



## UAB EDUCATUS PRIVACY POLICY

UAB Educatus (Data Controller) respects your privacy and the privacy of the child accompanied by you, including the privacy of the child (children) present at the CurioCity Edutainment Centre (hereinafter – Edutainment Centre) without the persons responsible for the child (children) and/or the child (children) who celebrates (celebrate) their birthday or who participates (participate) in the summer camp (hereinafter – Child) at the Edutainment Centre and undertakes to protect their privacy in accordance with this Privacy Policy (hereinafter – Policy). The Policy is valid and shall apply to the clients of the Edutainment Centre, other interested persons, and visitors of the [www.curiosity.lt](http://www.curiosity.lt) website and social network accounts of the Edutainment Centre.

The Policy provides information about how your personal data and the personal data of the Child are processed, the purposes of the processing, the legal basis for the processing, personal data retention periods and other information that must be provided according to valid legal acts.

This Policy does not apply to links to other persons' websites provided on the [www.curiosity.lt](http://www.curiosity.lt) website and on our social media accounts, therefore we recommend that you review the privacy policies or rules of the said websites separately. We also recommend that you review the privacy policies of the persons offering goods and services of the Edutainment Centre.

Persons under the age of 16 may not provide any personal data on our website and/or social media accounts. If we have reasonable doubts that we process data of the persons younger than it is specified in this Policy, we will remove the data of these persons from the databases. If you have reasonable doubts that we may process data of the persons under the age of 16, please notify us thereof immediately by email [info@educatus.lt](mailto:info@educatus.lt).

### What personal data we process and for what purpose

We lawfully processes personal data provided by you and use them for the following purposes and on these legal grounds:

#### 1. Visit to the Edutainment Centre

Personal data	Legal basis for data processing	Data Controller
Your first name, surname, and telephone number; the Child's first name, surname, and age	For the purpose of concluding an agreement with you and executing the agreement	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: 8 688 33202, email: <a href="mailto:info@educatus.lt">info@educatus.lt</a>
Email address, city	We process personal data based on your consent	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: 8 688 33202, email: <a href="mailto:info@educatus.lt">info@educatus.lt</a>

Personal data: your first name, surname, and telephone number, and the Child's first name, surname, and age are collected and processed for the purpose of visiting the Edutainment Centre. In order to visit the

Edutainment Centre, you must complete the Consent Form and provide your own and your Child's personal data. If you do not specify your first name, surname, telephone number, and the Child's first name, surname, and age, you will not be able to use our services.

We process information on your first name and surname in order to identify you as the person responsible for the Child during the Child's visit to the Edutainment Centre. We process information on your telephone number in order to be able to contact you when your Child is at the Edutainment Centre, or if after visiting the Edutainment Centre, you leave any personal items behind, etc. We process information on your Child's first name and surname in order to identify the Child who is at the Edutainment Centre with you or on his own. We process information on your Child's age in order to determine whether and under what conditions the Child has the right to visit the Edutainment Centre based on the Rules of the CurioCity Edutainment Centre.

In order to use the services of the Edutainment Centre you do not have to provide an email address, but if you provide an email address, we will use this information on the basis of your and our legitimate interests to identify you, when you submit a request to us or in order to contact you if you leave any items behind, etc.

In order to use the services of the Edutainment Centre you do not have to provide information about the city in which you live, but if you provide information about the city, we will use this information for statistical purposes in order to improve our services. The legal basis for the processing of such data is our legitimate interest to provide services that meet your expectations.

We do not use your telephone number and/or email address without your express consent for the direct marketing of the Edutainment Centre.

By submitting personal data you confirm that they are accurate and correct. If you notice any inaccuracies, please correct them immediately.

## 2. A birthday party at the Edutainment Centre

Personal data	Legal basis for data processing	Data Controller
Your first name, surname, and telephone number; the Child's first name, surname, and age	For the purpose of concluding an agreement with you and executing the agreement	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: 8 688 33202, email: info@educatus.lt

In order to book a birthday party at the Edutainment Centre and to provide the services you have ordered, you must complete the birthday party order form. You must specify your personal data and the Child's personal data in the form and confirm the information you have provided. If you do not provide the personal data requested in the order form, you will not be able to order a birthday party at the Edutainment Centre.

We process information on your first name and surname in order to identify you as the person who concludes the agreement with us regarding ordering a birthday party at the Edutainment Centre. We process information on your telephone number and email in order to be able to contact you in case we have any questions about the birthday party organized by the Edutainment Centre, or to notify you if after visiting the Edutainment Centre, you leave any personal items behind, etc. We process information on the Child's first name and surname in order to identify the Child who will come to the Edutainment Centre and the person who has completed the order form. We process information on the Child's age in order to determine whether and under what conditions the Child has the right to visit the Edutainment Centre based on the Rules of the CurioCity Edutainment Centre.

We will not use your telephone number and/or email address without your express consent for the direct marketing of the Edutainment Centre.

By submitting personal data you confirm that they are accurate and correct. If you notice any inaccuracies, please correct them immediately.

### 3. Agreement regarding attending the summer camp by the Child

Personal data	Legal basis for data processing	Data Controller
Your first name, surname, and telephone number; the Child's first name, surname, and age	For the purpose of concluding the agreement with you and executing the agreement	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: 8 688 33202, email: info@educatus.lt
Information about the Child's health (health certificate)	On the basis of your consent in order to protect the vital interests of the data subject and another natural person	

In order to use the summer camp services provided by us at the Edutainment Centre, you must conclude an agreement for the participation of the Child in the summer camp. In order to conclude the agreement, you must provide your own and the Child's personal data. We process information on your first name and surname in order to identify you as the person who concludes the agreement for the participation of the Child in the summer camp. We process information on the Child's first name and surname in order to identify the Child who will participate in the summer camp of the Edutainment Centre. We process information on the Child's age in order to ascertain that the Child has the right to participate in the summer camp in accordance with the rules for the Child's participation in the summer camp and the Rules of the CurioCity Edutainment Centre. By signing the agreement for the participation of the Child in the summer camp, you guarantee and have a reasonable assurance that the Child's health condition is appropriate for the Child to participate in the summer camp of the Edutainment Centre independently and with other children, and that this will cause no threat to the health and life of other Children and other persons in the Edutainment Centre/ summer camp.

If you fail to provide personal data required for the conclusion and execution of the agreement, we will not be able to conclude the agreement with you or to provide services for the participation of the Child in the summer camp.

In order to properly execute our services, we require information on your telephone number and email address. We will not use this information without your express consent for direct marketing purposes.

By submitting personal data you confirm that they are accurate and correct. If you notice any inaccuracies, please correct them immediately.

### 4. Direct marketing

Personal data	Legal basis for data processing	Data Controller
Email address, telephone number, city	For the purpose of direct marketing, we process your personal data based on your consent.	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: 8 688 33202, email: info@educatus.lt

We may send you information about our goods and services, special offers and promotional material only if you expressly agree (e.g. by ticking the appropriate box in the document) to receive such information and that the information on your email and/or telephone number can be used for direct marketing purposes. You may also give your consent to receive direct marketing communication by entering your email address in the box indicated on our website.

If you provide information about the city, in which you live, we will use this information for statistical and direct marketing purposes. This information helps us in knowing the market better and providing services that best meet your expectations.

You may at any time withdraw your consent to the processing of personal data for the purpose of direct marketing by clicking on the link “Unsubscribe from newsletters” in our newsletter. You may also withdraw your consent to the processing of personal data for the purpose of direct marketing by contacting the Edutainment Centre at Islandijos pl. 32 in Kaunas, or by email at [info@educatus.lt](mailto:info@educatus.lt). The processing of personal data for the purpose of direct marketing will be immediately suspended.

This Privacy Policy does not apply to other persons displayed in our newsletters and links to their websites, therefore we recommend that you review the privacy policies or rules of the aforementioned websites and other persons provided in the newsletters separately.

#### 5. Video surveillance (without audio recording)

Personal data	Legal basis for data processing	Data Controller
Image of a person (a photo or a video)	We process data to protect your and your Child’s vital interests and to pursue your, the Child’s and our legitimate interests	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: 8 688 33202, email: <a href="mailto:info@educatus.lt">info@educatus.lt</a>

We process personal data that contain your or the Child’s image for the purpose of prevention of breaches of legal acts and identifying offenders. We aim to protect the vital interests of our customers, employees and other natural persons, including their health and life, and to protect our own property and the property of our customers, employees, and other natural persons.

You have the right, on grounds relating to your particular situation, to object at any time to the processing of your own and the Child’s personal data. In this case, we will stop processing your and/or the Child’s personal data unless we can demonstrate that there are compelling legitimate grounds for the processing which override your and the Child’s interests, rights and freedoms or unless we wish to make, exercise or defend legal claims.

You are not obliged to provide personal data and we do not seek to identify you and the Child if this is not necessary for the purposes set out above. However, due to the nature of video surveillance, we cannot guarantee that you and the Child will be able to perform activities or use our services without entering the field of video surveillance.

Visitors to the Edutainment Centre are notified about video surveillance by appropriate notices placed on the premises.

We guarantee that video surveillance is not carried out on the premises where the data subject reasonably expects absolute protection of privacy and where any such surveillance would degrade human dignity (e.g. in the toilets, dressing rooms, etc.).

#### 6. Photographs and/or video made during public events or special photo shoots

Personal data	Legal basis for data processing	Data Controller
Image of a person (a photo or a video)	Your consent and/or our legitimate interests, which are: to disseminate information about the Edutainment Centre and its activities.	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: 8 688 33202, email: <a href="mailto:info@educatus.lt">info@educatus.lt</a>

We process your personal data in order to disseminate information about the Edutainment Centre and its activities.

Our events are public and open to anyone who wants to participate in them. By participating in events, you should understand that you and/or the Child may be photographed and/or filmed and the image may be used for publishing information about our activities. The information about public events and filming or photography during the event is provided by appropriate notices placed on the premises at the Edutainment Centre.

To avoid any possibility of being photographed and/or filmed or to prevent the Child from being photographed and/or filmed, you may choose not to participate in public events, contests or photo shoots organized by us or contact us with a request to remove your and/or the Child's image from our communication material. We will comply with your request immediately.

By participating in public events, you should understand and we consider that you have given your consent that you and your Child would be photographed and/or filmed and images may be used for advertising and/or public communication about the activities of our company.

In order to disseminate information and promote the Edutainment Centre, we sometimes organize special photo shoots. If you and/or the Child you accompany participate in such photo shoots, we will publish and use the image of you and/or of the Child you accompany in the photographs or video material on the basis of your written consent under the conditions set out therein.

## 7. Transfer and acceptance deeds of prizes/gifts

Personal data	Legal basis for data processing	Data Controller
First name, surname, address, and telephone number	Our legitimate interests	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: 8 688 33202, email: info@educatus.lt
Personal ID (for prizes/ over EUR 200)	Law on Personal Income Tax of the Republic of Lithuania	

We obtain your personal data when you claim a prize/gift and specify the data in the transfer and acceptance deed of the prize/gift. We process your personal data in order to ensure the fulfilment of our tax obligations: to calculate taxes and to declare information to tax authorities.

The processing of the above personal data is also necessary for the legitimate interests of the Data Controller in order to avoid possible disputes with the prize winner and/or third parties regarding the prize and/or claiming of the prize. In order to collect the prize, the winner must provide the above personal data. If no such data is provided, no prize will be awarded to the winner.

By submitting personal data, you confirm that they are accurate and correct. If you notice any inaccuracies, please correct them immediately.

## 8. Cookies

Cookies are files, often including unique identifiers, that are sent by web servers to web browsers, and which may then be sent back to the server each time the browser requests a page from the server. Cookies can be used by web servers to identify and track users as they navigate different pages on a website, and to identify users returning to a website.

There are persistent and session cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed. www.curiosity.lt uses both persistent and session cookies.

Cookies do not contain any information that personally identifies you, but personal information that we store about you may be linked, by us, to the information stored in and obtained from cookies.

We may use the information we obtain from your use of our cookies for the following purposes:

- to recognise your computer when you visit the website
- to monitor how users navigate pages and to enable the use of some functions on our website
- to improve the website's usability
- to analyse the use of the website
- to administer the website
- to personalize content and ads

Most browsers allow to block cookies or delete all cookies stored on your device. Blocking all cookies can have a negative impact on the use of many websites. If you block cookies, you will not be able to use some of the features of this website.

Using our website, you may also get third-party cookies. We use Google Analytics tools to analyse the use of the website. Google Analytics tools create statistical and other information about the browsing on the website by means of cookies stored on users' computers. The information generated in connection with our website is used to create reports about the use of the website.

We use cookies for Google AdWords Remarketing purposes. AdWords Remarketing is a remarketing and behavioural targeting service provided by Google that links the activity of this application with the AdWords. You can opt out of cookie tracking here: <https://adssettings.google.com/authenticated>.

## **TRANSFER OF DATA TO THIRD PARTIES**

The Company will not transfer your personal data to any third parties without your prior consent, except in the following cases:

- In the cases provided for in legal acts, your and/or the Child's personal data may be transferred to insurance companies, tax authorities, law enforcement, judicial or pre-trial authorities due to their investigation, to legal advisers, or in other cases provided for by legal acts;
- The Company may disclose your and/or the Child's personal data to the Company's service providers located in the countries of the European Union/European Economic Area (e.g. a property manager, a newsletter provider, a provider website design or administration services and similar service providers). All these companies are personal data processors who observe confidentiality and ensure proper personal data access protection.
- The Company may take photographs and/or make video of public events organized at the Edutainment Centre. It is likely that photographs of the individuals who choose to participate in such public events will be taken or they will be filmed, in which case their image will be used for publishing information about the activities of the Edutainment Centre and its services.

## **PROCESSING OF PERSONAL DATA OF MINORS**

When processing personal data of a minor on the basis of consent for the provision of information society services, such data processing is lawful if the minor is at least 16 years of age. If you are under the age of 18 but are already 16 years of age, when using our services, you confirm that you have the consent of your parents or guardians for the disclosure of your personal information to the Company.

## **HOW LONG DO WE KEEP YOUR PERSONAL DATA**

We store personal data provided for the purpose of visiting the Edutainment Centre and for the purpose of direct marketing for a period of 3 (three) years from the expiration of the Consent. Two years after the expiration of the Consent by a natural person to process his/her personal data for direct marketing purposes, we send a notification to the natural person with a proposal to renew their Consent to process personal data for direct marketing purposes. If the natural person does not renew his/her Consent within 1 month, we suspend sending of newsletters and offers, and after the expiry of the remaining term of the Consent, we destroy personal data, unless personal data is stored on another lawful basis established in the Privacy Policy or legal acts. If the natural person has renewed his/her Consent to the processing of personal data for direct

marketing purposes, the period of storage of his/her personal data is extended for another 3 (three) years (after 2 years we suspend sending of direct marketing communications and store the completed Consent forms for 1 year for the purpose of possible disputes and/or claims), unless personal data is stored on another lawful basis established in the Privacy Policy or legal acts.

If personal data for direct marketing purposes has been provided on our website, we will process such personal data for 2 (two) years from their submission, unless personal data is stored on another lawful basis established in the Privacy Policy or legal acts. Two years after the submission of personal data for direct marketing purposes, we send a notification to the natural person with a proposal to renew their Consent to process personal data for direct marketing purposes. If the natural person does not renew his/her Consent within 1 month, we suspend sending of newsletters and offers, and destroy personal data, unless personal data is stored on another lawful basis established in the Privacy Policy or legal acts.

We store your and/or the Child's questionnaires for a game/contest for 2 (two) years from the end of the game/contest for the purpose of possible complaints from the participants of any such game/contest related to the execution of the game/contest. If you have provided your consent to the processing of your personal data (except for the personal data of the Child) for direct marketing purposes in the form of a game/contest, we process such personal data submitted for direct marketing purposes for 2 (two) years from their submission. Two years after the submission of personal data, we send a notification to a natural person with a proposal to update his/her consent to the processing of personal data for the purpose of direct marketing. If the natural person does not renew his/her Consent within 1 month, we suspend sending of newsletters and offers, and destroy personal data, unless personal data is stored on another lawful basis established in the Privacy Policy or legal acts.

We store the completed questionnaires by the winners of the games/contest for a period of 10 years, based on the general 10-year limitation period for disputes provided for in the valid legal acts and the provisions of the Index of Time Limits for Storage of General Documents of the Republic of Lithuania (Paragraph 10.25 "Asset management documents [transfer, acceptance, issuance, write-off, transfer, destruction), inspection and other deeds]").

We store video material for the purpose of prevention of breaches of the law, investigation of breaches and identification of offenders for a period of 7 days.

Your personal data provided when placing an order for a birthday party or signing an agreement for participation in the summer camp will be stored for a period of 3 years from the date of placing the order or signing the agreement, based on the statutes of limitations for claiming damages set out in the valid legal acts.

Your image (photo or video) from public events or competitions or from special photo shoots will be stored for a maximum of 3 years from the actual date of the event or photo shoot.

Your personal data submitted during the transfer and acceptance of prizes and other gifts will be stored for a period of 10 years from the date of signing of the transfer-acceptance deed, based on the general 10-year limitation period for disputes provided for in the valid legal acts and the provisions of the Index of Time Limits for Storage of General Documents of the Republic of Lithuania (Paragraph 10.25 "Asset management documents [transfer, acceptance, issuance, write-off, transfer, destruction), inspection and other deeds]").

Personal data provided for the purposes of direct marketing are processed and stored for a maximum period of 10 (ten) years, depending on the consents provided by you to extend the processing of personal data for the purpose of direct marketing.

After the expiry of the period of the personal data retention period, we destroy your personal data.

## **PROTECTION OF YOUR PERSONAL DATA**

We process your personal data responsibly. We use technical, organizational and security measures to protect your data. The data is stored in a secure manner and is accessible to a limited number of persons. Personal data are processed within the European Union/European Economic Area.

**SUBJECT TO THE CONDITIONS SET OUT IN THE VALID LEGAL ACTS, YOU HAVE THE FOLLOWING RIGHTS:**

- the right to access the personal data which is being processed
- the right to request the rectification of inaccurate personal data
- the right to request the erasure of your personal data, excluding the exceptions provided for in legal acts
- the right to receive or transfer your personal data to another company (the right to data portability)
- the right to restrict the processing of personal data in certain circumstances
- the right to object to the processing of personal data where the processing of personal data is based on our legitimate interests or those of third parties
- the right to object to the processing of personal data for direct marketing purposes
- the right to withdraw your consent to the processing of your data at any time

In order to exercise these rights, please contact us in writing or contact the Data Protection Officer (contact details are provided below).

If you think that processing of your personal data by us does not comply with the valid legal acts, you may contact the State Data Protection Inspectorate ([www.ada.lt](http://www.ada.lt)).

**Amendments to the Privacy Policy**

We regularly review our Privacy Policy. This version was updated on 21 November 2019.

**Contact information**

If you have any questions about the processing of personal data, any requests or comments, please contact us:

UAB Educatas, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: 8 688 33202, email: [info@educatus.lt](mailto:info@educatus.lt).

Contact details of the Data Protection Officer: [duomenuapsauga@balticred.com](mailto:duomenuapsauga@balticred.com), tel.: 8 37 239 017.