

**PRIVACY POLICY OF
PI “GYVUNU GEROVES INICIATYVOS”**

APPROVED
By Order of the Director
of 14 September 2022

Updated: 14 September 2022

We care about your privacy and the security of your personal data. In this Privacy Policy (hereinafter referred to as the Policy), you can get acquainted with how PI “Gyvunu geroves iniciatyvos” processes your personal data, what your rights we guarantee and other information about the processing of your personal data.

The manager of your personal data is PI “Gyvunu geroves iniciatyvos”, a public institution established in the Republic of Lithuania, legal entity code 302842427, address – Ateities str. 10, LT-08303 Vilnius, all data are collected and processed in the Register of Legal Entities of the State Enterprise “Centre of Registers” (hereinafter – “GGI” or “We”). The GGI is a non-governmental organisation that seeks to ensure the protection of the public interest and the representation of the rights of animals in the field of welfare and protection.

This Policy applies when you visit the GGI website, provide support for GGI activities, volunteer, subscribe to newsletters, provide notifications or other information or otherwise contribute to the activities of GGI. This Policy does not apply when you browse the websites of other companies or use the services of third parties.

If you use the GGI website, We will assume that you have read and agreed to this Policy. If you do not agree to this Policy, you may not use the GGI website.

When processing personal data, We follow the requirements of the Data Protection Regulation No. 2016/679 of the European Union, the Law on Legal Protection of Personal Data of the Republic of Lithuania, other relevant legal acts and the instructions of the controlling authorities.

For the purposes of this Policy, the following terms are used:

Personal Data	- it is any information by which it is possible to identify you by directly or indirectly identifying you. Personal data includes surname, first name, date of birth, postal or e-mail address, location data and internet identifier, characteristics specific to you, and etc.
Activity	- the activities carried out by the GGI, as specified in the Articles of Association of the institution and on the Website, which may be constantly updated, supplemented or changed on the Website.
Partners	- persons with whom the GGI cooperates in providing you with the Services;
Site	- online portal ggi.lt, which is available at the internet address – www.ggi.lt .

1. WHAT PERSONAL DATA OF YOU AND FOR WHAT PURPOSES DO WE COLLECT AND PROCESS?

1.1. We only collect and process such personal data as is necessary to achieve the purposes for which it is collected. We do not collect or store data that is unrelated to the conduct of our activities.

1.2. Depending on the nature of your exposure, the GGI may collect and process the following Personal Data about you:

Purposes of data processing		
For the purpose of concluding a support or volunteering contract	What Personal Data do We process?	<ul style="list-style-type: none"> • Name; • Surname; • Date of birth; • Phone number; • E-mail address; • Date of issue of the identity document; • ID document number; • Place of issue of the identity document; • The date of validity of the identity document; • Signature; • Personal number (in exceptional cases, when necessary).
	When do We process your data?	When concluding a contract: <ul style="list-style-type: none"> • Physically arriving; • Online; • By other means of concluding the contract, if another method is used in the institution.
	How long do We store?	10 years from the date of the termination of the contract
	On what basis do We process?	On the basis of the contract concluded between you and Us.
For the purpose of defending the public interest	What Personal Data do We process?	In order to ensure the protection of the public interest in the field of animal welfare, the GGI collects Personal Data from informants, publicly available sources, as part of an independent research.

	When do We process your data?	When information on animal welfare violations is received.
	How long do we store?	The data is archived after 120 days, stored in the archive for 10 years from the date of application.
	On what basis do We process?	On the basis of the implementation of the requirements of the law.
For the purpose of processing your requests	What Personal Data do We process?	In order to fully answer the questions you ask, properly examine your requests, claims and other inquiries you have submitted, we process all Personal Data collected and processed about you, taking into account the content of your inquiry.
	When do We process your data?	When you submit an inquiry/complaint/claim or any other request.
	How long do We store?	The data is archived after 120 days, stored in the archive for 10 years from the date of application.
	On what basis do We process?	On the basis of the implementation of the requirements of the law.

2. HOW DO WE PROCESS YOUR PERSONAL DATA AND WHERE DO WE GET IT FROM?

2.1. We collect, use and otherwise process your Personal Data in order to perform our activities and our contractual obligations to you, as well as to pursue a legitimate interest, to comply with the instructions or obligations of legal acts.

2.2. When processing your Personal Data, We will:

2.2.1. We comply with the requirements of valid and applicable legislation, including the General Regulation on the Protection of Personal Data;

2.2.2. We process your Personal Data in a lawful, fair and transparent way;

2.2.3. We collect your Personal Data for specified, clearly defined and legitimate purposes and do not process it in a manner incompatible with those purposes, except to the extent permitted by law;

2.2.4. We take all reasonable measures to ensure that any Personal Data that is not accurate or complete (taking into account the purposes for which they are processed) is immediately corrected, supplemented, suspended or destroyed;

- 2.2.5. We keep them in a form that allows you to be identified for no longer than is necessary for the purposes for which the Personal Data are processed;
- 2.2.6. We do not provide Personal Data to third parties and will not make them public, unless it is necessary to ensure the performance of the activities;
- 2.2.7. We ensure that your Personal Data is processed in such a way as to ensure appropriate security of Personal Data, including protection against unauthorised or unlawful data processing and against accidental loss, destruction or damage, by applying appropriate technical or organizational measures.

2.3. Your Personal Data We receive:

- 2.3.1. Directly from you when you submit them to Us or when you use the Website;
- 2.3.2. We may also generate your Personal Data in the course of the activities;
- 2.3.3. From the persons who provide information about you, as well as from other third parties – in accordance with the procedure established by legal acts and this Policy.

2.4. By providing data to Us, you are responsible for the correctness, completeness and relevance of this Personal Data. When you provide Personal Data about other persons (i. e. you report animal welfare violations), you are responsible for the correctness, completeness and relevance of such Personal Data.

2.5. We may combine the Personal Data, which We have received from you, when you use the Website with those collected by Us from other public or accessible sources (i. e. We may combine the Personal Data you provide with data obtained from third parties).

2.6. You may at any time object to the processing of your Personal Data or at any time withdraw your consent, which is carried out on the basis of your consent.

2.7. You have the right to modify and update the information you have provided to Us.

2.8. It is necessary for Us to have up-to-date information related to Our interests necessary for the quality of the provision of services, so We may ask you to confirm that the information available to the GGI about you is correct.

3. TO WHOM DO WE TRANSFER YOUR PERSONAL DATA?

3.1. Your Personal Data is transferred only to trusted third parties and only to the extent necessary for the performance of the activity. We may transfer your Personal Data to the following partners, managers and institutions:

3.1.1. Other non-governmental organizations;

3.1.2. State institutions and institutions, law enforcement institutions, other persons performing functions assigned by law, in accordance with the procedure provided for by the legal acts of the Republic of Lithuania.

- 3.1.3. For other enterprises, institutions and organizations when such transfer is necessary for the proper provision of services to the Client.
 - 3.1.4. Partners or other reliable third parties assisting in the implementation of the activities may be transferred only to the extent necessary to ensure the proper performance of the activities.
 - 3.2. For the processing of Personal Data, We may also use administrators (for example, IT, server services, companies providing website administration, analytics, companies providing advertising services, auditors, consultants, and etc.). We require such administrators to store, process and treat Personal Data with the same responsibility as We do.
 - 3.3. Data is transferred outside the European Union in accordance with the procedure established by Article 49(1) of the GDPR.
4. WHAT PROTECTIVE MEASURES ARE APPLIED IN ORDER TO PROTECT MY PERSONAL DATA?
 - 4.1. Your Personal Data is processed responsibly, securely and is protected from loss, unauthorized use and alteration. We have implemented physical and technical measures to protect all information We collect for the purpose of providing our services from accidental or unlawful destruction, damage, alteration, loss, disclosure, as well as from any other unlawful processing.
5. WHAT ARE YOUR RIGHTS?
 - 5.1. You have the following rights in relation to your Personal Data:
 - 5.1.1. To know (be informed) about the processing of your data (right to know);
 - 5.1.2. To access to your data and how they are processed (right of access);
 - 5.1.3. To request the rectification or, taking into account the purposes of the processing of Personal Data, to supplement incomplete Personal Data (right to rectify);
 - 5.1.4. To demand the destruction of your data, to destroy or suspend the processing of your data (except for storage) (the right to destroy and the right to “be forgotten”). Your right to request the erasure of your personal data may be limited if, upon receipt of your request, We determine that:
 - 5.1.4.1. Your personal data is necessary for the purposes for which it was collected or processed;
 - 5.1.4.2. You have not withdrawn your consent to the processing of your personal data;
 - 5.1.4.3. You have not consented to the processing of your personal data, but such processing of data is necessary for the protection of our legitimate interests or the protection of the public interest;
 - 5.1.4.4. We are obliged to process your personal data by applicable European Union and national legislation.

- 5.1.4.5. It is necessary for Us to process your data for the purpose of making, enforcing or defending legal claims.
 - 5.1.5. To require Us to restrict the processing of Personal Data for one of the legitimate reasons. You may restrict the processing of personal data in the presence of at least one of the following circumstances:
 - 5.1.5.1. Your Personal Data is inaccurate (the processing of Personal Data in this case will be limited until the verification of the accuracy of the data);
 - 5.1.5.2. Your personal data is processed unlawfully, but you do not agree to the erasure of your data;
 - 5.1.5.3. Your personal data is necessary for the purpose of asserting, exercising or defending legal claims;
 - 5.1.5.4. Your personal data is processed if you object to such processing of Personal Data (data processing will be limited on this basis until it is verified whether the reasons why We process your personal data take precedence over yours).
 - 5.1.6. The right to data portability (right to transfer). This right will be exercised only if there are grounds for its implementation and appropriate technical measures to ensure that the transfer of the requested Personal Data to the data of other persons does not create a risk of a security breach.
6. HOW CAN I APPLY FOR THE EXERCISE OF MY RIGHTS?
- 6.1. You can submit requests related to the processing of your Personal Data to Us in the following ways:
 - 6.1.1. By sending Us a request by e-mail: info@ggi.it;
 - 6.1.2. notifying Us by phone: +370 686 00 626.
 - 6.2. When submitting a request for your rights in relation to Personal Data, We, in order to better understand the content of your request, may ask you to fill in the necessary forms, as well as provide an identity document or other information that will help Us to verify your identity. If you submit a request by e-mail, depending on its content, We may ask you to come to Us or submit a request in writing.
 - 6.3. Upon receipt of your request or instruction regarding the processing of Personal Data, no later than within one month from the date of the request, We will provide a response and perform the actions specified in the request or inform you why We refuse to perform them. If necessary, the specified period may be extended by a further two months, depending on the complexity and number of requests. In this case, within one month from the date of receipt of the request, We will inform you about such an extension.
 - 6.4. If you believe that your rights have been violated, you can apply to the State Personal Data Protection Inspectorate for the protection of your rights.
7. SENDING NEWS

- 7.1. After you have given your consent to receive news, We may use your personal data to provide you with newsletters, offers, notices, including personal ones, and information about Our activities, the services of persons and partners associated with Us, which, in Our opinion, could be of interest to you.
- 7.2. For this purpose, We process your Personal Data specified in item 1.2 of the Policy.
- 7.3. After sending the news, We can collect information about the persons who received them, for example, which message the persons opened, what links they clicked on, and etc. We may combine the available information about you with information held by third parties. Such information is collected or combined in order to offer you relevant and more adapted news.
- 7.4. After you have given your consent to receive the news, your e-mail address and/or phone number may be transferred to Our partners/administrators who provide Us with news sending services.
- 7.5. After you have given your consent to receive Our news, you may at any time withdraw such consent, withdraw all or part of the processing of Personal Data. You can do this by clicking on the link in the e-mail or by contacting Us by e-mail to the address info@ggi.it; or by calling on the phone +370 686 00 626.

8. WHAT ARE COOKIES?

- 8.1. Cookies are small text files that are downloaded to your device when you visit the relevant website. Cookies help Us to recognize your device and help Us to improve the functionality of Our website and facilitate its use.
- 8.2. The cookies used on the website do not collect or store Personal Data.

9. THIRD PARTY LINKS ON OUR WEBSITE

- 9.1. The Website may contain links to external sites. When following such links to any of the websites, please note that these websites and the services accessed through them have their own separate privacy policies and We do not assume any responsibility or liability for the Personal Data collected on these websites or in the provision of services, such as contact or location data. We recommend that you review the privacy policies of such websites before using them and by providing Personal Data on these websites or using any services.
- 9.2. Our Website uses some third party tools, such as Google Analytics, Facebook, Linkedin, and these third parties may also use cookies through Our Website. The Company is not responsible for the security and privacy of information collected by such third parties. The aforementioned websites are guided by their own privacy settings and documents, so We recommend that you read the privacy statements that apply to the third party websites and services you use.

10. CONTACT US

- 10.1. If you have any questions about the information provided in this Privacy Policy, please contact:
 - 10.1.1. By sending Us a request by e-mail: info@ggi.it;

10.1.2. By notifying Us by phone: +370 686 00 626.

11. HOW IS THIS PRIVACY POLICY CHANGED?

- 11.1. We may change the terms of the Privacy Policy and update it. We will notify you of any significant changes on the Website or in other usual ways. If We change the Privacy Policy, its additions or amendments take effect from the date of their publication, i. e. from the day they are posted on the Website or are informed about them by other usual means, unless another deadline for entry into force is specified.