

Privacy notice regarding the processing of KN's personal data, when examining reports meeting the criteria set out in the Whistleblowers Protection Law of the Republic of Lithuania, submitted on the basis of the "Procedure for information provision, examination, and informing individuals about possible violations"

AB "Klaipėdos Nafta" (hereinafter – "We", "Company") collects and processes personal data in accordance with the Law of the Republic of Lithuania on the Legal Protection of Personal Data, the European Parliament and Council Regulation (EU) No. 2016/679 issued on April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter – "GDPR"), other legal acts and instructions, guidelines and recommendations of controlling institutions. Please read this notice carefully to know more about the subject.

1. What is the purpose of this document?

In this notice, We answer the most important questions about how We collect, use, and maintain personal data submitted in the notices that meet the criteria set in the Law on the Protection of Whistleblowers of the Republic of Lithuania if these notices are not anonymous. We also describe how You can exercise your rights related to the personal data that We process. If You have any questions or uncertainties about any part of this notice, We are ready to assist you as described in Section 12 of this notice.

You are **not legally obliged** to provide us with any of your personal data. However, by providing more detailed information, You will help us properly analyze the issue and take appropriate measures.

2. Who is responsible for processing and protecting my personal data?

The requisites of the party responsible for processing your personal data:

Data controller: AB "Klaipėdos nafta".
Mailing address: Burių str. 19, LT-92276 Klaipėda, Lithuania
Telephone number: + 3704 639 1772
E-mail address: info@kn.lt
Contacts of the data protection officer responsible for personal data protection: E-mail address: dpo@kn.lt , telephone number: 8 616 02000.

3. How and why do you collect information about me?

We receive personal data from a whistleblower who submits a non-anonymous report to us by the following means: e-mail (SpeakUp@kn.lt; SupervisoryBodies@kn.lt), SMS, or call (telephone number: +370 686 90155).

We collect and process your personal data for the administration of your report and the evaluation of the information contained in it (e.g. to contact You during the investigation for additional information related to a possible breach, in order to ensure

the proper implementation of remedial and/or control measures, and etc.) and for the purposes of providing feedback.

4. What information about me do you collect and process?

We collect and process the following personal data about You (the Reporter) if You provide it:

Identification data: name, surname, personal code, or date of birth if You do not have a personal code.

Contact details: e-mail address and (or) telephone number.

Data about your relationship with the Company: a workplace (employment or contractual relations that link or have been linked to the Company) and duties.

Data related to the submission of the notice: the fact, date, and time of submitting the notice to the Company, the content of the notice (including your personal data indicated in it), and, when applicable, the fact, date, and time of the response to your notice.

Other personal data: information about contacting You for notice clarification (the content of the correspondence, the date and time of the call, the content of the conversation, etc.).

We may process the data to third parties (e.g. a witness; a person who intends to participate, participates, or has participated in committing a violation, etc.) if the person (Reporter) indicates them in his/her report, provided on the basis of "Procedure for information provision, examination, and informing individuals about possible violations." We also process the data of these data subjects in accordance with the procedure established by this Privacy Notice and the Whistleblower Protection Law of the Republic of Lithuania.

5. What is the legal basis for collecting and processing my data?

We collect your personal data legally, i.e. the processing of your personal data for the purpose specified in point 3 is carried out:

- in the performance of the legal obligation applicable to the Company (GDPR Section 6, Subsection 1), in accordance with the Law on Protection of Whistleblowers of the Republic of Lithuania Article 4, Section 1, Part 1, Subsection 1, Parts 8 and 9, and Article 16;
- implementing Our legitimate interest to investigate and prevent cases of inappropriate behavior in the Company (GDPR Article 6, Section 1).

6. Are you collecting sensitive data about me?

Sensitive data is information related to your health, racial or ethnic origin, political views, religious or philosophical beliefs, membership in trade unions, genetic or biometric data, and sexual orientation. We do not intend to collect sensitive data unless You provide it in your notice. In this case, based on the exception established in GDPR Article 9, Part 2, Subsection a, your consent to process the provided information would be granted.

7. Are you making automated decisions? Are you profiling?

In your case, We **do not** make automated decisions, You **are not** profiled.

8. Do you share my personal data with third parties?

Non-anonymous notices received by e-mail (SpeakUp@kn.lt; SupervisoryBodies@kn.lt), SMS, or call (telephone number: +370 686 90155) are processed in accordance with the procedure for providing information on possible violations, examining and informing natural persons. It is known to the supervisory bodies, the head of the internal audit, and the internal auditor. Information about You is not shared with any third parties.

We do not intend to share your personal data with third parties, except in cases where a pre-trial investigation would be initiated due to the case specified in your report. In this case, if we receive a reasoned request from the authorities conducting the pre-trial investigation (e.g. the Prosecutor General's Office of the Republic of Lithuania), We would provide your personal data to the institutions conducting the pre-trial investigation in accordance with the requirements of legal acts. When providing your personal data to third parties, We will strictly comply with the requirements of the Whistleblower Protection Law of the Republic of Lithuania Article 9.

9. Do you transfer information about me outside the European Economic Area?

Information about you **is not** shared outside the European Economic Area (all member states of the European Union and Iceland, Liechtenstein, and Norway).

10. How long will my personal data be stored?

The submitted personal data will be stored for 10 years from the date of notice receipt by the Company.

11. What are my rights?

When processing personal data, We ensure your rights as data subjects in accordance with the GDPR. We bring to your attention the fact that these rights are subject to conditions and exceptions provided by law. As a data subject, You have the right to:

- know (be informed) about the processing of your personal data - *We exercise this right by submitting this Privacy Notice to you;*
- get acquainted with the personal data that is being processed;
- request correction of your personal data;
- request removal of your personal data ("Right to be forgotten"), if this can be justified by one of the reasons set in GDPR Article 17, part 1;
- restrict the processing of your personal data. You can request to limit the processing of your personal data if one of the cases set in GDPR Article 18, part 1 is applicable;

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- disagree with the processing of your personal data (*if the person submitting the notice expresses an objection to the processing of his/her personal data, his notice will be depersonalized and further evaluated as anonymous*).

12. Seek to take the aforementioned actions?

If you seek to exercise your rights or have questions, comments, or complaints related to how We process your data, please contact our data protection officer for assistance. We will cooperate with You and try to answer all arisen questions.

You can apply for the exercise of your rights by filling in one of the [following forms](#) (or a free form request) and submitting it to Us in accordance with our approved [Personal Data Privacy Policy](#).

If You have any questions or want to exercise your rights, please contact Us by e-mail at dpo@juridicon.lt; or visit our Company located at Burių str. 19, LT-92276, Klaipėda, Lithuania.

If You believe that we are violating Data Protection Act when processing your personal data, You have the right to file a complaint with the State Data Protection Inspectorate by mail at L. Sapiegos str. 17, LT-10312, Vilnius, e-mail at ada@ada.lt or by other means indicated on the website of the State Data Protection Inspectorate.

13. How can I help?

We ask You, as the data subject, to ensure the correctness and accuracy of the personal data provided to Us. If your personal data or other related information changes, please inform us immediately, but no later than within 5 (five) working days.

14. Will this notice be updated?

This Information Notice is reviewed and updated when necessary, but at least once a year. The last update of the notice: 21/02/2023.