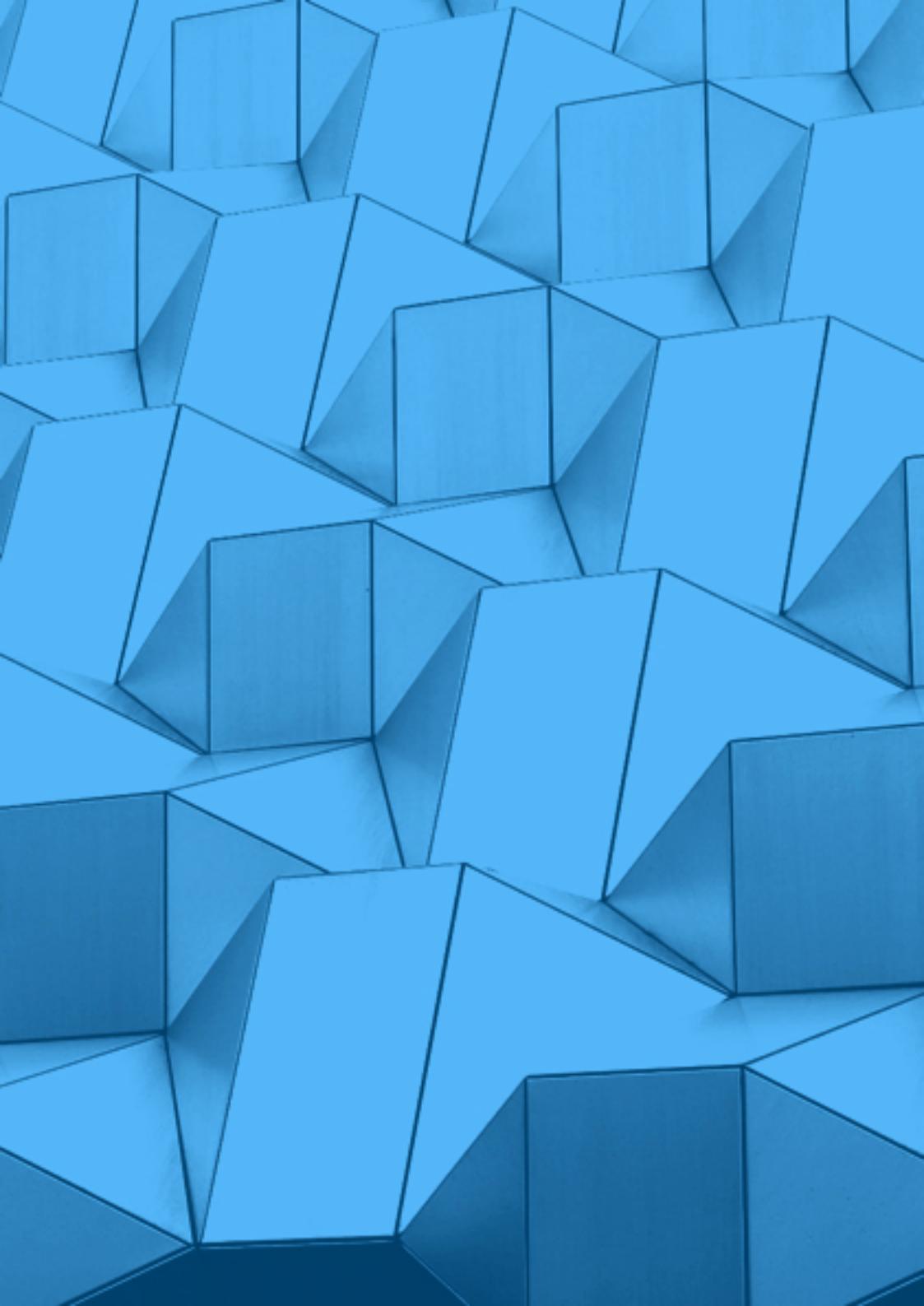




Privacy policy

SYNO INTERNATIONAL

A large, abstract graphic on the left side of the page consists of numerous blue, translucent, faceted cubes of varying sizes and orientations, creating a complex, three-dimensional structure.

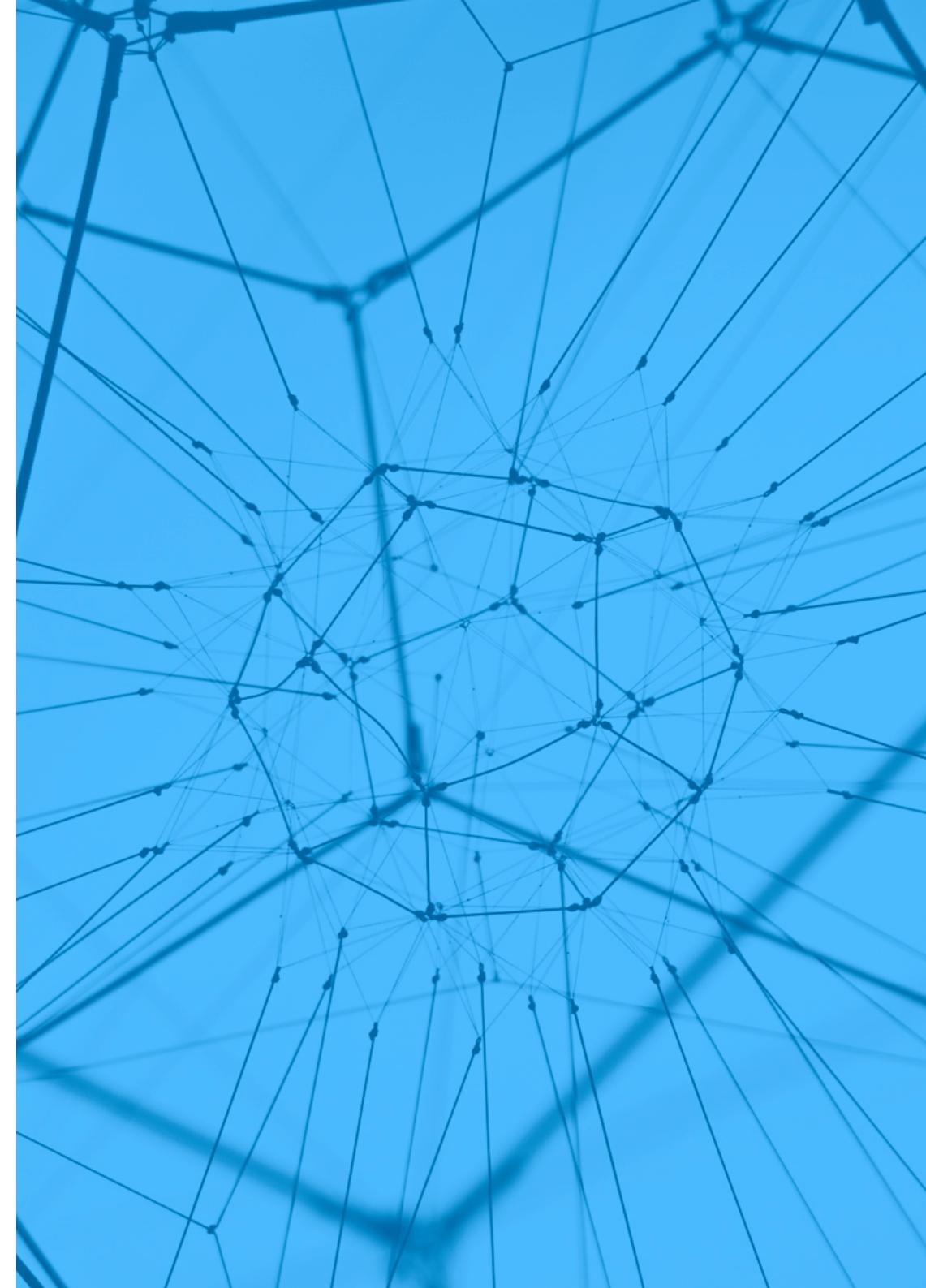
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Introduction

To UAB Syno International and its subsidiaries (hereinafter - "SynoInt") your and other data subjects personal data protection is important. Therefore, we are committed to respecting and protecting the privacy of each data subject.

Data subjects trust us with their personal information and we are responsible for ensuring that we work every day to justify that trust. This Privacy Policy contains essential information about the processing of personal data by SynoInt, the storage of these data and the rights of the data subjects.



I. Key terms

1. **Personal data** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
2. **Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
3. **Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
4. **Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
6. **Recipient** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
5. **Third party** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;
7. **Data subject** means a person whose personal data is processed;
8. **Consent** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
10. **The group of companies** means a controlling company, UAB Syno International and its controlled subsidiaries.

I. Key terms

9. **Special categories of personal data** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation

11. **Synolnt systems and platforms** means all Synolnt systems and platforms which belong to Synolnt, such as Syno Panel, Syno Tool, Syno Score, Syno Answers, Syno Media Panel, Syno Rewards, Syno Library, Surveyo24 etc. in which data subjects must register and provide personal data that is managed by the group of companies.

II. Personal data

1. Lawfulness of personal data processing

Synolnt collects and processes your personal data only on the basis of legal bases defined by legal acts regulating personal data protection:

- With your consent;
- In order to conclude and (or) execute an agreement with you.

2. Purposes of personal data processing

Synolnt processes personal data for purposes of market and public opinion research and consumer insights. Furthermore, Synolnt processes personal data for purposes of loyalty programs when data subjects use Syno Rewards as one of Synolnt systems and platforms.

3. Personal data processing

Synolnt processes the following data:

- with your consent, the personal data you submit when registering in the Synolnt systems and platforms (this is basic information such as name, surname, email address, postal code, gender and etc.);
- with your consent, personal data and special personal data that you submit in response to questionnaires (for example: country, region where you work, religion, racial origin, health (medicines, illness, disease intensity etc.);
- personal data obtained when entering into a business (cooperation) agreement (name, surname, personal code, address etc.);
- personal data from third parties, with the consent of the data subject for such data provision (for example: country, gender, travels and travels dates, type of work, shopping habits, political views etc.);

- other data that are collected on your permission and are defined in detail at the time when you are asked for permission;
- other data obtained in order to conclude and / or execute an agreement with you.

4. Cookies

Cookies are small text files that are stored by the browser (for example, Internet Explorer or Google Chrome) on your computer or mobile phone. They allow websites to store things like user preferences. You can think of cookies as providing a 'memory' for the website, so that it can recognize you when you come back and respond appropriately.

This site, like many others, uses small files called cookies to help us customize your experience. We use cookies to learn more about the way you interact with our content and help us to improve your experience when visiting our website. Cookies remember the type of browser you use and which additional browser software you have installed. They also remember your preferences, such as language and region, which remain as your default settings when you revisit the website. Cookies also allow you to rate pages and fill in comment forms. Some of the cookies we use are session cookies and only last until you close your browser, others are persistent cookies which are stored on your computer for longer.

II. Personal data

We will not use cookies to collect personally identifiable information about you. However, should you wish to do so, you can choose to reject or block the cookies set by Synolnt or the websites of any third party suppliers by changing your browser settings.

You can also visit www.allaboutcookies.org or www.google.com/privacy_ads.html for details on how to delete or reject cookies and for further information on cookies generally. For information on the use of cookies in mobile phone browsers and for details on how to reject or delete such cookies, please refer to your handset manual. Note, however, that if you reject the use of cookies you will still be able to visit our websites but some of the functions may not work correctly. If you need more information about cookies, please contact with us.

5. The term of protection of personal data

We store your personal data for no longer than the it is required by the data processing goals or is stated in legal regulations if there is a longer data storage duration provisioned. We aim not to store outdated or irrelevant information and ensure that personal data and other information about the clients would be updated consistently and correctly.

6. Personal data sharing

Synolnt can provide your data if:

- your consent (permission) has been granted to defined data recipients;
- your consent (permission) has been granted, UAB Syno International may provide data to subsidiary companies and vice-versa, subsidiary companies may provide data to UAB Syno International;
- your permission has been granted, UAB Syno International may provide data to other third parties in specific cases.

7. Children

Synolnt is committed to protecting the privacy of children. This website and Synolnt systems and platforms services are not intended for minors.

No information should be submitted to our website by users under the age of 13, and we do not collect information from any user we have reason to believe is a child under the age of 13.

If there are any cases when children want and must participate in surveys or in other Synolnt activities, they have to submit consents and permissions from their parents.

III. Measures to protect personal data

Synoint activities on the internet meet the appropriate internet activity-related requirements of international regulations, European Union regulations and the Republic of Lithuania regulations.

1. The EU General Data Protection Regulation 2016/679 (GDPR)

When processing data subjects' personal data, Synoint adheres to GDPR provisions and has implemented appropriate organizational and technical personal data security measures which help to protect personal data from coincidental or unlawful data destruction, editing, revealing as well as from any other unlawful processing.

In addition, UAB Syno International is officially registered in Lithuanian State Register of Personal Data Controllers as Personal Data Controller. UAB Syno International identification number is P8178.

Personal data controller – UAB Syno International, a private limited civil liability company incorporated and operating pursuant to the legal acts of the Republic of Lithuania under legal entity code 302748928, with the registered office address at Vilniaus str. 35, LT-01119, Vilnius, the Republic of Lithuania.

Personal data processors, recipients and other personal data controllers - UAB Syno International subsidiaries (Offices in London, South Korea, Tokyo, Singapore and etc.

2. Data protection officers (DPO)

We would like to inform that in adherence to the General Data Protection Regulation, UAB Syno International has been assigned the following data protection officers:

UAB Syno International, lawyer, Liudvikas Augutis. Contact information: phone numbers: **+3706 28 44 662** and **+3706 44 311 44**, e-mail: **liudvikas.augutis@synoint.com** and UAB Syno International, Senior IT Systems Developer, Mindaugas Liubinas. Contact information: phone number: **+3706 44 311 44**, e-mail: **mindaugas.liubinas@synoint.com**.

We would like to explain that data protection officers assist in ensuring that the requirements of the General Data Protection Regulations are met. They also take part in all personal data security related questions and consult in the field of personal data security. If you have any questions or issues regarding data security assurance, please use the contacts listed above or write us an e-mail to info@syno-int.com.

III. Measures to protect personal data

3. Measures

Synoint is implemented technical and organisational measures to safeguard the security of the personal data and information and Synoint is responsible that the security requirements constitute appropriate measures to protect the personal data as required by applicable legislation.

Synoint ensures that systems, applications, network components, and other computing devices are protected from malicious activity by implementing the appropriate controls such as anti-virus, firewalls, and intrusion prevention systems.

Synoint ensures passwords protection:

- All passwords are classified as confidential information;
- Passwords are not transferred or shared with others;
- If the customer / client / data subject / third party suspects their password has been compromised, the incident should be reported to info@syno-int.com and the password is changed immediately.

IV. Implementation procedure of data subjects` rights

You have the right to:

- Contact Synoint with a request to provide information regarding your personal data which is processed by Synoint ("the right to know" and "the right of access");
- Contact Synoint with a request to correct or destroy your personal data when you determine that the data is incorrect or incomprehensive ("the right to correct and destroy");
- Contact Synoint with a request to terminate your personal data processing if you determine that personal data is being processed unlawfully or unfairly ("the right to terminate");
- Contact Synoint with a request to disagree that your personal data would continue to be processed ("the right to disagree");
- Contact Synoint with a request to limit your personal data processing if personal data processing is unlawful ("The right to limit");
- Contact Synoint with a request to delete your data when your personal data is being processed unlawfully or personal data is no longer required by the collection or other processing goals ("The right to be forgotten");
- Contact Synoint with a request to receive information about personal data processed by Synoint and to receive data in a normally used format which the computer can recognize ("The right to data transferability").

In the process of these rights implementation, you may contact Synoint in your preferred method:

In writing – **Vilniaus street 35, Vilnius, 01119, Lithuania.**

E-mail: **info@syno-int.com; liudvikas.augutis@synoint.com;**
mindaugas.lubinas@synoint.com;

Verbally by phone: **+3706 44 31 144.**

If you are unable to resolve the issues with Synoint and if Synoint engagement or a lack thereof worries you that this privacy report or legal regulations requirements are not being adhered to, you have the right to contact State Data Protection Inspectorate or other institutions which are responsible for the supervision and control of legal acts which regulate personal data protection.

V. Other important information

1. Copyright laws

All information provided in the Synolnt web page, texts and other content is protected by the Copyright laws. No one has the right to copy information on the Synolnt webpage without the consent of Synolnt, except cases when the information is used for personal reasons.

2. Links

Synolnt web page contains links to other individual, company or organization webpages, however Synolnt is not responsible for the content of these web pages or their privacy and security assurance methods.

3. Mobile

Most mobile devices provide users with the ability to disable location services. Most likely, these controls are located in the device's settings menu. If you have questions about how to disable your device's location services, we recommend you contact your mobile service carrier or your device manufacturer.

4. Servers

All Synolnt data and information is stored on servers and systems located in the EU. All servers and systems are licensed.

5. Web page usage

By using the services of Syno International, the client agrees that he or she has read the Privacy Policy of Synolnt and does not disagree.

6. Privacy report news

As our activities and services expand, we may need to update this Privacy report. Due to this reason we recommend that you periodically visit our web page in which you will always find an up-to-date version of this Privacy report.

This Privacy Policy is also used by the following sites:

- www.synoscore.com;
- www.synoanswers.com;
- www.synopanel.com;
- www.synorewards.com;
- www.syno-int.com.

Contact

If you are interested in a deeper discussion about our privacy policy, please contact Syno International Managing Director Renata Ševcovienė:

+370 644 31 144

renata.sevcoviene@synoint.com