

# Privacy policy

POLXXX Version: 1

<b>Business area</b>	11. Manage risks, compliance, enhance operational resilience	PATVIRTINTA AB „KN Energies“ Generalinis direktorius
<b>Process group</b>	11.3. Manage compliance	Darius Šilenskis
<b>Process owner</b>	Chief corporate affairs officer	2025-09-17
<b>Process manager</b>	Manager of law and compliance department	
<b>Author</b>	Compliance specialist	
<b>Review</b>	Every 3 year	
<b>Scope</b>	Apply to all KN group companies.	

## 1. Policy implementation objectives

- 1.1. The purpose of this policy is to establish common personal data protection principles mandatory for all Group companies, and to define the measures and responsibilities ensuring compliance with the GDPR and other applicable legislation.

## 2. Principles

- 2.1. When processing personal data, the Group companies commit to adhere to the following principles:
  - **Accountability** – demonstrate compliance with the GDPR principles.
  - **Lawfulness, fairness, and transparency** – process data on a lawful basis, clearly informing data subjects about the processing.
  - **Purpose limitation** – use data only for clearly defined, legitimate purposes.
  - **Data minimization** – collect only as much data as is necessary to achieve the purpose.
  - **Accuracy** – ensure that data is accurate and kept up to date.
  - **Storage limitation** – retain data only for as long as necessary to achieve the purpose.
  - **Integrity and confidentiality** – apply technical and organizational measures to ensure data security.

## 3. Measures

- 3.1. The following measures are applied to implement the principles:
  - Maintaining and regularly updating records of processing activities (where required under the GDPR).
  - Conducting data protection impact assessments in cases of high risk.
  - Monitoring and updating technical security measures.
  - Ensuring secure data transfers by applying legal and technical measures.
  - Incident management – including registration, investigation, risk mitigation, and notification to authorities.
  - Employee training and continuous strengthening of competencies.

## 4. Responsibilities

- **Managers** – ensure compliance with legal requirements and this policy, implement organizational measures.
- **Information security officers** – establish and maintain technical measures, provide guidance to employees.
- **All employees** – perform their functions in accordance with the GDPR and this policy, report incidents.

## 5. Terms and Abbreviations

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**GDPR** - 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) (Text with EEA relevance).

**Policy** – this privacy policy.