

**Private Trading Company APRANGA**  
**Website: [www.aprangagroup.lt](http://www.aprangagroup.lt)**  
**PRIVACY NOTICE**

Last updated 4 September 2024

We understand the importance of protecting personal data, therefore we respect and protect your privacy and personal data. The Apranga Group, consisting of the Private Trading Company Apranga and its directly or indirectly controlled companies (listed in Chapter 1) (hereinafter – the Apranga Group) stores information about you, and in processing your data, comply with the European Union's General Data Protection Regulation (hereinafter – the GDPR<sup>1</sup>) and other data protection legislation. In this privacy notice (hereinafter – the Privacy Notice), we will answer the most important questions about how we collect, use and protect information about you. You will also be able to get acquainted with your rights as a data subject, cookie information and the processing of your personal data when you use the website [www.aprangagroup.lt](http://www.aprangagroup.lt) (hereinafter – the Website).

If you use the Website, we will assume that you have got acquainted with the information contained in the Privacy Notice and that you authorize the Apranga Group to process your personal data in accordance with the terms and conditions set out herein. Get acquainted with this important information carefully and visit our Website from time to time to read the most up-to-date version of the Privacy Notice posted there.

## **1. WHO IS RESPONSIBLE FOR PROTECTING INFORMATION ABOUT YOU?**

The controller of your personal data processed in the course of the administration of the Website is Private Trading Company APRANGA, identification number: 121933274, registered office address: Ukmergės st. 362, Vilnius.

In addition, with regard to the brand and the purposes set out in Chapter 2, the following shall be considered to be controllers of your personal data:

| <b>Controller</b>                                                      | <b>Brand</b> |
|------------------------------------------------------------------------|--------------|
| Apranga LT“, UAB, registered office address: Ukmergės st. 362, Vilnius | Zara         |
| Apranga HLT, UAB, registered office address: Ukmergės st. 362, Vilnius | Zara Home    |
| Apranga BPB LT, UAB, buveinės adresas Ukmergės g. 362, Vilnius         | Bershka      |
| Apranga PLT, UAB, registered office address: Ukmergės st. 362, Vilnius | Pull&Bear    |
| Apranga SLT, UAB, registered office address: Ukmergės st. 362,         | Stradivarius |

<sup>1</sup> 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 (General Data Protection Regulation).

|                                                                        |                                            |
|------------------------------------------------------------------------|--------------------------------------------|
| Vilnius                                                                |                                            |
| Apranga MLT, UAB, buveinės adresas Ukmergės g. 362, Vilnius            | Massimo Dutti                              |
| Apranga OLT, UAB, registered office address: Ukmergės st. 362, Vilnius | Oysho                                      |
| Apranga, APB, registered office address: Ukmergės st. 362, Vilnius     | All other brands except those listed above |

## 2. WHY AND WHAT INFORMATION DO WE COLLECT ABOUT YOU?

| No  | Why do we collect information about you?                                                                                                                                                              | What information do we collect about you?                                                                                                                                                                                                                                                                                                                                                                                                                      | Why do we have the right to collect the information you provide?                                                                                                                               | How long do we use or store information about you?                                       |
|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| 2.1 | We enter into and perform contracts with you, comply with related tax obligations, and provide you with information relating to contract performance, ordering, returns, payments and administration. | Full name, position, telephone number, email address, date of birth or personal identification number of the customer, business partner, employee or representative of the customer or business partner. For the purpose of concluding and executing contracts with natural persons, the following personal data may additionally be processed: address, customer's measurements needed to produce the garment ordered, information about the garment ordered. | We enter into and perform a contract with you (Article 6(1)(b) GDPR), and we are required to collect information in accordance with the law (Article 6(1)(c) GDPR).                            | Within duration of the contract and for (5) five years after the expiry of the contract. |
| 2.2 | You request an invoice.                                                                                                                                                                               | Full name, position, email address, telephone number, address, postal code of the representative of the legal entity.                                                                                                                                                                                                                                                                                                                                          | We enter into a contract with you and fulfil our contractual obligations (Article 6(1)(b) GDPR), and we are required to collect information in accordance with the law (Article 6(1)(c) GDPR). | For (10) ten years after the invoice is issued.                                          |

| No  | Why do we collect information about you?                                | What information do we collect about you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Why do we have the right to collect the information you provide?                                             | How long do we use or store information about you?                                       |
|-----|-------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| 2.3 | We maintain relations with natural or legal persons represented by you. | Full name, information contained in the power of attorney (which may include date of birth or personal identification number), date of validity and number of the power of attorney, signature, relationship to the represented person, the represented person's full name, position, telephone number, email address, login to our systems, any information you provide to the Apranga Group (e.g. information on the person you are representing, the contracts you have entered into, etc.), and, with respect to the performance of the contract, any communication with you and any other information which may be required to enable us to perform the contract properly. | We have a legitimate interest (to maintain relations with the persons you represent) (Article 6(1)(f) GDPR). | Within duration of the contract and for (5) five years after the expiry of the contract. |

| No  | Why do we collect information about you?                                                                                                                                                             | What information do we collect about you?                                                                                                                                                                                                                                                                                                                                        | Why do we have the right to collect the information you provide?                                                                                                                                                                                                                                                                                                                                                                                                                                           | How long do we use or store information about you?                                                                                                                                                                                                                                                                                                                 |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2.4 | We keep you informed about the latest Apranga Group products by sending you newsletters via the channel of your choice (email, SMS). Only persons aged 14 and over can subscribe to our newsletters. | <p>Full name, telephone number, email address, details of obtaining or withdrawing consent, communications sent to the customer, choice in the account as to how to receive newsletters.</p> <p>You can cancel the receipt of newsletters at any time by clicking on the unsubscribe link in the email you receive. Consent can only be given by persons over the age of 14.</p> | <p>You consent to our use of information about you (Article 6(1)(a) GDPR and Article 81(1) of the Republic of Lithuania Law on Electronic Communications). However, subject to the terms and conditions set out in Article 81(2) of the Republic of Lithuania Law on Electronic Communications and without your consent, we may process your personal data for the purposes of direct marketing in accordance with Article 6(1)(f) GDPR in order to pursue our legitimate interests as the controller.</p> | <p>Personal data shall be processed for (4) four years from the date of consent, unless you withdraw your consent within this period. Sent communications shall be stored for no longer than (2) two years from the date of sending, depending on the channel chosen.</p>                                                                                          |
| 2.5 | We administer the personal data of people who participate in the loyalty programme and send direct marketing messages and offers. The loyalty programme is open to persons aged 18 years or over.    | <p>For the purpose of administering the loyalty program, the following data is processed: Name, surname, date of birth, city, signature, information about the goods purchased by customers. For the purpose of providing offers and information: telephone number, e-mail address, brand that interests the customer, month and day of birth.</p>                               | <p>You consent to our processing of information about you (Article 6(1)(a) GDPR).</p>                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>Personal data shall be processed for a period of (3) three years from the last purchase made by presenting the loyalty card, but no longer than the customer participates in the loyalty programme or the consent is valid. Sent communications shall be stored for no longer than (2) two years from the date of sending, depending on the channel chosen.</p> |

| No  | Why do we collect information about you?                                                                                                                                                                                 | What information do we collect about you?                                                                                                                                                                                                                                                                                                                                                                         | Why do we have the right to collect the information you provide?                                                                                                                                                   | How long do we use or store information about you?                                                                                                                                                                                                                                                           |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2.6 | We invite you to take part in surveys about our products and the quality of our services. The survey is only open to persons aged 14 years or older.                                                                     | In order to contact you and to obtain your opinions and evaluations, we collect the following data: your email address, an evaluation of the items sold or services provided, your name and/or surname, which are optional.                                                                                                                                                                                       | We have a legitimate interest to enquire about the quality of the items and services after the conclusion of the contract of purchase and sale (Article 6(1)(f) GDPR) or have your consent (Article 6(1)(a) GDPR). | The data will be retained for (2) two years after the sending of the survey invitation and will be anonymised at the end of the retention period, without the possibility of linking the data to a specific individual.                                                                                      |
| 2.7 | Processing of personal data of shareholders, beneficiaries, members of management and other bodies/committees of the Apranga Group for the purposes of internal administration and the performance of legal obligations. | Full name, personal identification number, date of birth, residential address, email address, telephone number, position, information on securities holdings, education, other activities, bank account and payment information and other personal data required by law.                                                                                                                                          | We have a legal obligation under Article 12 of the Republic of Lithuania Law on Companies and Article 29 of the Regulations of the Register of Legal Entities of the Republic of Lithuania (Article 6(1)(c) GDPR). | For as long as the person is a shareholder, beneficiary or member of a management or other body/committee of the Apranga Group and until the company of the Apranga group of companies in which he held the relevant position is liquidated.                                                                 |
| 2.8 | You make a request to us about the quality or return of an item, which we have to consider and process.                                                                                                                  | Full name, contact details (telephone number or email address), details of the defective or returned item, reason for returning the item, explanations relating to the quality of the item, bank account number (if required), request regarding the item (for a replacement, to rectify the defect, for a reduction in the price, for a take-back and for a refund), and any other details relating to the item. | We have a legal obligation under the Civil Code (law of obligations), the Retail Trade Regulations of the Republic of Lithuania, and the Republic of Lithuania Law on Consumer Protection (Article 6(c) GDPR).     | For (1) one year from the date of the request, provided that there is no dispute between the parties and the data are not used for legal proceedings. In certain cases where you do not provide the original purchase receipt, the request may be stored for 10 years in order to enforce national tax laws. |

| No   | Why do we collect information about you?                                                                                                                                       | What information do we collect about you?                                                                                                                                                                                                                                                                                                             | Why do we have the right to collect the information you provide?                                                                                                                                                   | How long do we use or store information about you?                 |
|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
| 2.9  | You make a general request, enquiry, offer or complaint to us via the Apranga Group general email addresses, social media accounts or other electronic communication channels. | Full name, email address, country, telephone number, subject of the request, time of receipt of the request, content of the request, attachments to the request, correspondence history, social network account details – account name, account profile picture, other information provided in relation to the request made, response to the request. | We have a legitimate interest (to consider your enquiries, requests or complaints) (Article 6(1)(f) GDPR).                                                                                                         | For (1) one year from the date of the request, offer or complaint. |
| 2.10 | We ensure the safety of your health, your life and the safety of the Apranga Group and your property – when you are filmed in Apranga Group leased or owned store premises.    | Video material (recording without sound).                                                                                                                                                                                                                                                                                                             | We have a legitimate interest (security of property and persons) (Article 6(1)(f) GDPR).                                                                                                                           | For no longer than 30 calendar days.                               |
| 2.11 | Our aim is to identify you correctly so that your items are delivered to the right recipients when you choose to collect your items from our stores.                           | Full name of the customer or other person collecting the items, the customer's telephone number, email address, the order number of the shipment, the purchase details.                                                                                                                                                                               | We have a legitimate interest under Article 6(1)(f) GDPR to ensure that the identity of the customer or other person collecting the items is duly ascertained in order to hand over the items to the right person. | At the time of handover.                                           |

| No   | Why do we collect information about you?                                                             | What information do we collect about you?                                                                                                                                                                                                                                                                                      | Why do we have the right to collect the information you provide?                                      | How long do we use or store information about you? |
|------|------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| 2.12 | Conducting statistical research and data analysis for the purposes of running the loyalty programme. | <p>Year of birth, gender, city, details of items purchased in the store, brand.</p> <p>We use automated data analysis for statistical and market research. We do not process information that personalises you for analytical purposes. This data analysis does not have any legal or similarly significant effect on you.</p> | We have a legitimate interest to improve and expand the provision of services (Article 6(1)(f) GDPR). | For (3) three years after the purchase.            |

| No   | Why do we collect information about you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | What information do we collect about you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Why do we have the right to collect the information you provide?                                                                                                                                                                                                                                                                                                                                                        | How long do we use or store information about you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2.13 | <p>Communicating with you, organising competitions and games on our social networks:</p> <p><b>Facebook account</b><br/> <a href="#">Apranga Group   Vilnius   Facebook</a>,<br/> <a href="#">Apranga   Facebook</a>,<br/> <a href="#">Aprangos galerija   Facebook</a>,<br/> <a href="#">City men&amp;women   Vilnius   Facebook</a>,<br/> <a href="#">ALDO Shoes   Facebook</a>.</p> <p><b>Instagram account</b><br/> <a href="#">Apranga Group (@aprangagroup)</a> • <a href="#">Instagram photos and videos</a>;<br/> <a href="#">APRANGA - visiems (n)orams (@apranga)</a> • <a href="#">Instagram photos and videos</a>;<br/> <a href="#">Aprangos Galerija (@aprangosgalerija)</a> • <a href="#">Instagram photos and videos</a>;<br/> <a href="#">CITY men &amp; women (@city menandwomen)</a> • <a href="#">Instagram photos and videos</a>;<br/> <a href="#">Mados linija   Vilnius (@madoslinija)</a> • <a href="#">Instagram photos and videos</a>.</p> <p><b>LinkedIn account</b><br/> <a href="#">Apranga Group: My Company   LinkedIn</a></p> <p><b>YouTube channel</b><br/> <a href="#">APRANGA Group - YouTube</a>;<br/> <a href="#">APRANGA - YouTube</a>;<br/> <a href="#">CITY MEN&amp;WOMEN - YouTube</a>;<br/> <a href="#">Aprangos Galerija - YouTube</a>.</p> <p><b>TikTok channel</b><br/> <a href="#">Apranga group (@aprangagroup)   TikTok</a>.</p> | <p>We will process the social media account data you have provided to our accounts, such as your account name, your account profile picture, the reactions ('likes') you have expressed to the information posted, the comments you have left, and the content you have posted on our account (e.g. if you have shared photos or videos in comments).</p> <p>For the purpose of organising games and competitions, we will process your personal data as described in the Privacy Notice.</p> <p>You can exercise your right to object to the processing of your personal data on social networks in accordance with the procedures laid down by the social network managers.</p> | <p>We will process the personal data you provide on the basis of legitimate interest (Article 6(1)(f) GDPR) in order to keep you informed about news, to communicate with our followers and visitors to our social pages, and to tailor the information we provide on the basis of statistical information, as well as the other activities we carry out in the accounts, to the needs of visitors to the accounts.</p> | <p>The personal data that you provide in connection with certain actions on social networks is processed and stored in accordance with the procedures and within the time limits established by the managers of the social networks, and cannot be influenced by us. For more information on the privacy of social networks, refer to the privacy notices of controllers:</p> <p>Facebook:<br/> <a href="https://www.facebook.com/policies/cookies">https://www.facebook.com/policies/cookies</a></p> <p>Instagram:<br/> <a href="#">Instagram Privacy   About Instagram</a></p> <p>LinkedIn<br/> <a href="#">LinkedIn Privacy Policy</a>;</p> <p>Youtube ( adheres to Google's Privacy Policy ):<br/> <a href="#">Privacy Policy – Privacy &amp; Terms – Google</a>;</p> <p>TikTok:<br/> <a href="#">Privacy Policy   TikTok</a>.</p> |

| No   | Why do we collect information about you?                                                                                                                                                                                                                                                                                                                             | What information do we collect about you?                                                                                                                                                                                                                                                                                                                                   | Why do we have the right to collect the information you provide?                                                                                                                                                                                                                                                                                                                                                                                                                              | How long do we use or store information about you?                                                                                                                                                                                                                                                                                                                                                                       |
|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2.14 | We ensure the efficient and secure operation of our website and seek to understand how individuals use the services offered on our website so that we can improve them and develop new ones.                                                                                                                                                                         | IP address, operating system version, the settings of the device you are using, the start time and duration of your session, the timing of any queries you make on our website, other statistical data and any information stored by the use of cookies placed on your device (for more information on the cookies we use, see our <a href="#">Cookie Privacy Notice</a> ). | Essential cookies are processed for legitimate interest (to monitor the quality of our services, to improve and develop new services, to ensure that the website of the Apranga Group operates qualitatively safely and that its visitors find relevant information) (Article 6(1)(f) GDPR), and all other cookies are processed on the basis of your consent, which can be withdrawn at any time in the manner set out in the <a href="#">Cookies Privacy Notice</a> (Article 6(1)(a) GDPR). | For no longer than 2 years (for more information on the retention periods of the cookies we use, see the <a href="#">Cookie Privacy Notice</a> ).                                                                                                                                                                                                                                                                        |
| 2.15 | You provide us with information about possible fraud, offences of a corruptive nature or other criminal offences, infringements of law or infringements of your employment obligations via the channels of the trust line:<br><a href="mailto:compliance@apranga.com">compliance@apranga.com</a> and<br><a href="mailto:pranesk@apranga.lt">pranesk@apranga.lt</a> . | The processed personal data is indicated by the person himself/herself – full name, contact details, position, content of the report to be submitted, photographs, videos, full name, position, contact details of the persons concerned.                                                                                                                                   | We have a legitimate interest (to prevent fraud, corruption, other criminal offences, infringements of the law, infringements of employment obligations and other infringements – to prevent acts being committed, to take measures to prevent acts from being committed in the future, etc.) (Article 6(1)(f) GDPR).                                                                                                                                                                         | While the report is being investigated, examined and enforced. If the investigation does not reveal an infringement, the data shall be stored for (3) three years from the date of the decision to terminate the investigation. In the event of a finding of an infringement, the data shall be stored for (3) three years following the decision to terminate the investigation or as described in Clause 2.16. herein. |

| No   | Why do we collect information about you?                | What information do we collect about you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Why do we have the right to collect the information you provide?                                                                                                                                                                           | How long do we use or store information about you?                                                               |
|------|---------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
| 2.16 | We may be involved in legal proceedings concerning you. | All information mentioned in the Privacy Notice, such as full name, date of birth, residential address, telephone number, email address, power of attorney, relationship with the court/pre-trial participant, all documents sent to persons and attachments thereto, documents submitted by persons and attachments thereto, documents of proceedings, court orders, rulings, judgments, and information about criminal offences and convictions. Special categories of data may also be processed if they relate to legal proceedings. | We have a legitimate interest (to defend the rights of the Apranga Group in legal proceedings) (Article 6(1)(f) of the GDPR), and certain data is necessary for the lodgement, exercise or defence of legal claims (Article 9(2)(f) GDPR). | For 5 years after the legal proceedings have been completed/validated/finally executed (whichever is the later). |

| No   | Why do we collect information about you?                                                                                                                                                  | What information do we collect about you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Why do we have the right to collect the information you provide?                                                                                                                                                                                                                                                                 | How long do we use or store information about you?                                             |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| 2.17 | You make a request to exercise the data subject's rights under the GDPR and we ensure the implementation of the request.                                                                  | Depending on the personal data you provide: full name, telephone number, address, date of birth, email address, tax number, identification number of the legal partner, copy of identity document, request for the execution of the data subject's rights, date of the request, place of the request, the specified method of responding to the request, the content of the request and other information provided in the data subject's request, the response to the data subject, and any other information relevant to the execution of the data subject's rights. | We have a legal obligation (to exercise the rights of data subjects (Chapter III GDPR)).                                                                                                                                                                                                                                         | Requests shall be stored for 5 years from the date of the response.                            |
| 2.18 | We carry out recruitment, organise the recruitment process (for a broader list of the purposes for which we collect candidates' personal data, see the <u>Candidate Privacy Notice</u> ). | All the information listed in the <u>Candidate Privacy Notice</u> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | We have your consent (Article 6(1)(a) GDPR) or we are processing the data for legitimate interest (Article 6(1)(f) GDPR) or in order to enter into a contract with you (Article 6(1)(b) GDPR), and we are required to collect certain data under the laws of the Republic of Lithuania (Article 6(12)(c), Article 9(2)(b) GDPR). | The retention periods for personal data are specified in the <u>Candidate Privacy Notice</u> . |

### **3. WHERE DO WE RECEIVE INFORMATION ABOUT YOU AND WHAT INFORMATION ARE YOU REQUIRED TO PROVIDE US?**

Most of the information is provided by you, but we may receive some information about your personal data, for example, from legal entities you represent.

Please see the answer to Chapter 2 above – you must provide the information about you that is necessary to:

- enter into contracts with you and fulfil our contractual obligations;
- if you do not provide the information specified, we will not be able to enter into contracts with you and/or persons you represent and fulfil contractual obligations.

### **4. WHO DO WE TRANSFER INFORMATION ABOUT YOU TO?**

We provide your personal data to the following third parties who assist us in the execution and administration of our services to you:

- companies providing software maintenance and support services;
- payment service providers;
- companies providing marketing services;
- companies of the Apranga Group, where they are responsible for carrying out certain specific functions assigned to them
- companies providing advertising, media planning, public relations and event organization services;
- companies providing SMS and newsletter services;
- on the basis of your consent, your personal data may be transferred to our franchise partners of your choice, such as companies in the Max Mara Fashion Group (Max Mara s.r.l.), for the purpose of providing you with information about offers related to discounts, promotions, sales.

Your personal data may also be provided to:

- law enforcement authorities in accordance with the procedure provided for by the legislation of the Republic of Lithuania;
- public authorities and courts, where such an obligation is imposed by applicable law.

### **5. WILL YOUR DATA BE TRANSFERRED OUTSIDE THE EUROPEAN ECONOMIC AREA<sup>2</sup>?**

In most cases, personal data are processed and transferred within the territory of the European Union and the European Economic Area, but, where necessary for the provision of certain services, they may be transferred and processed outside these territories, subject to an adequate level of protection of personal data. Where permitted by law and necessary for the reasons set out in Clause 4 herein, we disclose information about you:

- on the basis of an adequacy decision of the European Commission, which means that the European Commission has recognised the country in which the third party is established and/or carries out its activities as having an adequate level of protection of personal data
- if we have signed a contract with a third party based on the Standard Contractual Clauses approved by the European Commission;
- if we have obtained the permission from the State Data Protection Inspectorate;

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<sup>2</sup> The European Economic Area consists of all the member states of the European Union and Iceland, Liechtenstein and Norway.

- if we have used, where possible, other available personal data protection measures and derogations.

## 6. WHAT RIGHTS DO YOU HAVE?

- **Right of access to your personal data processed by us**

You have the right to obtain our confirmation as to whether we are processing your personal data, as well as the right to have access to your personal data processed by us and to information about the purposes of the processing, the categories of data processed, the categories of recipients of the data, the duration of the processing, the sources of receipt of the data, the use of automated decision-making, including profiling, and the meaning and consequences for you.

- **Right to rectification of personal data**

If the data you have provided to us in your registration form has changed or if you believe that the information we are processing about you is inaccurate or incorrect, you have the right to request that we rectify the information by logging in to your account, and failing that, you have the right to rectify the data by sending an email to [info@apranga.lt](mailto:info@apranga.lt), or by sending a data subject request to [dataprotection@apranga.lt](mailto:dataprotection@apranga.lt) in Lithuania.

- **Right to withdraw consent**

Where we process your data on the basis of your consent, you have the right to withdraw your consent at any time and the processing based on your consent will cease. In some cases, this may mean that we may no longer be able to provide you with further access to our services. You can modify (withdraw or re-grant) your consent to receive offers and product information in your account, in the Newsletters tab. By sending direct marketing content information to the data subject by email or other form, we provide the customer with a convenient, free and simple (easy) opportunity to opt-out of receiving further such information. All you have to do is click on the unsubscribe link from the information notice or newsletter sending service in the information notice or newsletter. Opt-out of the information notice or newsletter sending service also withdraws the data subject's consent (to receive future newsletters) to the processing of personal data for the purpose of direct marketing.

- **Right to lodge a complaint**

If you believe that we are processing your data in breach of data protection law, we always ask you to contact us directly first. We trust that, with your goodwill, we will be able to resolve all your doubts, satisfy your requests and rectify our mistakes, if any. If you are not satisfied with the way we propose to resolve the problem, or if, in your opinion, we do not take the necessary steps to comply with your request, you have the right to lodge a complaint with a supervisory authority (in Lithuania, the State Data Protection Inspectorate (L. Sapiegos st. 17, Vilnius, Lithuania; email address: [ada@ada.lt](mailto:ada@ada.lt))).

- **Right to object to processing where processing is based on legitimate interests**

You have the right to object to the processing of personal data where the processing is based on our legitimate interests. However, taking into account the purposes of the provision of the services and the balance between the legitimate interests of both parties (you as the data subject and us as the controller), your objection may mean that we will not be able to continue to provide you with access to the services once we have ceased to process your data based on our legitimate interest.

- **Right to erasure (right to be forgotten)**

In certain circumstances listed in the data processing legislation (where the processing of personal data is unlawful, the basis for processing has ceased to exist, etc.), you have the right to request that we erase your personal data.

- **Right to restriction of processing**

In certain circumstances listed in the data processing legislation (where the processing of personal data is unlawful, where you contest the accuracy of the data, where you have objected to the processing of the data on the grounds of our legitimate interest, etc.), you also have the right to restrict the processing of your data. However, we must point out that due to the restriction of data processing and during the period of such restriction, we may not be able to provide you with the services.

- **Right to data portability**

You have the right to receive or transfer your personal data to another controller (right to data portability). This right only applies to data provided to us on the basis of your consent or on the basis of a contract and where the data is processed by automated means.

- **Right to object to fully automated processing of personal data**

You have the right to object to fully automated decision-making, including profiling, where such decision-making is likely to have legal consequences or similar significant effects for you.

## **7. HOW CAN YOU EXERCISE YOUR RIGHTS?**

In order to exercise your rights set out in Clause 6 of the Privacy Notice, you may:

- you may deliver your request to exercise the data subject's rights (hereinafter – **the Request**)<sup>3</sup> in person to the registered office of the Apranga Group or to the Data Protection Officer at the addresses set out in Clause 10 of the Privacy Notice (we will ask you to provide your ID document when submitting the Request);
- send a Request to the Apranga Group or the Data Protection Officer at the postal addresses set out in Clause 10 of the Privacy Notice (if you are not our customer, please attach a copy of your ID document to the Request);
- submit a Request to the Apranga Group or the Data Protection Officer at the email addresses set out in Clause 10 of the Privacy Notice (the Request submitted by email must be signed with a secure qualified electronic signature);
- in the case of a Request submitted through a representative, the Request must be accompanied by a document confirming the representation or a copy thereof, certified in accordance with the procedure laid down by the legislation, and the contact details of the person who wishes to receive a response concerning the exercise of the data subject's rights;
- the controller may, upon receipt of a Request and after assessing the specificity of its activities, the content of the Request and the information available on the data subject, additionally request the data subject to identify himself/herself by additional means or methods, if there are doubts as to the data subject's identity;

## **8. DO WE PROFILE YOU AND MAKE AUTOMATED DECISIONS?**

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<sup>3</sup> The recommended form for the Request for the exercise of data subject's rights is available at [the following link](#).

The Apranga Group may profile you for statistical purposes and to prevent the sending of unsolicited marketing offers.

## **9. ARE COOKIES USED ON THE WEBSITE?**

Yes, we use cookies on the Website, you can find out more about the cookies we use in the [Cookie Privacy Notice](#).

Cookies are small text files that are stored in the browser of your device (e.g. computer, mobile phone, tablet) when you browse websites. Other technologies, including data we store on your browser or device, identifiers associated with your device and other software may be used for similar purposes. Cookies are used widely to make websites work or work better and more efficiently.

Cookies can be categorised according to their purpose as essential, functional, statistical, marketing and other. Cookies are only recorded if you confirm your consent in a message on the home page of the Website, except for essential cookies for which consent is not required.

For analytical and other purposes, with your consent, we use third party services (e.g. Google Analytic, Facebook). In this case, we only have access to aggregated data and do not use cookies to identify a specific person, but the service provider and other third parties may have access to your personal data. For more information on how Google and other third parties process your personal data, please refer to their privacy policies (Google's Privacy Policy can be found here: <https://policies.google.com/privacy?hl=en-US>, for information on the processing of personal data by Facebook, please refer to <https://www.facebook.com/policies/cookies>).

For more information on how you can manage cookies and how to remove them from your device, see the [Cookie Privacy Notice](#).

## **10. HOW TO CONTACT THE CONTROLLER OR DATA PROTECTION OFFICER?**

If you have any questions, comments or complaints about how we collect, use and store information about you, or if you wish to exercise your rights as a data subject, you may contact the relevant controller (the list is set out in Chapter 1):

- at Ukmergės st. 362, LT-14311, Vilnius, email: [info@aprange.lt](mailto:info@aprange.lt), tel.: +37052390808;
- Data Protection Officer, at Ukmergės st. 362, LT-14311, Vilnius, tel.: +370 5 232 1015, email: [dataprotection@aprange.lt](mailto:dataprotection@aprange.lt).

## **11. AMENDMENTS TO AND VALIDITY OF THE PRIVACY NOTICE**

We reserve the right to amend the Privacy Notice by notifying you of amendments or supplements hereto on the Website.

The previous Privacy Notice can be found at [the following link](#).