the personal data need to be erased to comply with a legal obligation in the European Union or national law to which the controller is subject;

20.4. The right to request *AQ Wiring Systems, UAB* to restrict the processing of the data if any of the following conditions apply:

20.4.1. the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data,

20.4.2. the processing is unlawful when the data subject opposes the deletion of the personal data and requests the restriction of their use,

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

20.5. The right to obtain personal data concerning the data subject, which they have provided to the controller, in a structured, commonly used, and machine-readable format, as well as the right to have those data transmitted to another controller (right to data portability) and *AQ Wiring Systems, UAB*, as the recipient of such personal data, shall not impede this transfer when processing is based on consent or carried out by automated means. When exercising this right, the data subject may request that the Company transmit their personal data directly to another controller, where technically feasible

21. The data subject shall have the right to object at any time, on grounds relating to their particular case, to the carried out processing of personal data concerning them, where such processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or where the processing is necessary for the legitimate interests of the controller or a third party, including in the context of profiling, in accordance with these provisions.

22. The data subject shall have the right to object to being subject to a decision based solely on automated processing, including profiling, which gives rise to legal consequences for the data subject or similarly significantly affects them.

23. The protection of third parties' personal data and privacy rights must be ensured when exercising the rights of data subjects (for example, the personal data of third parties must be depersonalised when providing a reply or a copy of personal data to the data subject).

VII. PROVISION OF DATA TO THIRD PARTIES

24. Personal data shall only be disclosed to third parties in the cases and according to the procedures established by law and other legal acts, as follows:

24.1. Personal data of individuals who have submitted a complaint or request to *AQ Wiring Systems, UAB*, for the purpose of processing the complaint or request, shall be disclosed to legal and natural persons;

24.2. Personal data of employees of *AQ Wiring Systems, UAB*, for the purpose of social insurance tax administration, shall be disclosed to the State Social Insurance Fund Board under the Ministry of Social Security and Labour and, for the purpose of tax administration, it shall be disclosed to the State Tax Inspectorate under the Ministry of Finance;

24.3. Video data of persons who have entered the field of video surveillance by *AQ Wiring Systems, UAB*, for the purpose of detecting possible violations of legislation, shall be disclosed to the pre-trial investigation authorities, courts or other state authorized institutions;

24.4. To other third parties to whom *AQ Wiring Systems, UAB* is required by law, other legal acts, or contracts to provide personal data.

VIII. SUBMISSION OF THE REQUEST FOR THE EXERCISE OF DATA SUBJECTS' RIGHTS

25. The data subject may exercise their rights independently or through a representative. If a representative of the data subject (e.g., a lawyer, insolvency administrator, attorney, etc.) applies to exercise the data subject's rights, it shall be considered as the data subject acting on their own behalf

26. The data subject's rights may only be exercised if the data subject, or their representative, provides the Company with the means to identify the data subject.

27. When applying to exercise the rights of data subjects, the data subject and/or their representative must be properly identified to ensure the Company has no doubt about their personal identity.

28. In case of doubt regarding the identity of the data subject, the Company has the right to request additional information necessary to verify their identity

29. When applying to exercise their rights as a data subject, an individual who is not an employee, trainee, or any other person performing functions or activities for the Company:

29.1. Shall submit a request in the standard form set out in Annex 1 to this Description of the Procedure;

29.2. Shall have the right to make the request in person, by post or by electronic means. When submitting a request by electronic means, the data subject must sign it with an electronic signature;

29.3. The request must be legible, signed by the individual, and include the data subject's name, place of residence, contact details, and information on which rights set out in Section IV of the Description of the Procedure the data subject wishes to exercise, and to what extent;

29.4. If the data subject has not submitted the request in accordance with the procedures and requirements set out in Section 8 of the Description of the Procedure, the request will not be considered, and the individual will be notified within 10 (ten) working days of receipt of the request at the latest.

30. When applying to exercise their rights as a data subject, an individual who is an employee, trainee, or any other person performing functions or activities for the Company:

30.1. Shall submit a free-form request to the Company's Data Security Officer, either in writing or by email: info.aqwp@aqgroup.com;

30.2. When making a request, the individual must provide their name, department, position, and specify how they wish to receive the response.

31. The data subject may exercise their rights within the Company independently or through a representative. If a representative applies to *AQ Wiring Systems, UAB* on behalf of the data subject, they must include their own name, surname, place of residence, contact details, as well as the name, surname, and place of residence of the represented person. The request must also specify which rights of the data subject, as outlined in Section VI of the Description of the Procedure, the data subject wishes to exercise and to what extent. Additionally, the representative must enclose a document confirming the representation, or a copy of such a document, certified in accordance with the procedure established by law.

IX. REVIEW OF THE REQUEST FOR THE EXERCISE OF DATA SUBJECTS' RIGHTS

32. *AQ Wiring Systems, UAB* shall provide the data subject or their representative with information about the action taken in response to the request, without undue delay and no later than 30 calendar days from the receipt of the request. The Company shall provide the data subject or their representative with a reply in the official language, using the method chosen by the data subject: by registered post, by personal delivery to the Company, or by electronic means with an electronically signed document using a secure electronic signature. If, for objective reasons, it is not possible to provide a reply to the data subject or their representative in the manner chosen, *AQ Wiring Systems, UAB* shall provide the reply by registered mail.

33. In the event of a delay in the provision of the information when reviewing the request, the data subject shall be informed within a specified period of time, indicating the reasons for the delay and the possibility of lodging a complaint with the State Data Protection Inspectorate and indicating the estimated time limit for the reply.

34. *AQ Wiring Systems, UAB* shall not process a request from a data subject that is not submitted in accordance with the requirements outlined in points 25-31 of the Description of the Procedure.

35. If the controller does not review the data subject's request, the controller shall inform the data subject or their representative of the reasons for the failure to review and of the possibility of lodging a complaint with the Supervisory Authority and of exercising another remedy, without delay, but at the latest within 30 calendar days of receiving the request.

36. *AQ Wiring Systems, UAB* shall provide the data subject with the reasons for refusing to comply with their request to exercise their rights as a data subject.

37. The Company shall provide the processed data to the data subject in writing and free of charge. In certain cases (where the data subject is clearly abusing their rights by making repeated, unreasonable, or disproportionate requests for information, extracts, or documents due to their repetitive nature), the provision of information and data to the data subject may be subject to a charge. The controller may impose a reasonable fee, considering the administrative costs associated with providing the information or handling the requested notifications or actions, or may refuse to

act on the request. The data controller shall have the burden of proving that the request is manifestly unfounded or disproportionate.

38. When exercising the rights of the data subject, *AQ Wiring Systems, UAB* shall ensure that the inviolability of others' private lives is not infringed.

39. The data subject shall have the right to complain against the actions or omissions of the Company when exercising the data subject's rights, to the State Data Protection Inspectorate at L. Sapiegos st. 17, Vilnius, e-mail: ada@ada.lt, website: www.vdai.lrv.lt, or to other institutions which examine such complaints in accordance with the procedure established by law.

40. The refusal of *AQ Wiring Systems, UAB* to exercise the rights of the data subject may be subject to the procedure established by law.

41. In the event of material or non-material damage as a result of the violation of the data subject's rights, the data subject shall have the right to indemnification, for which they shall have the right to apply to the court in accordance with the procedure established by law.

X. MANAGEMENT OF DATA SECURITY BREACHES

42. *AQ Wiring Systems, UAB* has appointed a person responsible for compliance with the Company's internal data protection procedures, policies and rules (the Data Security Officer responsible for the protection of Personal Data within the Company) by order of the Director of *AQ Wiring Systems, UAB*.

43. Employees and Data Subjects shall have the right to directly contact the Data Security Officer on any matter relating to the processing of their personal data.

44. Any employee of the Company who receives a request from a Data Subject regarding the exercise of their data protection rights shall forward it to the Data Security Officer.

45. In the event of a personal data breach or any other incident related to data security, *AQ Wiring Systems, UAB* employees who become aware of the breach shall immediately inform the Data Security Officer of *AQ Wiring Systems, UAB*.

46. All personal data breaches shall be recorded and documented in the Personal Data Breach Log, which shall be kept by the Data Security Officer.

47. Upon receiving information about a personal data breach, the Data Security Officer shall assess the breach. If the assessment identifies a potential risk to the rights and freedoms of data subjects, the Data Security Officer shall notify the State Data Protection Inspectorate within 72 hours of becoming aware of the breach and inform the affected data subjects if the breach poses a significant risk to their rights and freedoms. *AQ Wiring Systems, UAB* employees must promptly provide the Data Security Officer with any information and documents requested in relation to a personal data breach.

48. In the event of a personal data breach, *AQ Wiring Systems, UAB* shall take immediate steps to remedy the breach, mitigate its consequences, and implement all necessary measures to reduce or eliminate risks or potential damage to data subjects' rights and freedoms, ensuring such incidents do not recur. *AQ Wiring Systems, UAB* continuously improves its internal processes based on identified causes of personal data breaches.

(Request Form for Exercising Data Subject's Rights at AQ Wiring Systems, UAB)

(name and surname)

(personal identification number, address, telephone number, email address)

**REQUEST
FOR THE EXERCISE OF THE DATA SUBJECT'S RIGHT(S)**

(Date)

(Location)

1. In accordance with the Procedure for the Exercise of Data Subjects' Rights set out in Personal Data Processing Procedure of AQ Wiring Systems, UAB (hereinafter - the Company), I request to exercise the following right(s):

- to receive information on the processing of personal data by the Company
- to access my personal data processed by the Company
- to request correction of my personal data
- to request the erasure of my personal data ("right to be forgotten")
- to restrict the processing of my personal data
- to object to the processing of my personal data
- to transfer my personal data
- to require that a decision based solely on automated processing, including profiling, is not applied

2. Additional info. Please provide as much information as possible to enable the proper exercise of your right(s).¹

ATTACHED DOCUMENTS² :

- 1) _____
- 2) _____
- 3) _____

(Signature)

¹ Where erasure of personal data or restriction of processing of personal data is requested, the grounds on which the exercise of these rights is requested must be fully justified.

² When submitting a request, you must confirm your identity as follows:

- 1) If the request is submitted directly to a *AQ Wiring Systems, UAB* employee, the data subject must provide a document verifying their identity;
- 2) If the request is submitted by post or courier, a notarized copy of the identity document must accompany the request;
- 3) If the request is submitted by electronic means, the request must be signed by electronic signature. If the request is made by your **representative**, it must be accompanied by a document certifying the representative's authority.