

## Privacy Policy

This Privacy Policy describes how we process the personal data of our customers, customers' representatives, and users of the services and business software we offer.

The Privacy Policy has been prepared and we process personal data in accordance with the General Data Protection Regulation (EU) 2016/679 and other applicable legislation regulating the protection of personal data.

This Privacy Policy applies to all natural persons who use our services, the business software we offer, our website, or submit enquiries about our services or communicate with us in other ways.

Please read the Privacy Policy carefully, as it contains important information about your rights as a data subject.

### 1. Definitions

**Personal data** means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

**Processing of personal data** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, reading, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### 2. Data controller

The controller of your personal data is **UAB Directo**, registration code 125943981; address Juozo Balčikonio g. 9, Vilnius, Lithuania ("**Directo**", "**we**", "**us**" or "**our**").

Please note that for personal data entered/transmitted by our clients into our business software (e.g. data of clients' end customers), Directo is a processor authorised by its clients. In this case, the controller of the personal data is the respective Directo client and Directo processes the personal data on the basis of a separate personal data processing agreement, and such processing is not subject to this Privacy Policy.

### 3. Purposes of and legal basis for data processing

When collecting personal data, we limit ourselves to the minimum necessary to fulfil the purposes described in this section.

The legal basis for the processing of personal data is, depending on the situation, the conclusion or performance of a contract, our legitimate interest (notably for processing purposes relating to performance of a contract concluded with a client in cases where the data subject is not our client but our client's representative or employee), or the data subject's consent.

Directo processes personal data for the following purposes:

- personal identification;
- preparing client contracts and/or invoices;
- performance of contracts concluded with clients;
- enabling access to the services and business software offered;
- contacting persons for the purpose of providing the service (to the client);
- providing customer service;
- resolving enquiries or other questions submitted persons;
- improving and developing our service and business software;
- direct marketing, including sending newsletters.

The personal data we may collect may include the following categories of personal data:

- your name;
- your personal identity code;
- your phone number;
- your e-mail address;
- your address;
- the name of your employer or the company you represent and your position or relationship with our client;
- the text of your enquiry;
- the user code (ID) assigned to you;
- information about your user rights group;
- other data necessary for providing the service.

The categories of personal data processed may vary depending on the specific purpose of the processing.

We obtain personal data directly from you, including by collecting data about your activities when using our services or business software, or indirectly from the client you represent or with whom you are associated.

## **4. Data retention**

We retain personal data for as long as necessary to achieve the purposes for which the data were collected. As an exception, we may retain personal data for longer, particularly in

situations where the retention of personal data for a longer period is justified. The retention period will also depend on the legal requirements for storage of documents and personal data.

Personal data related to Directo's transactions will be stored for at least seven (7) years from the end of the relevant financial year, due to the obligation to prove transactions under the Accounting Act.

## **5. Data sharing and disclosure**

Personal data processed by Directo may be disclosed without the consent of the data subject only to an authority or person who has a legitimate need for it or a direct legal right to it (e.g. a court or a person conducting pre-court proceedings).

We may transfer your personal data for processing to third parties who help us provide and manage our services and who offer services related to the handling of customer enquiries. We may also disclose your personal data to other third parties, such as tax, audit and other authorities, third-party service providers, such as accounting and legal service providers, insurance companies and other professional advisors and business consultants.

In any case, we will transfer data to a processor only to the extent necessary for the performance of a specific task or service.

## **6. Collecting data on website visitors**

Directo's website uses cookies. You can make choices about cookies and find additional information by clicking on the "Cookie settings" button on the website.

## **7. Personal data security**

We maintain appropriate technical and organisational security measures (including physical, electronic, and administrative) to protect your personal data against loss, destruction, misuse and unauthorised access or disclosure.

We have established clear and mandatory requirements for all persons who process personal data on our behalf and upon our instructions, and have communicated these requirements to them.

Directo complies with the requirements of ISO 27001:2013 (Information Security Management System, ISMS) standard or equivalent when processing personal data.

Please note that although we strive to protect the security of personal data with reasonable measures, no system can completely eliminate all possible risks.

## **8. Transfers outside the European Economic Area**

As a general rule, we do not transfer your personal data outside the European Economic Area ("EEA"). However, if we do so, we will only transfer personal data outside the EEA in cases where this is permitted under applicable law. In connection with the transfer of personal data to countries that do not offer an adequate level of data protection, we use

appropriate safeguards when transferring personal data, such as the European Commission's standard data protection clauses in data transfer agreements. You may request information on the applicable protection measures by contacting us at the e-mail address [info@directo.lt](mailto:info@directo.lt).

## 9. Data subject's rights

As a data subject, you have the following rights in accordance with applicable personal data protection legislation and subject to the limitations provided in such legislation:

- the right to receive information about the personal data processed about you as a data subject;
- the right to rectify personal data if the personal data is incorrect;
- the right to request the erasure of personal data, except where the controller may lawfully refuse to do so (if we have a legal basis for continuing to retain the data);
- the right to request restriction of the processing of personal data;
- the right to object to the processing of your personal data;
- the right to data portability; and
- the right to withdraw consent to the processing of personal data at any time, if the processing of personal data is based on consent.

If you wish to exercise your rights or if you have any further questions, please contact us by sending an e-mail to [info@directo.lt](mailto:info@directo.lt). Please also contact us if you believe that our processing of your personal data fails to comply with applicable legislation.

## 10. Privacy Policy and changes

Directo reserves the right to modify, add or remove any terms of this Privacy Policy as necessary. The currently applicable Privacy Policy is available on Directo's website at <https://directo.lt/privatumo-politika>.

This Privacy Policy is applicable as of 30.10.2025.