

PROCEDURE ON EXAMINATION OF APPLICATIONS OF DATA SUBJECTS AND EXERCISING OF RIGHTS

I. GENERAL PROVISIONS

1. UAB "I Asset Management", office address: Liepyno Str. 25A, Vilnius, code 304405305, tel. +370 655 57033, e-mail: info@1am.lt, (hereinafter referred to as **IAM**), as a data controller, regulates the rights of data subjects, their exercising procedure, procedure on examination and fulfilment of application by IAM in accordance with the Procedure on Examination of Applications of Data Subject and Exercising their Right (hereinafter referred to as the **Procedure**).
2. The Procedure applies to all applications from data subjects and to all IAM employees.
3. This Procedure is prepared in accordance with the provisions of the Regulation of the 27 April 2016 European Parliament and of the Council 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 General Data Protection Regulation)(hereinafter referred to as the **GDPR**), the Law on the Legal Protection of Personal Data of the Republic of Lithuania (hereinafter referred to as the **Law**) and other applicable legal acts.
4. The terms used in this Procedure shall be understood as they are defined in the GDPR, the Law and other applicable legal acts.
5. The Procedure is publicly available (on the website, etc.).

II. RIGHTS OF DATA SUBJECTS

6. The data subject has the following rights related to the processing of his personal data by the IAM:
 - 6.1. Be informed about his personal data processing;
 - 6.2. The right of access to the personal data, processed by IAM;
 - 6.3. The right to data rectification;
 - 6.4. The right to erasure ("right to be forgotten");
 - 6.5. The right to restriction of data processing;
 - 6.6. The right to data portability;
 - 6.7. The right to object to the processing of personal data related to him;
 - 6.8. The right not to be subject to automated data processing only, including profiling based on a decision that has legal consequences for him or that has a significant impact on him in a similar way;
 - 6.9. The right to cancel the given consent.

111. PROCEDURE ON EXERCISING OF RIGHTS OF DATA SUBJECTS

7. In order to exercise their rights provided for in Part II of the Procedure, the data subjects shall submit to IAM a written application (hereinafter referred to as the **Application**) in person, by post, courier or e-mail, as set out in Annex No. 1. An application may be submitted to any employee of IAM.
8. When submitting the Application, the data subject must submit a personal identification document or a copy thereof verified in accordance with the procedure established by the legal acts of the Republic of Lithuania attached to the Application. In cases where the Application is submitted on behalf of another person, the documents proving the powers must also be submitted. The Application shall be accepted for examination only if IAM identifies the applicant. If a person provides a copy of an identity document to IAM, such copy shall be returned to the person or destroyed immediately upon identification.

9. The Application must be signed by the data subject. In order to protect the personal data of the data subjects, IAM does not process anonymous Applications and Applications from individuals who has not been identified in accordance with valid identity documents.
10. If the Application does not meet the above requirements, it will not be examined. However, the person who receives the Application should inform the applicant at minimal cost that the Application can be processed, if the identity documents of the applicant are submitted (for example, by e-mail or telephone).

IV. PROCEDURE ON EXAMINATION OF APPLICATIONS OF DATA SUBJECTS

11. Upon receipt of an Application of a data subject, IAM must:
 - 11.1. Examine the Application and submit a response to the data subject in the manner specified in the Application no later than within one month from the date of receipt of the Application;
 - 11.2. If necessary, this period may be extended for two months more for objective reasons (complexity of the Application, large amount of data, occupation, etc.). IAM shall inform the applying data subject of such an extension and state the reasons for the extension.
 - 11.3. Where the data subject submits the Application by electronic means, the response and the information shall also be provided to him by electronic means, if possible, unless the data subject requests otherwise.
12. If IAM fails to take actions on the Application of the data subject, IAM shall, without delay and within one month of receipt of the Application at the latest, inform the data subject of the reasons for the inaction and of the possibility to file a complaint to the supervisory authority and use the mean for defence of rights.
13. IAM examines the Applications and provides responses with information free of charge. Where the Application (s) of the data subject is (are) obviously unreasonable or disproportionate, in particular because of their repetitive content, IAM may charge a reasonable fee based on the administrative costs related to provision of the information or notifications or taking of actions requested, or may refuse to take actions on the Application. An Application shall be deemed to be identical if, in 3 months or earlier after the final response has been sent, an Application with substantially the same content has been examined or there are other reasonable grounds for considering the Application to be identical. An Application shall be deemed to be obviously unreasonable if it cannot be complied with because it is contrary to general reasonableness or legal requirements or there are other reasonable grounds for considering the Application to be obviously unreasonable.
14. The Data Protection Officer shall be responsible to IAM for the fulfilment of duties set out in items 11 to 13 and for ensuring that the relevant decisions are taken.
15. Upon receipt of the Application, IAM employees will identify of the applicant. Once the person submitting the Application has been identified, the said employees shall register the Application in the Register of Applications of Data Subjects and shall immediately forward it to the Data Protection Officer. Upon receipt of the Application, the Data Protection Officer shall assess the reasonableness of the Application, provide the data subjects with information on the payment of the additional fee or the need for additional information and provide a timely response to the data subjects in accordance with Part V of the Procedure. When taking the above actions, i.e. examining the rights of data subjects or refusing to examine the rights in accordance with Part V of the Procedure, the Data Protection Officer may use the privacy representatives of IAM departments and (or) units. If necessary, the Data Protection Officer may also interview and (or) otherwise use (for example, assigning specific tasks) other IAM employees (such as those working directly with the person who submitted the Application).

VI. PROCEDURE ON PERFORMANCE OF APPLICATIONS OF DATA SUBJECTS

16. When exercising the rights specified in clauses 6.1, 6.2 of the Procedure, IAM must provide the data subject with confirmation that personal data related to him are being processed, an access to the personal data and the following information: 16.1. purposes of data processing;

- 16.1. categories of relevant personal data;
- 16.2.the recipients or categories of recipients to whom the personal data have been or will be disclosed, including recipients in third countries or international organisations;
- 16.3.the categories of personal data concerned;
- 16.4.where possible, the period for which the personal data will be stored or, if it is impossible, the criteria for determining that period;
- 16.5. the right to file a complaint to a supervisory authority;
- 16.6.where personal data are collected not from the data subject, all available information on their sources;
- 16.7.in case of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- 17. IAM shall provide a copy of the processed personal data to the data subject. For any further copies requested by the data subject, IAM may charge a reasonable fee based on administrative costs. The Data Protection Officer shall ensure that the decision to charge a reasonable fee is taken by the responsible IAM employee.
- 18. When exercising the right specified in Clause 6.3 of the Procedure, IAM shall immediately verify the personal data of the data subject who submitted the Application and correct incorrect, incomplete, inaccurate personal data and inform the data subject thereof. IAM shall notify each recipient to whom personal data have been disclosed of any rectification of the personal data, unless this would be impossible or would require a disproportionate effort. IAM shall inform the data subject about those recipients upon the request of the data subject.
- 19. When exercising the right specified in Clause 6.4 of the Procedure, IAM must delete all personal data within a reasonable term, if:
 - 19.1.the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - 19.2.the personal data subject revokes the consent on which the processing of personal data is based and there is no other legal basis for the processing of the data;
 - 19.3.the data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR;
 - 19.4. the personal data have been unlawfully processed;
 - 19.5.the personal data must be deleted in accordance with the obligation established by the law of the European Union or Lithuania;
 - 19.6.the personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.
- 20. IAM shall not exercise the right specified in Clause 6.4 of the Procedure if the data processing is necessary:
 - 20.1. for exercising the right of freedom of expression and information;
 - 20.2.for compliance with a legal obligation of the law of the European Union or Lithuania, which requires processing of data, or for the performance of a task carried out in the public interest or in the fulfilment of official authority functions vested to the controller;
 - 20.3.for reasons of public interest in the area of public health in accordance with items (h) and (i) of Article 9(2) as well as Article 9(3) of the GDPR;
 - 20.4.for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR, if the right referred to in Clause 6.4 of the Procedure is likely to become impossible or seriously impair the achievement of the objectives of that processing;
 - 20.5. for the establishment, exercise or defence of legal claims.
- 21. When exercising the right referred to in Clause 6.4 of the Procedure, and in cases when the personal data has become public, taking account of available technology and the cost of implementation, IAM shall take reasonable steps, including technical measures, to inform the

controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data. IAM shall notify each recipient to whom personal data have been disclosed of any rectification of the personal data, unless this would be impossible or would require a disproportionate effort. IAM shall inform the data subject about those recipients upon the request of the data subject.

22. When exercising the right referred to in Clause 6.5 of the Procedure, IAM must suspend processing of such personal data, if:
 - 22.1.the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
 - 22.2.the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - 22.3.the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
 - 22.4.the data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.
23. Where processing has been restricted, IAM may process such personal data, with the exception of storage, only with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural person or legal entity or for reasons of important public interest of the European Union or Lithuania.
24. IAM must inform the data subject who has restricted the processing of personal data before the cancelling the restriction on processing. IAM shall notify each recipient to whom personal data have been disclosed of any restriction on personal data, unless this would be impossible or would require a disproportionate effort. IAM shall inform the data subject about those recipients upon the request of the data subject.
25. When exercising the right referred to in Clause 6.6 of the Procedure, depending on the request of the data subject, IAM must: a) prepare the personal data of the data subject in a structured, commonly used and computer-readable format (for example, PDF or other formats) and make them available to the data subject for free personal use; or b) forward the personal data to another controller (if technically possible). After the transfer of personal data, IAM may store those personal data that are required by law to be stored, or if they are required for a legitimate purpose and interest (for example, to defend his rights related to provision of services, etc.) within specified storage periods. This right may be exercised only in respect of personal data which are processed by electronic means and obtained from the data subject with his consent or on the basis of an agreement.
26. When exercising the right referred to in Clause 6.6 of the Procedure, IAM may narrow the scope of the information provided to the data subject if this would inevitably lead to the disclosure of another person's data or if the legitimate interests of IAM would be violated (disclosure of trade secrets, intellectual property, etc.). In these cases, IAM must provide the data subject with the reasons for the narrowing of the information and indicate the procedure for appeal.
27. When exercising the right referred to in Clause 6.6 of the Procedure, IAM shall no longer process the personal data, when the personal data is processed in accordance with items (e) or (f) of Article 6 (1) of the GDPR, except for cases where IAM demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. Where personal data are processed for direct marketing purposes, IAM shall no longer process the personal data if the data subject objects to processing of personal data concerning him for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1) of the GDPR, IAM shall no longer process the personal data if the data subject, on grounds relating to his particular situation, objects to processing of personal data concerning him, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
28. When exercising the right referred to in Clause 6.6 of the Procedure, IAM no longer process the personal data, when the data subject objects to be subject to the decision based on automated data

processing only, including profiling, which has legal effects or has a significant effect on it in a similar way. IAM may waive this right if the decision is necessary for the conclusion or performance of the agreement between the data subject and the data controller; the decision is permitted by the law of the European Union or Lithuania and establishes appropriate measures to protect the rights and freedoms and legitimate interests of the data subject; the decision is based on the explicit consent of the data subject. When applying automated data processing, IAM implements specific measures to protect rights and freedoms and legitimate interests of the data subject.

29. When exercising the right referred to in Clause 6.9 of the Procedure, IAM no longer process the personal data, when the data subject revokes his consent. The revocation of the consent shall not affect the lawfulness of processing based on consent before its revocation.
30. If IAM refuses to exercise the personal right (s) specified in this Procedure, it must provide the data subject with the reasons for the refusal and indicate the procedure for appeal. The data subject has the right to apply to the State Data Protection Inspectorate regarding the actions (inaction) of IAM.
31. When exercising the rights of the data subject specified in this Procedure, IAM must ensure that the right of other persons to privacy and other rights is not violated.
32. IAM, which has implemented or refused to implement the Application of the data subject, shall indicate the status of the Application and all related information in the Register of Applications of Data Subjects.

VII. FINAL PROVISIONS

33. All IAM employees must get acquainted with this Procedure against acknowledgement of signature.
34. A verified copy, electronic version or relevant text of this IAM Procedure shall be placed on the IAM intranet and published on IAM website.