PRIVACY POLICY

We understand the special importance of your personal data protection, therefore we collect and process only those data that are necessary for the performance of our activities. We process personal data lawfully, transparently and fairly, for pre-determined purposes and only to the extent necessary to achieve the processing purposes. When we process personal data, we seek to ensure that it is accurate, secure, confidential, and properly stored and protected.

When processing your personal data, we adhere to the 2016 April 27 the requirements for the processing of personal data established by the General Personal Data Protection Regulation (EU) 2016/679 as of 27 April 2016 (hereinafter referred to as the **GDPR**), the Law on the Legal Protection of Personal Data of the Republic of Lithuania, as well as by other legal acts and (or) regulating authorities.

1. WHAT IS THIS DOCUMENT?

1. When reading this Privacy Policy (hereinafter referred to as the **Privacy Policy**), you will learn how and for what purposes we process your personal data, where we obtain it, to whom it is provided and how it is protected, and the rights you have as a data subject.
2. This Privacy Policy regulates the use of our website https://www.1am.lt (hereinafter referred to as the **Website**), our account on the social network LinkedIn https://www.linkedin.com/company/1-asset-management/ (hereinafter referred to as the **Account**) and the privacy terms of the provision of services (such as the use of the system accessible through the Customer Zone option on the Website) using the Website in relation to our processing of personal data and our privacy rules. Please read this Privacy Policy carefully, as each time you visit the Website and (or) our Account, you agree to the terms and conditions of the Privacy Policy. If you do not agree to these terms and conditions, please do not visit our Website and (or) our Account or use our services.
3. The term **"personal data"** used in this Privacy Policy means any information used to identify you - directly or indirectly The personal data includes, for example, surname, name, e-mail address, telephone number, location data and internet identifier, your unique characteristics and other personal data as defined in the GDPR.

2. WHO ARE WE?

1. We are **UAB "I Asset Management"**, office address: Liepyno Str. 25A, Vilnius, code 304405305, tel. +370 655 57033, contact e-mail: info@1am.lt.
2. In accordance with the provisions of legal acts, we are the controller of your personal data in the cases and to the extent provided for in this Privacy Policy.

3. WHAT PRINCIPLES DO WE FOLLOW?

1. When processing your personal data, we:

a) will comply with the requirements of the applicable legal acts, including GDPR;

b) will process your personal data in a lawful, fair and transparent manner;

c) we will collect your personal data for specified, clearly defined and legitimate purposes and will not continue to process it in a way incompatible with those purposes, except to the extent permitted by law;

d) we will take all reasonable measures to ensure that that personal data that are not accurate or complete in terms of processing purpose, are processed, are rectified, supplemented, suspended or destroyed without delay;

e) personal data is stored in such a way that your identification could take no longer than is necessary for the purposes for which personal data is processed;

f) will not transfer or disclose personal data to third parties except as provided in the Privacy Policy or applicable legal acts;

g) ensure personal data is processed in such a way as to ensure the proper security of personal data, including protection against unauthorised processing or processing of unauthorised data, and against accidental loss, destruction or damage by appropriate technical or organisational measures.

4. HOW DO WE COLLECT YOUR PERSONAL DATA?

4.1. We process your personal data received by the following ways:

a) **When you provide your personal data to us.** You provide us with your personal data and other information by using the Website, visiting our Account, writing to us or communicating with our team, submitting your complaints and (or) inquiries, and etc. We hereby inform that if you contact us in writing or by e-mail – we will save the correspondence data.

b) **When you use any our Website and (or) our Account.** When you use the Website and (or) visit our Account in social networks, specific information (such as your Internet address (IP), type of web browser used, number of visits or other) is collected automatically, as detailed in Chapter 6 of this Privacy Policy.

c) **When we receive your personal data from other persons** in accordance with the procedure established by legal acts and (or) this Privacy Policy. In cases where we do not receive data from the data subjects, we require to inform the data subjects about the processing of the relevant personal data (the purpose and other conditions and circumstances detailed in this Privacy Policy). Moreover, in cases when we receive personal data of the other data subject, we require to introduce the data subject to this Privacy Policy.

4.2. We may combine personal data we received from you through our Website, our Account or through both of them with data we collect from other public and (or) available sources (for example, we may combine the personal data you provide with data obtained through the use of cookies on the Website or with data lawfully obtained from third parties).

4.3. You will always be able to request the correction of incorrect personal data and the exercise of your other rights as a data subject defined in this Privacy Policy and applicable legal acts

5. FOR WHAT PURPOSES AND HOW DO WE PROCESS YOUR PERSONAL DATA?

5.1. The exact amount of personal data and the way we process it depends on the specific relationship between you and us. We process your personal data for the following independent purposes:

a) In order to improve the Website and offer better services personalized. We use your personal data, including the personal data we receive from you when using our Website, visiting our Account to improve and develop the Website and to offer you better and more personalized services. For this purpose we receive data from you through cookies when you use our Website and (or) from other sources (including, but not limited to, owners of social networks, their used cookies).

For detailed information about the categories and specifics of the processing of personal data for this purpose and how we use cookies and similar technologies, please read Chapter 6 of this Privacy Policy.

b) For the purpose of administration, identification of the Customer Self-Service Zone of the Website Customer area of individual accounts and proper provision of services. You provide us with your personal data when you use the Website through your individual account (which provides a convenient and quick way to perform electronically the functions permitted by the Customer Zone option on the Website). We also process your personal data if you register on the Website or use it as a representative and (or) contact person of a legal entity. Each account holder can view, edit and delete his personal data at any time (except for a login). Personal data which may be processed for this purpose:

Data categories	Name, surname, e-mail, password, login, related legal entity (position held in it), collective investment undertaking in which the account holder or the legal entity represented by him has invested.
Legal basis for data processing	Execution of your contract with the Management Company as a customer (investor) of the Management Company
Data processing term	During the term of the contract mentioned above and for 10 years after the end of the contract, unless the (legal) dispute lasts longer (in this case, until the effective date of the final decision of the competent authority)
We receive data from	You
We provide or transfer the data	to site administration or other related service providers (for example, IT service providers, compliance service providers)

c) **For the purpose of quality control of our activities and ensuring the use of other functions of the Website and communication with us** (processing of complaints and (or) inquiries and communications submitted by you, including - storage). When you contact us (or we will contact you upon receipt of your request), we will process the information received in writing, by e-mail, through the Website or other communication, which may also include personal data:

Data categories	Date and time of application, subject of application, name, surname, e-mail, telephone number, picture in the social network, date of the letter, details of the related company, content of the complaint and (or) inquiry, telephone number, date, time and duration of the call, other communication information voluntarily provided by the applying person / collected when dealing with the inquiry / complaint
Legal basis for data processing	Compliance with the rules for the use of 1AM Website, as well as our legitimate interest to assess the feedback from our customers to improving the quality of our operations and the services we provide
Data processing term	For this purpose, we store your data for 3 years after the date of their recording, unless: (i) there are grounds to believe that a criminal offense or other illegal activity has been recorded or that an (internal) investigation / dispute has been initiated and that the data need to be processed until the effective date of the final decision of the competent authority; or (ii) the relevant data related to the agreement concluded between you, as a customer (investor) of the Management Company, the Management Company - in this case the data shall be stored for 10 years from the end of the loan agreement, unless the (legal) dispute is in progress (in this case - until the effective date of the final decision of the competent authority).
We receive data from	You when executing an inquiry or analysing a complaint, we may create personal data ourselves (for example, upon receipt of your complaint, we will contact our employees regarding the actual circumstances of the complaint and record them, etc.), from third parties: distributors, compliance service providers or other entities for the performance of the activity

We provide or transfer the data	to Website administration service, legal service, compliance service providers.

d) Candidates joining our team for recruitment purposes. If you contact us for the opportunity to join our team, we may process your personal data for the following purpose:

Data categories	Data specified in your CV or your completed questionnaire, as well as data, provided by you, such as: name, surname, e-mail, telephone number, city, gender, date of birth, education, activities, information about professional (including volunteering) experience, professional projects completed, knowledge of foreign languages, link to LinkedIn social network account.
Legal basis for data processing	Agreement (conclusion of an Employment Contract) to join your team
Data processing term	Until the end of recruitment process. If you have given a separate consent to store the data for another purpose (i.e. administration of the Candidate Database) for longer – in this case, personal data is stored for the period specified at the time of obtaining the consent (usually for 1 year after your consent was given to us)
We receive data from	you, third parties (for example, legal entities providing employment services, current or former employers, if there is a legal basis)
We provide or transfer the data	to legal service providers, compliance service providers.

e)**For the purpose of direct marketing.** For this purpose, the following personal data may be processed:

Data categories	Name, surname, telephone number, e-mail address, gender, age, social network account data. Additionally, the following data of employees of business partners can be processed: work telephone number, work e-mail address, workplace address, position held, date of birth.
Legal basis for data processing	Only on the basis of your consent.
Data processing term	During the validity of the consent and 3 years after the expiry of the consent.
We receive data from	You.
We provide or transfer the data	to legal service providers, compliance service providers.

f) for other purposes specified in our Personal Data Processing Rules and (or) other internal documents, when your personal data is required to be processed by us by legal acts or there is a legitimate interest or other grounds for lawful processing of personal data established by legal acts.

5.2. For the purposes of processing of personal data detailed in this Privacy Policy, we do not in any way ask you to provide/ disclose to us and we do not process special categories of your

personal data that reveal your racial or ethnic origin, political views, religious or philosophical beliefs or trade union membership, as well as health data, genetic data, biometric data (used to identify you) and information about your sexual life.

6. HOW DO WE USE COOKIES?

6.1. We collect information about you using cookies and similar technologies. Cookies are small files that are temporarily stored on a hard drive of your device and allow to identify you during other visits of the Website, social networks, save your browsing history, options, customize content, speed up searches, create more convenient and friendly environment, and provide it more efficiently and reliably. Cookies are common website browsing practices that make it easier to use the website.

6.2. We may use cookies through the Website to collect the information specified in Section 5.1 (a) of this Privacy Policy, as detailed in clause 6.6.

6.3. We use the information received from cookies:

a) to ensure the functionality of the Website;

b) to improve and develop the Website so it would better meet your needs;

c) for development of services and analysis of the use of the Website;

d) for targeted orientation of marketing solutions.

6.4. Without violating the law, we may combine the information obtained through the use of cookies with information obtained about an individual through other means (for example, information about the use of the Website with other personal data provided by you or obtained from other sources).

6.5. Please note that the Website, social networks may use cookies such as:

a) *compulsory (technical) cookies* - the cookies that are necessary for operation of websites;

b) *functional cookies* - the cookies significantly improve their performance, quality and visitor experience, although not necessary for operation of websites.

c) *analytical (statistical) cookies* - the cookies that are used for the statistical analysis of navigation methods of website visitors; the data collected by these cookies is used anonymously;

d) *targeted or promotional cookies* - the cookies that are used to display offers or other information that may be interesting for you;

e) *cookies of social networks* - the cookies that are necessary for the use of website information in your social account.

6.6. Information about the cookies used on this Website is generated automatically and updated through cookiebot integration.

6.7. You can give your consent to the use of cookies on our Website by clicking on the “I Accept” link in the link (bar) on the Website.

6.8. You can cancel your consent to use cookies at any time. You can do this by changing your web browser settings so that it does not accept cookies. How you do this depends on your operating system and web browser. You can find detailed information about cookies, their use and cancellation options here http://AllAboutCookies.org or http://google.com/privacy_ads.html.

6.9. In some cases, especially the switch off, disagreement with or deletion of technical and functional cookies may slow down the Internet browsing, restrict the operation of specific functions of the Website, block access to the Website.

6.10. For more information about external websites (such as social networks), see Chapter 10 of this Privacy Policy.

7. WHOM DO WE PROVIDE YOUR PERSONAL DATA?

7.1. We guarantee that your personal data will not be provided or otherwise transferred to third parties without a legal basis, nor will it be used for the purposes other than those for which they were collected. We will not transfer your personal data in any way other than as required by legal acts in accordance with this Privacy Policy. However, we reserve the right to provide information about you if we are required to do so in accordance with the procedure established by law or if required to do so by lawful authorities or prosecuting authorities.

7.2. We may transfer your personal data to the partners who help us operate businesses. We require such entities to process your data only in accordance with the instructions given by us and the applicable legal acts on data protection. We enter into agreements with these entities, which impose strict obligations to protect personal data.

7.3. The use of your data by the above-mentioned service providers is limited - they may not use this data for purposes other than provision of services to us.

7.4. A non-exhaustive list of individuals and their categories to whom we transfer your personal data is provided in Section 5.1 of this Privacy Policy separately for each purpose of using personal data.

8. HOW LONG DO WE STORE YOUR PERSONAL DATA?

8.1. We store your personal data no longer than required for the purposes of the data processing or as provided by legal acts, if they provide for a longer retention period.

8.2. We strive not to store outdated, not relevant personal data, so only up-to-date information is stored when it is updated (for example, revised, changed, etc.). Historical information is stored if it is required in accordance with the procedure established by legal acts or for the performance of our activities.

8.3. Clause 5.1 of the Privacy Policy sets out the terms for storing your personal data separately for each purpose of personal data use.

9. HOW DO WE STORE YOUR PERSONAL DATA?

9.1. The data we collect from you will be within the EU territory, but may be transferred or stored outside the EU. They may also be processed by our employees or employees of our suppliers working outside the EU. When transferring your data outside the EU, we will take all necessary actions to ensure that your data is processed securely and in compliance with this Privacy Policy.

9.2. Unfortunately, the transfer of information through the Internet is not completely safe. Although we take every effort to protect your personal data, we cannot guarantee the security of your data when you transfer data to the Website - you assume the risks related to the transfer of data to the Website. When we receive your data, we will apply those legal procedures and security measures to protect your data against unauthorized access, unauthorized processing or disclosure, accidental loss, deletion, or destruction.

9.3. Should unlikely circumstances arise and we become aware of a breach of security of your personal data which could constitute serious hazard to your rights or freedoms, we will notify you immediately as soon as we become aware of it and determine what information has been accessed.

9.4. The Website uses a Letsencrypt.org SSL certificate.

a) Verified Website Identity (you are visiting the real domain owner’s website and not being redirected to a hacked server).
b) All data transmitted between the server and the browser is encrypted (network hackers can no longer read it).
c) Data integrity and originality are guaranteed (routers on the way cannot correct or censor the information being transmitted).
d) Click https://letsencrypt.org for more information.

10. EXTERNAL WEBSITES

10.1. The Website may contain links to external sites, such as our business partner sites or sites where we have accounts that promote our services. By clicking such links to any of the websites, please note that these websites and the services accessed through them have their own privacy policies and we do not accept any responsibility or liability for these policies or for any personal data collected on or through these websites, such as contact or location details. We encourage you to read these policies before submitting personal information on these sites or using any services.

11. WHAT RIGHTS TO YOU HAVE?

11.1. When processing personal data, we guarantee your rights in accordance with GDPR and the Law on the Legal Protection of Personal Data of the Republic of Lithuania. You shall have the have the following rights as a personal data subject:

a) know (be informed) about the processing of your personal data;

b) get acquainted with our personal data that we process;

c) demand the correction or supplementation, adjustment of incorrect, inaccurate, incomplete personal data;

d) require the destruction of personal data when they are no longer needed for the purposes for which they were collected;

e) require the destruction of personal data if it is processed unlawfully or if you cancel or do not give your consent to the processing of personal data, which is necessary;

f) disagree with the processing of personal data or cancel a previously given consent;

g) require the suspension (except for storage) of your personal data processing in case of a dispute or verification of the lawfulness of the processing, the accuracy of the data, as well as in cases where we no longer need your personal data but you do not want us to destroy it;

h) require the submission, if technically possible, of your personal data collected with your consent or for the purposes of performing the contract in an easy-to-read format or request that they be transferred to another controller.

11.2. We will seek to guarantee the exercise of your rights as a personal data subject and to create all conditions for the effective exercise of these rights, but we reserve the right not to comply with your requirements when it is necessary to ensure:

a) fulfilment of the legal obligations imposed on us;

b) national security or defence;

c) public order, the prevention, investigation, detection or prosecution of criminal offenses;

d) important economic or financial interests of the state;

e) prevention, investigation and detection of violations of official or professional ethics;

f) protection of the rights and freedoms of you or others.

11.3. You may submit claims related to the exercise of your rights to us in person, by post or by electronic means. Upon receipt of your application, we may ask you to provide proof of identity as well as any additional information we require regarding your application.

11.4. Upon receipt of your claim, we will respond to you no later than within 30 calendar days from the date of receipt of your claim and the submission of all documents required to provide a response.

11.5. If we deem it necessary, we will suspend the processing of your data, except for storage, until your request has been resolved. Upon lawful cancellation of your consent, we will immediately, but not later than 30 calendar days, terminate the processing of your personal data, except as provided in Clause 11.2 of this Privacy Policy and as required by legal acts, i.e. when we are required to further process your data by applicable legal acts, our legal obligations, court decisions or binding instructions given to us.

11.6. If we reject your claim, we will clearly state the grounds for such rejection.

11.7. If you disagree with our actions or the response to your application, you may appeal against our actions and decisions to the competent public authority.

12. WHO CAN YOU COMPLAIN TO?

12.1. If you wish to make a complaint about our processing of data, please submit it in writing, providing as much information as possible, using the contact details provided at the end of this Privacy Policy. We will cooperate with you and try to resolve any issues promptly.

12.2. If you think that your rights have been infringed in accordance with the GDPR / other applicable personal data protection legislation, you can file a complaint to our supervisory authority, the State Data Protection Inspectorate of the Republic of Lithuania, more information and contact details can be found on the website of the Inspectorate (https://vdai.lrv.lt/). Although, first of all, we seek to resolve all disputes with you promptly and peacefully.

13. HOW WILL THIS PRIVACY POLICY BE AMENDED?

13.1. All amendments to our Privacy Policy will be published on the Website. We will notify you of any material changes and (or) needs. The new terms and conditions of the Privacy Policy may also be published on the Website and you may need to read and agree to them in order to continue using the Website and (or) our services.

14. HOW TO CONTACT US?

14.1. Please send all documents related to this Privacy Policy or contact us at the following contacts:

a) when sending by mail - to **UAB "I Asset Management"**, office address: Liepyno Str. 25A, Vilnius;

b) when sending by e-mail - info@1am.lt;

c) contact telephone number - +370 655 57033.

Date of publication of the Privacy Policy – XX of January, 2023.