OUR PRIVACY POLICY - UPDATED MAY 2018 - GDPR

Mega Baltic JSC commits to respect and protect your personal data and the privacy.

The privacy policy reflects the practice of Customer Data Processing for Business Knowledge.

If you are a company or an organization, the information specified in the notice applies to you to the extent that our company, by executing contracts, may process personal data of your employees who you authorize.

Take time to review this document. If you have any questions, please contact us: marketing@megabaltic.lt

The policy will be updated. We kindly ask you to review it periodically.

WHAT PERSONAL DATA WE COLLECT AND HOW WE USE

WHAT WE NEED

MEGA BALTIC JSC is what's known as the 'controller' of the personal data you provide to us. We collect basic business personal data about you; your name, company name, company address, company telephone number, company email address. We will also collect data on what parts of our service interest you.

WHY WE NEED IT

We process your personal information for the following main purposes:

- Conclusion and execution of contracts for the sale of products and provision of services.
- Direct marketing
- Communication. We seek to answer your questions and requests for services, to get your feedback; send important messages, for example, about this Policy or other documents changes; send technical notifications, updates, alerts for security, support, etc.
- The information is needed to fulfil your request or to enable us to provide you a more personalised service (for example, keeping you up to date with new product details and our event details).

HOW WE OBTAIN YOUR DETAILS

We collect your personal information in a number of ways:

- When you buy our goods
- When you provide it to us directly
- We collect it when you sign up for information or inquiry on www.megabaltic.lt or www.aleodrinks.eu
- We also collect information that reveals the features of our products or service delivery or automatically generated visitor statistics. See "Using Cookies" for more information.
- When you have given it to a third party and you have provided permission to pass your information on to us.

OUR MARKETING

Sometimes, with your consent, we will process your personal data to provide you with information about our work or our activities that you have requested or are expecting.

We also process your data when it is in our legitimate interests to do this and when these interests do not override your rights. Those legitimate interests include providing you with information on upcoming events and exhibitions which are relevant to your business. Please see the section on 'Legitimate Interest' for more information.

USING COOKIES

Cookies are applied to the website <u>www.megabaltic.lt/</u> and <u>www.aleodrinks.eu/</u>, where visitors are given access to the Company's products, services and information related to the Company's activities.

A cookie is a small text file that is downloaded to the device by the user while browsing on certain sites.

Cookies allow web sites to recognize the user device and helps you remember information about your options (for example, your chosen language) so you do not have to re-select the settings each time you browse the site from a particular device. Most major web sites use cookies.

You can choose whether you want to accept cookies. If you do not agree you can change your web browser settings and turn off all cookies or turn them on / off one by one. However, please note that in some cases it may slow down speed internet browsing, restrict the functionality of certain web sites or block access to the site. More information about cookies is available at www.AllAboutCookies.org or www.AllAboutCookies.org

Cookies we use in our websites:

www.aleodrinks.eu:

Google Analytics - these cookies collect anonymous information on which pages you visit, how long you stay there. This is how we find out what information is most relevant to our web visitors.

pll_language - when the visitor selects a language on website, the next time he returns to the site, the language will be the same.

www.megabaltic.lt:

Google Analytics - these cookies collect anonymous information on which pages you visit, how long you stay there. This is how we find out what information is most relevant to our web visitors.

pll_language - when the visitor selects a language on website, the next time he returns to the site, the language will be the same.

SHARING YOUR INFORMATION

We only disclose information to third parties or individuals when obliged to by law, for purposes of national security, taxation and criminal investigations and the following:

- If you have agreed that we may do so.
- If we run a project in partnership with other named organisations your details may need to be shared. We will be very clear what will happen to your data when you register.

We will never sell or rent your personal information to other organisations.

RETAINING YOUR INFORMATION

We will continue to hold client's details (those who have entered a contract with us) unless instructed to delete your record. All other contacts will remain on our database for 8 years from the date of this policy (May 2018) after which we will email you to check you would like to continue hearing from us.

YOU CAN STOP RECEIVING OUR EMAILS AT ANY TIME:

Contact <u>biuras@megabaltic.lt</u> or <u>info@aleodrinks.eu</u> and ask to be removed from our database.

OUR LEGITIMATE INTERESTS

Broadly speaking Legitimate Interests means that we can process your personal information if:

- We have a genuine and legitimate reason and we are not harming any of your rights and interests.
 - We will carefully consider and balance any potential impact on you and your rights before contacting you with emails pertaining to our legitimate business interests of promoting our events and exhibitions within the food and drink sector.
 - We generally use legitimate interests as an approach for our direct marketing.
 - The following are some examples of when and why we would use our legitimate interests as an approach to market our new and existing products and exhibitions.
- The only personal data that we hold on any individual is their employer name and address; telephone number; email address and information relating to their dealings with us as a representative of their employer.

- This information is held for use in business to business marketing and relaying relevant industry information.
- It is our interest with the company and not the individual employed by the company that dictates our need to open communication.
- We will send email marketing which details the events and exhibitions we have coming up as we have identified that your company may have interest in receiving these mailings.
- We will make sure our marketing is relevant for you, tailored to your business interests.
- We will only contact you for business purposes.

YOUR INTERESTS AND RIGHTS

When we process your personal information for our legitimate interests, we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent).

New data protection law, starting in May 2018, gives everyone a number of very important rights. These are:

- Transparency over how we use your personal information (right to be informed).
- Request a copy of the information we hold about you, which will be provided to you within one month (right of access).
- Update or amend the information we hold about you if it is wrong (right of rectification).
- Ask us to stop using your information (right to restrict processing).
- Ask us to remove your personal information from our records (right to be 'forgotten').
- Object to the processing of your information for marketing purposes (right to object).
- Obtain and reuse your personal data for your own purposes (right to data portability).
- Not be subject to a decision when it is based on automated processing (automated decision making and profiling).

Any request or instruction relating to the processing of personal data must be made by us in one of the following ways:

- submitting such a request or order to us directly at Naugarduko st. 100, LT-03160 Vilnius, Lithuania
- sending such an application or instruction to the e-mail address marketing@megabaltic.lt from the email address given to us
 previously.

Upon receipt of such a request or instruction, we will respond within 30 (thirty) calendar days and we will either complete or refuse the actions specified in the request. Your request will be answered in writing.

If you believe that the processing of your personal data does not comply with applicable law, you are entitled to contact the State Data Protection Inspectorate (www.ada.lt).