

## UAB KLAIPĖDOS JŪRŲ KROVINIŲ KOMPANIJA BEGA PRIVACY POLICY

### I. CHAPTER GENERAL PROVISIONS

1. UAB Klaipėdos Jūrų Krovinių Kompanija BEGA (hereinafter referred to as the Company) is aware that the issues of data protection are extremely important for the Company and its clients and other data subjects and undertakes to respect and protect the privacy of each data subject and the processing of personal data in accordance with applicable legal acts.
2. This Privacy Policy governs the basic principles and procedures for collecting, processing and storing the data of data subjects (hereinafter referred to as the Policy).
3. This Policy is applied to persons who use or intend using the Company's services, including vessel agency services, the authorisation and registration system for freight transport, or visit the website [www.bega.lt](http://www.bega.lt) (hereinafter referred to as the Website).
4. By using the Company's Website, as well as by subscribing/using and ordering the services offered by the Company, including vessel agency services, the authorisation and registration system for freight transport, and providing your personal data to the Company you agree to this Privacy Policy (except for the data processing actions that will require your individual consent).
5. By respecting your privacy and protecting your personal data, we take appropriate technical and organizational measures to ensure the security of your personal data and that the processing of data is in line with the requirements of data protection legislation and our internal policies.
6. By processing your personal data we comply with the 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 (the Regulation), the Republic of Lithuania Law on the Protection of Personal Data – LPPD), the Law on Electronic Communications of the Republic of Lithuania (hereinafter referred the LEC) and other directly applicable legal acts governing the protection of personal data, as well as the instructions of the data protection supervisory authorities (in Lithuania – the State Data Protection Inspectorate).

### II. CHAPTER DEFINITIONS

7. The terms used in this Policy correspond to the definitions laid down in the laws of the Republic of Lithuania, secondary legislation, legal acts of the European Union, internal rules of the Company, taking into account the context of the term used, unless paragraph 8 lays down a different definition of the term.
8. Terms used in the Policy:

**personal data** - means any information about a natural person who is identified or identifiable (the data subject); a natural person who can be identified, whose identity can be determined directly or indirectly, in particular, by the identifier, such as his name, personal identification number, location data and internet identifier, or according to one or more features of physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

- data subject** - a natural person whose personal data is collected by the Company.
- consent of the data subject** - means any express, specific and unequivocal expression of the will of the duly notified data subject in a statement or unambiguous manner in which he consents to processing of the personal data relating to him.
- data processing** - means any operation or sequence of operations, such as collecting, recording, sorting, organizing, storing, adapting or modifying, extracting, accessing, using, disclosing, transmitting, distributing, or otherwise changing, by automated or non-automated means of personal data or personal data sets and access to them, as well as matching or interconnection with other data, their restriction, erasure or destruction.
- data processor** - A natural or legal person, a public authority, an agency or other entity that processes personal data on behalf of the data controller.
- data controller** - UAB Klaipėdos Jūrų Krovinių Kompanija BEGA is a company established under the laws of the Republic of Lithuania, code 140451567, registered office address Nemuno g. 2B, Klaipėda, Republic of Lithuania, the data of which are collected and stored in the Register of Legal Persons.
- sea-going personnel** - means the staff of the Company's agency vessels.
- authorisation and registration system for freight transport** - system for controlling the access of cars and persons, for automated weighing of motor vehicles, for traffic queues, for online pre-registration and authorisation.
- Cookie** - means a small piece of text information automatically created when browsing the Website or in the above-mentioned system and is stored on your computer or other end device.

### **III. CHAPTER PERSONAL DATA COLLECTED**

9. for the purpose of the proper implementation of the agency functions the Company collects and processes the following of your personal data submitted by the captains, owners, operators, seafarers' employment agencies of the vessels within the agency of the Company:
  - 9.1. personal data of vessel crew members:
    - 9.1.1. name;
    - 9.1.2. surname;
    - 9.1.3. rank;
    - 9.1.4. date of birth;
    - 9.1.5. place of birth;
    - 9.1.6. personal ID document data (number, date of validity);
    - 9.1.7. declaration of personal belongings;
    - 9.1.8. special categories – medical declaration of the vessel, nationality.
  - 9.2. personal data of family members of the crew:
    - 9.2.1. name;
    - 9.2.2. surname;

- 9.2.3. date of birth;
  - 9.2.4. place of birth;
  - 9.2.5. personal ID document data (number, date of validity);
  - 9.2.6. for special categories – nationality.
10. The Company collects and continues to process the following personal data that you supply when using the Company's services:
- 10.1. using the services of the authorisation and registration system for freight transport:
    - 10.1.1.name;
    - 10.1.2.surname;
    - 10.1.3.position title;
    - 10.1.4.document type;
    - 10.1.5.document number;
    - 10.1.6.company name;
    - 10.1.7.photo;
    - 10.1.8.e-mail;
    - 10.1.9.vehicle brand and registration number;
    - 10.1.10. date of issue and expiry date of authorisation;
    - 10.1.11. entry time, reader code;
    - 10.1.12. exit time, reader code;
    - 10.1.13. telephone No.;
    - 10.1.14. password.
11. Your data indicated in point 9 is stored in the e-mail for 5 (five) years from the receipt of the e-mail. Your personal data referred to in clause 10 are stored for 3 (three) years from the date of receipt of this data.
12. Only one functional cookie required for Website functionality is used on the Company's Website. The Company's Website does not use cookies that collect the information necessary for analytical or advertising purposes or for target marketing purposes. Only system cookies are used in the Company's authorisation and registration system for freight transport.
13. The purpose and duration of all cookies used by the Company are described in Chapter IX. of this Policy.
14. The Company processes the abovementioned personal data on the following legal grounds:
- 14.1. to provide the vessel agency services, the services offered on the Website and in the Company's authorisation and registration system for freight transport;
  - 14.2. on the requirements of the legal acts applicable to the Company;
  - 14.3. with the consent of the data subject.

#### **IV. CHAPTER PURPOSE OF DATA PROCESSING**

15. The Company processes the above personal data for the following purposes of data processing:

- 15.1. for the proper provision of services, processing and administration;
- 15.2. to identify the Website visitors and to authorize the users of the authorisation and registration system for freight transport;
- 15.3. implementing the international Ship and Port Facility Security (ISPS) Code, legal and secondary legal acts of the Republic of Lithuania regulating port security and port regime.

**V. CHAPTER  
PRINCIPLES OF DATA PROCESSING**

- 16. We ensure that your personal data will be:
  - 16.1. processed in a lawful, fair and transparent manner;
  - 16.2. data are collected for specified, clearly defined and for legitimate purposes, and not further processed in a way incompatible with those purposes;
  - 16.3. adequate, appropriate data and necessary only for the purposes for which they are processed (applying the data reduction principle);
  - 16.4. accurate and, if necessary, updated (applying the precision principle);
  - 16.5. processed in such a way as to ensure the adequate protection of personal data, including the protection against unauthorized processing or processing of unauthorized data and unintentional loss, destruction or damage by appropriate technical or organizational measures (applying the principles of integrity and confidentiality);

**VI. CHAPTER  
RIGHTS OF DATA SUBJECT**

- 17. You have the following rights of data subjects:

Your right	Description
<b>Right of access to own personal data</b>	<p>You can contact us with a request:</p> <ul style="list-style-type: none"> <li>• to confirm that we process your personal data;</li> <li>• to provide you with a copy of this data;</li> <li>• to provide information about the processing of your personal data, such as what personal data we collect, for what purpose we process them, for whom and for what purpose we disclose them, whether this data is being transmitted outside the European Union, what security measures we apply to them, and other information about your personal data.</li> </ul> <p>Most of this information is provided in this Policy.</p>
<b>Right to demand the correction of personal data</b>	<p>If you, after getting familiar with your personal data, find that your personal data is incorrect, incomplete or inaccurate, and you contact us, your personal data will be verified and, upon your request, we will correct any incorrect, incomplete, inaccurate data, and/or we will discontinue the actions of processing such personal data other than storage.</p>

<p><b>Right to request to delete the personal data (the right to be forgotten)</b></p>	<p>You can contact us with a request to delete your personal data in the following cases:</p> <ul style="list-style-type: none"> <li>• when the data is no longer needed to implement the purposes of processing the personal data;</li> <li>• when you withdraw your consent (if your personal data processing was based on your consent);</li> <li>• when you exercise the right to oppose us to process the personal data relating to you;</li> <li>• when you think that your personal data is being processed illegally, etc.</li> </ul> <p>We are not required to implement your request to delete your personal data if the processing of your personal data is necessary to fulfil legal obligations stipulated in the Regulation or the laws of the Republic of Lithuania.</p>
<p><b>Right to restrict the processing of your personal data</b></p>	<p>You can contact us with a request to restrict (for example, to store, but not use) your personal data processing in one of the following cases:</p> <ul style="list-style-type: none"> <li>• You contest the accuracy of the personal data for a period enabling us to verify the accuracy of your personal data;</li> <li>• The processing of your personal data is unlawful and you oppose to the erasure of the personal data and request the restriction of their use instead;</li> <li>• the data is no longer needed to implement the purposes of processing the personal data, but the data are required by the data subject for the establishment, exercise or defence of legal claims;</li> <li>• You have opposed to the processing of data until it is verified that our legal reasons are prevail over your legitimate reasons.</li> </ul> <p>Due to the limitation of data processing and during this period of limitation of processing, we may not be able to ensure the provision of services to you.</p>
<p><b>Right to your personal data portability</b></p>	<p>You may contact us with a request for providing the personal data relating to you that you have provided by us in a computerized, customary and computer-readable format, or you may request that we transfer your personal data directly to your other personal data controller, to the extent technically feasible and when:</p> <ul style="list-style-type: none"> <li>• The processing of your personal data is based on your consent or performance of the contract concluded with you;</li> <li>• Your personal data is processed by automated means.</li> </ul>
<p><b>Right to disagree</b></p>	<p>You may contact us with a request for the reasons related to your particular case to withdraw your consent to the processing of personal data relating to you at any time and free of charge when such processing is carried out with your consent or may be necessary for our legitimate interests.</p> <p>The withdrawal of consent will not affect the legality of reasonable processing of personal data performed before the withdrawal.</p> <p>However, in view of the objectives of the service provision and the balance between the legitimate interests of both parties (both your as a data subject and as, as a controller), your objection may mean that, upon termination of our processing of your data based on our legitimate interest, we will not be able to provide our services to you.</p>

<b>Right to file a complaint regarding the processing of personal data</b>	<p>If you believe that we process your data in violation of the requirements of the data protection laws, we will always ask you to contact us directly first.</p> <p>If you are not satisfied with our proposed solution to the problem or, in your opinion, we do not take action as required by your request, you will have the right to file a complaint to the State Data Protection Inspectorate.</p>
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## VII. CHAPTER PROCEDURE FOR EXAMINATION OF APPLICATIONS

18. In order to protect the data of all our Customers from unauthorized disclosure, we will be required to identify you upon receipt of your request for data or for the exercise of your other rights.
19. Upon receipt of your request for the implementation of any of your rights and having successfully performed the above-mentioned verification procedure, we undertake to inform you without undue delay, but in any case no later than within 1 (one) month from the receipt of your request and completion of the verification procedure, about the actions that we have taken in respect of your request. This term may be extended for a further 2 (two) months, depending on the complexity of the submitted requests and by notifying you in advance.
20. 1 (once) in 1 (one) year, we are obliged to provide you with information about the processing of your personal data free of charge. In case you contact for more than 1 (once) in 1 (one) calendar time or your application will be unfounded, repetitive or disproportionate, in this case we can to charge a reasonable fee that will not exceed the cost of data provision.

## VIII. CHAPTER THIRD PARTIES TO WHICH WE PROVIDE YOUR PERSONAL DATA

21. The Company can provide your personal data to:
  - 21.1. data processors who provide services to the Company and process your personal data on behalf of the Company and for the benefit of the Company or yourself;
  - 21.2. State Border Guard Service, Klaipėda State Seaport Authority, The Customs Department under the Ministry of Finance of the Republic of Lithuania, the police of the seaport;
  - 21.3. other third parties, with your consent.
22. We only use the data processors who ensure to have the appropriate technical and organizational measures in place, in such a way that the data processing complies with the requirements of the Regulation and ensures the protection of your rights as data subjects.
23. Please note that the above data processors have the right to process your personal data only according to our instructions.
24. The data processor cannot use another data processor without prior written permission of the Company (data controller) of a specific or general written permit.
25. The Company may also provide personal data of data subjects in response to requests from judicial, law enforcement or public authorities to the extent necessary for the proper implementation of existing legislation and instructions from public authorities, companies involved in debt collection, other data recipients, with consent or upon request of the data subject.

**IX. CHAPTER  
USE OF COOKIES**

26. The Company uses cookies to make it easier and more efficient for you to browse the Website and use the authorisation and registration system for freight transport. Cookies shall only be used to ensure the proper functioning of the Website and authorisation and registration system for freight transport.
27. Since only cookies necessary for the operation of the Website are used on the Website, data subjects do not have the option to choose whether or not to accept cookies. Data subjects have access to the information about cookies they use by clicking the link to this Policy in the pop-up window for cookies. The pop-up window can be closed by clicking the “I understand” box.
28. **Data on the cookies used on the Website and in the authorisation and registration system for freight transport:**

<b>Cookie name</b>	<b>Description</b>	<b>Use</b>	<b>Information collected by the cookie</b>	<b>Creation time and expiration date</b>
1. ses2000070663	Functional cookie used to identify a new/returning user.	On the Website.	The data you receive is used to improve the performance of the Website.	After the client visits the Website; after the client has completed the session or closed the tab/browser.
2. .BegaPublicAuth	System cookie.	In the authorisation and registration system for freight transport.	Used for authorizing.	After the client visits the system; 24 hours.
3. .BegaPublicSession	System cookie.	In the authorisation and registration system for freight transport.	Used for authorizing.	After the client visits the system; after the client has completed the session or closed the tab/browser.
4. .BegaPublicToken	System cookie.	In the authorisation and registration system for freight transport.	Used for authorizing.	After the client visits the system; after the client has completed the session or closed the tab/browser.
5. .BegaPublicUser	System cookie.	In the authorisation and registration	Used for authorizing.	After the client visits the system; 24 hours.

		system for freight transport.		
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**X. CHAPTER  
VALIDITY OF THE POLICY**

29. This Policy applies from 25 May 2018. If we change this Policy, we will announce its updated version on this Website.

**XI. CHAPTER  
CONTACTS**

30. On all data processing issues, contact us with the following contacts:
- 30.1. by e-mail: [bdar@bega.lt](mailto:bdar@bega.lt);
  - 30.2. by phone: +370 (46) 39 55 00;
  - 30.3. by sending correspondence to: UAB KJKK BEGA Nemuno g. 2B, LT – 91199, Klaipėda;
  - 30.4. By submitting the request directly at the address of the Company, Nemuno g. 2B, Klaipėda.