**VILNIUS FACTORING COMPANY, UAB**

**PRIVACY POLICY**

**General Information**

This Privacy Policy shall be applicable to all personal data submitted by you to us or collected and processed by us when you use the services provided by Vilnius factoring company, UAB by submitting them to us personally or by electronic means (by telephone, e-mail or using internet website).

Vilnius factoring company, UAB respects your privacy and protects your personal data submitted to us and collected by us as it is provided in this Privacy Policy. This Privacy Policy explains why we collect your personal data and how we use them.

**Purposes of Data Processing**

Vilnius factoring company, UAB shall process your personal data for the following purposes:

* consultation and evaluation of needs;
* conclusion and performance of factoring agreements;
* conclusion and performance of loan agreements;
* execution and implementation of security instruments;
* fulfilment of legal liabilities;
* credit rating assessment;
* prevention of money laundering and terrorist financing;
* direct marketing;
* selection of job candidates.

**\* In case you do not submit the personal data which is necessary for conclusion of an agreement or its enforcement or submission of them is required by legal acts or an agreement, we will not be able to render you our services.**

**Legal Grounds for Data Processing**

Vilnius factoring company, UAB shall process your personal data based on the following legal grounds:

* your personal data are necessary in order to conclude and perform an agreement with Vilnius factoring company, UAB;
* you have given your consent for the processing of your personal data;
* your personal data must be processed in order to implement a legal liability;
* processing of your personal data is required for the purposes of legitimate interests of Vilnius factoring company, UAB, such as:
  + to defend legitimate interests of Vilnius factoring company, UAB and use our legal remedies;
  + to improve the quality of services, ensure the integrity of our activity and conformity of services to your needs;
  + to protect assets and health and life of employees and other persons.

**Processed Data**

Vilnius factoring company, UAB shall collect and process the following personal data concerning you:

* **general personal data**, such as name, surname, personal number, date of birth;
* **identification data**, such as bank account number, bank name;
* **contact data**, such as address, phone number, e-mail;
* **financial data**, such as debts, obligations, credit rating data, data on benefits, income and expenses, social insurance data, information about the real estate, etc.;
* **economic data**, such as engagement in an economic or individual activity, work-related data, securities, deposits, information about economic activity, education, information about the debtor for whose obligations the surety is issued, etc.;
* **demographical data**, such as marital status, information about the spouse, number of dependants, etc.;
* **video data** recorded using the surveillance system when visiting Vilnius factoring company, UAB.

**Data Storage Terms**

We shall process and store all of your personal data only for a period required for the purposes indicated in this policy. Vilnius factoring company, UAB shall store your personal data for the following periods:

* requests submitted via internet website - 2 years.
* data of factoring and security (surety, guarantee, promissory note) agreements – 10 years as of the expiry of the agreement;
* credit rating assessment data – 10 years as of the expiry of the agreement, and where the agreement has not been concluded – 12 months as of the request to conclude the agreement;
* data used for the prevention of money laundering and terrorist financing – 10 years;
* direct marketing data – 3 years as of the latest opening of a newsletter and 5 years after the date of receipt of the consent;
* data of the selection of job candidates – selection period or 1 year, subject to given consent;
* video data - 1 month.

**Profiling**

Vilnius factoring company, UAB may perform your profiling (i.e. rate your possibilities to receive a credit). To assess the credit rating, a decision-making method based on automated processing may be used. Also, automated profiling may be carried out, which is performed in order to ensure the transparency and accuracy of credit rating assessment by using high-quality and reliable assessment methods.

**Data Transfer**

We may transfer your personal data to:

- State institutions and companies, other institutions that implement functions established under laws, such as Financial Crime Investigation Service, police, courts, arbitrators, other dispute resolution institutions and law enforcement institutions under their requests or on our own initiative following the applicable legal acts;

- State Social Insurance Fund Board, State Tax Authority, Centre of Registers, bailiffs, notaries and other state register and institutions;

- UAB „Creditinfo Lietuva“ and other institutions providing creditworthiness services;

- Companies that provide post, currier and other shipment services;

- Service providers such as audit, legal, tax, accounting and employment services;

- EU Commission or any other party which acts on behalf of the EU Commission, European Investment Fund (EIF), European Investment Bank or providers of the financing for EIF guarantee;

- IT service providers, such as companies providing assistance in administering our website, protect its data and provide services, database software suppliers, providers of database administration services, providers of cloud services, etc.

**Data Protection**

We shall apply to data processing security and processing requirements set out in the Republic of Lithuania Law on Legal Protection of Personal Data and the European Union General Data Protection Regulation EU 2016/679.

Vilnius factoring company, UAB shall use appropriate technical and organisational measures in order to ensure the protection of all processed personal data from accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, and from all other unlawful forms of processing.

**Your Rights**

You have the following rights associated with your personal data:

* right to request Vilnius factoring company, UAB to provide access to the data and rectify or erase them, or restrict the data processing;
* right to object to data processing;
* right to receive your personal data in a structured, commonly used and machine-readable format (right to data portability);
* right to withdraw your consent;
* right to file a complaint with the State Data Protection Inspectorate.

**Contacts**

You can exercise your rights by contacting Vilnius factoring company, UAB via e-mail [info@vfc.lt](mailto:info@vfc.lt) or post at Lvovo g. 25, 09320 Vilnius. For this purpose, please send the documents proving your identity together with your request.

**Validity and Amendments**

This amended Privacy Policy shall come into effect as of 15 July 2019. If we amend this Privacy Policy, we will publish the updated version on our website [www.vfc.lt](http://www.vfc.lt). Amendments and/or supplements to the Privacy Policy shall come into effect as of publication thereof on the website.