PRIVACY NOTICE

This privacy notice (hereinafter – the **Notice**) sets out information on how the Public Institution Visoriai Information Technology Park, legal entity code 126090582, registered address Mokslininkų St. 2A, LT-08412 Vilnius, Lithuania (hereinafter – **VITP** or **we**) processes information received from its clients / community members and their representatives, partners / service providers / suppliers and their representatives, event attendees, enquirers, candidates and visitors to its pages on the social networks "Facebook" (hereinafter – **VITP Facebook**), "YouTube" (hereinafter – **VITP YouTube**) and "LinkedIn" (hereinafter – **VITP LinkedIn**), information collected on VITP's websites https://vitp.lt/, https://toolas.eu/, https://spacecluster.lt/, https://esabic.lt/, https://inovacijudirbtuves.lt/, https://balticphotonics.eu/ (hereinafter – the **Websites**), as well as other information specified in this Notice.

This Notice describes the personal data we collect, how we obtain it, on what legal basis and for what purposes we use your personal data, how we use it, how long we retain your personal data, with whom we share it, how we ensure the protection of your personal data, and what your rights are. VITP respects your privacy and is committed to protecting your personal data.

Personal data means any information relating to a living individual who is or can be identified, directly or indirectly. Separate pieces of information which, when collected together, may also lead to the identification of a particular individual also constitute personal data.

This Notice has been prepared in accordance with the applicable legislation and recommendations, such as the General Data Protection Regulation (EU) No 2016/679 (hereinafter – the **GDPR**), the Law on the Legal Protection of Personal Data, and the guidelines and instructions of the State Data Protection Inspectorate (hereinafter – the **SDPI**) and other competent authorities.

The Websites may be used and VITP's services may be received by persons aged 14 or over. If you are at least 14 but under 18 years of age, please read this Notice carefully together with one of your parents or guardians to ensure that you understand and comply with it. VITP does not collect personal data of persons under the age of 14; therefore, if you are under 14, you should not provide any of your personal information to VITP.

You are responsible for ensuring that the data you provide to us is accurate, correct and complete. If any of the data you have provided changes, you must inform us immediately. Under no circumstances shall we be liable for any damage incurred by you as a result of your having provided incorrect or incomplete personal data or having failed to inform us of any changes thereto. Please do not send VITP any personal data about yourself if you do not wish such information to be used in any way.

I. DATA CONTROLLER

Public Institution Visoriai Information Technology Park, company code 126090582, registered address Mokslininkų St. 2A, LT-08412 Vilnius, e-mail info@vitp.lt, tel. +370 5 210 9256, is the controller (within the meaning of the GDPR) of the personal data referred to in this Notice.

By using the Website, communicating with VITP Facebook, VITP YouTube or VITP LinkedIn, or providing VITP with any information about yourself, you acknowledge that your personal data will be used in the manner set out below. If you do not agree to comply fully with the provisions of this Notice, you should not provide any of your personal information to VITP.

If you have any questions regarding the information set out in this Notice, you may contact VITP at any time using the contact details provided above.

II. DATA PROTECTION OFFICER

In accordance with Article 37 of the GDPR, VITP has appointed a data protection officer, who may be contacted by e-mail at: dap@vitp.lt.

III. WHEN DO WE PROCESS YOUR DATA?

Data is processed when:

- You provide the data yourself, for example, in order to conclude a contract with VITP, to apply for employment, when browsing the Websites or VITP Facebook, VITP YouTube or VITP LinkedIn, when submitting an enquiry to VITP by e-mail, and in other cases as set out in Section V of this Notice;
- The data is provided by the organisation / company for which you work or to which you otherwise belong and which has a contractual relationship with VITP;
- We receive the data from other sources which transfer it in compliance with instructions issued by public authorities, etc.

IV. HOW DO WE PROTECT YOUR DATA?

In order to protect your data, we have implemented organisational and technical measures designed to properly regulate and manage the processing of your data. Such measures include, but are not limited to: SDPI guidelines, EDPB (*European Data Protection Board*) and WP29 (*Working Party 29*) guidelines and other recommendations.

Whenever data processors are engaged, a data processing agreement is always concluded.

Although VITP strives to protect the personal data it processes, please understand that VITP cannot ensure or guarantee the security of any information you transmit to us, as no method of data transmission or storage is 100% secure today.

V. WHAT DATA DO WE PROCESS?

VITP, as the data controller, processes the following personal data:

	Purpose of personal data processing	**Data subjects concerned, source of data and personal data processed**	**Personal data retention period**	**Legal basis for personal data processing**
1.	VITP community activities and administration of clients / community members (conclusion and termination of contracts for the lease of non-residential premises, the use / lease of car parks and electric vehicle charging points and other contracts, actions taken with a view to concluding such contracts, etc.).	VITP clients / community members and their representatives: name, surname, position held, entity represented, telephone number, e-mail address, order information, information on the contract concluded, payment information (e.g. payment card information, such as the amount paid), payment method, other related information (e.g. purpose, date); bank account details, where applicable; communication with	Your personal data is retained for 10 years after the performance of the contract. Where no contract is concluded, data relating to communication is retained for 2 years after the relevant data was provided.	Compliance with legal obligations to which we are subject (Article 6(1)(c) of the GDPR); our legitimate interest in organising VITP community activities efficiently and transparently and in performing contracts concluded with clients / community members (legal entities) (Article 6(1)(f) of the GDPR); and performance of contracts concluded with clients / community members (natural persons) (Article 6(1)(b) of the

		VITP and its content. In the case of a natural person, the residential address and personal identification number are additionally processed. VITP obtains personal data directly from you or from the organisation you represent, or collects it when you participate in VITP community activities or communicate with VITP.		GDPR).
2.	Conclusion and performance of contracts with partners / service providers / suppliers, administration of partners / service providers / suppliers, actions taken with a view to concluding contracts	Partners / service providers / suppliers or their representatives: name, surname, position held, entity represented, e-mail address, telephone number, other contact details, information relating to payments under concluded contracts; communication with VITP and its content. VITP obtains personal data directly from you or collects it in the context of the performance of a contract with you.	Your personal data is retained for 10 years from the performance of the contract. Where no contract is concluded, data relating to communication is retained for 2 years after the relevant data was provided.	Compliance with legal obligations to which we are subject (e.g. accounting requirements) (Article 6(1)(c) of the GDPR); conclusion and performance of a contract with a partner / service provider / supplier (natural person) (Article 6(1)(b) of the GDPR); and our legitimate interest in concluding and performing contracts with partners / service providers / suppliers (legal entities) (Article 6(1)(f) of the GDPR).
3.	Implementation of project activities in the course of which VITP registers de minimis aid and State aid granted to legal entities	Representatives of legal entities: name, surname, position held, entity represented; related persons / entities: name, surname. We obtain your personal data from	Personal data is retained for the period of implementation of the relevant project and for 10 years after the end of the project. Accounting documents relating to concluded	VITP's legitimate interest in properly carrying out project activities by ensuring the registration and administration of de minimis aid / State aid in accordance with

		the representative of the relevant legal entity.	contracts are retained for 10 years from the performance of the contract.	the project financing conditions (Article 6(1)(f) of the GDPR).
4.	Recruitment of employees for vacant positions	Candidates wishing to be employed by VITP: name, surname, e-mail address, telephone number, address (if provided by the candidate); text of correspondence with VITP, information on the candidate's education (qualifications), work experience, knowledge of foreign languages and other information provided by the candidate in his/her CV and/or other documents (e.g. information from a partner / recruitment agency); information on the results of the selection procedure. The personal data is provided by you or by our partner / recruitment agency.	Your personal data is retained for the duration of the selection procedure for the specific position and, with your consent, for 1 year after the end of the selection procedure.	We process personal data on the basis of our legitimate interest in finding new employees (Article 6(1)(f) of the GDPR) and in order to take steps at your request prior to entering into an employment contract with you (Article 6(1)(b) of the GDPR) or with your consent, if you wish us to retain your personal data for future selection procedures (Article 6(1)(a) of the GDPR).
5.	Administration of enquiries submitted to VITP by e-mail or telephone and of other direct communication	Persons submitting enquiries to VITP by e-mail or telephone or otherwise communicating directly with VITP: name, surname, position held, entity represented, telephone number, e-mail address, message and other information provided by you.	The data is retained for 2 years after the enquiry has been resolved. In certain cases, in accordance with the requirements of applicable legislation or where your enquiry relates to a contract you have with VITP, your personal data may be retained for a longer period, e.g. 10 years from the	Our legitimate interest in handling your enquiry and providing you with accurate and comprehensive information about our activities or other matters of interest to you (Article 6(1)(f) of the GDPR).

		VITP obtains personal data directly from you.	performance of the contract.	
6.	Organisation and promotion of events (e.g. conferences, business breakfasts, seminars, webinars, live training sessions, hackathons, workshops, consultations, quizzes, etc.)	Participants in events organised by VITP: name, surname, position held, entity represented, telephone number, e-mail address, signature, data on communication with the event participant (message content and metadata), training data (name, surname, e-mail address, telephone number, training topic), data on payment of the event registration fee and related bank information (where applicable), the person's image (photograph and/or video recording). VITP obtains personal data directly from you. VITP may also collect information from financial service providers (e.g. when you make a payment for event registration, where applicable) or collect it itself or through relevant service providers (e.g. when photographing or filming the event).	Personal data intended for the organisation of the event will be retained for 2 years after the end of the event. Personal data relating to published information about your participation in the event will be retained for 2 years or until you withdraw your consent, whichever occurs earlier. In certain cases, in accordance with the requirements of applicable legislation, your personal data may be retained for a longer period.	Your consent, insofar as it relates to the publication of information (including your image) about your participation in the event (Article 6(1)(a) of the GDPR), and our legitimate interest in organising the event smoothly and efficiently (Article 6(1)(f) of the GDPR).
7.	Publication of news and relevant information relating to VITP clients / community members, partners, service providers, suppliers and/or other persons in the public domain (e.g. on the Website, in the press).	Representatives of VITP clients / community members, VITP representatives, representatives of partners / service providers / suppliers and other persons related to VITP's activities: name,	Personal data is processed for 3 years or until you withdraw your consent, whichever occurs earlier.	Your consent (Article 6(1)(a) of the GDPR).

		surname, position held, entity represented, image (photograph, video footage), other information contained in the relevant news item or announcement. VITP obtains personal data directly from you.		
8.	Administration of vehicles of VITP clients / community members or their guests (maintenance of vehicle lists in order to ensure entry through the automatic barrier)	Vehicle registration numbers of employees of VITP clients / community members or their guests using the car park. VITP obtains personal data from clients / community members. Please note that some VITP clients / community members, on their own initiative, provide the first names or the first names and surnames of employees together with the registration numbers; however, VITP does not actively request or require such data to be provided.	The data is retained for the term of the lease agreement with the relevant client / community member. Upon expiry or termination of the lease agreement, or where a VITP client / community member notifies VITP to remove the relevant employee / vehicle from the administered list, the data of the employee and the vehicle of the relevant client / community member are deleted from the list.	VITP's legitimate interest in ensuring smooth and safe access of vehicles of clients / community members to VITP's territory (Article 6(1)(f) of the GDPR).
9.	Access control to the premises and building leased by VITP (maintenance of lists of employees of clients / community members in order to ensure access to the leased premises and the building; production, programming and issuance of access cards to employees of clients / community members)	Employees of VITP clients / community members entitled to access the relevant premises and building leased by VITP: name and surname. When employees or other persons (e.g. employees of companies providing cleaning services to VITP) enter the building / VITP premises	The data is retained for the term of the lease agreement with the relevant client / community member. When a client / community member updates the employee access list, the previous list is destroyed on the same day. Upon expiry or termination of the lease agreement, or upon instruction of	VITP's legitimate interest in ensuring the security of the premises and building leased by VITP and in controlling access thereto (Article 6(1)(f) of the GDPR).

		outside working hours (after 9 p.m.) or at weekends, they must sign the building / VITP premises access log and state their name and surname. During hackathons, where the event lasts 1–2 days, participants are given the opportunity to remain on VITP premises for longer or overnight, having informed security in advance and signed the log (stating their name and surname). VITP obtains personal data from clients / community members.	the client / community member, the data of the employee of the relevant client / community member and the physical records relating to access cards are destroyed. The physical premises access log is replaced once per calendar year, and the previous version of the log is destroyed.	
10.	Administration of fault reports concerning leased premises (receipt and resolution of reports from clients / community members concerning faults in leased premises)	Employees or representatives of VITP clients / community members reporting faults in the leased premises: name, surname, e-mail address, telephone number, content of the report (description of the fault). VITP obtains personal data directly from you.	Personal data is not stored. Where information is provided by e-mail, e-mail correspondence for this purpose is retained for 2 years.	VITP's legitimate interest in properly administering the leased premises and ensuring the performance of the lease agreement (Article 6(1)(f) of the GDPR) and performance of the contract with clients / community members (natural persons) (Article 6(1)(b) of the GDPR).
11.	Lease of conference halls and meeting rooms and administration of bookings	VITP clients / community members, their employees or representatives, as well as other persons wishing to rent a conference hall or meeting room: first name and/or surname, entity represented, e-mail address, telephone number, booking date, duration, hall / room set-up requirements,	Personal data is retained for 1 year after the booking has been fulfilled. The physical key issuance log is replaced once per calendar year, and the previous version of the log is destroyed.	VITP's legitimate interest in properly administering the lease of conference halls and meeting rooms and ensuring the security of VITP's property (Article 6(1)(f) of the GDPR) and compliance with legal obligations to which we are subject (e.g. accounting requirements)

		content of communication with VITP. In the case of natural persons, the bank account number is also processed. VITP obtains personal data directly from you.		(Article 6(1)(c) of the GDPR).
12.	Organisation and implementation of the Innovation Workshops programme (administration of the participation of student teams and clients / community members, payment of cash prizes)	Students participating in the Innovation Workshops: name, surname, e-mail address, telephone number, higher education institution, faculty, field of study, year of study. Where cash prizes are paid, the data specified in the student's application are additionally processed: personal identification number, bank account number, name of the bank, amount of the prize in euros. VITP obtains personal data directly from students when they register for the programme workshops or from higher education institutions (e.g. KTU). Students provide the data required for the payment of prizes themselves. Company representatives participating in the Innovation Workshops: name, surname, position, e-mail address, telephone number,	Personal data is retained for 2 years after the end of the relevant Innovation Workshops programme. Accounting documents relating to the payment of cash prizes are retained in accordance with the requirements of applicable accounting legislation (10 years).	VITP's legitimate interest in organising and implementing the Innovation Workshops programme (Article 6(1)(f) of the GDPR). Where cash prizes are paid – compliance with legal obligations to which we are subject (e.g. accounting and tax requirements) (Article 6(1)(c) of the GDPR).

		entity represented, description of the challenge, content of communication with VITP. VITP obtains personal data directly from representatives of clients / community members.		
13.	Organisation and implementation of projects carried out by VITP (e.g. the contract for the project "Carrying out Start-up Incubation Activities at the European Space Agency Business Incubation Centre", EDIH Vilnius, PhotonQBoost, etc.) and provision of services to project participants: selection of participants, incubation, provision of information on services, provision of consultations in the fields of RDI, business development and finance, conclusion of project arrangements and contracts	Representatives of project participants (companies / start-ups): name, surname, position, e-mail address, telephone number, entity represented, information on the company's activities and RDI needs, content of applications and consultations, content of communication with VITP. VITP obtains personal data directly from you (e.g. when submitting an application, registering for a project, concluding incubation or project agreements) or from project consortium partners. Please note that in certain projects (e.g. PhotonQBoost) contracts are concluded not in the name of VITP but in the name of the consortium leader – in such case the principal data controller is the consortium leader, and VITP acts in accordance with the	Personal data is retained for the period of implementation of the relevant project and for 10 years after the end of the project. Accounting documents relating to concluded contracts are retained for 10 years from the performance of the contract.	VITP's legitimate interest in organising and implementing projects and providing incubation and consultancy services (Article 6(1)(f) of the GDPR); conclusion and performance of a contract with a participant (Article 6(1)(b) of the GDPR); compliance with legal obligations to which we are subject, including accounting requirements (Article 6(1)(c) of the GDPR).

		agreements concluded with it.		
14.	Application for admission to VITP	Name of the organisation, legal status, date of establishment of the business entity / institution, contact person (position, name and surname, telephone number, e-mail address), details of the legal entity / natural person, activities of the business entity (according to the EVRK / NACE classification), founders of the business entity (holding more than 25% of the shares) (name and surname / name of the business entity, number of shares held, %), description of activities, number of employees, premises requirements in square metres, planned turnover.	1 year after the decision is taken.	VITP's legitimate interest in assessing the applicant (legal entity) and taking a decision on admission to the VITP community / tenants (Article 6(1)(f) of the GDPR); taking steps at the request of the applicant (natural person) prior to entering into a contract (Article 6(1)(b) of the GDPR).
15.	Provision of information to persons and businesses interested in the ESA BIC Lithuania programme	Persons making enquiries about the ESA BIC Lithuania programme: name, surname, company represented, e-mail address, telephone number. VITP obtains personal data directly from you.	Your personal data is processed for 2 years from the date of collection or until you withdraw your consent to the processing of personal data for this purpose, whichever occurs earlier.	Your consent (Article 6(1)(a) of the GDPR).
16.	Incubation of start-ups (companies) participating in the ESA BIC Lithuania programme and submission of performance indicator data to the European Space Agency	Persons participating in the ESA BIC Lithuania programme: name, surname, company represented; e-mail address, telephone number. VITP obtains personal data directly from you.	Your personal data is processed for 5 years after the end of the incubation period, counting from the date of collection, until the termination of the incubation agreement or until you withdraw your	Your consent (Article 6(1)(a) of the GDPR).

			consent to the processing of personal data for this purpose, whichever occurs earlier.	
17.	Administration of contact details of Space Cluster members for the purpose of maintaining contact	Space Cluster members: e-mail address, name, surname, telephone number. VITP obtains personal data directly from you.	Your personal data is processed for 2 years from the date of collection or until you withdraw your consent to the processing of personal data for this purpose, whichever occurs earlier.	Your consent (Article 6(1)(a) of the GDPR).
18.	Registration and administration of Baltic Photonics event participants, with data collected in person during the event	Baltic Photonics event participants attending the event: name, surname, company represented. VITP obtains personal data directly from you during the event.	Your personal data is processed for 2 years from the date of collection or until you withdraw your consent to the processing of personal data for this purpose, whichever occurs earlier.	Your consent (Article 6(1)(a) of the GDPR).
19.	Direct marketing (news and other information about services offered by VITP, offers, activities of VITP or VITP clients / community members, newsletters, notices to the VITP community about our and our partners' events, ongoing projects, news relevant to business, science, innovators and start-ups; invitations to events organised by VITP and other VITP community events), including the collection of data for this purpose via websites administered by VITP (toolas.eu, balticphotonics.eu, esabic.lt)	Persons who have given their consent to the processing of their personal data for direct marketing purposes: name, surname, position, entity represented, contact e-mail address, an indication of whether the person is a member of the VITP community or a representative of an external company. VITP obtains personal data directly from you.	Your personal data is processed for 2 years from the date of collection or until you withdraw your consent to the processing of personal data for this purpose, whichever occurs earlier. At least every 2 years, VITP will inform data subjects of the possibility to renew the consent given to the processing of personal data for this purpose; if the consent is not renewed, the personal data of the data subjects will be deleted.	Your consent (Article 6(1)(a) of the GDPR).
20.	Video surveillance for the purpose of ensuring the security of the property of VITP	Natural persons entering VITP premises and their	60 days	VITP's legitimate interest in ensuring the security of the

	and third parties and protecting the life, health, property, confidential information and personal data, as well as other rights and freedoms, of VITP employees and other persons	surroundings – data transmitted by video transmission devices: the person's image, date, time, location. Personal data is collected by technical means (video cameras) where persons intend to enter VITP premises.		property of VITP and third parties and protecting the life, health, property, confidential information and personal data, as well as other rights and freedoms, of VITP employees and other persons (Article 6(1)(f) of the GDPR)
21.	Administration of the VITP Facebook, VITP YouTube and VITP LinkedIn accounts and communication with users of VITP Facebook, VITP YouTube and VITP LinkedIn. Further information on the social networks and accounts administered by VITP is provided in Section VII of this Notice.	Users of the social networks VITP Facebook, VITP YouTube and VITP LinkedIn communicating with VITP Facebook, VITP YouTube and VITP LinkedIn: profile name, profile picture; public comments and other interactions with VITP Facebook, VITP YouTube and VITP LinkedIn; subject and text of enquiries, if any. VITP obtains personal data directly from you and/or from the relevant social network.	Given that VITP does not administer the Facebook, VITP YouTube and LinkedIn social networks, but only its own accounts on them, and acts as a joint controller together with Facebook, YouTube and LinkedIn, we invite you to read the information on the storage of your personal data by Facebook (here), YouTube (here) and LinkedIn (here).	Our legitimate interest in communicating with Facebook, YouTube and LinkedIn users on our accounts (Article 6(1)(f) of the GDPR).

Please note that VITP may not process all of the data listed above, and the scope of the personal data processed in each case **is determined in line with the requirements of the data minimisation principle**; therefore, less personal data than indicated may be collected, following an individual assessment of each case.

VITP may also process all of the personal data listed above for the establishment, exercise or defence of legal claims. For this purpose, we will process personal data on the basis of our legitimate interest in establishing, exercising or defending legal claims (Article 6(1)(f) of the GDPR). We will process such data for this purpose until the end of the relevant legal proceedings (for example, the examination of a claim, or the entry into force of a court or arbitration decision) and, where a final decision of a court or other dispute resolution body is adopted in the relevant legal proceedings, for 5 years from the date of adoption of such decision.

VI. JOINT CONTROLLERS

Where VITP carries out activities financed or jointly organised by the European Union Structural Funds, the European Commission, the European Space Agency or other international institutions together with foreign partners (e.g. ESA BIC Lithuania, EDIH Vilnius, *PhotonQBoost*, etc.), VITP may act as a joint controller

together with the consortium partners of the relevant project. Please note that in certain projects (e.g. *PhotonQBoost*) contracts with participants are concluded not in the name of VITP but in the name of the consortium leader – in such case the principal data controller is the consortium leader, and VITP acts in accordance with the agreements concluded with it. Information on the terms of joint control in a specific project is provided in the privacy notices published on the website of each such project.

VII. SOCIAL NETWORKS

We may process your data on the following social network accounts administered by VITP:

- LinkedIn (VITP): https://www.linkedin.com/company/visoriai-information-technology-park-vitp/
- LinkedIn (Photonics and Laser Micromachining Technology Cluster (hereinafter – **Toolas Cluster**)): linkedin.com/company/toolas/
- LinkedIn (Lithuanian Space Technology Cluster (hereinafter – **Space Cluster Lithuania**)): https://www.linkedin.com/company/lietuva-space/posts/
- LinkedIn (European Space Agency Business Incubation Centre in Lithuania (hereinafter – **ESA BIC Lithuania**)): https://www.linkedin.com/company/esa-bic-lithuania/
- LinkedIn (Innovation Workshops): https://www.linkedin.com/showcase/inovaciju-dirbtuves/

- Facebook (VITP): https://www.facebook.com/visoriuparkas/
- Facebook (Toolas Cluster): https://www.facebook.com/people/Toolas-klasteris/100092385163983/
- Facebook (Space Cluster Lithuania): https://www.facebook.com/KosmosoKlasteris/
- Facebook (ESA BIC Lithuania): https://www.facebook.com/people/ESA-BIC-Lithuania/100088823384258/
- Facebook (Innovation Workshops): https://www.facebook.com/Inovacijudirbtuves/

- YouTube (Toolas Cluster): https://www.youtube.com/@toolas
- YouTube (ESA BIC Lithuania): https://www.youtube.com/@esabiclt

VIII. WEBSITE FUNCTIONALITY AND COOKIES

In this section, we inform you about the technologies used on the Websites, such as cookies, which help ensure the proper functioning of the Websites or monitor and analyse the behaviour of Website visitors while browsing.

The Websites use cookies. Cookies (*cookies*) are text files which, with your consent, are stored in the browser of your device (e.g. computer, mobile phone, tablet) when you browse the Websites and which collect information about your browsing.

By function, cookies are classified as:

- **Strictly necessary cookies**. These cookies enable the core functions of websites or ensure compliance with legal requirements (e.g. cookies ensuring the proper functioning of the cookie banner).
- **Functional cookies**. These cookies enable websites to remember the visitor's choices, such as the selected language, region or other settings, so that the visitor does not need to set them again when revisiting the website.
- **Statistical or analytical cookies**. These cookies collect anonymous information about the activity of website visitors and statistics, which helps to understand how visitors use the website.
- **Marketing or advertising cookies**. These cookies are intended to deliver tailored advertisements to visitors and to measure the effectiveness of advertising campaigns.

By duration, cookies are classified as **session cookies and persistent cookies**. Cookies may be **first-party cookies**, e.g. set by our website, or **third-party cookies**, e.g. set by other websites.

When you visit a website for the first time, cookies are transferred to your computer and subsequently used to distinguish your computer from other computers; they make the use of the website more convenient for

you and allow us to improve the website. This is a common practice in website browsing which facilitates browsing on a website you have already visited and simplifies access to the published information.
Cookies are used to process your IP address and browsing information, such as the areas of the website visited, the time spent on the website, etc.

Further details on the cookies used on https://vitp.lt/, https://toolas.eu/, https://balticphotonics.eu/, https://spacecluster.lt/, https://esabic.lt/, https://inovacijudirbtuves.lt/:

https://vitp.lt/ – cookies used:

Cookie name	Cookie purpose	Category	Expiry	Source	Legal basis for processing
CookieConsent	Stores the user's cookie preferences (Cookiebot)	Strictly necessary	1 year	First-party (VITP)	Legitimate interest (Article 6(1)(f) of the GDPR)

https://toolas.eu/ – cookies used:

Cookie name	Cookie purpose	Category	Expiry	Source	Legal basis for processing
cookieconsent_status	Records whether the user has acknowledged the cookie policy	Strictly necessary	1 year	First-party (Toolas)	Legitimate interest (Article 6(1)(f) of the GDPR)
wordpress_test_cookie	Checks whether the browser accepts cookies	Strictly necessary	Until the end of the session	First-party (Toolas)	Legitimate interest (Article 6(1)(f) of the GDPR)
elfsight_viewed_recently	Indicates which Elfsight widget content (e.g. reviews) has recently been viewed	Functional	1 year	Third-party (Elfsight)	Consent (Article 6(1)(a) of the GDPR)
_ga	Uses IP addresses and unique ID numbers to distinguish visitors for statistical purposes	Statistical	2 years	Third-party (Google)	Consent (Article 6(1)(a) of the GDPR)
_ga_3GMG1ZZ6VS	Stores information on the session state of the pages visited (GA4)	Statistical	2 years	Third-party (Google)	Consent (Article 6(1)(a) of the GDPR)
_lfa	Identifies visitors' companies for B2B marketing	Marketing	1 year	Third-party (Leadinfo)	Consent (Article 6(1)(a) of the GDPR)

	analysis (Leadinfo)				
_cfuvid	Distinguishes individual users sharing the same IP address (bot protection)	Strictly necessary (security)	Until the end of the session	Third-party (Cloudflare)	Legitimate interest (Article 6(1)(f) of the GDPR)

https://balticphotonics.eu/ – cookies used:

Cookie name	Cookie purpose	Category	Expiry	Source	Legal basis for processing
pressidium_cookie_consent	Stores the visitor's cookie preferences (the categories consented to, the date of consent and an identifier) so that the cookie banner is not displayed on every visit	Strictly necessary	6 months	First-party (Baltic Photonics)	Legitimate interest (Article 6(1)(f) of the GDPR)
Hcdn	Cookie of the content delivery network (CDN) of the website hosting provider (Hostinger), used for request processing and for protecting the website against malicious traffic	Strictly necessary (security)	Until the end of the session	Third-party (Hostinger)	Legitimate interest (Article 6(1)(f) of the GDPR)
__Secure-ENID	Remembers the visitor's preferences (e.g. language) in Google services; used for security purposes and for analytics of the use of	Functional	13 months	Third-party (Google)	Consent (Article 6(1)(a) of the GDPR)

	Google services where embedded Google content is displayed on the website				
SEARCH_SAMESITE	Ensures secure processing of Google requests across different websites (protection against request forgery) where embedded Google content is displayed on the website	Functional	6 months	Third-party (Google)	Consent (Article 6(1)(a) of the GDPR)

https://spacecluster.lt/ – cookies used:

Cookie name	Cookie purpose	Category	Expiry	Source	Legal basis for processing
wordpress_test_cookie	Checks whether the browser accepts cookies	Strictly necessary	Until the end of the session	First-party (Space Cluster)	Legitimate interest (Article 6(1)(f) of the GDPR)
elfsight_viewed_recently	Indicates which Elfsight widget content has recently been viewed	Functional	1 year	Third-party (Elfsight)	Consent (Article 6(1)(a) of the GDPR)
_lfa	Identifies visitors' companies for B2B marketing analysis (Leadinfo)	Marketing	1 year	Third-party (Leadinfo)	Consent (Article 6(1)(a) of the GDPR)
_cfuvid	Distinguishes individual users sharing the same IP address (bot protection)	Strictly necessary (security)	Until the end of the session	Third-party (Cloudflare)	Legitimate interest (Article 6(1)(f) of the GDPR)

https://inovacijudirbtuves.lt/ – cookies used:

Cookie name	Cookie purpose	Category	Expiry	Source	Legal basis for processing
_ga	Uses IP addresses and unique ID numbers to distinguish visitors for statistical purposes	Statistical	2 years	Third-party (Google)	Consent (Article 6(1)(a) of the GDPR)
_ga_KB6N71LB39	Stores and updates information on the session state of the pages visited (GA4)	Statistical	2 years	Third-party (Google)	Consent (Article 6(1)(a) of the GDPR)

https://esabic.lt/ – cookies used:

Cookie name	Cookie purpose	Category	Expiry	Source	Legal basis for processing
wordpress_test_cookie	Checks whether the browser accepts cookies	Strictly necessary	Until the end of the session	First-party (ESA BIC)	Legitimate interest (Article 6(1)(f) of the GDPR)
_ga	Uses IP addresses and unique ID numbers to distinguish visitors for statistical purposes	Statistical	2 years	Third-party (Google)	Consent (Article 6(1)(a) of the GDPR)
_ga_6YMGVS91CV	Stores information on the session state of the pages visited (GA4)	Statistical	2 years	Third-party (Google)	Consent (Article 6(1)(a) of the GDPR)

Strictly necessary cookies, which are essential for the proper functioning of the Websites, serve our legitimate interest in ensuring the smooth operation of the Websites, their legal compliance and the security of the Websites (Article 6(1)(f) of the GDPR). Other cookies, such as functional, analytical, statistical or marketing cookies, are used only with your prior consent (Article 6(1)(a) of the GDPR).

In any event, the processing of personal data by means of cookies and/or other technologies used on the Websites is based on your explicit choice, which you make using the cookie banners of the Websites and which you may change at any time. To do so, click Manage cookie preferences on the relevant website:

- https://vitp.lt/ – Privacy Notice (only strictly necessary cookies are used)
- https://toolas.eu/ – Manage cookie preferences
- https://balticphotonics.eu/ – Manage cookie preferences

- https://spacecluster.lt/ – Manage cookie preferences
- https://esabic.lt/ – Manage cookie preferences
- https://inovacijudirbtuves.lt/ – Manage cookie preferences

Cookies can be controlled or deleted directly in the web browser settings of your smart device, irrespective of your use of our Websites. Most browsers allow you to reject all cookies, and some browsers offer the option to reject only third-party cookies. You may therefore make use of these options. Please note, however, that blocking all cookies may have a negative impact on the use of the Websites, and without cookies you will not be able to use all of the services offered by the Websites.

If you require further information, please visit www.aboutcookies.org. This website provides comprehensive information, prepared by independent experts, on how to disable cookies in your web browser and how to remove cookies already stored on your computer. To remove cookies from your mobile phone, please refer to the relevant information in your phone's user manual.

IX. TO WHOM AND WHEN MAY WE TRANSFER YOUR DATA?

VITP may share your personal data with third parties (data processors) providing services to VITP and acting on its behalf (e.g. companies providing data centre services, IT service providers, accounting service providers, etc.). VITP ensures that the processing of personal data by such third parties is carried out only on the basis of VITP's lawful instructions and in accordance with the requirements of the GDPR and other applicable legislation, and that personal data is transferred to them only when and to the extent necessary for the provision of the relevant services. In addition, personal data may be transferred to relevant recipients of personal data / independent third parties, i.e. independent data controllers.

We may transfer your personal data where:

- You have consented to the transfer;
- We are required to do so in accordance with the procedure established by law, where requested by a public / law enforcement / municipal authority / pre-trial investigation authority in the event of a suspected criminal offence, e.g. the State Tax Inspectorate (VMI), the State Enterprise Centre of Registers, the Financial Crime Investigation Service (FNTT), the police, etc., or by other persons performing official duties assigned to them;
- We engage a data processor for certain data processing operations, or transfer data to independent data controllers where necessary, for example:
    - audit firms;
    - consultants on operations, security, processes, etc.;
    - entities providing legal services and debt collection / debt purchase services, the central mortgage office;
    - banks, credit unions and other companies providing financial services;
    - insurance companies;
    - companies providing information technology services;
    - providers of electronic communications services;
    - entities providing physical security services;
    - courts, arbitrators, mediators, opposing parties and their lawyers (where necessary for the purposes of court proceedings);
    - in the course of business transactions (sale of VITP, its assets (or part thereof) or its shares (or part thereof), merger, consolidation or division of VITP, etc.) – potential or final acquirers (their representatives), persons carrying out due diligence of VITP or otherwise involved in the relevant business transaction. In such case, VITP will transfer only such personal data as is necessary for the purposes of the relevant business transaction and will ensure that the confidentiality of the personal data is maintained;
    - the State Digital Solutions Agency (to the extent necessary for the registration of de minimis aid and State aid in the Register of Aid Granted (KOTIS));
    - other.

All your data is processed within the European Economic Area and is not transferred to third countries. Where a transfer to other countries is required, we may rely on an adequacy decision of the European Commission

(where, on the basis of a decision of the European Commission, an adequate level of data protection is ensured in the specific country in which the data recipient is established and/or operates). Other mechanisms ensuring adequate data protection may also be used, e.g. standard data protection contractual clauses laid down in legislation.

VITP makes every effort to ensure that the requirements of the GDPR are complied with when data is transferred in this manner and implements appropriate measures to ensure that your personal data remains secure. Further information on such measures may be obtained by contacting us directly using the contact details provided in this Notice.

X. YOUR RIGHTS

You have the following rights in relation to your personal data processed by us:

Right to be informed and right of access to personal data	You have the right to receive information on the processing of your personal data in a transparent, intelligible and easily accessible form, using clear and plain language. Such information is provided in this Notice. If any part of this Notice is unclear to you, you are kindly invited to contact us using the contact details provided above. You also have the right to obtain confirmation from VITP as to whether or not your personal data is being processed and, where that is the case, to access information on how we process your personal data. We will also provide you with a copy of your personal data processed by us.
Right to rectification of personal data	You have the right to request that VITP rectify inaccurate or incomplete personal data concerning you.
Right to erasure of personal data (“*right to be forgotten*”)	You have the right to request that we erase or remove personal data where there is no valid reason for us to continue processing it, where the personal data is no longer necessary for the purposes for which it was collected or otherwise processed, where you withdraw the consent on which the processing was based and there is no other legal ground for the processing, or where other grounds set out in Article 17 of the GDPR apply. Please note that Article 17(3) of the GDPR provides for exceptions to the above cases where the processing of personal data is necessary. Where such exceptions apply in your case, we will inform you accordingly.
Right to restriction of processing of personal data	You have the right to request that VITP restrict (or suspend) the processing of your personal data where: • you contest the accuracy of the personal data – for a period enabling the accuracy of the data to be verified; • the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead; • we no longer need the personal data for the purposes of the processing, but you require it for the establishment, exercise or defence of legal claims; • you have objected to the processing of your personal data in accordance with the procedure set out below – pending verification of whether our legitimate grounds override yours. Where the processing of personal data has been restricted, such personal data may, with the exception of storage, be processed only with your consent or 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.
Right to data portability	You have the right to receive the personal data you have provided to VITP in a structured, commonly used and machine-readable format, and the right to transmit such data to another controller, where: • the processing is based on consent or on a contract; and • the processing is carried out by automated means.

	You also have the right to request that VITP transmit your personal data directly to another controller, where technically feasible.
Right to object	You have the right to object at any time to the processing of your personal data which is carried out for the performance of a task carried out in the public interest or on the basis of VITP's legitimate interest. In such case, VITP will no longer process your personal data unless we are able to demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or unless the processing is necessary for the establishment, exercise or defence of legal claims. Where personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such purposes, and we will no longer process it.
Right to withdraw consent	Where your personal data is processed on the basis of your consent, you have the right to withdraw such consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
Right to lodge a complaint with a supervisory authority	If you consider that the processing of your personal data infringes the provisions of the GDPR, you have the right to lodge a complaint with the supervisory authority of the EU Member State of your habitual residence, place of work or place of the alleged infringement. The supervisory authority in Lithuania is the **State Data Protection Inspectorate of the Republic of Lithuania**, address L. Sapiegos St. 17, LT-10312 Vilnius, Lithuania, e-mail ada@ada.lt, website https://vdai.lrv.lt/. Before lodging a complaint with the relevant supervisory authority, we would be grateful if you would contact us and set out the matters of concern to you. We will make every effort to resolve your issue promptly and with due care.

To exercise these rights, please send a written request to the e-mail address dap@vitp.lt. VITP shall, no later than within 1 month of the date of receipt of your request, give effect to your rights and inform you thereof, or refuse to satisfy the request by stating the reasons for the refusal in writing. Where necessary, this period may be extended by a further 2 months, taking into account the complexity and number of requests. In such case, VITP will inform you of such extension within 1 month of receipt of the request, together with the reasons for the delay.

In order to ensure data protection and to enable you to exercise your rights, VITP has the right to request additional information necessary to confirm your identity.

XI. VALIDITY AND REVIEW OF THE NOTICE

We regularly review whether this Notice complies with the legislation and with the personal data processed by VITP.

We may update or amend this Notice at any time. Any such updated or amended Notice shall take effect from the moment of its publication on our Website. In the event of material changes to the Notice, VITP will inform you thereof separately.

Date of the last revision of this Notice: 2026-10-28, version – V1.

XII. LIABILITY

The Website and the materials contained therein are provided for information purposes only. VITP accepts no liability for the information and materials contained on the Website.

To the extent permitted by law, VITP shall not be liable for any aspects related to the use of the Website and the materials contained therein by you or any third party.

XIII. INFORMATION ABOUT THE WEBSITE AND ITS OWNERS

The Website, the materials contained therein, the code, the design, the Website domain name, all copyrights, trademarks, databases, names and other intellectual property or other property relating to the Website and/or the materials contained therein belong entirely to VITP, with the exception of intellectual property objects (trademarks, logos, etc.) relating to VITP members, partners or suppliers, and are protected by national and international intellectual property laws and other legislation.

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