

SOCIAL MEDIA PRIVACY POLICY

Please take a moment to familiarize yourself with the privacy policy of the social media accounts and the YouTube video channel of the CURIOCITY Edutainment Centre (hereinafter – CurioCity). This privacy policy (hereinafter – Privacy Policy) is intended to the visitors of the CurioCity Facebook account at <https://www.facebook.com/CurioCitycentras>, the Instagram account at <https://www.instagram.com/curiocity.lt/> and the YouTube channel at <https://www.youtube.com/@curiocity-edukacinispramog2309> in order they could access and use information, communicate and express their opinions, participate in competitions, etc. using these accounts and the channel (hereinafter – Accounts).

The Privacy Policy establishes and defines the purpose of personal data processing, the legal basis for processing, what personal data is collected, the rights of users of the Accounts, etc.

By using the Account pages, you confirm that you have read this Privacy Policy, understand its provisions and agree to comply with them.

DATA CONTROLLER

We, i.e. the data controller UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel. +370 688 33202, email: info@educatus.lt, contact details of the Data Protection Officer: duomenuapsauga@balticred.com, (hereinafter – We or Company) are in charge of the processing of personal data of the CurioCity Accounts together with:

- *Facebook and Instagram*: Facebook Ireland Ltd., registered address 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland;
- *YouTube channel*: Google LLC, registered address 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

This Privacy Policy does not apply to the Facebook, Instagram and YouTube websites. Detailed information about the processing of personal data by these websites and the purpose and scope of using the data in connection with the information provided by you is available at:

- Facebook privacy policy:
<https://www.facebook.com/privacy/explanation;>
- Instagram privacy policy:
<https://help.instagram.com/519522125107875;>
- YouTube privacy policy:
[https://support.google.com/youtube/answer/7671399?hl=en.](https://support.google.com/youtube/answer/7671399?hl=en)

Additional information on the processing of personal data is also available in the CurioCity Privacy Policy at <https://curiocity.lt/privatumo-politika/>.

GENERAL PROVISIONS

By commenting, posting messages or otherwise communicating with us on our media Account platforms, you personally ensure that you are using all technical and other means to secure the confidentiality and integrity of your post.

The Company shall take all necessary measures to protect your personal data against unauthorised transfer or use, provided that such data has been collected with the help of the tools used by the Company. For this reason, the Company shall implement and update appropriate organisational and technical security measures to help protect personal data against accidental or unlawful destruction, alteration, disclosure or any other unauthorised processing on a regular basis.

It should be noted that personal data and/or any other information that you post publicly on our

Accounts is visible to other visitors, so before posting please check that your post would not contain any content that is offensive, discriminatory or otherwise violates the law and/or the rights of other visitors. We reserve the right to remove any information posted by visitors on our Account pages if it violates the law or the rights of other visitors.

We will only use any data that you provide to us on a voluntary basis for the purpose for which you have provided it to us (e.g. for the purposes of communicating with you, assistance in the Account game, etc.). We do not collect any additional information about you and we do not forward it to third parties unless it is required by applicable law.

PROCESSING OF DATA OF MINORS

Persons under the age of 16 are not permitted to share their personal data on our Accounts without prior parental consent.

Comments, reactions, sharing of information or other actions performed by a minor on social media are considered to have been carried out with parental consent.

DATA COLLECTION

In the course of running our promotions and games and publishing other information, we may contact the person participating in a game or promotion or otherwise commenting on the published information. For the purpose of organising a game or promotion, determining the winner and awarding a prize, we may collect personal data such as first name, surname, or information about the place of collection of a prize or other personal data necessary for the identification of the person or for the participation in the game and awarding a prize.

If you have a Facebook or Instagram account or are a YouTube user and “like” or start to “follow” our Accounts or the channel, you can post comments or click likes on individual posts. If you comment or “like” our content, this information will be visible to us and to other social media users. The amount of your data visible to others will depend on your individual privacy settings on the Accounts and your activity, i.e. on how much data you post and what information you choose to receive according to your settings.

Please note that the Company’s Accounts are integrated with the Facebook, Instagram, and YouTube websites, and therefore Facebook, Instagram, and YouTube have every opportunity to collect and use your profile and behavioural data in order to assess your habits, personal relationships and interests, and other personal data. Given that the aforementioned, personal data may be obtained from the social media provider, we, as users of Facebook, Instagram and Youtube, have no control over the generation and provision of the data collected by these websites, but we can ensure that no additional optional information is provided to us. For more information on the tools used by Facebook, Instagram and YouTube and the information they collect, please see their privacy policies.

GROUNDS FOR PROCESSING PERSONAL DATA

The Company collects and processes personal data in accordance with the legal acts of the European Union and the Republic of Lithuania regulating the protection of personal data.

Personal data of visitors is processed in the Accounts on the following legal grounds and for the following purposes:

- *On the basis of your consent*, which is expressed by your actions, e.g. by contacting us and submitting personal data, commenting, responding to and sharing messages posted on our Accounts, etc.;
- *For the pursuit of legitimate interests* (e.g. for the purpose of administration of our Accounts, publication of CurioCity’s activities, keeping you updated with CurioCity’s latest news, for the

purpose of communicating, expressing an opinion, participating in games, promotions, etc.).

The Company aims to ensure that your personal data is processed accurately, fairly and lawfully, and only for the purposes for which it was collected, and that it is processed in accordance with the clear and transparent principles and requirements for personal data processing set out in law.

THIRD PARTIES

The Company shall not transfer your personal data provided to us on a voluntary basis to any third party without your prior consent, except as described below:

- We will transfer your personal data to third parties who assist us in operating and administering our Accounts and provide services related to the administration of requests from Account visitors. In each case, we will only provide as much data to the data processor as is necessary to carry out a specific order or provide a specific service.
- The personal data processors we use may only process your personal data on our instructions. They must also ensure the security of your personal data in accordance with applicable law and written agreements with us.
- Data may also be disclosed to competent government or law enforcement authorities, such as the police or supervisory authorities, but only upon request and only when required by applicable law or in the cases and according to procedures provided for by law, in order to ensure our and your rights and to make, exercise and defend legal claims.

DATA TRANSFER

We process all the personal data you provide to us within the European Union. The data collected by the operators of the media Accounts is shared globally between Facebook, Instagram and YouTube companies and partners.

RETENTION PERIOD

All personal data that the Account visitors provide on a voluntary basis will for the purpose of resolving a particular issue be kept until the purposes for which the personal data was collected have been achieved.

YOUR RIGHTS AS A DATA SUBJECT

If you prefer that your personal data on our Accounts would not be processed as described in this Privacy Policy, you can choose to “unfollow” or “unlike” the page (where the website has such an option). Also, if you feel that the information provided by the Company, the Company’s advertising appearing in your news feed is not relevant to you, you may unsubscribe from it at any time by following setting instructions in the Facebook, Instagram and YouTube privacy policies.

Pursuant to Regulation (EU) No 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 (hereinafter – the General Data Protection Regulation or Regulation), you have the following rights:

- *Right to access your personal data* (Article 15 of the Regulation). You have the right to obtain confirmation as to whether your personal data concerning you are being processed and, where that is the case, access to the personal data processed and the information specified in Article 15;:
- *Right to rectification and erasure* (Articles 16 and 17 of the Regulation). You have the right to request without undue delay the rectification of inaccurate personal data concerning you and, where necessary, to have incomplete personal data completed;

- *You also have the right to have personal data concerning you erased without undue delay* where one of the grounds set out in Article 17 of the Regulation are present, e.g. the data are no longer necessary for the purpose for which they were collected;
- *Right to restriction of processing* (Article 18 of the Regulation). You have the right to request restriction of the processing of your data during the period of verification of the data, if any of the cases set out in Article 18 are present, e.g. if you have not given your consent to the processing of your data;
- *Right to data portability* (Article 20 of the Regulation). In certain cases specified in Article 20, you have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format or to request the transfer of the data to a third party;
- *Right to object* (Article 21 of the Regulation). Where data is processed in accordance with Article 6(1)(f) of the Regulation (processing for legitimate interest), you have the right to object to processing at any time on grounds specific to your particular case. In this case, we will no longer process your personal data unless there is a manifestly justified legitimate ground for doing so which overrides the interests, rights and freedoms of the data subject, or if the processing is for the establishment, exercise or defence of legal claims.
- *Right to lodge a complaint with a supervisory authority*. According to Article 77 of the Regulation, you have the right to lodge a complaint with a supervisory authority if you consider that the processing of your personal data infringes data protection regulations. You can exercise your right to lodge a complaint in the Member State where you are domiciled, where you work, or where the alleged infringement took place.

EXERCISE OF RIGHTS

If you do not consent to the processing of any of your specific data, please contact us using the contact details below. Since only Facebook, Instagram and YouTube have full access to your information and data, if we are unable to fulfil your request ourselves, we will pass it on to the relevant Account service provider. We also recommend that you contact Facebook, Instagram and YouTube directly to request information or ask other questions about your user rights. If you wish to prevent your personal data from being processed on our Account pages or have any other questions, please contact us by email at info@educatus.lt or duomenuapsauga@balticred.com;

If you are not satisfied with our solution or if you feel that we have not taken the necessary action in connection with your request, you have the right to lodge a complaint with the State Data Protection Inspectorate (A. Juozapavičiaus g. 6, LT-09310 Vilnius, tel. (+370 5) 271 2804, 279 1445, e-mail: ada@ada.lt, www.ada.lt).

OTHER PROVISIONS

The Company may update the Privacy Policy at any time.

This Privacy Policy is effective as of 22 March 2023.