



PATVIRTINTA
Akcinės bendrovės „Klaipėdos nafta“
Teisės ir administravimo direktorius
Rytis Valūnas
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WEBSITE VISITOR PRIVACY AND COOKIE POLICY

Nr. POL011

VERSION 2

WEBSITE VISITOR PRIVACY AND COOKIE POLICY

This AB Klaipėdos nafta (hereinafter referred to as *KN* or *Data Controller*) website visitor personal data privacy policy (hereinafter referred to as the *Policy*) provides information on the processing of the personal data of visitors (hereinafter referred to as the *Data subject*) to the *KN* website www.kn.lt (hereinafter referred to as the *Website*): the categories of data collected and processed, the use, storage, etc. of this data.

The links made from the *Website* to third party websites are not the subject of this *Policy*. We encourage you to consult the privacy policies of the other websites you visit.

This *Policy* is based on Regulation (EU) 2016/679 of the European Parliament and of the Council 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 referred to as GDPR), the Republic of Lithuania Law on Legal Protection of Personal Data, other legal acts of the European Union and the Republic of Lithuania.

The latest and current version of this *Policy* is published on the website at <https://www.kn.lt/privatumo-politika/2525>

1. Purpose and categories of personal data processing

The following personal data shall be processed in the context of the maintenance of *KN* website, cyber security, or efforts to facilitate the browsing and use of the website by *Data subjects* and the adaptation of operations as required:

Purpose: Website improvement and administration

DATA CATEGORIES	
Demographics	IP address, region from which you are browsing.
Statistics	The address of the opened <i>KN</i> website, the most frequently read information on the website, the type and version of the browser and device, the type and version of the operating system, the language settings, webpage that was visited before visiting the website, the time spent browsing the pages, the login time, and other statistical data.
LEGAL BASIS FOR DATA PROCESSING	
Consent, legitimate interest	Consent is given by selecting the cookie settings.
ADDITIONAL DATA PROCESSOR USED	
Company providing website maintenance	To ensure the smooth and uninterrupted operation of the <i>KN</i> website and the relevance of the published content.
Google Ireland Limited	The website analytics service Google Analytics is used to collect analytical information about the website's activities. Gordon House, Barrow Street, Dublin, D04 E5W5, Dublin.
BI The Core Centre of State Telecommunications	To ensure the smooth and uninterrupted operation of the <i>KN</i> website securing it from cyber-attacks.

	Pilies str. 23/15, LT-01123 Vilnius, Tel. No. 8 5 239 1727, e-mail: pagalba@kvtc.gov.lt
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2. Sources of personal data

Personal data about the *Data subject* is collected directly – when the *Data subject* visits the website www.kn.lt and (or) consent is given for statistical cookies usage. Statistics are collected using the Google Analytics tool.

3. Use of cookies

Strictly Necessary – these cookies are necessary for the *Data subject* to browse and use the functions of the website. Without these cookies, the website would not run smoothly.

Strictly Necessary cookies			
Name	Cookie provider	Purpose	Period of validity
PHPSESSID	kn.lt	To support the <i>Visitor's</i> session.	Throughout a browsing session

Analytical – these cookies allow us to record the *Data subject's* visit to the website. They are used to ensure the information displayed is relevant to the interests of the *Data subject*, while also making it clear to the employees managing the website content which content is relevant and in demand.

Analytical cookies			
Name	Cookie provider	Purpose	Period of validity
_ga	google-analytics.com	Logs a unique ID that is used to generate statistics on how a <i>Visitor</i> uses the website.	2 years
_gat	google-analytics.com	Used to excel the query rate.	1 minute
_gid	google-analytics.com	Logs a unique ID that is used to generate statistics on how a <i>Visitor</i> uses the website.	24 hours

4. Personal data retention period

Personal data from usage of the Google Analytics service is stored for a maximum of 26 months.

The storage of the *Visitor's* personal data for a longer period than specified in this *Policy* may be carried out only when:

- there are reasonable grounds for suspecting that an illegal activity is under investigation,
- *Visitor* data is necessary for the proper resolution of a dispute or complaint,
- on other grounds provided for in the legislation.

In any case, *KN* may retain the consent given by the *Visitor* and the proof of obtaining this consent for a longer period if this is necessary in order to meet or defend legal requirements and/or protect your or another person's rights, or for reasons of public interest.

5. Social networks

All personal data at KN is accessed through the company's social network accounts (including messages, use of the "Like" and "Follow" fields in the social network account, etc.), managed by the respective social network service provider. We recommend that you read the privacy policies of social networking service providers.

These accounts are currently used on behalf of KN:

- LinkedIn, the privacy policy is available at:
<https://www.linkedin.com/legal/privacy-policy>.
- YouTube, the privacy policy is available at:
<https://policies.google.com/privacy?hl=en#application>.

6. Disclosure of personal data to third parties

KN may transfer the *Visitor's* data to third parties who provide services related to the creation, development, and administration of the website in accordance with the instructions of KN. In such cases, only as much data as is necessary to fulfil the specific KN instruction or to provide specific services shall be provided. KN has written agreements with all service providers under which they can process *Visitors'* personal data only in accordance with the KN instructions, although they are unable to use the data for other purposes without the consent of KN.

KN may transfer the *Data subject's* data to the authorized institutions provided for in the Republic of Lithuania Law on Cyber Security, the Republic of Lithuania Law on the Protection of Objects of Importance to Ensuring National Security and the Republic of Lithuania Law on Prevention of Corruption.

7. Transfer of personal data outside the EU

KN processes *Data subject* data within the European Union, except in cases where the Google Analytics tool is used and the owner of this tool, US company Google Inc., processes such data in accordance with its [Terms of Service](#) or according to privacy policies on US, EU or Asian servers which can be found at <https://support.google.com/analytics/answer/6004245>. In such a case, Google Inc. is committed to taking appropriate measures to comply with the requirements of the EU Privacy Standards as set forth in the Google Analytics [Additional Terms of Service](#). Standard contractual clauses are the part of agreement between Google Inc. and Google Analytics tool user.

8. Data subject's rights

Data subject have the right to access his *Personal Data*. He must contact KN in advance using the e-mail address provided in order to find out what *Personal Data* we have collected or received at KN and from what sources, for what purposes they are processed, to whom they have been provided for at least the last 1 (one) year, or whether all *Data subjects Personal Data* is complete and correct.

Data subject also have the right:

- to request the correction of *his* personal data when they are inaccurate and/or incomplete.
- to request that the processing of *his* personal data be restricted until KN has verified the accuracy of this data.
- to request access to his personal data processed automatically by KN in a structured, commonly used and computer-readable format.
- not to process *his* personal data upon submission of a written or e-mail request to KN and to request the revocation or suspension of the processing of *Personal Data* when the *Personal*

Data is processed in violation of the Law on Legal Protection of Personal Data and other laws, except as provided in the *Policy*,

- to express his disagreement immediately or provide a subsequent notice of disagreement with the processing of *your Personal Data*.

If *Data subject* believe that the way we process *his* personal data does not comply with the applicable legal acts, he have the right to apply to the State Data Protection Inspectorate (L. Sapiegos st. 17, 10312 Vilnius; Tel. No.: (8 5) 271 2804, 279 1445; e-mail address: ada@ada.lt).

9. Examination of requests

Any request or instruction relating to the processing of personal data must be made in writing to *KN* in one of the following ways:

- by submitting such a request or instruction to *KN* directly at Burių st. 19, LT-93239 Klaipėda,
- by sending an electronically signed request or instruction to the e-mail address info@kn.lt.

KN must identify the data subject at the request of the data subject for the exercise of any right of the data subject. For this purpose, the *KN* employee accepting the request must view an identity document (a passport of a citizen of the Republic of Lithuania or a personal identity card) for confirmation of identity). Additional identification documents are not required for data subject requests submitted electronically and signed with a qualified electronic signature.

Upon receipt of such a request or instruction, we will provide a response within 30 (thirty) calendar days and will perform or refuse to perform the actions specified in the request. Data are provided free of charge once a calendar year.

Depending on the complexity and number of requests, *KN* shall be entitled to extend the one-month period by a further two months, informing the applicant before the end of the first month and stating the reasons for such extension.

If the request is made by electronic means, the response shall also be provided to the data subject by electronic means, unless this is not possible (e.g. due to the extremely large amount of information) or if the data subject requests a response by other means.

KN may refuse the data subject's request and in this case will provide a reasoned response in writing, explaining the circumstances specified in the legislation.

10. Personal data controller

Data controller details:

Public limited company Klaipėdos nafta (KN), legal entity code 110648893, email info@kn.lt, telephone No. +370 46 391 772, fax +370 46 311 399, address – Burių st. 19, LT-92276 Klaipėda, Lithuania.

Contact of the Data Protection Officer appointed by the Data Controller on all data processing issues:

- Address – Juridicon, JSC, Totorių g. 5-7, 01121 Vilnius
- Email address – dap@juridicon.lt
- Telephone number – +370 616 02000

11. Technical and organisational measures for the protection of personal data

KN shall process personal data in a manner that ensures adequate security of personal data through appropriate technical or organisational measures, including protection against loss, unauthorized use, and alteration.