

PRIVACY POLICY

AB Lietuvos radijo ir televizijos centras (hereinafter referred to as the **Company**) undertakes to respect and protect personal data (hereinafter referred to as **data**) and the privacy of individuals.

This privacy notice:

- explains how the Company collects, uses and stores/processes personal data;
- informs data subjects about how their personal data are processed and what rights each data subject has.

When processing data subjects' personal data, we comply with the European Union's General Data Protection Regulation (**GDPR**), the Republic of Lithuania Law on Legal Protection of Personal Data, the Republic of Lithuania Law on Electronic Communications, and other directly applicable personal data protection legislation.

The privacy notice is applicable in cases when a person uses the Company's services or visits our websites. The privacy notice does not apply in cases when other companies' websites or services are being used, even if they are accessed using the Company's network or services.

1. Our contact details:

- Name: AB Lietuvos radijo ir televizijos centras
- Legal entity code: 120505210
- E-mail address: info@telecentras.lt
- Telephone number: (8 5) 204 03 00
- Address: Sausio 13-osios g. 10, LT-04347 Vilnius

2. Why and how do you collect my personal data?

The Company offers a wide range of services. The information we collect about you depends on the services you order or use and what information you provide to us when you order the services or register on our websites.

We collect data:

- that **you submit**, e.g. when you communicate or have a legal relationship with our Company, such as when purchasing services or registering for services, subscribing to newsletters, or contacting us with a request for information;
- that are **generated when you use the services**, for example, when you use our network or services (e.g. when you make a phone call, send an e-mail or visit our websites);
- that **we receive from other sources**, such as other service providers or publicly available registers, databases, websites (such as rekvizitai.lt), and social media accounts (Facebook, Instagram, LinkedIn, etc.).

2.1. Because we provide you with TV tower tourist and entertainment services

2.1.1. We sell tickets to the TV tower online

When you buy a ticket on our website www.tvbokstas.lt, we will process the data that are necessary to enable you to purchase the ticket.

Legal basis for the processing of personal data	Categories of personal data	The period for which the personal data will be stored	Is the provision of personal data mandatory?
Conclusion or performance of a contract with you (GDPR Article 6(1)(b))	Name, surname, e-mail address, telephone number, purchase details, order number and IP address	The data are stored for two years after the purchase of the ticket, except in cases where grounds emerge (e.g. for the fulfilment of tax/financial obligations, etc.) to store the data longer, but not exceeding the 10-year storage period	Yes. This is a requirement arising from the conclusion and performance of the contract. If you do not provide the data, we will not be able to provide you with our services.

2.1.2. We provide an opportunity to book guide services for a TV tower tour

When you book guide services for a TV tower tour, we will process the data that are necessary to provide this service.

Legal basis for the processing of personal data	Categories of personal data	The period for which the personal data will be stored	Is the provision of personal data mandatory?
Conclusion or performance of a contract with you (GDPR Article 6(1)(b))	Name, surname, e-mail address, telephone number	Until the service is completed	Yes. This is a requirement arising from the conclusion and performance of the contract. If you do not provide the data, we will not be able to provide you with our services.

2.1.3. We provide an opportunity to reserve tables at the restaurant *Paukščių Takas*

When reserving a table at the restaurant *Paukščių Takas* by telephone or e-mail, through the website or otherwise, we will process the data that are necessary to complete the table reservation.

Legal basis for the processing of personal data	Categories of personal data	The period for which the personal data will be stored	Is the provision of personal data mandatory?
Consent (GDPR Article 6(1)(a))	Name, surname, e-mail address, telephone number, number of people, information about the reservation, other personal	The data are stored for the calendar month of the reservation	No, but if you do not, we will not be able to reserve a table for you.

	data that you provide		
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2.1.4. We administer extreme walks along the edge of the TV tower

When you sign up for an extreme walk along the edge of the TV tower (during the open season), we will process the data that are necessary for the provision of this service.

Legal basis for the processing of personal data	Categories of personal data	The period for which the personal data will be stored	Is the provision of personal data mandatory?
Conclusion or performance of a contract with you (GDPR Article 6(1)(b))	Name, surname, telephone number, signature, information about the services being provided, other personal data that you provide to use the service/while using the service.	30 calendar days from the date of provision of the service	Yes. This is a requirement arising from the conclusion and performance of the contract. If you do not provide the data, we will not be able to provide you with our services.

2.2. Because we provide electronic communications and other services

2.2.1. We provide electronic communications and data centre services

In cases where you or the company you represent orders electronic communications and/or data centre services, we will process the data that are necessary for the provision of these services.

Legal basis for the processing of personal data	Categories of personal data	The period for which the personal data will be stored	Is the provision of personal data mandatory?
Conclusion or performance of a contract with you (GDPR Article 6(1)(b)) In cases where you are a representative of the company ordering the services – our legitimate interest is to process orders (GDPR Article 6(1)(f))	Name, surname, date of birth, e-mail address, telephone number, workplace, position, the service recipient being represented, signature, the content of e-mail correspondence, the data you provide, records of telephone conversations, comments/notes about you when we provide you with cloud computing services: logs, self-service system account login details	The data are stored for the duration of the contract with you and for 10 years after the contract expires	Yes. This is a requirement arising from the conclusion and performance of the contract. If you do not provide the data, we will not be able to provide you with our services.

2.2.2. We strive to assess the need of state institutions to use the resources of the state data centre

We process your personal contact details to ascertain the technology cabinet and communications needs of the state institution you represent in the state data centre that we manage.

Legal basis for the processing of personal data	Categories of personal data	The period for which the personal data will be stored	Is the provision of personal data mandatory?
In cases where you are a representative of the institution ordering the services – our legitimate interest is to assess the technology cabinet and communications needs of the state institution you represent before the service is provided/ordered (GDPR Article 6(1)(f))	Name, surname, e-mail address, telephone number, workplace, position, the service recipient being represented, signature, the content of e-mail correspondence, other data you provide.	We will process the data until a contract is concluded with the institution you represent, but in any case, no longer than three years after your data are collected.	No.

2.2.3. We provide TuriuTV free-to-air television services

When you or the company you represent orders our TuriuTV free-to-air television services, we will process the data that are necessary for the provision of the services.

Legal basis for the processing of personal data	Categories of personal data	The period for which the personal data will be stored	Is the provision of personal data mandatory?
Conclusion or performance of a contract with you (GDPR Article 6(1)(b)) In cases where you are a representative of the company ordering the services – our legitimate interest is to process orders (GDPR Article 6(1)(f))	Name, surname, e-mail address, telephone number, home address, the content of e-mail correspondence, data provided during telephone conversations, records of telephone conversations.	The data are stored for the duration of the contract with you and for 10 years after the contract expires.	Yes. This is a requirement arising from the conclusion and performance of the contract. If you do not provide the data, we will not be able to provide you with our services.

2.3. We hold asset auctions for our Company

When you participate in auctions of the Company's movable or immovable property, we will process the data that are necessary to organise the auction.

Legal basis for the processing of personal data	Categories of personal data	The period for which the personal data will be stored	Is the provision of personal data mandatory?
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Conclusion or performance of a contract with you (GDPR Article 6(1)(b))	Name, surname, address, telephone number, home address, e-mail address, national identification number, account login/visit information, purchase history, auction bid price, payment-related information, account login details, the content of the preliminary and notarial contract, e-mail correspondence, and if you are representing a company – your workplace and position.	<p>When you participate in a movable property auction: 90 days after your account becomes inactive.</p> <p>When you participate in an immovable property auction: 10 years after the end of the auction</p>	Yes. This is a requirement arising from the conclusion and performance of the contract. If you do not provide the data, we will not be able to provide you with our services.
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2.5. Because we carry out marketing activities

2.5.1. We provide customers with information about our services

We send newsletters to individuals and provide information about new auctions to individuals who have previously participated in the auctions we organise.

Legal basis for the processing of personal data	Categories of personal data	The period for which the personal data will be stored	Is the provision of personal data mandatory?
Consent (GDPR Article 6(1)(a)) Customer relationship (Article 81(2) of the Republic of Lithuania Law on Electronic Communications)	Name, surname, e-mail address, telephone number When we provide information about new auctions, we additionally process auction participation information and purchase history.	We store information for three years, unless you inform us earlier that you do not want to receive information from us.	No.

2.5.2. We ask customers for their opinions about our services and communicate with representatives of potential customers

We conduct customer surveys about the quality of the services provided, and we also communicate with representatives of potential customers.

Legal basis for the processing of personal data	Categories of personal data	The period for which the personal data will be stored	Is the provision of personal data mandatory?

<p>The legitimate interest to communicate with potential customers and ask existing customers for their opinion about the quality of our services (GDPR Article 6(1)(f))</p> <p>Article 81(2) of the Republic of Lithuania Law on Electronic Communications</p>	<p>When we send surveys about the quality of services: name, surname, e-mail address, telephone number, a questionnaire that is filled out during the call, the answers marked in the questionnaire, comments.</p> <p>When we communicate with representatives of potential customers: name, surname, e-mail address, telephone number, position, information provided in the LinkedIn account, other publicly available information about the person.</p>	<p>The data are stored for one year.</p>	<p>No.</p>
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2.5.3. We administer our social media accounts

When you perform actions on our social media accounts (e.g. send a message, follow our profile, share our posts, etc.), we, as the administrators of these profiles, will process personal data about your actions. When writing comments, messages or otherwise communicating with us on Facebook or Instagram (www.facebook.com, www.instagram.com), you must personally ensure that you use all your confidentiality guarantees.

Legal basis for the processing of personal data	Categories of personal data	The period for which the personal data will be stored	Is the provision of personal data mandatory?
<p>Consent (GDPR Article 6(1)(a))</p>	<p>The name and surname, gender, country, city and photo provided in the account, post comments, post shares, post reactions, messages sent via social media sites and their content, other personal data that you provide.</p>	<p>You can find detailed information about the Facebook and Instagram data storage and processing policies related to the data you provide in their respective privacy policies: https://www.facebook.com/privacy/explanation; https://privacycenter.instagram.com/policy/version/5066055233450651/.</p>	<p>No.</p>

2.6. Because we strive to ensure the safety of individuals and property

2.6.1. We carry out video surveillance

When you visit the transmitter halls, data centre spaces, TV tower premises, or other premises where video surveillance is carried out, we process the video data of our staff and customers and other persons who enter the video surveillance field in order to ensure their safety and the safety of the property.

Legal basis for the processing of personal data	Categories of personal data	The period for which the personal data will be stored	Is the provision of personal data mandatory?
The legitimate interest to ensure the safety of individuals and property (GDPR Article 6(1)(f))	Video data captured by our video surveillance equipment.	30 calendar days.	No.

2.6.2. We administer access to our car parking

We process the data of persons who park in our car park in order to administer access to the car parking and ensure the security of the property.

Legal basis for the processing of personal data	Categories of personal data	The period for which the personal data will be stored	Is the provision of personal data mandatory?
The legitimate interest to administer the car park and ensure the safety of the property (GDPR Article 6(1)(f))	Name, surname, workplace, vehicle registration plate, time and date of entering the car park, validity period of the contract with the Company's tenants, contractors, suppliers	Until the end of the contract with the contractor/tenant/supplier, but not more than 180 calendar days	No.

2.7. Because we carry out selection of potential employees

When you apply for one of our vacant positions or we contact you about job opportunities, we process your personal data related to the employee selection process.

Legal basis for the processing of personal data	Categories of personal data	The period for which the personal data will be stored	Is the provision of personal data mandatory?
Consent (GDPR Article 6(1)(a)) The legitimate interest to contact you about job opportunities at our Company (GDPR Article 6(1)(f))	Details of the candidate's CV (cover letter): name, surname, mail, address, telephone number, experience, education, family status, current and former jobs, other information that you provide independently, LinkedIn account information.	We store the data for the entire duration of the selection process and for four months after it is over, but in any case no longer than is necessary for the selection and employment of the suitable candidate	No.

2.8. Because we conclude and execute guide services and other contracts

When you provide guide services to the Company in accordance with concluded service contracts or enter into other contracts with the Company, we will collect and process data about your identity, the information required for making payments, and other data necessary for the conclusion and execution of said contracts.

Legal basis for the processing of personal data	Categories of personal data	The period for which the personal data will be stored	Is the provision of personal data mandatory?
Conclusion or performance of a contract with you (GDPR Article 6(1)(b))	Name, surname, personal code or another national identification number, address, self-employment certificate number, signature, contract, information about the contract, services provided or planned to be provided, invoice, payments made and taxes deducted, and other information that you provide.	The data are stored for the duration of the contract with you and for 10 years after the contract expires.	Yes. This is a requirement arising from the conclusion and performance of the contract. If you do not provide the data, we will not be able to provide you with our services.

2.9. Because we carry out administrative functions

2.9.1. We strive to respond to your enquiries

When you submit an enquiry to us via e-mail or telephone, we process your personal data related to your enquiry.

Legal basis for the processing of personal data	Categories of personal data	The period for which the personal data will be stored	Is the provision of personal data mandatory?
Consent (GDPR Article 6(1)(a))	Name and surname, e-mail address, telephone number, address, enquiry, request or complaint, information related to the enquiry, request or complaint submitted, other information that you provide independently	E-mail correspondence is stored for five years from the date of the enquiry, and records of telephone conversations are stored for six months.	No.

2.9.2. We comply with legislative requirements and protect our legal interests

If you have entered into a contract with us, we will retain the data in accordance with statutory limitation periods so that we can defend our rights and legal interests if necessary. We need to store some data in order to meet the requirements set out in the legislation in accounting, archiving and other areas. In the rare event that you become involved in a legal process to which we are a party, we will use these data for the purposes of that legal process.

Legal basis for the processing	Categories of personal data	The period for which the personal	Is the provision of personal data
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of personal data		data will be stored	mandatory?
The legitimate interest to protect our rights and legal interests (GDPR Article 6(1)(f))	All of the above personal data, communications, legal documents, procedural documents, attachments, court documents, investigative information, information about criminal convictions and criminal offences, other data submitted,	10 years after the end of the contractual relationship with you Three (3) years from the date of entry into force of the decision of the court or institution or the full execution of the legally binding decision	No.

3. Where do you collect information about me?

We collect most of the information from you personally. We collect some information from:

- professional social networking websites (when communicating with representatives of potential customers (companies))
- from the company you represent (when you participate in communication with our company)
- from courts or other state, government and local government institutions (when we are a party to judicial or other legal proceedings with which you are related, or we need to fulfil other legal requirements)

4. How do we store your data?

For the processing of your personal data, the Company has implemented appropriate organisational and technical security measures that help protect personal data from accidental or unlawful destruction, alteration, unauthorised disclosure, or any other unlawful processing. The Company's security activities include, inter alia, the protection of personnel, information, IT infrastructure, internal and public networks, as well as office buildings and technical equipment.

5. Who do we provide your data to?

Data recipients or categories of data recipients	If the data is meant to be transferred to a third country or an international organisation:	
	Location of the data recipient	Legal basis to transfer the data
<ul style="list-style-type: none"> • UAB Novian Technologies; UAB AP Group; UAB Baltic Amadeus; UAB Artogama; UAB Synergy Consulting; UAB A lygio reklama (IT infrastructure and solution service providers) • UAB Dokobit; State Enterprise Centre of Registers (GoSign) (document signing service providers); • CV bankas; CV online; UAB Atranka 360 (recruiting services providers) • AS Citadele banka, Lithuanian branch (payment system) • UAB Herman Data (archiving service provider) 	---	

<ul style="list-style-type: none"> • Tour guides (relevant when booking guide services) • Other service providers (for example, IT, e-mail, work tools, cloud computing, legal service providers), attorneys at law, notaries, judicial officers, real estate brokers, insurance brokers • Law-enforcement authorities and courts of the Republic of Lithuania and the EU 		
Microsoft (work tools/software service provider)	United States of America	EU Standard Contractual Clauses
Facebook (Meta) (social media service provider)	United States of America	EU Standard Contractual Clauses
LinkedIn (social media service provider)	United States of America	EU Standard Contractual Clauses
Ivanti (SD) (IT infrastructure and solution service providers)	United States of America	EU Standard Contractual Clauses
Google Inc. (work tools and other IT infrastructure service provider)	United States of America	EU Standard Contractual Clauses
Potential or actual buyers of the Company's business or part thereof and their authorised consultants or representatives	-	EU Standard Contractual Clauses

6. Do you use cookies or other identifiers?

In order to improve your experience when visiting the Company's websites, we use cookies – small text files that are automatically created when browsing the website and are stored on your computer or other terminal equipment. The information collected by the cookies allows us to ensure your ability to navigate more comfortably, to provide you with attractive offers and learn more about the behaviour of our website users, and to analyse trends and improve both the website and your service, as well as the services provided by the Company. You can find information about the cookies we use in the tables below.

www.telecentras.lt

Cookie category	Cookie name	Purpose of the cookie	Expiration period
Functional cookies	PII_language	Distinguish in which language the information should be presented	One year
	PHPSESID	Used for the session	Until the website is closed

www.tvbokstas.lt

Cookie category	Cookie name	Purpose of the cookie	Expiration period
Functional cookies	PHPSESID	Used for the session	Until the website is closed
Statistics cookies	_ga	A unique ID is registered, which is used to generate statistical data about how the visitor uses the website.	399 days
	_gat	Used to limit the Google Analytics request speed.	One day

	_gid	A unique ID is registered, which is used to generate statistical data about how the visitor uses the website.	One day
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www.turiutv.lt

Cookie category	Cookie name	Purpose of the cookie	Expiration period
Functional cookies	_grecaptcha	This cookie is used to distinguish between humans and bots.	Persistent
	_GRECAPTCHA	This cookie is used to distinguish between humans and bots.	179 days
	elementor	This cookie allows you to manage or change the content of the website in real time.	Persistent
	rc::a	This cookie is used to distinguish between humans and bots.	Persistent
	rc::b	This cookie is used to distinguish between humans and bots.	Until the website is closed
	rc::c	This cookie is used to distinguish between humans and bots.	Until the website is closed
	rc::d-15#	This cookie is used to distinguish between humans and bots.	Persistent
Statistics cookies	_ga	A unique ID is registered, which is used to generate statistical data about how the visitor uses the website.	399 days
	ga#	Google Analytics uses data about the number of times the user visited the website as well as the dates of the first and last visit.	399 days
Marketing cookies	_gcl_au	Google AdSense uses this cookie to experiment with the effectiveness of advertising on websites that use their services.	Three months
	ads/ga-audiences	Google AdWords is used to identify visitors who are likely to become customers based on the visitor's behaviour on the websites.	Until the website is closed

7. How can I manage cookies?

When you visit our website, we ask for your consent to the use of non-essential cookies. However, we use essential cookies by default as they are necessary for the functioning of our website. You can manage the use of non-essential cookies by adjusting your browser settings. If you would like to learn how to manage cookies in your browser, please visit one of the links below:

- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Google Chrome: <https://support.google.com/chrome/answer/95647>
- Opera: <https://www.opera.com/help/tutorials/security/privacy>
- Microsoft Edge: <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>
- Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-information-sfri11471/mac>

8. What are your rights?

Your right	Description of the right
Right of access (GDPR Article 15)	When you want confirmation as to whether we are processing data relating to you and, if so, access to the data and information about the processing of the data.
Right to rectification (GDPR Article 16)	When you want us to rectify inaccurate data relating to you.
Right to erasure ('right to be forgotten') (GDPR Article 17)	(1) When the data are no longer necessary to achieve the purposes for which they were collected or otherwise processed, (2) when you withdraw the consent on which the processing is based and there is no other legal basis for processing the data, (3) when you object to the processing and there are no overriding legitimate grounds for processing the data, or you object to processing for direct marketing purposes, (4) when the data has been processed unlawfully, (5) when the data must be deleted in accordance with a legal obligation imposed on us, (6) when the data were collected in the context of offering an information society service directly to a child after obtaining his or her consent.(2) when you withdraw the consent on which the processing is based and there is no other legal basis for processing the data, (3) when you object to the processing and there are no overriding legitimate grounds for processing the data, or you object to processing for direct marketing purposes, (4) when the data has been processed unlawfully, (5) when the data must be deleted in accordance with a legal obligation imposed on us, (6) when the data were collected in the context of offering an information society service directly to a child after obtaining his or her consent.
Right to restriction of processing (GDPR Article 18)	(1) When you challenge the accuracy of the data, (2) when the processing is unlawful and you object to erasure of the data and instead request the restriction of its use, (3) when we no longer need the data for processing purposes, but you require it for the establishment, exercise or defence of legal claims, (4) when you objected to the processing.
Right to data portability (GDPR Article 20)	When you want to obtain the data you have provided to us in a structured, commonly used and machine-readable format and transmit those data to another controller, or when the data processing is based on consent or on a contract and is carried out by automated means.
Right to object (GDPR Article 21)	When the data processing is based on a task carried out in the public interest or in the exercise of official authority, or in the legitimate interest of the data controller, including profiling, or if you object to the processing of your data for direct marketing purposes.
Right to withdraw consent (GDPR Article 7)	When the processing is based on the consent, and you want to revoke it at any time.
Right to lodge a complaint (GDPR Article 77)	When you want to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged GDPR infringement.

9. How can I contact your data protection officer?

For consultation and questions related to this Privacy Policy or the processing of personal data, please contact the Company's data protection officer by e-mail at ada@telecentras.lt.

10. How do I find out about changes to this notice?

We may need to update this privacy notice. For this reason, we recommend that you periodically visit our website, where you will always find the latest version of this privacy notice.

Last updated: 19-Apr-2023