

# PRIVACY POLICY

## 1. General provisions.

1.1. This privacy policy of UAB "SOFTDENT" (hereinafter - Privacy Policy) regulates the basic principles and rules of processing personal data when using the websites [www.visivaistai.lt](http://www.visivaistai.lt), [www.visas-zales.lv](http://www.visas-zales.lv), [www.koikravimid.ee](http://www.koikravimid.ee) (hereinafter, any website may be referred to as the Website, together as the Websites).

1.2. Terms used in this Privacy Policy:

1.2.1. personal data - any information about a natural person whose identity has been established (is known) or whose identity can be directly or indirectly determined using relevant identifiers, such as name and surname, e-mail, Internet identifier (IP address) and other data and attributes:

1.2.3. data controller (Us) – SOFTDENT UAB, enterprise code 110799112, registered address 62 Drobės st., Republic of Lithuania, tel. +37037424734, e-mail [info@softdent.lt](mailto:info@softdent.lt), VAT payer code LT107991113, which processes the personal data of the data subject (You) on the basis of the principles and purposes specified in the Privacy Policy.

1.2.4. cookies - a small text file that the website saves to the browser of the visitor's (Your) computer or mobile device when the visitor (You) visits the website. The next time You visit the Website, this file can be scanned so that the Website can recognize the visitor's (Your) computer or mobile device. The subjects used are discussed in more detail in Chapter 4 of the Privacy Policy.

1.2.5. data protection officer – the data controller has appointed a data protection officer whose contact details are: tel. +37037424734, e-mail [info@softdent.lt](mailto:info@softdent.lt).

1.3. When processing personal data, the data controller is guided by this Privacy Policy, Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons in the processing of personal data and on the free movement of such data and which repeals Directive 95/46/EC (GDPR), the personal data of the Republic of Lithuania the Law on Legal Protection of Data and other legal acts governing the processing of personal data that apply in the Republic of Lithuania.

1.4. The data controller applies appropriate technical and organizational measures to ensure the security of personal data processing and the compliance of data processing with applicable laws and which are designed to protect processed personal data from accidental or unlawful destruction, damage, alteration, loss, disclosure, as well as from any other unlawful processing.

1.5. The information that the data controller (Us) collects about the data subject (You) depends on what information about himself the data subject (You) provides to the data controller when using "[www.visivaistai.lt](http://www.visivaistai.lt)", "[www.visas-zales.lv](http://www.visas-zales.lv)", "[www.koikravimid.ee](http://www.koikravimid.ee)" portals, agrees to the use of cookies.

## 2. Purpose and scope of personal data processing, recipients of personal data.

2.1. The data controller collects and processes the following personal data of data subjects:

2.1.1. data about the use of the Website - data collected through the use of cookies related to Internet browsing, information about consent or refusal to use cookies, etc.

2.2. the data controller collects and processes personal data on the grounds defined in the legal acts specified in point 1.3. of this Privacy Policy and for the following purposes:

2.2.1. for the legitimate interests of the data controller (GDPR Article 6 d. 1 point f), including in the event of complaints, requests, disputes, claims, demands against the data controller and in order to defend the violated rights and legitimate interests of the data controller, for the purpose of analyzing the data controller's activities, etc.

2.2.2. with the consent of data subjects (GDPR Article 6 d. 1 point a) - when you agree to the use of cookies, etc. The content of the data subject's consent each time will indicate the purpose of the data processing. The data subject can revoke the consent to process personal data at any time by contacting UAB SOFTDENT by using the procedure and contact addresses indicated in this Privacy Policy.

2.3. The provision of personal data of the data subject is voluntary and is not a legal requirement.

2.4. The data controller will store the data specified in points 2.1.1. of this Privacy Policy for no longer than 2 (two) years.

2.5. Longer terms than those set out in point 2.4. of this Privacy Policy are applied when the aim is to fulfill the obligations set out in legal acts (including those related to the storage of documents) or to pursue the legitimate interests of the data controller, which necessitates the need to store personal data for a longer period of time. In such cases, the personal data is stored by the data controller for the retention period established by legislation and to the extent that such storage is necessary to ensure the legitimate interests of the data controller.

2.6. The data controller currently has no intention to transfer and does not transfer Your (as a data subject) personal data to third countries.

2.7. Taking into account the processing of data for the purposes and grounds indicated above, personal data may be provided to public authorities or entities performing public tasks (to the extent required by legal acts), as well as to the recipients or categories of recipients specified below in accordance with contracts, to the extent necessary to achieve the above-mentioned purposes:

2.7.1. entities serving the data controller's information systems, Website content management tools or Website hosting services;

2.7.2. The Google Analytics tool is provided by Google Inc., so it also has access to the data collected by this tool;

2.7.3. The data manager also provides Your personal data to those subjects to whom you have expressed your consent to provide your personal data.

2.8. In each case, the data manager provides data recipients with only as much data as is necessary to fulfill a specific order or provide a specific service.

### **3. Rights of persons whose data is processed.**

3.1. Based on these provisions, each data subject whose personal data is processed by the data controller has the right to:

3.1.1. demand access to their data, i.e. receive information about the purposes of personal data processing, storage period, data recipients, sources of personal data, as well as information about how and in which

cases the data subject can exercise the right to demand correction or deletion of personal data, or to limit the processing of personal data or disagree with such processing;

3.1.2. demand correction of personal data if the data is inaccurate and/or incomplete;

3.1.3. demand erasure of personal data (the right "to be forgotten"), or limit, except for storage, the processing of personal data when the accuracy of the data is contested, when the processing of personal data is illegal, when the data controller no longer needs the personal data for the purposes of their processing, but it is needed by the data subject in order to to assert, enforce or defend legal claims, or when the data subject expresses his objection to the processing of personal data;

3.1.4. in the event that the data subject's personal data is processed due to the legitimate interest of the data controller, the data subject, for specific reasons related to him, has the right to express his objection to the processing of his personal data. In such a case, the data controller undertakes to no longer process such personal data of the data subject, except in cases where the data controller processes such personal data for legitimate reasons that are superior to the interests of the data subject and the specified reasons for objection to the processing of personal data, or in order to assert or defend legal claims.

3.1.5. withdraw your consent at any time;

3.1.6. demand to provide them (transfer) their personal data, if the personal data was provided in a structured, commonly used and computer-readable format and are processed by automated means. Subject to the mentioned conditions, data subjects have the right to request for their personal data to be transferred to another data controller when this is technically possible (right to data transfer);

3.1.7. submit a complaint to the competent supervisory authority - The State Data Protection Inspectorate, address 17 L. Sapiegos st., Vilnius, tel. 8 5 271 2804, e-mail [ada@ada.lt](mailto:ada@ada.lt).

3.2. The rights of the data subject (except those discussed in point 3.1.7.) are implemented by submitting a written request to UAB "SOFTDENT" by sending a letter by mail to the mentioned address or by e-mail to the address [info@softdent.lt](mailto:info@softdent.lt), after properly identifying your personal identity by electronic means.

#### **4. Cookies.**

4.1. In order to administer the Website, improve its performance, as well as for other purposes listed below, the data controller uses cookies. By clicking the "I agree" button, you confirm your consent to the use of cookies, which you can revoke at any time by changing the settings of your Internet browser and deleting the saved cookies.

4.2. Cookies are used:

4.2.1. to more accurately count the number of visits to the Website and evaluate the behavior of visitors on the Website and collect statistical information;

4.2.2. to ensure smooth operation of the Website;

4.2.3. to know whether the data subject has consented to the use of cookies on the Website;

4.2.4. save the data subject's (Your) visit history to the Website and adapt the content of the Website accordingly.

4.3. Information related to cookies is not used to determine the personal identity of the data subject.

4.4. Cookies used on the website:

The name of the cookie	Purpose of use	Expiry date
google_analytics	In order to distinguish users and record visit flows	2 years

4.5. It is possible to control and/or delete cookies. To learn more about cookies, such as how to manage or delete them, you can visit <http://www.allaboutcookies.org>. To learn how to stop your web pages from being tracked by Google Analytics cookies, you can visit <http://tools.google.com/dlpage/gaoptout>. It is possible to delete all cookies already on the visitor's computer, and most browsers can be set so that cookies are not stored on the device. However, in this case, you may need to manually change some options each time you visit the Site, and some services and features may not work.

4.6. The data controller uses cookies transparently and responsibly. You can always view which cookies are being saved in your browser. You can also withdraw your consent to the use of cookies at any time by changing your settings and deleting saved cookies.

4.7. A change in settings is only valid for one browser at a time. If the visitor uses multiple browsers, he must change the settings for all browsers separately. In addition, the visitor can delete cookies from the multimedia memory at any time. Additional information is available through your browser or operating system.

**5. Final Provisions.**

5.1. This Privacy Policy is drawn up in accordance with the GDPR, the Law on the Legal Protection of Personal Data of the Republic of Lithuania and other legal acts governing the processing of personal data that apply in the Republic of Lithuania. This Privacy Policy is valid from September 7, 2021.

5.2. This Privacy Policy is approved by UAB "SOFTDENT" and is regularly reviewed in order to update it, especially in cases where legal acts regulating the processing of personal data change. The current version of the Privacy Policy is published at <https://www.softdent.lt/privacy-policy>.