

TD BALTIC PRIVACY POLICY

1. Introduction

- 1.1 TD Baltic is committed to safeguarding the privacy of its customers.
- 1.2 This policy applies, where TD Baltic is acting as a data controller with respect to the personal data of TD Online and other systems TD Baltic might use to process customer's data, in other words, where TD Baltic determines the purposes and means of the processing of that personal data.
- 1.3 TD Baltic uses cookies on its website. We will ask your consent to our use of cookies when you first visit our website.

2. How TD Baltic uses the personal data

- 2.1 In this Section 2 we have set out:
 - (a) the general categories of personal data that TD Baltic may process;
 - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
 - (c) the purposes for which TD Baltic may process personal data; and
 - (d) the legal bases of the processing.
- 2.2 TD Baltic may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths. This usage data may be processed for the purposes of guaranteeing security and analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely security monitoring and improving our website and services.
- 2.3 TD Baltic may process your personal profile on our website ("profile data"). This profile may include your name, email address and phone number. The source of the account data is you or your employer. The account data may be processed for the purposes of providing our services, ensuring the security of our website, services and maintaining back-ups of our databases. The legal basis for this processing is the performance of a contract between you (or your employer) and TD Baltic and/or taking steps, at your request, to enter into such a contract.
- 2.4 TD Baltic may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include your name, e-mail address and phone number related to for example to order processing (receiver contact person of goods) or Return Material Authorization (RMA) requests. The source of the service data is you or your employer. The

legal basis for this processing is the performance of a contract between you (or your employer) and TD Baltic.

- 2.5 TD Baltic may process information relating to our customer relationships, including customer contact information ("**customer relationship data**"). The customer relationship data may include your name, your employer, your job title or role, your contact details (e-mail address, phone number), and information contained in communications between TD Baltic and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing TD Baltic relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers. The legal basis for this processing is our legitimate interests, namely the proper management of our customer relationships OR consent.
- 2.6 TD Baltic may process information relating to transactions, including purchases of goods and services that you enter into with TD Baltic and/or through our website ("**transaction data**"). The transaction data may include your contact details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and TD Baltic and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our website and business.
- 2.7 TD Baltic may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent OR the performance of a contract between you and TD Baltic and/or taking steps, at your request, to enter into such a contract.
- 2.8 TD Baltic may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- 2.9 TD Baltic may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of TD Baltic legal rights, your legal rights and the legal rights of others.

- 2.10 TD Baltic may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 2.11 In addition to the specific purposes for which we may process your personal data set out in this Section 2, TD Baltic may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which TD Baltic are subject.
- 2.12 Please do not supply any other person's personal data to TD Baltic, unless we prompt you to do so.

3. Providing your personal data to others

- 3.1 TD Baltic may disclose your personal data to any member of TD Baltic group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 3.2 TD Baltic may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 3.3 TD Baltic may disclose to your personal data to our suppliers or subcontractors insofar as reasonably necessary for specify purposes.
- 3.4 When you request specific conditions, TD Baltic may disclose your enquiry data to one or more of third party suppliers of goods and services, identified on our website for the purpose of enabling them to contact you to verify valid use of contract articles (special pricing, certifications requirements, warranty terms, etc). Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.
- 3.5 In addition to the specific disclosures of personal data set out in this Section 3, TD Baltic may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which TD Baltic are subject, or in order to protect your vital interests or the vital interests of another natural person. TD Baltic may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4. International transfers of your personal data

- 4.1 In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 4.2 TD Baltic and our other group companies have offices and facilities in Lithuania, Latvia and Estonia. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.
- 4.3 The hosting facilities for our website, related services and the data storage is all located in European countries.

5. Retaining and deleting personal data

- 5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2 Personal data that TD Baltic processes for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.3 Notwithstanding the other provisions of this Section 5, TD Baltic may retain your personal data where such retention is necessary for compliance with a legal obligation to which TD Baltic is subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Amendments

- 6.1 TD Baltic may update this policy from time to time by publishing a new version on our website.
- 6.2 You should check this page occasionally to ensure you accept the changes to this policy.
- 6.3 TD Baltic may notify you of significant changes to this policy via email.

7. Your rights

- 7.1 In this Section 7, we have summarised the rights that you have under data protection law. Full explanation of these rights can be found in source text of relevant laws and guidance from the regulatory authorities.
- 7.2 Your principal rights under data protection law are:
 - (a) the right to access;
 - (b) the right to rectification;
 - (c) the right to erasure;
 - (d) the right to restrict processing;

- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

- 7.3 You have the right to confirmation as to whether or not TD Baltic process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing, the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to an administrative fee.
- 7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the

personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

7.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

7.9 To the extent that the legal basis for our processing of your personal data is:

(a) consent; or

(b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

7.10 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

7.11 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.12 You may exercise any of your rights in relation to your personal data by written notice to TD Baltic "Data Protection Officer" dataprotection@tdbaltic.com.

8. About cookies

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web 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.

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

9. Cookies that we use

9.1 TD Baltic uses cookies for the following purposes:

- (a) authentication - we use cookies to identify you when you visit our website and as you navigate our website;
- (b) status - we use cookies to help us to determine if you are logged into our website;
- (c) personalisation - we use cookies to store information about your preferences and to personalise the website for you;
- (d) security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- (e) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

10. Cookies used by our service providers

10.1 TD Baltic uses Facebook page widget on our website to display the latest news feed from TD Baltic's Facebook home page. Facebook cookies may be stored on your computer when you visit our website.

11. Managing cookies

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

11.2 Blocking all cookies might have a negative impact upon the usability of many websites.



11.3 If you block cookies, you will not be able to use all the features of TD Baltic website.

12. Our details

12.1 This website is owned and operated by TD Baltic.

12.2 TD Baltic Data Protection Officer's contact details are:
dataprotection@tdbaltic.com