

PRIVACY POLICY

General provisions:

1. The controller of your personal data is Freda, AB, (hereinafter referred to as Freda), subsidiaries and representative offices thereof as well as other legal entities hired by Freda for provision of services and authorized to operate on behalf of Freda. The contact details are available here: <https://freda.eu>
2. Personal data collected by Freda shall be processed in accordance with the Law on Legal Protection of Personal Data of the Republic of Lithuania, the General Data Protection Regulation and other legislations. All employees and representatives of Freda as well as employees of the representatives, who learn the secret of personal data, are bound to keep it confidential even upon expiry of their labour or contractual relations.
3. Freda may hire data processors for processing of personal data and (or), at their own discretion, hire other entities who would carry out certain functions on behalf of Freda. In such cases Freda shall take required measures in order to make sure that such data processors would process personal data by adhering to the instructions given by Freda and the effective legislations and shall require implementation of appropriate personal data security measures. Freda shall also ensure that the aforementioned entities would be bound by confidentiality obligations and would not be able to use such information for any other purposes except to a scope needed for implementation of the functions assigned to them.
4. This Privacy Policy establishes the main rules applicable to collection, accumulation, processing, and storage of your personal data, other information related to you, the scopes, purposes, sources, and recipients of personal data being processed as well as other important aspects associated with your purchases of the products sold by Freda and using the services of Freda. Therefore it is hereby recommended analysing the provisions of this Privacy Policy thoroughly before ordering the products or starting using the services provided by Freda.
5. Freda respects a person's right to inviolability of a private life and shall make every reasonably possible effort in order to ensure security and confidentiality of personal data as well as other information being processed.
6. You are welcome to visit this website without giving any information about you.
7. You acknowledge and confirm that you have become familiar with this Privacy Policy, understood and agreed to it by visiting the website at <https://freda.eu> (hereinafter referred to as this website) and (or) by using the information available on it, the products and (or) services provided by Freda. Freda shall reserve the right to amend these provisions of the Privacy Policy, therefore, whenever visiting this website, you are obliged to make sure that you are familiar with the latest version of the Privacy Policy applicable at the moment of your visit on this website each time.

Purposes of the data processing

8. Freda collects and processes your personal data for the following purposes:
 - 8.1. collect, store and track information for statistical purposes or perform web site functions (use of cookies).
 - 8.2. other purposes for which Freda has a right to process your personal data when you express your consent, when the data must be processed for lawful interests of Freda or when Freda is obliged to process data by respective legislations.
9. All your personal data collected for the aforementioned purposes, except for name, surname, personal number, date of birth and the exact residence place address, may be processed for the purposes of statistical analysis. Personal data processed for this purpose must be handled in such a manner that the identity of specific data subjects could not be determined upon inclusion thereof in the scope of

statistical analysis. Collection of your personal data for the purposes of statistical analysis is based on lawful interests for analysis, improvement, and development of the activities being carried out. I have been informed that I have a right to disallow and refuse processing of my personal data for such a purpose at any time and in any form by informing Freda about my disagreement or waiver via e-mail at info@freda.eu. However, Freda may continue processing of data for the purposes of statistics, assuming their able to prove that the data is processed for valid lawful reasons, which supersede the interests, rights, and liberties of the data subject or in order to raise, implement, or defend lawful claims.

10. In all aforementioned cases Freda shall process personal data only to a scope needed for achieving respective clearly defined and lawful objectives, taking into consideration protection of the privacy of the data subject. Freda shall make sure that personal data is processed accurately, in good faith and lawfully by strictly adhering to clear and transparent personal data processing requirements established by legislations.

Scopes of data processing

11. The following personal data may be processed for all aforementioned purposes:

11.1 name, surname, personal number, date of birth, address, e-mail address, telephone number, fax number, payment account number, position held;

11.2. data related to provision of equipment and (or) services, for instance, the service and details of the order placed for it, information on equipment purchased and (or) used, issuing of invoices, payment details, information on consent or refusal of personal data processing for direct marketing purposes and provision thereof to the third parties, contact details and related records;

11.4. data collected by using cookies and similar technologies related to browsing on this website, etc.;

Data providers

10. Data providers:

10.1. data subject himself/ herself directly;

10.2. data generated when you use the services provided by Freda, contact Freda in writing, via telephone, e-mail, visit this website, when this is established by the effective legislations.

Data recipients

11. Data recipients:

11.1. Freda's service brokers (if provision of the services includes using their services), only to a scope needed for provision of the service;

11.2. debt management and collection companies, attorneys at law, companies processing joint debtor data files. Data on data subjects (debtors) having failed to implement their obligations in due time and properly shall be provided only upon giving a prior written reminder to the data subject on failure to implement the obligations and upon proper implementation of data protection requirements established by legislations;

11.3. courts of law or state authorities based on their request, only to a scope required for proper implementation of the effective legislations or a court decision;

11.4. other subjects under contracts with Freda, only in case when you gave a separate consent for this yourself.

12. Data may be provided to the third countries only in case when provision of your electronic communication service is associated with the services provided in the third countries or a partner from the third country (correspondent) is hired for provision of the service.

13. With this document you confirm that you have been informed that your data: e-mail address and (or) telephone, could be processed for the purpose of direct marketing and that you have a right to disallow and to refuse of using your personal data for such a purpose at any time by informing Freda about your disagreement or refusal in writing via e-mail at info@freda.eu

14. The data may be transferred to search engines or social network systems (a possibility to refuse data processing is ensured on the websites of these systems) for the purpose of direct marketing. The data shall not be provided to other entities.

Profiling

15. Profiling may be carried out by using the tools available on Google, Facebook or other analysis tools for the purpose of direct marketing and statistical analysis.

Terms of data processing

16. We store your personal data for no longer than needed for data processing purposes or as established by legislations, if they determine a longer data storage period. We seek to avoid storage of obsolete or unnecessary information and to make sure that personal data and other information on Customers would be kept up-to-date and correct.

Processing of minor's personal data

17. A minor person under 14 (fourteen) years of age seeking to use the services of Freda must provide a written consent of his/ her representative (father, mother, guardian) regarding processing of his/ her personal data.

Cookie policy

18. Freda may use cookies on this website. Cookies are small files sent to the internet browser used by the person and stored on the Customer's device. Cookies are transferred to a person's computer during the first visit to this website. Later on cookies are used on the person's device for identification, if they are designed for improvement of functionality and use of the website, also for purposes of analysis, they facilitate a person's access to this website or information available on it.

Name of Cookies	Description	Creation date / Validity date
cookiepolicy	The user's consent to the preservation of the cookie policy	On click „Agree“ / 1 Year
PHPSession	Designed to support the user's session	Open website/closing website
language_id	To determine the language of the site	Open website/closing website

19. Freda monitors traffic on the website and collects information on how many visitors visited it, domain name of the visitors' internet service provider's server, etc. Such information is collected automatically during the visit to the website. It helps the website manager to understand how the visitors use the website and provides an opportunity for Freda to improve the services being provided.

21. A message on use of cookies is displayed to a visitor of this website. You confirm your consent and allow the website manager to record cookies on your end device (computer, tablet, smart phone, etc.) by clicking on [AGREE] button on the information line. Furthermore, you also agree to use of cookies by continuing browsing on this website and without changing the existing settings.

22. Most web browsers accept cookies, however, if you do not agree to save cookies on your computer or other end device, you may change the settings of your internet browser and turn off all cookies or turn them on / off one by one. However, please note that in some cases this could slow down the speed of browsing on the internet, limit operability of certain functions on websites or block access to a website.

23. This website may contain links to third-party websites, products, and services as well as social network extensions. Privacy policy of a respective third party shall apply to the services or applications of the third parties. We urge you to get acquainted with the privacy protection policies applied by such third parties.

Your rights

24. You have the following rights:

24.1. A right to know (be informed) about processing of your personal data.

24.2. A right to get acquainted with the data: to get information on whether Freda processes your personal data and, if yes, to get acquainted with your personal data processed by Freda as well as to get information on the sources which your personal data has been obtained from, including specific data obtained from these sources, the purpose of processing thereof and who it is provided to or could be potentially provided to; to get a copy of your personal data from Freda under the procedure established by the effective legislations. Upon receipt of your written application, Freda would provide the requested data or would specify the reasons of refusal to comply with such a request in writing within a time period established by the legislations. The data may be provided free of charge once a calendar year, however, in other cases, a charge may be set for provision of data, which shall not exceed the expenses incurred in relation provision of the data.

24.3. A right to require correction of the data: to contact Freda in writing and to require correction of incorrect, inaccurate personal data or to supplement your incomplete personal data by submitting an application, if your personal data processed by Freda is incorrect, incomplete, or in inaccurate.

24.4. A right to request destruction of illegally, fraudulently accumulated personal data or to stop the operations of processing such personal data, except for storage. Freda shall check lawfulness of processing of personal data free of charge immediately and, if necessary, destroy the data. The personal data shall be stored until correction or destruction thereof upon suspension of the operations of processing personal data upon request of the data subject.

24.5. A right to be forgotten: to request termination of the processing (to delete data), in case when personal data is processed with the person's consent upon the person's withdrawal of this consent or when the personal data is no longer needed for the purpose it has been obtained for or when the personal data was being processed illegally or the personal data must be deleted in order to adhere to a legal obligation. You must file a written statement of your disagreement to processing of personal data to Freda in person, by mail or by using electronic communication tools. If your disagreement is legally justified, upon consideration of your request, Freda would terminate the operations of processing personal data, except for cases established by the law.

24.6. A right to restrict data processing: to require restriction of data processing when the personal data subject challenges accuracy of the data for such a period of time during which the data controller could verify accuracy of the personal data; processing of the personal data is illegal and the data subject does not agree to deletion of the data and requests restriction of the use thereof instead; the data controller no longer needs the personal data for the purposes of processing thereof, however, it is needed for the data

subject in order to raise, implement, or defend legal claims. The data controller shall inform the data subject processing of whose personal data has been restricted before lifting the restriction on processing of the data.

24.7. A right to data portability.

24.8. A right to disallow processing of your personal data for the purposes of direct marketing, also to withdraw the given consent at any time without specifying the reasons of the withdrawal.

25. It should be noted that the aforementioned rights may be restricted or not implemented:

25.1. When security or defence of the state must be ensured;

25.2. When public order, prevention, investigation, or detection of criminal acts or prosecution must be ensured;

25.3. When important economic or financial interests of the state must be ensured;

25.4. When prevention, investigation, or detection of breaches official or professional ethics must be ensured;

25.5. When protection of rights and liberties of the data subject or other persons must be ensured.

26. You may apply to Freda for implementation of your rights by filing an application by mail, via fax (by referring to the contact details given on this website), via e-mail at info@freda.eu. The person must clearly indicate his/ her name and surname in one's application and produce an identification document or sign the application by affixing an electronic signature.

Ensuring information security

27. The objective of Freda is to ensure security of all information received from the Customer and public data files of a level as high as possible. Freda uses proper legal, administrative, technical and physical security measures in order to secure this information from unauthorized access, use, copying, accidental or unlawful destruction, alteration, or disclosure as well as any other unlawful processing.

Final provisions

28. The provisions of this Privacy Policy shall be governed by the law of the Republic of Lithuania. All disputes arising out of the provisions of this Privacy Policy shall be resolved by way of negotiations and in the event of failure thereof, they shall be resolved by courts of law of the Republic of Lithuania.