**PAYRAY, 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 PayRay, UAB by submitting them to us personally or by electronic means (by telephone, e-mail or using internet website).

PayRay, 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 and Legal Grounds for Data Processing**

PayRay, UAB shall collect and process your personal data which you provide yourself or which we get ourselves from the other sources for the following purposes:

* consultation and evaluation of needs in order to conclude an agreement with you and to perform our contractual obligations – legal ground of conclusion and performance of an agreement and consent;
* conclusion and performance of supply contracts in order to conclude an agreement with you and to perform our contractual obligations – legal ground of conclusion and performance of an agreement;
* conclusion and performance of financing agreements - in order to conclude an agreement with you and to perform our contractual obligations – legal ground of conclusion and performance of an agreement;
* execution and implementation of security instruments - in order to conclude an agreement with you and to perform our contractual obligations – legal ground of conclusion and performance of agreement;
* prevention of money laundering and terrorist financing – in order to implement the anti-money laundering requirements and to establish your possibility to become a customer – legal ground of legal obligation;
* credit rating assessment in order to evaluate your creditworthiness and to conclude an agreement with you and to perform our contractual obligations – legal ground of conclusion and performance of an agreement and consent;
* direct marketing in order to inform you about our services - legal ground of consent;
* selection of job candidates in order to employ you in our company;
* video surveillance in order to ensure public order, security, property and rights and freedoms of persons – legal ground of legitimate interest.

**\* 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**

PayRay, UAB shall process your personal data based on the following legal grounds:

* your personal data are necessary in order to conclude an agreement with PayRay, UAB and to perform it;
* 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 PayRay, UAB, such as:
	+ to defend legitimate interests of PayRay, 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**

PayRay, 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 position, 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, citizenship, etc.;
* **video data** recorded using the surveillance system when visiting PayRay, 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. PayRay, UAB shall store your personal data for the following periods:

* requests submitted via internet website - 2 years.
* data of factoring, loan 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**

PayRay, 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. In case you do not agree with such a decision-making method, please inform PayRay, UAB by the email info@payray.lt.

**Data Sources**

Personal data can be taken from the following sources:

* credit rating companies such as UAB „Creditinfo Lietuva“ and any other third parties providing analysis of creditworthiness services and its assessment and etc;
* companies that provide tools for the fulfilment of the requirements on prevention of money laundering and terrorist financing such as Bureau Van Dijk and similar;
* state registers such as VĮ Registrų centras and its administrated registers, VĮ „Regitra” and similar;
* state institutions/companies such as State Tax Inspectorate under the Ministry of Finance of the Republic of Lithuania and similar.

**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;

 - Debt recovery companies;

- Credit insurance companies;

- 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;

 UAB „Investicijų ir verslo garantijos“;

- 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.

PayRay, 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 PayRay, 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 PayRay, UAB via e-mail info@payray.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 26 March 2020. If we amend this Privacy Policy, we will publish the updated version on our website [www.payray.lt](http://www.payray.lt). Amendments and/or supplements to the Privacy Policy shall come into effect as of publication thereof on the website.