



PRIVACY POLICY

Protection of personal data

The personal data subject at the Company is the client as a natural person or someone associated with the client (such as the client's representative, spouse or partner).

The personal data controller is UAB INVL Asset Management, company code 126263073, registered address Gynėjų g. 14, Vilnius (hereinafter, the Company).

Personal data is any information concerning a natural person as a data subject, whose identity is known or could be directly or indirectly established by using data such as a personal identity number or one or more specific attributes of a physical, physiological, psychological, economic, cultural or social nature.

Data processing is any action carried out with personal data: collection, recording, accumulation, storage, classification, grouping, combination, modification (supplementing or correcting), provision, publication, usage, logical and/or arithmetic operations, search, dissemination, elimination or other type of action or set of actions.

The Company processes a data subject's personal data (usually, but not limited to, name, surname and personal identity code), which it has obtained from a client who intends to use or does use the Company's services. If a data subject does not agree to provide their personal data, the Company's services might not be provided to them.

The Company processes a data subject's data for the following purposes (including but not limited to situations where separate consent for data processing is obtained from the data subject):

- in order to provide the Company's services or carry out other activity as foreseen in legislation that is applicable to the Company's operations;
- in order to inform a client about its service agreements with the Company or with companies in the INVL Group;
- in order to inform a data subject about the services of the Company or companies in the INVL Group;
- in order to get information from the data subject regarding the services of the Company or of companies in the INVL Group;
- in order through video surveillance to ensure the security of property belonging to the Company and clients of the Company;
- in order to assess the quality of the conclusion and implementation of the Company's agreements and services provided by the Company (for example, by recording telephone calls), to ask for an opinion about the provided services, client care and their quality, and to carry out market research;
- in order to analyse and forecast the habits, needs and operations of the data subject in using the Company's services, seeking to ensure the most suitable client care and personalised offers;
- to prevent money laundering and the financing of terrorism;
- for other legitimate purposes as established in legal acts of the Republic of Lithuania.

A data subject has the right to request that the Company:

- after establishing the data subject's personal identity, acquaint the data subject with their personal data that is being processed and inform them about the content of their personal data as well as from what sources the data was obtained, for what purpose, how it is being processed and to whom it is being provided;
- correct the data subject's personal data which is inaccurate, incomplete or inexact, and/or suspend the processing of such personal data except for its protection;
- eliminate the data subject's personal data which has been collected unlawfully or suspend the processing of the personal data except for its protection.

A data subject has the right not to consent to:

- the processing of their personal data, also committing to present their legally justified refusal of consent to the Company in writing or in such a manner that the data subject's identity can be established, if the data subject concludes that the Company is processing their data unlawfully;



- the processing of their personal data for direct marketing purposes, with the right not to indicate the reasons for such refusal of consent.

The Company undertakes:

- to take, and to endeavour that other persons to whom personal data may be provided also take, suitable organisational and technical measures for the protection of personal data received by the Company from accidental or unlawful elimination, modification, disclosure or any other unlawful processing;
- to ensure that personal data is protected during the entire period of validity of an agreement and for the period of time established by law after the expiration of an agreement.

Data subjects may acquaint themselves with the purposes for which the Company processes personal data and with the data processors in the State Personal Data Controllers Register, which is maintained by the State Data Protection Inspectorate and is publicly accessible on the website www.ada.lt.

Cookies

Cookies are certain information which is saved on the computer of a person visiting the Company's webpage and using its customer service site. Cookies are used in order to recognise a visitor as someone who previously visited the website and to gather website traffic statistics, as well as with the goal of improving the functionality of operations carried out on the customer service site. Under default settings, most browsers accept cookies. Visitors, however, have the ability to turn off cookies by changing their browser settings. Browser settings can also be set to accept only certain cookies or to generate a warning each time and offer a choice of whether or not to allow cookies to be saved on the computer. Note that if cookies are disabled, some website functions may not work.

Cookies used by the Company on the website www.invl.com:

Name of cookie	Purpose	When created	Expiration	Data that is used
INVLAPP	Used to enable the functionality of the website.	Upon entering into funds	1 hour	Unique ID
_ga	Used to gather statistical information about traffic on the site; the data collected is used for reports and in order to improve the site.	Upon entering the website	2 years	IP addresses and unique ID numbers are used for record-keeping, yielding a statistical result. Counters function via Google Analytics.
_dv_gmt_UA			10 minutes	