



**UAB EDUCATUS**

## **PRIVACY POLICY**

UAB Educatus (hereinafter – Data Controller or the Company) 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 camp (hereinafter – Child) at the Edutainment Centre or who uses other children's recreation services organised by the Company (i.e. the trampoline) outside the boundaries of 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, participants of other entertainment organised by the Company, other interested persons, and visitors of the [www.curiosity.it](http://www.curiosity.it) website and social network accounts of the Edutainment Centre (hereinafter – Data Subject).

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.it](http://www.curiosity.it) 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.it](mailto:info@educatus.it).

By submitting your personal data, you confirm that it is accurate and correct. If you notice any inaccuracies, please correct them immediately.

### **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. A visit to the CurioCity Edutainment Centre where visitors fill in the Consent Form.

Personal data	Legal basis for processing	Data Controller
Your first name, surname, and telephone number.	Personal data are processed on the basis of Article 6(1)(b) of the General Data Protection Regulation (EC) No 2016/679 (hereinafter – GDPR), where processing is necessary for the performance of a contract to which the Data Subject is party.	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 33202, email: info@educatus.lt
The Child's first name, surname, and date of birth, relationship or another basis for representation	Personal data are collected and processed on the basis of Article 6(1)(f) of the GDPR, where the legitimate interests are pursued by the Data Controller	
Email, address, city, and country of residence of the person signing the Consent Form	Personal data are collected and processed on the basis of Article 6(1)(f) of the GDPR, where the legitimate interests are pursued by the Data Controller.	
Time spent by the Child and the person responsible for the Child at the Edutainment Centre.	Personal data are collected and processed on the basis of Article 6(1)(f) of the GDPR, where the legitimate interests are pursued by the Data Controller.	

Your first name, surname, and telephone number, and the Child's first name, surname, date of birth, relationship or another basis for representation of the Child 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 the Child's personal data. If you do not specify your first name, surname, telephone number, and the Child's first name, surname, date of birth, relationship or another basis for representation of the Child, The Data Controller shall have the right to refuse to provide the services to you.

We process information on your first name and surname, relationship or another basis for representation 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

date of birth 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 and the pricelist for the services.

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.

Every visitor of the Edutainment Centre will receive a magnetic wristband with a unique code prior to entering the Centre. The wristband will be issued to a specific Child, depending on the type of the Consent Form (“single day” or “annual” Consent Form), “annual” – by assigning a card with the first name and surname of the Child to the wristband in the system or “single day” – by issuing a wristband with a unique code without assigning the first name and surname of the Child in the system. The Child will enter the Edutainment Centre with the wristband, which for the purpose of payment and for identification of the Children staying at the Centre without their parents will record the exact time spent by the Child in the Edutainment Centre. The wristband will be issued to the person responsible for the Child for the purpose of entering the Centre and recording the entry time; the exit time is also displayed, but is not restricted. In order to track and, if necessary, to manage the traffic of visitors in the Centre, due to the unique codes of the wristbands, the cashier/check out desk can see the occupancy of the Centre. The data is used for general statistics and is not personal.

## 2. Provision of birthday party planning services at the CurioCity Edutainment Centre.

Personal data	Legal basis for processing	Data Controller
Your first name, surname, telephone number, and email	Personal data are collected and processed on the basis of Article 6(1)(b) of the GDPR, where processing is necessary for the performance of a contract to which the Data Subject is party.	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 33202, email: info@educatus.lt
The Child’s first name, surname, and age	Personal data are collected and processed on the basis of Article 6(1)(f) of the GDPR, where the legitimate interests are pursued by the Data Controller.	

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. The Data Controller shall have the right to refuse to provide services to you.

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 to celebrate their birthday with 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.

### 3. Organisation of a camp at the CurioCity Edutainment Centre.

Personal data	Legal basis for processing	Data Controller
Your first name, surname, telephone number, and email	Personal data are collected and processed on the basis of Article 6(1)(b) of the GDPR, where processing is necessary for the performance of a contract to which the Data Subject is party.	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 33202, email: info@educatus.lt
The Child's first name, surname, and age	Personal data are collected and processed on the basis of Article 6(1)(f) of the GDPR, where the legitimate interests are pursued by the Data Controller.	
Special needs (special diet, allergies, etc.)	Personal data are collected and processed on the basis of Article 6(1)(a) of the GDPR, where the data subject has given consent to the processing of their personal data.	

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

If you fail to provide personal data required for the conclusion and execution of the agreement, we will not be able to conclude and/or duly execute the agreement with you.

In order to properly provide our services, we require information on your telephone number and email address. We use this information to identify you when you make enquiries to us and to communicate information related to the execution of your agreement. We will not use this information without your express consent for direct marketing purposes.

Information about the Child's special needs (special diet, allergies, etc.) is optional. The information is collected to protect the vital interests of the Data Subject. We consider that by providing such information you give your consent to the Data Controller to process the information about the Child provided by you.

#### 4. Organisation of a camp outside the CurioCity Edutainment Centre.

Personal data	Legal basis for processing	Data Controller
Your first name, surname, telephone number, email and residential address	Personal data are collected and processed on the basis of Article 6(1)(b) of the GDPR, where processing is necessary for the performance of a contract to which the Data Subject is party.	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 33202, email: info@educatus.lt
Telephone numbers of relatives in Lithuania (if parents do not live in Lithuania). The Child's first name, surname, and age	Personal data are collected and processed on the basis of Article 6(1)(f) of the GDPR, where the legitimate interests are pursued by the Data Controller.	
Special needs (special diet, allergies, etc.)	Personal data are collected and processed on the basis of Article 6(1)(a) of the GDPR, where the data subject has given consent to the processing of their personal data	

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

If you fail to provide personal data required for the conclusion and execution of the agreement, we will not be able to conclude and/or duly execute the agreement with you.

In order to provide our services properly, we require the information on the telephone numbers of your relatives in Lithuania (if you do not live in Lithuania). We collect this data in order we could, if necessary, contact the Child's family as soon as possible in the event of an accident or similar emergency involving the Child. We collect information on your email address and telephone number in order to communicate information related to the execution of your agreement. We will not use this information without your express consent for direct marketing purposes.

Information about the Child's special needs (special diet, allergies, etc.) is optional. The information is collected to protect the vital interests of the Data Subject. We consider that by providing such information you give your consent to the Data Controller to process the information about the Child provided by you.

By submitting your personal data, you confirm that it is accurate and correct. If you notice any

inaccuracies, please correct them immediately.

## 5. Organisation of recreation on a trampoline.

Personal data	Legal basis for processing	Data Controller
Your first name, surname, email and telephone number	Personal data are collected and processed on the basis of Article 6(1)(b) of the GDPR, where processing is necessary for performance of a contract to which the Data Subject is party.	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 33202, email: info@educatus.lt
Special needs (special diet, allergies, etc.)	Personal data are collected and processed on the basis of Article 6(1)(f) of the GDPR, where the legitimate interests are pursued by the Data Controller.	

In order to use the trampoline services provided by us, you must conclude an agreement for the participation of the Child in the recreation on a trampoline. 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 recreation on a trampoline. We process information on the Child's first name and surname in order to identify the Child who will participate in the recreation on a trampoline. We process information on the Child's age in order to ascertain that the Child has the right to participate in the recreation on a trampoline in accordance with the rules for the Child's participation in the recreation on a trampoline. By signing the agreement for the participation of the Child in the recreation on a trampoline, you guarantee and have a reasonable assurance that the Child's health condition is appropriate for the Child to participate in the recreation on a trampoline independently and with other children, and that this will cause no threat to the health and life of the Child and other Children participating in the recreation on a trampoline.

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 and we will not provide the recreation services on a trampoline to the Child.

In order to properly provide our services and to communicate information related to the execution of your agreement, 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 your personal data, you confirm that it is accurate and correct. If you notice any inaccuracies, please correct them immediately.

## 6. Direct marketing.

Personal data	Legal basis for processing	Data Controller
Your first name, surname, email and telephone number	Personal data are collected and processed on the basis of Article 6(1)(a) of the GDPR, where the data subject has given consent to the processing of their personal data.	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 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.

You may at any time withdraw your consent for 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 for the processing of personal data for the purpose of direct marketing on our website account (if you have created an account in your own name and provided your consent for direct marketing in the account) by contacting the Edutainment Centre at Islandijos pl. 32 in Kaunas, or by email at [info@educatus.lt](mailto:info@educatus.lt) by submitting your request signed with a qualified electronic signature. The processing of personal data for the purpose of direct marketing will be immediately suspended.

## 7. Ensuring the security of customers, employees and their property (video surveillance).

Personal data to be provided	Legal basis for processing	Data Controller
<p>The overall video surveillance zone may include images of people, their location and movement across the video surveillance zone, their possessions, behaviour and other related information (date, time)</p>	<p>Personal data are collected and processed on the basis of Article 6(1)(d) of the GDPR, where processing is necessary to protect your vital interests and the vital interests of the Child.</p> <p>The processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by a third party, except where such interests are overridden by the interests or the fundamental rights and freedoms of the Data Subject, in particular where the Data Subject is a child (Article 6[1][f] of the GDPR).</p>	<p>UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 33202, email: <a href="mailto:info@educatus.lt">info@educatus.lt</a></p>

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 video surveillance zone.

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.).

**8. Video and/or photography of public events, organisation of special photo shoots and videos and using your image in photographs and/or videos with your consent.**

Personal data to be provided	Legal basis for processing	Data Controller
Video (with or without sound) and photography at public events	Personal data are collected and processed on the basis of Article 6(1)(f) of the GDPR, where the legitimate interests are pursued by the Data Controller.	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 33202, email: info@educatus.lt
Personal data specified in the consent: first name, surname, telephone number, email, year of birth	Personal data are collected and processed on the basis of Article 6(1)(a) of the GDPR, where the data subject has given consent to the processing of their personal data.	
Person's image, photo or video (with or without sound)	Personal data are collected and processed on the basis of Article 6(1)(a) of the GDPR, where the data subject has given consent to the processing of their personal data.	

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

In order to disseminate information and promote the Edutainment Centre, we organise public events during which videos and photographs are made or special photo shoots are organised. If you and/or the Child you accompany participate in a special photo shoot or photos/videos of you or your Child have been taken at a public event, we will publish and use your image and/or the image of the Child you accompany in the photographs or videos on the basis of your written consent or an agreement with you under the terms and conditions set out therein. In the case of signing consent, the data subject has the right to withdraw the consent at any time during the term of the consent.

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 your Child may be photographed and/or filmed. 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.

By participating in public events, you should understand and we consider that you have given your consent that you and the Child would be photographed and/or filmed.

**9. Processing of data when a person provides information for an account on the website of the Edutainment Centre.**

Personal data to be provided	Legal basis for processing	Data Controller
First name, surname, email, password	Personal data are collected and processed on the basis of Article 6(1)(a) of the GDPR, where the data subject has given consent to the processing of their personal data.	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 33202, email: info@educatus.lt

In order to help manage your visits to the Edutainment Centre, you can open a personal account on the website of the Edutainment Centre at [www.curiosity.lt](http://www.curiosity.lt) and add the Children you represent who visit the Edutainment Centre by filling in the Consents for visiting the Edutainment Centre. In order to open such an account, you must provide the following personal data to the Data Controller: first name, surname, email, and password. We consider that by filling in and providing personal data required to open an account, you give your consent for the processing of your personal data for the purpose of providing services to you. If you do not provide the mandatory personal data required to open an account, you will not be able to open your account. In this case, you can fill in a hard copy Consent Form, which can be obtained from the employees of the Edutainment Centre. You can cancel your personal account on the website of the Edutainment Centre at any time. This function is available in your account and you can delete the account yourself. After your account is deleted, the Data Controller reserves the right to continue to store the documents you had completed and signed online for the period set out in this Privacy Policy.

#### **10. Processing of data when a person purchases a gift voucher, a subscription, other goods or services on the website of the Edutainment Centre.**

Personal data to be provided	Legal basis for processing	Data Controller
First name, surname, email, payment data for goods/services	Personal data are collected and processed on the basis of Article 6(1)(b) of the GDPR, where processing is necessary for the performance of a contract to which the Data Subject is party.	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 33202, email: info@educatus.lt

In order to purchase the goods or services offered on the website of the Edutainment Centre, you must enter your personal data in the section indicated on the website. We process the information on your first name and surname in order to identify you as the person purchasing the goods/services offered by the Edutainment Centre. In order to properly provide our services and the information related to your order, we need your email address.

After the customer pays for the services provided by the Edutainment Centre, the Data Controller will receive the payment data for the goods/services. The Data Controller will process the data related to the payments only for the purposes of payment for the services.

If you fail to provide personal data required for the conclusion and execution of the agreement, we will not be able to duly conclude and/or execute the agreement with you.

#### **11. Processing of personal data for the purpose of employment at the Edutainment Centre.**

Personal data to be provided	Legal basis for processing	Data Controller
Name, surname, telephone number, email, other personal data provided by the candidate	Personal data are collected and processed on the basis of Article 6(1)(a) of the GDPR, where the data subject has given consent to the processing of their personal data.	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 33202, email: info@educatus.lt

As potential employees of the Edutainment Centre (candidates, jobseekers), you normally provide the following personal data to the Centre: first name, surname, telephone number, email, and other personal data. If a potential employee contacts the Edutainment Centre via social media, e.g. Facebook, the social media manager may process the person's interest in the vacancies published by the Centre for the purposes set out in the policy of the social media manager. Your personal data provided when applying for a specific advertised position/job or provided by you on the websites of job advertisements are processed for the purpose of the recruitment procedure. It is considered that by contacting the Edutainment Centre for the purpose of employment and providing your personal data, or by submitting your CV with your personal data as a job seeker on the websites of job advertisements, you give your consent for the processing of your personal data for the purpose of the recruitment procedure. If the candidate does not receive a job offer at the end of the recruitment procedure for a specific advertised position/job, the candidate's personal data will be deleted, unless the person gives consent for the storage of the data for the purpose of other future recruitment procedures at the Edutainment Centre.

## 12. Processing of personal data received from contractors, suppliers, service providers and other partners.

Personal data to be provided	Legal basis for processing	Data Controller
Where the contracting party is a natural person, the following personal data are provided: first name, surname, position/job, telephone number, email, personal ID number or date of birth, passport number or personal identity card number, actual or registered address and any other information specified in a document, email or publicly available website provided by the contracting party.	Personal data are collected and processed on the basis of Article 6(1)(b) of the GDPR, where processing is necessary for the performance of a contract to which the Data Subject is party.	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 33202, email: info@educatus.lt
Where the contracting party is a legal person, the following personal data are collected and processed: first name, surname, position/job, period of representation, telephone number, email and other information specified in the document, email or publicly available website provided by the contracting party; the data of the contracting party's employees participating in the conclusion or execution of the contract or the data of other data processors used by the contracting party or the persons/employees representing any such data processors.	Personal data are collected and processed on the basis of Article 6(1)(f) of the GDPR, where the legitimate interests are pursued by the Data Controller.	

The Data Controller shall, for the purpose of the conclusion and execution of a contract and for the purpose of cooperation, obtain and process the personal data of the contractor, supplier, service provider and another business partner (hereinafter – Contracting Party), where the Contracting Party is a natural

person, or the personal data of the representative of the Contracting Party, where the Contracting Party is a legal person; and also the personal data of the employees of the Contracting Party, other data processors used by the Contracting Party and their representatives and employees. The personal data of the Contracting Party, where the Contracting Party is a natural person, are processed on the legal basis of the performance of a contract by the Contracting Party. The personal data of the person representing the Contracting Party, where the Contracting Party is a legal person, and the personal data of other employees of the Contracting Party involved in the conclusion and execution of a contract, the personal data of data processors used by the Contracting Party or their representatives of employees are processed on the basis of the legitimate interest of the Data Controller, where the legitimate interest is to conclude and execute the contract with the Contracting Party using the Contracting Party's representatives (to contact the Contracting Party, etc.).

The following personal data are obtained and processed for the purpose of concluding and executing a contract and for the purpose of cooperation: first name, surname, position/job, period of representation, telephone number, email and other information provided by the Contracting Party and the representatives of the Contracting Party in a document, email or publicly accessible website. In addition, such information as the personal ID number or date of birth, the passport or personal ID card number, and the actual or registered address may also be obtained from the Contracting Party. When concluding and executing a contract, the Contracting Party where Contracting Party is a natural person, and the representatives of the Contracting Party may be requested to provide their ID document. The provision of personal data is not required or compulsory, but failure to provide the personal data referred to in this clause will prevent the Contracting Parties from concluding and/or executing the contract.

**13. Processing of personal data for the purpose of quality assurance when conducting surveys, examining complaints, and when customers contact us regarding our services by email or telephone.**

Personal data to be provided	Legal basis for processing	Data Controller
First name, surname and/or user name(s), email, telephone number, subject of the enquiry, comment or complaint, and the text of the enquiry, comment or complaint	The processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by a third party, except where such interests are overridden by the interests or the fundamental rights and freedoms of the Data Subject, in particular where the Data Subject is a child (Article 6[1][f] of the GDPR) and where the Data Subject has given consent to the processing of their personal data (Article 6[1][a] of the GDPR).	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 33202, email: info@educatus.lt

In order to improve the quality of the services, the Data Controller carries out surveys concerning the services provided to the visitors of the Edutainment Centre, participants of the birthday parties, educational programmes, and camps, where you answer the questionnaire in writing or you are asked to leave feedback concerning the services by the e-mail you have provided. Leaving feedback is not compulsory and in such cases, the Data Controller processes the data you have provided. We consider that by submitting the personal data, the Data Subject gives consent for the processing of the data for the purpose of improving the quality of the services provided by the Data Controller.

The Data Controller may process your personal data received via social media platforms (Facebook, Instagram, etc.) in order to examine complaints from individuals or respond to customer feedback concerning the Edutainment Centre, and to monitor its online reputation, so that the Data Controller can

use these tools to evaluate and improve the quality of its services. For the purposes set out in this paragraph, the personal data provided by the Data Subject will be processed by the Data Controller on the basis of the Data Controller's legitimate interests.

The Data Controller also processes your personal data when you enquire about the services provided by the Data Controller by contacting the Data Controller by telephone or email. When you contact the Edutainment Centre by telephone or e-mail, we will process the personal data you have provided to us. We consider that by freely providing personal data to the Data Controller, you give your consent for the processing of your personal data for the purpose of the provision of services.

**14. Processing of personal data for the purpose of organising games, promotions, and competitions.**

Personal data to be provided	Legal basis for processing	Data Controller
First name, surname, email, and telephone number	Personal data are collected and processed on the basis of Article 6(1)(f) of the GDPR, where the legitimate interests are pursued by the Data Controller.	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 33202, email: info@educatus.lt
Child's first name, age, and city	Personal data are collected and processed on the basis of Article 6(1)(a) of the GDPR, where the data subject has given consent to the processing of their personal data.	

For the sake of the legitimate interests of the Data Controller, in each case, in order the Data Controller could organise a competition/game, and you could take part in the competition/game, the Data Controller shall specify in the rules of the competition/game what personal data the person wishing to take part in the competition/game must provide to the Data Controller. The Data Controller usually asks for the following personal data: first name, surname, email, telephone number, city, and age of the Child. If the participant is under the age of 18 but over the age of 16 and is participating in the competition/game, the participant must confirm that they have the consent of their parents or guardians to participate in the competition/game and to disclose their personal information to the Data Controller. The contact details provided by the participant and the information about the city where the participant lives may, with the participant's consent, be used by the Data Controller for statistical purposes. If the participant indicates this optional information in the competition/game form, the Data Controller will consider that the person gives consent for the processing of the information on the city provided by the person. The Data Controller collects the contact details of the participant in order to comply with the rules of the competition/game and to inform the winner of the prize. The information on the age of the Child may be collected in order to determine and assess the type of the prize to be awarded to the Child (where the prizes are differentiated according to the age groups of Children).

It is your choice whether to participate in competitions/games and, consequently, whether to provide personal data. If you do not provide the data required to take part in a competition/game, you will not be able to take part in the competition/game. The Data Controller usually publishes the name of the winner of a competition/game for maximum transparency on the basis of legitimate interests.

**15. Handover and acceptance deeds of prizes and other gifts.**

Personal data to be provided	Legal basis for processing	Data Controller
First name, surname, address, and telephone number	Personal data are collected and processed on the basis of Article 6(1)(f) of the GDPR, where the legitimate interests are pursued by the Data Controller.	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 33202, email: info@educatus.lt
Personal ID number (where the value of the prize/gift is over EUR 200)	Personal data are collected and processed on the basis of Article 6(1)(c) of the GDPR, where processing is necessary for compliance with a legal obligation to which the controller is subject as specified in the Law on Personal Income Tax of the Republic of Lithuania.	

We obtain your personal data when we award a prize or another gift of the competition to you and you provide your personal data in the handover and acceptance deed of the prize. We process your personal data in order to ensure the fulfilment of your tax obligations: to calculate taxes and to declare information to the tax authorities as required by law.

The processing of the above personal data is also necessary for the legitimate interests of the Data Controller – to avoid possible disputes involving the winner and/or third parties in connection with the winning and/or award of a prize. The winner must provide the above-mentioned data in order to claim the prize, failing which the prize will not be awarded to the winner.

#### 16. Administration of the company's debtors.

Personal data to be provided	Legal basis for processing	Data Controller
Personal data of customers (debtors, natural persons): first name(s), surname(s), personal ID number, actual and declared address, telephone number, email, debt amount, information on the provided services and/or sold goods, and any other data related to the debt.	Personal data are collected and processed on the basis of Article 6(1)(f) of the GDPR, where the legitimate interests are pursued by the Data Controller.	UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 33202, email: info@educatus.lt

We process your personal data for the purpose of debt recovery. We may transfer your personal data to data recipients entrusted with the recovery of the debt.

#### 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.

## **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 to disclose your personal information to the Company.

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

We process personal data for no longer than is necessary to achieve the purposes of data processing or for no longer than is required by the data subjects and/or provided for by applicable law. In the event of a change in the statutory retention period for personal data, the Data Controller shall retain the personal data provided by the data subject (collected by the Data Controller) for the specific purpose of processing the personal data for the period of time prescribed by law.

We store personal data provided for the purpose of visiting the Edutainment Centre for 3 (three) years from the expiry of the Consent, based on the statutes of limitations for bringing claims for damages set out in applicable law.

Your personal data provided when placing an order for a birthday party or signing an agreement for participation in the camp or other recreation will be stored for a period of 3 years from the date of placing the order or signing the agreement for participation in the camp, subject to the statutes of limitation for claiming damages set out in applicable law.

We process your personal data for direct marketing purposes for a period of 2 years from the date of your consent for such processing. After the expiry or withdrawal of the consent, we will store your personal data for a further period of 2 years in accordance with Article 27 of the Law on Legal Protection of Personal Data of the Republic of Lithuania, unless a longer period of time is required on another legal basis for the processing of personal data.

We store video material for the purposes of prevention, detection and identification of offences for a period of 7 days.

We process your image (photograph or video) for the purpose of publicity and advertising of the Edutainment Centre for a maximum period of 3 (three) years from the date of signing the consent and/or signing an agreement to use your image. In this case, your image (photographs and/or video) will subsequently be deleted from all sources where the image (photographs and/or video) was published and the Data Controller will no longer process such personal data. In the case of signing an agreement for using your image, the terms for the termination of the agreement and the responsibilities of the parties are set out in the agreement. It should be noted that in the case of signing an agreement, the relationship between the Data Controller and the contracting party is governed by the rules of civil law. After the expiry or withdrawal of the consent, we will store your personal data provided in the consent for a further period of 2 years in accordance with Article 27 of the Law on Legal Protection of Personal Data of the Republic of Lithuania. After the expiry of the agreement to use your image, the agreement, together with the personal data contained therein, will be stored for a period of 10 years in accordance with the general statutes of limitation period laid down in the applicable law.

We store questionnaires for competitions/games for a period of 2 (two) years from the end of the competition/game for the purpose of possible complaints from the participants of any such competition/game related to the execution of the competition/game.



We store the competition/game forms completed by the winners of the competition/game 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]”).

Your personal data submitted during the handover and acceptance of prizes and other gifts will be stored for a period of 10 years from the date of signing of the handover-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]”).

We store the data provided to open an account on the website of the Edutainment Centre only to the extent and for the period of time necessary to achieve the stated purposes. When it is no longer required to process the personal data of the customer, a decision is taken to destroy the data, except for the data that must be archived in accordance with legal requirements or the Company's internal local regulations. If the account remains inactive for more than 3 (three) years since the last login by the user, the Data Controller shall have the right to delete the account without any prior notice or notification of the deletion to the user.

For the purposes of quality assurance of services, we store and process customer surveys, complaints, and personal data for a maximum period of 1 (one) year from the date of submission of any such personal data.

The personal data submitted by candidates for the recruitment procedure at the Edutainment Centre will be processed and stored for the duration of the recruitment procedure. After the end of the recruitment procedure, where no employment contract is concluded with the candidate, the candidate's personal data will be stored, with the consent of the candidate, for a period of 1 (one) year, or until the data subject withdraws their consent for the processing of data.

The Data Controller will store the personal data obtained during online purchases only to the extent and for the period of time necessary to achieve the stated purposes. When it is no longer required to process the personal data of the customer, a decision is taken to destroy the data, except for the data that must be archived in accordance with legal requirements or the Company's internal local regulations.

Personal data obtained through social media platforms or online reviews for the purpose of investigating customer complaints or responding to feedback concerning the Edutainment Centre will be processed by the Data Controller for a maximum period of 1 year from the date of collection of such data.

Contracts/agreements, VAT invoices and other related documents will be stored in accordance with the data retention periods set out in the Index of Time Limits for Storage of General Documents of the Republic of Lithuania approved by the order of the Chief Archivist of Lithuania.

Data relates to the administration of the Company's debtors will be stored no longer than is necessary for the purposes for which the personal data are processed.

If the data subject withdraws their consent for the processing of the data or the term for the data processing expires (where the data are processed on the basis of the data subject's consent), in such case, only the data evidencing that the data subject has given consent will be retained for a period of no longer than 2 (two) years from the expiry or the withdrawal of the consent, for the purpose of making, executing or

defending legal claims of the Data Controller.

## **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 APPLICABLE LAW, 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.it](http://www.ada.it)).

### **Procedure for the exercise of the data subject's rights**

The Data Subject shall have the right to contact the Company verbally or in writing regarding the exercise of the Data Subject's rights, by submitting an application (Annex 1) in person, by mail or by electronic means using the contact details specified in this Privacy Policy. The application for the exercise of the Data Subject's rights must be legible and signed, and must contain the first name,

surname, address and/or other contact details of the person submitting the application for the purpose of maintaining contact or replying regarding the exercise of the Data Subject's rights.

The Data Subject must confirm their identity when contacting the Company regarding the exercise of the Data Subject's rights. If the Data Subject fails to do so, the Data Controller will not be able to accept the Data Subject's application and the Data Subject will not be able to exercise their rights. This provision does not apply in the case of requesting information regarding the processing of personal data pursuant to Articles 13 and 14 of the GDPR.

If a person decides to contact the Data Controller regarding the exercise of the Data Subject's rights in person, the Data Subject must provide their personal ID document. If the person decides to contact the Data Controller regarding the exercise of the Data Subject's rights in writing, they must include a copy of the ID document certified by a notary (or using another procedure established by law) with the application. In the absence of a copy of the ID document, the Data Subject will be asked to visit the Company and to provide the ID document. If the person chooses to submit the application by electronic means, the application must be signed with a qualified electronic signature.

If the Company has any doubts concerning the identity of the person submitting the application, the Company has the right to request additional information necessary for verification.

The Company's reply to the Data Subject will be provided no later than within one month from the date of receipt of the Data Subject's application, taking into account the specific circumstances of the processing of personal data. This period may be extended for further two months if necessary, depending on the complexity and number of requests.

### **Amendments to the Privacy Policy**

We regularly review our Privacy Policy. This version was updated on 23 February 2024.

### **Contact information**

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

UAB Educatus, company reg. No. 304496988, registered address Islandijos pl. 32, Kaunas, mob. tel: +370 688 33202, email: [info@educatus.lt](mailto:info@educatus.lt).

Contact details of the Data Protection Officer: [duomenuapsauga@balticred.com](mailto:duomenuapsauga@balticred.com).

THE FORM OF THE APPLICATION REGARDING THE EXERCISE THE DATA SUBJECT'S RIGHTS

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First name and surname of the data subject (natural person)

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(Contact information: address, telephone number, email (to be provided at the data subject's request)  
or a representative and the grounds for representation, if the application is made by a representative of the data subject)

Attn: Manager of UAB Educatus

**APPLICATION  
REGARDING THE EXERCISE OF THE DATA SUBJECT'S RIGHTS**

Date:

\_\_\_\_\_  
(place)

I request to exercise the following data subject's right(s)\*:

\* Place an "x" in the appropriate box:

**Right to receive information about data processing.**

**Right of access to the data processed.**

**Right to rectification of data.**

**Right to erasure of data (the right to be forgotten).** This right does not apply if the personal data to be erased are also processed on another legal basis, e.g. processing is necessary for the performance of a contract or the fulfilment of an obligation under applicable law.

**Right to restrict processing.**

**Right to object to processing.**

**Right to data portability.** The right to data portability must not adversely affect the rights and freedoms of others. The data subject shall have no right to data portability in respect of personal data where processing is not carried out by automated means, e.g. paper files.

**Right to request not to be subject to a decision based solely on automated processing, including profiling.**

Other information\*\*:

\*\* Please clearly specify what exactly you are requesting and provide as much information as possible, so that your right(s) could be exercised properly (e.g. if you are requesting a copy of your personal data, please specify which personal data you are requesting [e.g. a copy of the email dated dd/mm/yy; a video dated dd/mm/yy (x hours x minutes – x hours x minutes)]. If you wish to have your personal data rectified, please indicate which personal data are inaccurate; if you object to the processing of your personal data, please specify the reason for your objection and which specific processing you object to; if you are requesting the exercise of the right to data portability, please specify in respect of which data you wish to exercise this right and whether you wish to have the data transferred to your own device or to another controller, if you wish to transfer the data to another controller, specify to which controller):

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ENCL\*\*\*:

\*\*\* If the application is sent by post, a copy of the ID document certified by a notary (or using another procedure established by law) must be enclosed with the application. If the application is for the rectification of inaccurate data, copies of the documents confirming the correct data must be provided; if the copies are sent by post, they must be certified by a notary (or using another procedure established by law). If the data subject's personal data, such as the first name and surname have changed, copies of the documents confirming the change of personal data must be enclosed; if the copies are sent by post, they must be certified by a notary (or using another procedure established by law).

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*(Signature) (First name and surname)*