

This information is important, please read it carefully!

SYFUD SIA PRIVACY AND COOKIES POLICY

SECTION I GENERAL INFORMATION

WHO WE ARE AND HOW TO CONTACT US

1. **Syfud SIA**, registration number 40203272645, address: Ronu str. 6, LV-3401 Liepaja, Latvia, info@portlite.eu (hereinafter –**the company**, data controller) – respects the privacy and confidentiality of the persons (visitors, customers or other personal data subjects) who visit the website **www.portlite.eu** (hereinafter – the **website**) and guarantees that the personal information provided on the website and during provision of services by the company is used only for the purposes indicated and stored in a secure manner by organisational and technical measures.

2. This Privacy and Cookies Policy (hereinafter – the **Policy**) sets out what data subjects' information is collected by the Company, how it is processed, and the rights of personal data subjects with respect to the use and disclosure of the personal data provided to other parties.

3. The terms of the policy shall apply every time you visit the website, regardless of the device (computer, mobile phone, tablet, TV, etc.) you use, therefore, it is important that you read the policy carefully, because every time you visit the website or provide your personal data, you must confirm that you have read the terms and conditions and agree that the company will manage and process your data for the purposes, using the means and procedures provided for in this policy and the legal acts. If a visitor does not agree to these terms and conditions, we suggest that you do not visit our website, use our content and/or services, or provide us with your personal data.

4. The terms used in the policy shall be understood as defined in 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) (hereinafter – the GDPR).

5. The data controller of your personal data is **Syfud SIA**, registration number 40203272645, address: Ronu str. 6, LV-3401 Liepaja, Latvia, info@portlite.eu.

6. Contact information of the Company's Data Protection Officer: info@portlite.eu.

7. Persons under the age of 16 may not provide personal data to the Company via the website. Persons under the age of 16 must obtain the consent of their parents or other legal guardians before providing personal data.

8. The Company **receives personal data from the following personal data sources:**

8.1. from the data subject (when the person applying directly to the company makes inquiries on the website regarding the provision of services);

8.2. personal data is obtained automatically when the data subject visits the company's website (cookies).

9. The Company **transfers** personal data to third parties only on the basis of contracts or in accordance with a legal obligation provided by law:

9.1. to representatives acting on behalf of the company distributing our services in certain territories;

9.2. to companies providing data centre, hosting, cloud, website administration and related services, software creation, provisioning, support and development companies, companies providing information technology infrastructure services and companies providing communication services;

9.3. to credit and debit card companies used to facilitate payment transactions related to the provision of our services, banks and other credit or payment institutions;

9.4. to the company's professional advisers, auditors, legal and/or financial advisers;

9.5. to other service providers (data processors) or subcontractors of the company;

9.6. to notaries, if the contract concluded with you requires a notarial form;

9.7. to judicial officers, entities providing legal and/or debt collection services, entities assuming the right to debt;

9.8. to companies providing advertising and marketing services;

9.9. to companies providing archiving, physical and/or electronic security, asset management and/or other business services;

9.10. in accordance with the procedure provided by law, to the state authorities, institutions, etc.;

9.11. to law enforcement authorities at their request or on our own initiative if there is a suspicion that a criminal offense has been committed, as well as to courts and other dispute resolution bodies; and tax administrators;

9.12. in the event of a company restructuring, transfer/acquisition and/or business transfer/acquisition, to a third party acquiring the business and processing personal data for the same purposes as specified in this policy.

10. In the event that personal data other than your own is provided to the company (for example, another person is identified as the beneficiary), please inform that person of this policy and its content.

11. If the service user is a legal entity, this policy applies to natural persons whose personal data is transferred to us by a legal entity. Pursuant to Article 14 of the GDPR, the user must duly inform the data subjects (managers, beneficiaries, representatives, etc.) about the transfer of their personal data to the company.

12. The Company does not normally apply automated decision-making in accordance with Article 22 of the GDPR. If it is decided to use this procedure in individual cases, the data subjects shall be informed about it.

13. The Company processes personal data in a partially automated manner in order to assess certain personal aspects (hereinafter – profiling). Profiling applies, for example, when we are required by law to carry out money laundering prevention or financial risk management.

14. The Company may expand or reduce the scope of its business operations, which may involve the transfer of the sale and/or management of all or part of the business. All personal data provided to the Company shall be transferred with the transferred part of the business, however, the new owner or controlling party will be required to process the personal data only for the purposes and under the conditions set forth in this policy.

SECTION II CONCEPTS AND DEFINITIONS

15. **Personal data** shall mean any information, directly or indirectly related to the requesting person, that is provided on the company's website to express an interest in the services. (Personal data are any information related to a natural person, a data subject whose identity is known or can be established directly or indirectly by means of data such as name, personal identification number, location data, one or more personal, physiological, psychological, economic, cultural or social identity traits (video or audio recordings, profiled website statistics, etc.);

16. **Requesting person** – (hereinafter referred to as visitors, customers, personal data subjects) shall mean any natural person who has visited the website in order to use the company's services.

17. Cookie shall mean a short textual information (file) that websites place on the computers or other devices of users browsing these websites in order to identify the user's terminal device when the user visits the website again. Depending on your browser, this information shall be stored either in small individual files or in a shared file of cookies stored by different websites.

SECTION III PERSONAL DATA PROCESSING PRINCIPLES

18. When processing personal data, the Company follows the principles established by the GDPR related to the processing of personal data:

ARTICLE 5 OF GDPR PRINCIPLES:	CONTENT:
Principle of lawfulness, fairness and transparency	Personal data shall be processed lawfully, accurately, transparently, fairly and in such a way as to ensure the accuracy, identity and security of the personal data processed.
Principle of purpose limitation	Personal data shall be collected for specified and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
Principle of data minimisation	Personal data shall be collected and processed in accordance with the principles of purpose and proportionality, data subjects shall not be required to provide data that are not required, and redundant data shall not be collected or processed.
Principle of accuracy	Only accurate data are collected and regularly updated as necessary. Inaccurate or incomplete data are corrected, supplemented, destroyed or their processing is suspended, i.e., all reasonable steps shall be taken to ensure that personal data which are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
Principle of storage limitation	Data shall be kept to the extent necessary to enable that the data subjects are identified for no longer than is necessary for the purposes for which the personal data are processed.
Principle of integrity and confidentiality	Personal data shall be processed in such a way as to ensure adequate security of personal data through appropriate technical or organisational measures, including protection against unauthorised or unlawful processing of data and against unintentional loss, destruction or damage (principle of integrity and confidentiality).
Principle of accountability	The Company shall be responsible for ensuring that the said principles are followed and has all the means necessary to demonstrate compliance therewith.

SECTION IV LEGAL FRAMEWORK, OBJECTIVES AND CATEGORIES OF COLLECTION OF PERSONAL DATA

19. In order to perform its services, the company processes personal data on the following grounds (as provided for in Article 6(1) of the GDPR) and the following categories of personal data:

No	Legal basis:	Objective:	Categories
1.	On the basis of consent:	Query " <i>Contact us</i> "	<ul style="list-style-type: none"> ✓ name; ✓ contact telephone number; ✓ contact e-mail address; ✓ message (information)
		Direct marketing* (newsletter subscription)	<ul style="list-style-type: none"> ✓ name;

			<ul style="list-style-type: none"> ✓ contact e-mail address.
		Cookies	<ul style="list-style-type: none"> ✓ country ✓ information viewed ✓ IP address ✓ how you accessed our site ✓ with which device you connected to our website; ✓ for more information see section "Cookies"
2,	On the basis of consent – social networks: <ul style="list-style-type: none"> • LinkedIn • Instagram • Facebook 	<ul style="list-style-type: none"> – to communicate with the visitors of the company’s social network; – to respond to visitor inquiries; – to obtain statistical information; – to conduct customer surveys, marketing campaigns, market analysis, lotteries, competitions or similar actions or events; – if necessary, in the protection of the legitimate interests of the company in the institutions and in other cases. 	<ul style="list-style-type: none"> – username when leaving comments and writing messages to the company; – other activities on the company page, e.g. page visits, duration statistics, queries, comment information, etc.
3.	On basis of contracts:	<p>Contracts for the performance of services provided by the Company (including preliminary)</p> <hr/> <p>Provision of services to the company</p>	<ul style="list-style-type: none"> ✓ name; ✓ surname; ✓ date of birth; ✓ personal ID number; ✓ address (residence or declared); ✓ identification document and number; ✓ represented person (relationship with the represented person); ✓ telephone number; ✓ e-mail address.
4.	For the implementation of legitimate interests of the company or third parties:	In order to bring and defend legal actions and perform other lawful actions seeking to prevent or reduce losses, etc.	The categories are specified in the legal acts.

**The data of personal data subjects are processed on the basis of consent expressed by submitting their data and agreeing the processing of personal data for the purpose of direct marketing (Article 6 (1)(a) of the GDPR), therefore we inform you that the personal data subject has the right to object or withdraw his/her consent to the processing of personal data for direct marketing purposes, without giving reasons for the objection by writing an e-mail [to info@portlite.eu](mailto:info@portlite.eu) or by clicking on the link provided in our*

newsletters and/or notifications. Withdrawal of consent shall not affect the lawfulness of the processing of data carried out prior to the withdrawal of consent.

20. If you do not provide the personal data required to ensure compliance with the law and/or the conclusion and/or performance of the contract, the company will not be able to provide you with services or enter into any other transaction.

SECTION V STORAGE OF PERSONAL DATA

21. The personal data collected by the company shall be stored in electronic media. Personal data is generally stored for as long as reasonable claims may arise from contractual or legal requirements.

22. Terms of storage of personal data:

22.1 for the purpose of execution of requests – **1 year** from the date of execution of the request;

22.2 for the purpose of direct marketing – **3 years** from the date of receipt of the consent, unless the visitor wishes to extend this period;

22.3. for the purpose of concluding/executing all contracts – **10 years from the last contact.**

23. Exceptions to retention periods may be made to the extent that they do not infringe the rights of data subjects, comply with legal requirements and are duly documented. The Company does not store redundant and unnecessary information and ensures that personal data and other information related to customers is constantly updated and correct. At the end of the retention period, personal data shall be destroyed in such a way that they cannot be reproduced.

24. The company, although having put in place the organisational and technical measures to protect all information collected for the purposes of provision of the services, notes that no website, online transaction, computer system or wireless connection is completely secure!

SECTION VI RIGHTS OF PERSONAL DATA SUBJECTS AND THEIR IMPLEMENTATION

25. Visitors and customers of the company's website shall have the following rights:

25.1. to know (be informed) about the processing of their data (right to information);

25.2. to access to their data and know how they are processed (right of access);

25.3. to demand the correction or, supplementation of incomplete personal data (right to rectification);

25.4. to erase their data or suspend the processing of their data (excluding storage) (right to erasure and right to be "forgotten");

25.5. to require the company to restrict the processing of personal data in the presence of one of the legitimate reasons (right to restrict);

25.6. to require the transfer of their personal data to another data controller or provide it directly to the customer in a convenient form (applies to personal data provided by the customer and processed by automated means on the basis of a contract or consent);

25.7. to object to the processing of personal data if they are processed on the basis of a legitimate interest, unless there are legitimate reasons for such processing or in order to assert, enforce or defend legal claims;

25.8. to withdraw the consent at any time if the personal data are processed on the basis of consent.

26. To exercise your rights, please e-mail to: info@portlite.eu or come directly to the company's office at: Roņu iela 6, Liepāja, Latvia (In Lithuania, the template request form is provided by Order

No 1T-63 (1.12.E) of the Director of the State Data Protection Inspectorate of 9 July 2018: <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/f80916c2847711e89188e16a6495e98c?jfwid=oo0h7ihg>).

27. The request must be legible and signed, stating the requesting person's full name, address, contact details for communication and information on the reason, rights and extent to which they wish to be exercised, as well as information on the preferred method to receive the response.

28. The Company, having ascertained the identity of the person who has submitted the request (complaint), shall submit a response regarding the exercise of rights to the requesting person no later than within one month from the receipt of the request. If necessary, this period may be extended by another two months, depending on the complexity and number of requests. The procedure for examining the application is set out in the company's internal procedures.

29. The company shall provide information on the processing of personal data free of charge. If the request is unfounded, repetitive or disproportionate, a fee may be charged.

30. The company may not create conditions for visitors and customers to exercise the above rights, except for refusal to process personal data by direct marketing, when in cases provided by law it is necessary to ensure the prevention, investigation and detection of crimes, breaches of professional ethics, as well as protection of rights and freedoms of the data subject, company or other persons.

31. Visitors and customers of the Company shall have the right to file a complaint with the State Data Protection Inspectorate in Lithuania (<https://vdai.lrv.lt/atmintine-asmenims-ketinantiems-kreiptis-i-valstybine-duomenu-apsaugos-inspekcija-del-skundo-pateikimo>) (list of supervisory authorities by country: https://edpb.europa.eu/about-edpb/board/members_en), but we recommend that you contact the company before filing a complaint so that we can find the correct solution.

SECTION VII DATA TRANSMISSION OUTSIDE THE EUROPEAN ECONOMIC AREA

32. The Company processes personal data in the countries of the European Economic Area (hereinafter – the EEA). However, in certain cases, personal data may be transferred to non-EEA countries. Please mind that in non-EEA countries, personal data may enjoy a lower level of protection than within the EEA, but the company carefully assesses the conditions under which such data will be further processed and stored after transfer to the above entities.

33. If the European Commission has determined that the third country, territory or one or more specified sectors in that third country or the relevant international organisation ensures an adequate level of protection of personal data, the transfer shall be performed according to the same procedure as within the EEA. Please note that the information regarding the countries on which the European Commission's decision has been taken can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.

34. In other cases, the company shall take all necessary measures to ensure that the personal data are transmitted securely to the recipient who processes the personal data. Measures used by the company:

34.1. the agreement concluded with the non-EEA data recipient shall include specific conditions for the secure processing of personal data;

34.2. in certain cases of transfer, we ask for the consent of the personal data subject to transfer his/her data outside the Republic of Lithuania, the EU or the EEA.

SECTION VIII SOCIAL NETWORKS

The company seeks to present a wide range of services/products and exchange ideas and opinions with customers on important topics via various social media channels.

35. When visiting social networks, the information of personal data subjects is processed by a specific social network, and the company starts processing personal data when the data subject visits Syfud SIA on social networks.

36. The legal basis for data processing is Article 6(1)(f) of the GDPR. The legitimate interests of the company are the ability to answer messages or questions and analyse our availability on social networks, and to present our products and services. To the extent that you wish to enter into a contractual relationship with the Company with your request, the legal basis for such processing is Article 6(1)(b) of the GDPR.

37. The pages created by the company on social networks are managed by specific social networks, therefore the processing of personal data is based on the privacy policies of the social networks. With some social networks, depending on the social network policy, purpose and scope of processing, the company is considered a joint data controller.

SECTION IX COOKIES

38. Cookies are used on the website on the basis of consent. When a visitor visits a website, a pop-up window will offer the option of agreeing to the storage of all cookies used on the website on the terminal device. If the visitor does not want to consent to the storage of cookies used on the company's website, it is possible to specify in the cookie management settings which categories of cookies the visitor agrees to store. Strictly mandatory cookies are stored on the terminal device, regardless of whether consent is given or not, as without the functioning of these cookies it is not possible to use all the functions of the website.

39. The company may use cookies to collect the following information: IP address, browser type, demographics.

40. The company uses the information obtained from cookies for the following purposes:

40.1. to ensure the functionality of the website;

40.2. to analyse the use of the website;

40.3. for improvement purposes of the website;

40.4. for service development and targeted marketing guidance.

41. The following cookies may be used on the website:

41.1. technical cookies – these cookies that are necessary for the operation of websites;

41.2. functional cookies – these are cookies that, although not necessary for the operation of websites, significantly improve their operation, quality and user experience;

41.3. analytical cookies – these are cookies that are used to compile statistical analysis of website visitors' navigation methods; the data collected by these cookies are used anonymously;

41.4. targeted or advertising cookies – these are cookies that are used to display offers or other information that may be of interest to visitors.

41.5. social network cookies – these are cookies that are necessary for the use of website information in your social profile account.

41.6. Cookies, purpose and storage period:

Category	Name	Purpose	Storage period
Mandatory cookies	CookieConsent	Stores information about a website visitor's consent to the use of cookies or the rejection of the use of cookies. Without the necessary cookies, the	Valid for 1 month.

		website may not function properly.	
Statistical cookies	_ga	Part of the Google Analytics statistics system, which stores information about the parts of the website visited by a visitor or customer, the number of visits, the duration of a visit and browser information, etc.	Valid for 2 years.
	ga#		Valid for 2 years.

42. Consent to the use of cookies is given in the following ways:

42.1. by not deleting the cookies and/or changing the settings of the web browser so that it does not accept cookies;

42.2. by clicking on the “I accept” button in the link (bar) on the websites.

43. The cookies of the website can be cancelled at any time. Detailed information about cookies, their use and opt-out options can be found at <https://www.allaboutcookies.org/> or <https://policies.google.com/technologies/ads>.

44. In some cases, disabling, disagreeing with or deleting cookies, in particular technical and functional cookies, may slow down browsing, restrict the functionality of certain websites or even block access to the websites.

SECTION X DATA PROTECTION

45. It is important for the company to protect the personal data of visitors and customers, therefore the company also requires its data processors (third parties) to strictly comply with the legislation on personal data protection valid in the Republic of Lithuania and take all organisational and technical measures to protect personal data of visitors and customers against their accidental or unlawful destruction, alteration, disclosure, as well as from any other unlawful processing.

46. The website contains links to the websites of other companies. Please note that the company is not responsible for the content of such websites or the privacy policies they use. Thus, if you click on a link from the company’s website to other websites, you should separately read their privacy policy.

47. The company is not responsible for the events beyond its direct control. The company does not warrant that there will be no operational errors in protecting the personal data of visitors or customers. The company is not responsible for any direct or indirect events or damage incurred during the use and/or disclosure of customers’ personal data, including, but not limited to, the risk of personal data due to errors, unauthorised third party access and any other factors beyond its direct control.

SECTION XI FINAL PROVISIONS

48. The Policy shall take effect on the day it is published on the website.

49. The company may update the Policy at any time. The company shall notify visitors and customers of updates by posting a new version of the policy on the Website, along with the date of the most recent changes. If a visitor or customer logs in or uses the services of the website after the publication/receipt of such updated policy, the company shall assume that visitors and customers agree to the changes implemented. It is recommended to check the updates regularly.

50. The policy is presented in Lithuanian.

The Policy has been updated on 11/01/2022
