**Privacy Policy**

This privacy policy contains information on data protection subject to the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter referred to as GDPR).

We inform you that:

To the extent that your personal data is processed through the functionality of this website hosted on leads.e100.cards subdomain, i.e. https://leads.e100.cards/secureLT to which this information refers (the "Website"), by accepting the data processing principles (the "Information") displayed on it after it has been loaded and by providing voluntary, unequivocal and informed consent to data processing, you, as the user, acknowledge and agree that:

1) your personal data controller is UAB "Europinių kortelių servisas" (ENG: European card service LLC) with the legal address in Republic of Lithuania, in Vilnius, LT-08108, Liepyno 25A St., entered in the Register of Legal Entities kept by the Lithuanian state enterprise Centre for Registers under number 304280403, hereinafter referred to as "E100 LT" or "Controller".

2) another controller of your personal data is a another member of E100 group, located in EEA country country within the meaning of GDPR, who ensures the Website operation and its technical functionality, performing periodic technical evaluation and introducing modification to the Website with due regard to the needs of E100 LT and E100 LT Clients, collecting data for this purpose, i.e. Baltia Trading Company OÜ (ENG name: Baltia Trading Company LLC) , with its registered seat in Republic of Estonia, Haarju county, Tallinn, 11415, Lasnamäe district, Väike-Paala 1 St., registered in the Estonian commercial register under number 14375399, hereinafter referred to as “E100 BTC” or “Co-Controller”.

Considering abovementioned, E100 LT and E100 BTC are joint controllers of your personal data collected and processed through the Website, they jointly determine the purpose and scope of personal data with due regard to the legitimate interests, if any, or your voluntary, unequivocal and informed consent to the processing rules followed by each member of E100 and data transfer or exchange between them.

We would like to inform you as well that if the personal data subject provides its personal data to E100 LT only, for example, by ignoring the functionalities offered on the Website, E100 LT shall be deemed the controller of such data.

To contact the Controller regarding the personal data processing received through the Website, send an email to gdpr@e100.eu.

**What kinds of personal data do we process?**

Registration on the Website and personal data disclosure is voluntary, but necessary to contact us through the contact form (telephone number or e-mail address) or to use our services through the Client Account.

In addition, on the Website, we also collect information contained in cookies and in server logs (for example, the IP addresses of endpoint devices).

Through the Website, we collect information contained in system logs (e.g. IP addresses of end devices) and in Cookies, information about the type of operating system, URLs of websites from which users were redirected, information about actions taken during visits to the website and dates and times of visits on page. A "cookie" is a text file placed on a computer's hard drive or in the memory of a mobile device by a website or server. The user may delete the 'cookies' processed by our Website at any time through the settings of his web browser.

In addition to the above, we process, to the extent necessary (including for the purposes of providing the offer of services), information, including personal data included in the business name (if any), tax id of the entrepreneur interested in our offer.

The Controller and the Co-Controller process the data provided by you always taking into account the principle of data minimization expressed in Article 5. sec. 1 point c) GDPR.

**Legal basis for personal data processing**

With due regard to the activities performed, the Controller and the Co-Controller process your personal data for various purposes as prescribed by law. You may provide us exclusively with data for processing in accordance with applicable law, including the GDPR. Hereby we inform you that we process the data based on:

- the consent to the extent given in E100 Information (so-called "pop-up cookie") which appears when you visit the Website, provided that you give such consent directly to the Controller, Co-Controller or E100 Partners pursuant to Article 6(1)(a) GDPR;

- the consent given by you in the E100 Client Form to the extent not processed through the functionality of the Website in accordance with Article 6(1)(a) of the GDPR;

- goals for contract conclusion which the data subject is a party to, performance of such contract, or for actions to be taken at the request of the data subject prior to the conclusion of the contract, i.e. in accordance with Article 6(1)(b) of the GDPR;

- performance of the legal obligations imposed on the Controller or Co-Controller, as prescribed by Article 6 (1) (c) of the GDPR;

- the Controller or Co-Controller legitimate interests protection in accordance with Article 6(1) (f) of the GDPR;

- on the basis of your individualized consent in the information (so-called 'cookies pop-up') appearing after loading the Website for the sharing of personal data provided by you to the Joint Controller to the Controller, to the extent that your personal data is made available via the Controller to the Joint Controller and to the extent necessary in connection with the legitimate legal interest of the Controller and the Joint Controller and joint determination of the purpose and methods of personal data processing via the Website by these entities, i.e. in connection with from Article 26(1) of the GDPR;

The Requirement to inform on personal data processing is met by putting on the Website the E100 information (so-called "cookie pop-up") and this Privacy Policy.

**Purpose of data processing and other controllers**

The information provided via the form will be used to contact customers that may be interested in Secure E-BOX product/service.

The customer informed about the rules of data processing, including the information clause for representatives (https://e100.eu/en/e100-data-aware-clause) grants explicit consent to the processing of personal data. For this purpose, the customer may also be contacted via e-mail address or telephone number provided in the form.

The processing of personal data is necessary for the purposes of observing the legitimate interests of the Personal Data Controller, including, but not limited to, processing of personal data entered in the contact forms present on the Website in order to present commercial information regarding the offer of services provided by the Controller. Processing may be also connected with ensuring technical functionality of the Website, its maintenance, debugging, fraud prevention.

**Retention period for personal data**

Personal data provided to the Controller via the Website may be stored by E100 LT or E100 BTC for no longer than a period appropriate to the legal grounds applicable to them, indicated in art. 6 GDPR. Regardless of this, the Website user has influence on the length of data processing in the field of 'cookies' and can delete data used by the Website using the functionality of his web browser.

**What rights do you have?**

The right to access data.

You have the right to receive information about the processing of your personal data and to receive a copy of your data that we process, in accordance with art.15 of GDPR. If we do not process your personal data, you are entitled to receive confirmation.

The right to correct data.

You have the right to correct or supplement personal data that is inaccurate or insufficient for the purposes of processing, in accordance with art.16 GDPR.

The right to delete data.

You may ask for your personal data to be deleted or exercise the "right to be forgotten", in accordance with Art.17 sec.1 or 2 of GDPR. Your data will be deleted if there is no legal reason to keep it. If your personal data is processed in accordance with your consent, you have the right to withdraw your consent at any time. In order to withdraw your consent, please send an email to gdpr@e100.eu

The right to request the restriction of data processing.

You have the right to request the restriction of your personal data processing. If the restriction is requested, the Controller or Co-Controller will only store the personal data in accordance with art.18 of GDPR. You can make a request for restriction, for example, if you have doubts about the correctness of the data, the lawfulness of its processing or you have filed an objection to the processing and your request is still under consideration.

Right to object.

You have the right to object to the processing of your personal data in order to comply with the legitimate interests of the Controller or Co-Controller with respect to your specific situation, i.e. to the processing of personal data under Article 6(1)(e) or (f) GDPR, including profiling, as per provisions of art.21 section 1 of GDPR. You can object to the processing of your personal data for direct marketing purposes at any time.

The right to have the personal data transmitted.

You have the right to receive your personal data and have it transmitted to another controller, as per provisions of art.20 of GDPR.

**Telephone calls and commercial information**

E100 LT conducts direct marketing or we send information that may be classified as commercial information via electronic means of communication, only based on the prior consent of the data owner, which we use for this purpose, i.e. the telephone number or email address provided for contact.

It is common practice for E100 LT to monitor telephone conversations and, in some cases, record such interactions for staff training or quality control purposes, or to preserve evidence of a specific transaction or interaction, which we inform our callers of.

**Data exchange**

We do not sell or otherwise disclose our users personal data that we collect, except for the cases described in this document or disclosed to the user at the time of data collection. We exchange data for the purpose of conducting transactions or performing other activities as part of business relationshipы. In accordance with the principles of data transfer to third countries in the meaning of GDPR, we may share the personal data we collect with the companies of the group, commercial affiliates, subsidiaries, vendors, suppliers and other organizations involved in the contracting process with clients. We may also share this data with our service providers who perform services on our behalf. We do not authorize such service providers to use or disclose this data, except as necessary to perform certain services on our behalf or to comply with requirements of the applicable legislation. We require such service providers, within the framework of their contract, to adequately protect the confidential and personal data that they process on our behalf.

We may share data with business partners with whom we do business. These business partners may contact the user regarding products or services in which the user may be interested. Such third parties may use personal data in accordance with their own privacy policy. When using such features, we recommend the user to read the third party privacy policy . We reserve the right to transfer personal data in the event we sell or transfer all or part of our business or assets. In the event of such sale or transfer, we will make reasonable efforts to instruct the recipient to use the personal information received from the user in accordance with our privacy policy. Upon completion of such sale or transfer, the user may contact the company that received the user's personal data for any questions related to the processing of that data.

**User rights and choice**

The user has the rights to his personal data that we store. We allow users to choose which personal data we collect.

The User may decide not to disclose their personal data to E100 group by refusing to provide consent when interacting with E100. You have the right to refuse to use cookies to assign a unique identifier to your computer when you use our websites to avoid aggregation and analysis of data collected on our sites.

The user may opt-in or opt-out email marketing through the websites, and may receive or unsubscribe from marketing emails following the instructions for subscribing and unsubscribing from promotions. The user can also opt out of receiving promotions. The user may revoke any previously given consent or at any time legally prohibit us from processing his/her personal data. From this point on, we will adhere to the preferences expressed by the user. In some cases, the withdrawal of consent to the use or disclosure of your personal data will mean that the user will not be able to use certain products or services offered by us.

If the user is located in the European Economic Area, the user may prohibit us from transferring his or her personal data to third countries, except: (i) to service providers we have hired to provide services on our behalf, (ii) if we sell or transfer all or part of our business or assets and a new administrator becomes a party to the user's contract (iii) if disclosure is necessary for good reasons in the public interest, or (iv) if we believe such disclosure is necessary or appropriate in connection with the investigation of suspected fraud or other illegal activity. If the user is located in the European Economic Area, we will use his personal data only for the purposes stipulated by the terms of our privacy policy and other conditions that the user has been notified about, unless we have other grounds, for example, consent, to use data for other purposes. If required by law, E100 obtains prior consent to the collection of (i) personal data for marketing purposes.

**Information security**

All user information can be transmitted and stored in a secure E100 database located on servers in the European Union. If we transfer user data to other countries, we will protect it in accordance with the Privacy Policy applicable to our website, including the Data Protection Policy. The data we collect may be transferred outside the country of origin of the user with his or her consent provided in accordance with the GDPR. Data may also be processed by employees working outside the user's country of origin who work for us or for any of our suppliers in order to prevent data transfer without explicit consent. These employees may be involved in, among other things, fulfilling user orders, processing payment information, and providing support services. By providing the personal data, the user gives consent to the transfer, exchange, storage or other processing of the data. If a user provides us with personal data of his/her company employees or individuals, we can reasonably assume that the user is acting as the administrator of that data and is responsible for obtaining their consent to act as such. We will take all reasonable measures to ensure the safety of user data and their protection in accordance with this privacy policy. E100 has a data protection program designed to (i) ensure and maintain the confidentiality of user personal data; (ii) protect personal data against security threats and risks to integrity; (iii) protect against unauthorized access to or use of personal data that could cause serious harm to the user or his/her company; and (iv) comply with applicable law. Our contracts with suppliers and service providers bind them with the obligations to protect the user's personal data.

Unfortunately, the transmission of information over the Internet is never completely secure. Although we will do everything possible to protect the user's personal data, we cannot guarantee 100% security of the data transmitted through our sites. The user provides this data to some extent at his or her own risk. We take all reasonable precautions, including appropriate technical, administrative and physical procedures, to protect the user's personal data from loss, misuse or alteration. The information that the user provides to us is stored on our secure servers.

Under applicable law, users have the right to request access to their personal data that we store, to update and correct inaccuracies in their personal data, and to request that data be blocked or deleted. In some cases, the user's right to access personal data may be restricted by local legislation. To update your preferences, request the removal of your information from our contact list, or make a request, contact us by email.

**Our contact details**

If you wish to opt out of receiving e-mail, fax or telephone messages from us, or want to update your personal data, ask to delete such data or find out some information about the data that we store, please write to gdpr@e100.eu. If you have further questions about this privacy policy or would like to file a complaint, please email us at gdpr@e100.eu or by sending corr.

**Information about automated decision-making**

Your personal data is used for automated profiling purposes with due regard to your consent and legitimate interests of the Controller or Co-Controller to better understand the web traffic on the Website and tailor our offers to your needs.

**Contact the Controller**

For questions related to the processing of your personal data, including those obtained through the Website, you can contact the Controller responsible for maintaining the register of personal data processing by e-mail: gdpr@e100.eu or by sending a letter to:

UAB "Europinių kortelių servisas
Liepyno 25A St

Vilnius, LT-08108,

Lithuania

Without prejudice to the aforementioned, you can also contact the Co-Controller in view of data processing.

**The right to lodge a complaint with a supervisory authority**

If you believe that the processing of personal data infringes the GDPR, you may lodge a complaint with a supervisory authority in Lithuania - the State Data Protection Inspectorate.

**Changes to the Privacy Policy**

We may update our privacy policy from time to time. We update it to meet the changes in our business activities. If there is a change in the way we use the personal information that users provide to us, or if the purposes or subjects to whom we disclose this information change, we will post a notice of such change on our Website, and continued use of the Website constitutes user acceptance of the changed policy applicable to the Website.