

PRIVACY POLICY

This privacy policy (the "**Policy**") sets out the basic terms and conditions for the processing of personal data of visitors to the website www.rontgen.lt, clients, their representatives, beneficiaries, collateral providers and applicants for jobs offered by Röntgen ("**you**") of the operator of the crowdfunding platform Röntgen, the crowdfunding service provider "Trečia diena" UAB ("**Röntgen**" or "**we**").

The controller of your personal data is:

UAB "Trečia diena"

Legal entity code: 304211859

Gynėjų g. 14, Vilnius, Lithuania

When this Privacy Policy is updated, the new version is always published on the Röntgen website.

If you have any questions regarding the protection of your personal data or the provisions of this Privacy Policy, you may contact us at any time at info@rontgen.lt.

Processing of personal data for the purpose of providing crowdfunding services:

- 1.1. As a provider of crowdfunding services, Röntgen processes the data of its clients, their representatives and persons who guarantee the clients' obligations for the purpose of providing the relevant services.
- 1.2. When providing crowdfunding services, we are guided by Regulation (EU) 2020/1503 and the contracts we have with our clients (or their obligors).
- 1.3. In order to properly provide crowdfunding services, we also process your personal data for the following purposes related to the provision of crowdfunding services:
 - 1.1.1. **the implementation of anti-money laundering and anti-terrorist financing requirements** (as set out in applicable law and our internal policies);
 - 1.1.2. **for the collection of debts owed to us or our clients** (in accordance with the agreements we have concluded);
 - 1.1.3. other requirements applicable to our activities.
- 1.2. For the purposes set out above, we process the following personal data of clients (their representatives) and persons who guarantee clients' obligations:
 - 1.2.1. identity details (name, surname, personal identification number, likeness, nationality, etc.)
 - 1.2.2. contact details (home address, email address, phone number, etc.)
 - 1.2.3. the data used by the customer to log in to the customer account on the Röntgen website (customer user ID, password, etc.);
 - 1.2.4. details of the client's (financier's) investment knowledge and experience;
 - 1.2.5. financial data (personal credit rating, financial obligations, income, property, loans, information on transactions made on the Röntgen platform, their volume, etc.);
 - 1.2.6. data on the data subject's relationship with legal persons (position in the company represented, involvement in the control of legal persons, etc.);
 - 1.2.7. other data necessary for the provision of Röntgen services.
- 1.3. Röntgen receives the above personal data directly from you (when you provide it) or from other sources (e.g. public databases, such as systems administered by the State Enterprise Centre of Registers, etc.). In addition, if you choose to access the platform via your *Facebook* or *Google* account, we will receive your basic identification data from these platforms (you will be informed separately by these platforms about the scope of the identification data transferred). We stress that in all cases the processing of the relevant data is carried out to ensure the proper provision of crowdfunding services.

1.4. Personal data collected for the purpose of the provision of crowdfunding services shall be retained for a period of 10 years from the date of execution of the transaction, the submission of the relevant application or the completion of the operation, unless longer retention periods for such data are provided for by law.

2. Processing of personal data for statistical purposes

2.1. Regulation (EU) 2020/1503 requires Röntgen to publish on its website statistics on the crowdfunding services provided by Röntgen. Accordingly, we process your personal data for this purpose, such as information on the amount of transactions concluded, the amount of investments, etc.

2.2. It should be noted that the processing of your personal data referred to above is carried out in such a way that no one can be identified individually (depersonalisation).

2.3. The retention period of the relevant personal data depends on the legal requirements applicable to Röntgen in relation to Röntgen's obligation to publish statistical data.

3. Processing of personal data for the purpose of administering your requests

3.1. If you contact Röntgen (by email, telephone, social media accounts or any other means), the personal data you have provided will be processed for the purpose of administering the relevant enquiry. Such processing is based on ensuring the quality of the services provided, as well as on the fulfilment of various legal requirements and/or the protection of our legitimate interests.

3.2. The processing of the data referred to is normally based on the legitimate interest of Röntgen. In some cases, the administration of requests or complaints submitted by you may be based on compliance with legal requirements.

3.3. When making requests, please respect at least the minimum requirements for the protection of personal information - do not provide superfluous personal data that is not necessary for the purpose of the request, i.e. to set out the request, complaint, letter or application.

3.4. The personal data you provide will normally be stored for up to 3 years, unless a different period of storage is necessary for reasons such as the protection of the rights and legitimate interests of Röntgen or others, the handling of a complaint or the settlement of a dispute. The retention period may also vary depending on the legal requirements and therefore your personal data may be retained for a longer period.

4. Processing of personal data when you apply for a position at Röntgen

4.1. Röntgen processes your personal data (CV, cover letter, etc.) when you provide the relevant information when applying for a position offered by Röntgen. Accordingly, the basis for such processing of your personal data is your consent expressed by providing your personal data.

4.2. When sending us your personal data for the purpose of ongoing or future recruitment exercises, please respect at least the minimum data protection requirements and do not provide superfluous information that is not relevant to your candidature.

4.3. The period of retention of the data you provide depends on the duration of the recruitment process at Röntgen for the specific job position. Röntgen will only process your personal data after the end of the respective selection process if you express your separate consent to this.

5. Cookies used on the website

5.1. When you visit our website (www.rontgen.lt), we may process your IP address as well as other network data if you provide it. Such data is collected by means of cookies and/or similar technological solutions on the basis of user consent. Cookies are small files that are sent to the web browser you are using and stored on your device (e.g. your computer or phone). Cookies are transferred to your computer the first time you visit our website.

5.2. For this reason, our website may "remember" your actions, preferences and transactions for a certain period of time. Thus, cookies are used to ensure a comfortable, safe operation of the website and to analyse the habits of visitors to the website. This allows us to better adapt the website to the needs of its

visitors. Some types of cookies (essential and analytical cookies) are necessary for the proper functioning of the website, so if you refuse these cookies, the website may not function properly.

- 5.3. Cookies are classified according to their duration into short-term session cookies (which are deleted when the visitor finishes a browsing session) and long-term cookies (which are stored for a longer period of time). Cookies can also be classified according to whether they belong to a first party (for example, a website administrator) or to a third party (for example, online advertisers).
- 5.4. The Company's website uses the following cookies:

Cookie name	Provider	Validity	Description
_fbp	facebook.com	3 months	Used by Facebook to provide promotional products, such as third party offers
_ga	google.com	1 year	Used by Google Analytics to distinguish between users
_gid	google.com	1 day	Used by Google Analytics to distinguish between users
CAKEPHP	rontgen.lt/p>	Until the browser closes	Technical cookie
csrfToken	rontgen.lt	Until the browser closes	Protection against csrt attacks
SelectedLanguage	rontgen.lt/p>	Until the browser closes	Language option
VisitsCount	rontgen.lt	Until the browser closes	To get attendance figures

- 5.5. You can control the use of cookies by changing the settings on your web browser. Each browser is different, so if you do not know how to change your cookie settings, we recommend that you consult your browser's user guide and instructions.
- 5.6. If you do not want cookies to collect information, you can refuse the use of cookies in your browser settings. However, some types of cookies (for example, essential cookies) are necessary for the proper functioning of the website, and if you refuse these cookies, the website may lose functionality. You can find more useful information about cookies and how to control and remove them on the website www.allaboutcookies.org.

6. Your rights as a data subject

- 6.1. As data subjects, you have the following rights in relation to your personal data:
 - 6.1.1. to have access to your personal data and how they are processed;
 - 6.1.2. require the rectification of incorrect, inaccurate or incomplete data;
 - 6.1.3. request the erasure of your personal data;
 - 6.1.4. to request restriction of the processing of your personal data;
 - 6.1.5. request the transfer of your personal data to another controller or to provide it directly in a form that is convenient for you;
 - 6.1.6. to object to the processing of your personal data if it is processed on the basis of legitimate interest;

6.1.7. withdraw your consent to the processing of your personal data.

- 6.2. To exercise your rights as a data subject, please contact us in writing (by email to info@rontgen.lt): please specify the specific right, detail the scope of the right and provide your contact details (e.g. name, surname, email address - where you have registered on our platform, telephone number). If we lack sufficient information to be able to properly analyse your request, we will contact you immediately. Please note that we exercise your rights as a data subject in accordance with the General Data Protection Regulation and other legislation governing the protection of personal data, as well as the guidelines of competent authorities.
- 6.3. If you believe that Röntgen is processing your personal data unlawfully or in violation of your rights related to the processing of personal data, you have the right to contact the State Data Protection Inspectorate. However, before contacting the State Data Protection Inspectorate, we encourage you to contact us immediately (by email to info@rontgen.lt). In this way, we will be able to work together to find the most expeditious and optimal solution to the problem for both parties.

7. Recipients of personal data

- 7.1. In the course of its activities, Röntgen may use certain data processors (service providers, such as data storage service providers, software development and support companies, debt management service providers, communication service providers, etc.) to whom your personal data may be transferred.
- 7.2. Your personal data is only transferred to the relevant service providers when and to the extent necessary for the provision of their respective services.
- 7.3. Röntgen may also provide your personal data to the following recipients:
- 7.3.1. state institutions and registers (Bank of Lithuania, Department of Statistics, notaries, courts, bailiffs, law enforcement agencies, lawyers, etc.);
 - 7.3.2. persons administering joint debtor data files (e.g. UAB Creditinfo Lietuva);
 - 7.3.3. payment and other service providers and financial institutions used by Röntgen in the course of its business;
 - 7.3.4. other companies, where necessary for financial accounting, auditing, risk assessment or the provision of services;
 - 7.3.5. to other third parties involved in the provision of our services and/or who have a legal basis to receive this data;
- 7.4. In all cases, reasonable efforts are made to ensure that personal data are not lost or misused in order to comply with the law.
- 7.5. Please note that Röntgen does not need to transfer your personal data to recipients located outside the European Union (EU)/European Economic Area (EEA) in order to carry out its activities. However, should it be necessary in exceptional circumstances to transfer part of your data to a recipient located outside the EU/EEA, Röntgen will implement the requirements set out in the General Data Protection Regulation and will take reasonable steps to ensure the security of the data transferred.