

DELFI CONFERENCES AND EVENTS. PRIVACY POLICY

Updated

Purpose of this privacy policy

When organizing conferences and events, we (DELFI UAB) process the personal data of participants, speakers, suppliers, partners, and visitors of our websites.

This privacy policy (hereinafter referred to as “Privacy Policy”) explains what personal data, how, and why we collect, the legal basis for personal data processing, retention period, and recipients of personal data as well as informs about your rights and their enforcement and provides other relevant and important information regarding the processing of your personal data.

Data controller: DELFI UAB, registration code: 125483974, address: 16 Gynėjų St, Vilnius, Republic of Lithuania (hereinafter referred to as “we” or “DELFI”). Our complete contact information is provided in section XI of this Privacy Policy.

Personal data shall mean all information related to the person who has been or may be identified, such as your name, date of birth, address, or email.

Please treat the information provided herein responsibly and read it carefully before providing us with your personal data.

For your convenience, we have divided this Privacy Policy into sections, so it is easier for you to find relevant information. The contents of the Privacy Policy are set out below:

Section I: processing of your personal data for the purpose of direct marketing (sending newsletters and offers);

Section II: processing the personal data of speakers participating in DELFI conferences and events;

Section III: processing of personal data on the basis of your requests;

Section IV: processing the personal data of suppliers’ and partners’ (legal persons’) employees or other representatives related to DELFI conferences and events;

Section V: security;

Section VI: recipients of your personal data;

Section VII: how we process your personal data;

Section VIII: your rights regarding personal data;

Section IX: submitting a request to exercise data subject’s rights;

Section X: regarding the personal data of children;

Section XI: our contact information.

I. Processing of your personal data for the purpose of direct marketing (sending newsletters and offers)

- 1.1. **Types of personal data** being processed. If you visit a website dedicated to a DELFI conference or event and give us your consent to receive direct marketing messages (various DELFI and/or DELFI partners' offers regarding services, goods, and participation in games and contests, etc.), DELFI processes your email address, the content and dates of messages sent, and reaction (message read, link opened, etc.). If during registration you did not give consent but neither expressed objection regarding the sending of information via email about events organized by DELFI, we, for the purpose of direct marketing related to our events, shall process the following types of your personal data: email address, the content and dates of messages sent, and reaction (message read, link opened, etc.).
- 1.2. You are the **source of personal data** or we collect the personal data (about messages sent, reaction, etc.) ourselves.
- 1.3. **Purposes of personal data processing.** In both cases (no objection regarding receiving information about events and conferences sent by DELFI or given consent to receive direct marketing offers from DELFI and/or DELFI partners) your personal data is processed for the purpose of direct marketing.
- 1.4. **Legal basis for personal data processing.** We process the aforementioned personal data on the basis of your consent or legitimate interest (when information about future events is sent to you in absence of objection).

Please note that you have the right to withdraw the consent regarding direct marketing messages at any time, and when the processing of personal data is based on a legitimate interest, you can do so by clicking the appropriate link in every direct marketing email or submitting a request to us in accordance with the procedure set out in section IX of this Privacy Policy.

- 1.5. Personal data **processing period.** Consent-based personal data is processed throughout the validity of your consent regarding direct marketing messages, but no longer than 3 years from the moment you gave consent. Legitimate interest-based personal data is processed for 1 year since your registration to the event.

The information proving that you have given consent or that you have been properly informed about the processing of personal data is retained for 3 years after data processing concludes.

When the retention period expires, we safely erase your data.

II. Processing the personal data of speakers participating in DELFI conferences and events

2.1. Types of personal data being processed:

- (i) In order to invite you to be a speaker during a conference or event, DELFI processes the following personal data: name, surname, company, position, contact information (telephone number, email address), and email communication content.
- (ii) During the announcement and promotion of conferences and events in which you will be a speaker, DELFI processes the following personal data: your photo (image), name, surname, your brief introduction (field of occupation, achievements, and rewards, etc.), the introduction of your topic;

(iii) In certain cases – payment related data (name, surname, bank account number, transaction date, amount, and purpose, etc.)

2.2. You and third parties are the source of this **personal data**, e.g., name, surname, company, position, and contact information may be obtained from publicly available sources on the internet (websites and/or social media accounts).

2.3. **Consequences of nonsubmission.** Please note that if you do not provide the personal data necessary for the announcement and promotion of a DELFI conference or event (personal data indicated in paragraph 2.1.(ii)), we will only be able to promote your participation at the DELFI conference or event in a limited manner or will not be able to do so at all, and, consequently, will not be able to draw a large audience to listen to your presentation. If you do not provide the data necessary for payment (if applicable), we will not be able to compensate you for the services/content provided.

2.4. **Purposes of personal data processing.** We process your personal data:

- (i) For the purpose of communication – in order to invite you to be a speaker at a DELFI conference or event and to agree upon the conditions of your participation (personal data indicated in paragraph 2.1.(i));
- (ii) For the purpose of concluding the contract regarding your participation in a DELFI conference or event and for the purpose of managing, accounting, and executing said contract (personal data indicated in paragraph 2.1.(i) and (iii));
- (iii) For the purpose of announcing you as a speaker and promoting a DELFI conference or event (personal data indicated in paragraph 2.1. (ii)).

2.5. **Legal basis for personal data processing:**

- (i) For the purpose of communication, your personal data is processed on the basis of our legitimate interest, i.e. in order to invite speakers relevant to DELFI and successfully organize a conference or event with as many participants as possible. Please note that you have the right, for personal reasons, to withdraw consent at any time regarding DELFI processing (retaining) the aforementioned personal data on the basis of a legitimate interest (this right is exercised in accordance with the procedure set out in section IX of this Privacy Policy);
- (ii) For the purpose of concluding the contract regarding your participation and proper management and execution of said contract, your personal data is processed on the legal basis of the contract. Your personal data that confirms the transaction (if applicable) is also retained on the basis that it has to be processed to meet the legal obligation applicable to data controllers, i.e. to follow the rules pertaining to the finalisation and accounting of settlements and other payments.
- (iii) For the purpose of introducing you as a speaker at a DELFI conference or event and for the purpose of promoting a DELFI conference or event (paragraph 2.4.(iii)), your personal data is processed on the legal basis of your consent. Please note that you have the right to withdraw your consent at any time (to do so, send us a request in accordance with the procedure set out in section IX of this Privacy Policy).

2.6. Personal data **processing period:**

- (i) For the purpose of communicating with you, personal data is processed until the finalization of the contract regarding your participation in a DELFI conference or the rejection of the offer;
- (ii) For the purpose or proper management and execution of the aforementioned contract, your personal data is processed during the execution of the contract and for 3 months after the conference or event, except personal data contained in the contract text (this data is retained for 10 years after contract expiration). The data that confirms the transaction (if applicable) is retained for 10 years for the purpose of accounting;
- (iii) For the purpose of introducing you as a speaker at a DELFI conference or event and promoting said conference or event, we process your personal data for 6 months after the conference or event.

The information proving that you have given consent or that you have been properly informed about the processing of personal data is retained for 3 years after consent withdrawal or expiration.

When the retention period expires, we safely erase your data.

III. Processing of personal data on the basis of your requests

3.1. **Types of personal data being processed.** Having received your request, we process the personal data indicated therein. It may be your name, surname, contact information (e.g., email address, telephone number), or other information.

3.2. You **are the source** of this personal data.

3.3. **Consequences of nonsubmission.** The nature of formulating and submitting a request to us is completely voluntarily. You do not have to do this. However, failure to provide the aforementioned data may prevent us from answering your question(s) or limit our possibilities to do so.

3.4. **Purposes of personal data processing.** We process your personal data in order to contact you and answer your request.

3.5. **Legal basis for personal data processing.** The aforementioned personal data is processed on the basis on your consent. By freely and actively submitting a request to us, you express your consent that the personal data submitted be accordingly processed (to answer your questions) by us.

3.6. Personal data **processing period.** For the purpose of answering your request, we process your personal data for as long as it takes to give a reply and for 2 months after the last message has been sent.

The information proving that you have given consent or that you have been properly informed about the processing of personal data is retained for 2 years after consent withdrawal or expiration.

When the retention period expires, we safely erase your data.

IV. Processing the personal data of suppliers' and partners' (legal persons') employees or other representatives related to DELFI conferences and events

4.1. **Types of personal data being processed.** In order for DELFI to conclude a contract with a DELFI conference and event supplier/partner (supplier of goods, provider of professional and other services, or renter, etc., hereinafter referred to as "Partner") and execute existing contracts, the following personal data is processed (in the case where you are an employee or representative of the contractor):

- (i) name and surname;
- (ii) contact information (telephone number, email address);
- (iii) company, position;
- (iv) signature (when this is objectively necessary, e.g., when signing contracts, invoices, and other company-related documents).

4.2. You and third parties are the source of this **personal data**, e.g., name, surname, company, position, and contact information may be obtained from publicly available sources on the internet (e.g., Partner's website), also, we may obtain your personal data from the Partner.

4.3. **Consequences of nonsubmission.** Failure to provide the aforementioned personal data may disproportionately impede, delay, or prevent concluding and properly administering contracts with the Partner.

4.4. **Purposes of personal data processing.** We process your personal data for the purpose of concluding contracts with the Partner and properly administering, accounting, and executing said contracts (personal data indicated in paragraph 4.1., depending on the situation).

4.5. **Legal basis for personal data processing.** For the purpose of concluding contracts with the Partner and properly administering, accounting, and executing said contracts, your personal data is processed based on our and/or Partner's legitimate interest, i.e. to conclude and/or exercise a contract with the Partner, solve issues that arise during the execution of the contract, etc. The personal data contained in the documents that confirm the transaction is also retained on the basis that it has to be processed to meet the legal obligation applicable to data controllers, i.e. to follow the rules pertaining to the finalisation and accounting of settlements and other payments.

4.6. Personal data **processing period.** For the purpose of concluding contracts with the Partner and properly administering, accounting, and executing said contracts, your personal data is processed during our contractual relationship with the Partner, except personal data contained in the documents that confirm the transaction and the text of contracts with the Partner (this personal data is retained for 10 years for the purpose of accounting).

When the retention period expires, we safely erase your data.

V. Security

5.1. We shall employ all necessary technical and administrative security measures to protect your personal data against unauthorised loss, access, alteration, disclosure, or deletion.

5.2. DELFI has no intention to transfer your personal data outside the European Economic Area (EEA) or to an international organisation. Should our data processors process your data outside the EEA (e.g. a service company's servers are located outside the EEA), we shall take all appropriate and adequate measures to ensure the safety of your data in accordance with the respective legislation regulating the protection of personal data.

VI. Recipients of your personal data

6.1. Certain types of your personal data may be transferred to our authorised data processors, such as IT or cloud service companies (e.g. when renting servers from an IT company, your personal data will be uploaded (stored) at that company) and other technical implementers of DELFI conferences and events.

6.2. Our data processors are expected to ensure the appropriate protection of your personal data, and we guarantee that they process your personal data only to the extent of their obligations and the purposes specified.

6.3. If you have questions about our service providers, please contact us at: info@delfi.lt

6.4. In certain cases we may disclose your information to subjects other than those mentioned above: to comply with applicable legislations or by court order (e.g. having been ordered by court to submit the data), to protect our legal interests, rights, and assets or to ensure their safety, and in other cases with your consent or legal request.

VII. How we process your personal data

7.1. We process your personal data in accordance with the requirements of applicable legislation, including, but not limited to:

- (i) Your personal data will be processed in accordance with the principles of legality; good faith, and transparency;
- (ii) Your personal data will be used solely in the capacity necessary to meet the set goals;
- (iii) Your personal data will be collected solely for the legal purposes which we have expressly stated and will not be used in any other way that is unrelated to said purposes;
- (iv) Your personal data will be accurate and updated regularly;
- (v) Your personal data will be retained only for as long as necessary to meet the disclosed goals (or for as long as we are obligated by applicable legislation);
- (vi) Your personal data will be used ensuring adequate security level.

VIII. Your rights regarding personal data

8.1. In accordance with personal data protection legislation, you have the following rights:

- (i) The right to be informed whether we process your personal data, and if so, to request a copy of the data and information how we use, retain, and share it. We may refuse your request to provide information or ask you to cover the expenses of making additional copies if you request the same information repeatedly;
- (ii) The right to request to correct, append, or update incorrect, inaccurate, or incomplete personal data (the right of rectification), if, upon gaining access to your personal data, you deem it incorrect, inaccurate, or incomplete;
- (iii) The right to demand that we erase your personal data if it is being processed improperly or unfairly or it is no longer required for the purpose it has been collected and there is no other legal basis for retaining the information any longer;
- (iv) The right to demand that we limit (cease) the processing of your personal data, except retention, if you have submitted a request to correct your personal data (while the validity is being verified and/or the data is being corrected), if it turns out that personal data is being processed illegally and you object to its erasure, or if you express disagreement with the processing of personal data (while an assessment is being carried out to determine whether our legal interests take primacy), etc. (the right to demand that the processing of personal data be limited);
- (v) The right to receive your data in a structured, commonly used, and computer-readable format and transfer it to another data processor (or demand that we transfer your personal data to another data processor when such an operation is technically feasible) (the right to data portability). This right is exercisable only if the processing is based on your consent or a contract and the processing is performed by way of automated means. This right applies only to the personal data you have provided us yourself;
- (vi) The right to withdraw your consent regarding the processing of your personal data at any time;
- (vii) The right to object to the processing of your personal data for personal reasons at any time when such processing is performed to pursue the legal interests of the data controller or a third party;
- (viii) Also, you have the right to submit a complaint with the Republic of Lithuania State Data Protection Inspectorate (www.vdai.lrv.lt) in accordance with the procedure set out in the Republic of Lithuania Law on Legal Protection of Personal Data.

IX. Submitting a request to exercise data subject's rights

9.1. You have the right to apply regarding the exercising of the data subject's rights by submitting us a written request in person, via mail, or email.

Appendix No 11 to Personal Data Processing Rules

approved by Delfi UAB CEO Vytautas Benokraitis

Order No 20221125-1IM of 25/11/22

- 9.2. If you are submitting the request in writing personally, you have to confirm your identity by providing an identity document. Otherwise, the data subject's rights will not be exercised.
- 9.3. If such a request is submitted via mail, a copy of your identity document (certified as authentic by a notary public) has to be provided as well. When submitting a request via electronic means, it has to be signed with a valid e-signature or created using such electronic means that allow ensuring the text's integrity and inalterability (this requirement does not apply when withdrawing consent regarding direct marketing messages or newsletters).
- 9.4. The request to exercise the data subject's rights has to be legible, signed, and contain the data subject's name, surname, address, and/or other contact details for communication purposes or the reception of our answer regarding the exercising of the data subject's rights.
- 9.5. The data subject may exercise their rights individually or via a representative. In the request, the representative has to indicate their name, surname, address, and/or other contact details for communication purposes or the reception of our answer as well as the represented person's name and surname and provide the document certifying the representation or its copy.
- 9.6. Should there be doubts regarding the identity of the data subject, we may ask for additional information to verify it.
- 9.7. Upon the reception of your request, we will inform you about the actions taken in regard to the request no later than within one month.

X. Regarding the personal data of children

- 10.1. DELFI conferences and events as well as our services related to them are not intended for children. If you are under 14 years of age, please do not provide us with any personal data. If you are the parent or guardian of a child under 14 years of age and you are aware that your child has provided us with their personal data without your written consent, please contact us so we can erase your child's personal data.

XI. Our contact information

DELFI UAB, 16 Gynėjų St, Vilnius, Republic of Lithuania, tel.: 8 5 204 54 00, email: info@delfi.lt