

Privacy Policy

UAB Trucks Market (hereinafter we or the Data Controller) takes care of your privacy. By this privacy policy (hereinafter the Privacy Policy), we seek to comprehensively explain how we process your personal data in our operations, irrespective of whether you provide your personal data yourself or whether we receive it by means of automated processes, from public sources, social networking websites or in other manners.

General information

Details of the Data Controller:
UAB Trucks Market

Company Reg. No.: 302251463

Address: Lentvario St. 14a, Vilnius

E-mail: info@trucksmarket.eu

How do we collect information about you?

Your personal data, i.e. any information about you, which enables us to identify you, can be received in different ways:

- You can provide information (personal data) yourself (for instance, when you send an inquiry via the website's "Fleet change form" or "Spare parts inquiry form," participate in surveys, present claims and requests, call us, subscribe to our newsletters or contact us in other manners);
- Information about you can be collected automatically (when you visit our website (by means of cookies and other similar technologies) and our Facebook and LinkedIn accounts; when you leave public posts on social networking platforms that we follow; when you visit our office or car parks, which are provided with video surveillance systems);
- To the extent permitted by enforced legal acts, we can receive information about you from third parties. Such information may include information provided by a digital marketing services company, which provides maintenance services to our websites, by our customers which are legal entities when you represent these legal entities, by our partners with which we cooperate in the process of providing services to you and by other companies of our group.

We can relate the information received from you and from public and commercial sources to other information, which we received from you or about you.

We can also collect information about you in other cases, which are not discussed in these privacy rules. In such cases, we will give you additional notice to that effect.

What information (personal data) about you do we process and on what grounds and for which purposes do we do it?

Although we seek to collect as little information about you as possible, to be able to engage in our operations and achieve our goals, we collect the information specified in the table below:

Purpose	Legal grounds	Personal data
Provision of services, maintaining a business relationship	Implementation of a contract concluded with you. Satisfaction of requirements of legal acts.	Given name, surname, phone number, e-mail, address, vehicle number plate, payment information, other information that may be required in the process of providing services.
Conclusion and implementation of contracts of purchase and sale, rental and other contracts	Implementation of a contract. Satisfaction of requirements of legal acts.	Given name, surname, personal No., phone number, address, bank account details, e-mail.
Responding to your requests and inquiries submitted via the forms available on our website	This information is provided to you because we have the legitimate interest to provide accurate information about our services and available vehicles and spare parts.	In order to respond to your inquiries submitted via the forms available on our website, by phone, e-mail, via social networking websites and in other manners, we may ask you to provide your phone number, e-mail, given name, surname and details of a specific vehicle.
Assurance of the security of property and people (video surveillance)	Legitimate interest: assurance of the security of property and people.	Video data.
For marketing purposes*, e.g. presentation of customised promotional advertisements and sending of notices about promotions, evaluation and analysis of our markets, customers, products and services (including collection of your opinions about services and organisation of customer surveys)	For this purpose, we process your personal data while having the legitimate interest to provide information about any identified defects/failures and our other services, events, news and other relevant information. Your consent.	Given name, surname, phone number, e-mail and details of social media accounts.
Finding out how people use our online services, so that we are able to improve the services and develop new content, products and services	For this purpose, we process your personal data while having the legitimate interest to monitor the quality of our services, develop and improve our website content and ensure the security of our website.	IP address, operating system version, parameters of the device used to access content, your session time and duration, any information stored in cookies that we place on your device, your device's GPS signal or information about the nearest Wi-Fi access points and mobile communications towers, which may be transmitted to us as you use our website content.

Purpose	Legal grounds	Personal data
Defending our interests in courts or other institutions	<p>Satisfaction of requirements of legal acts</p> <p>Legitimate interest: to defend ourselves against presented lawsuits and claims.</p>	Depending on the presented lawsuit or claim, for this purpose all of your personal data available to us and listed in these privacy rules may be processed.

***We would like to inform you that we have the right to e-mail to our current customers promotional information about other similar products or services that we supply/provide and that you have the right to refuse, either now or at any time later, to receive our direct marketing content by notifying us about your decision by e-mailing to info@trucksmarket.lt or clicking the respective link in a newsletter received from us.**

In cases where we are unable to act based on any one of the legal grounds provided in the table above, we will ask for your consent prior to starting to process your personal data. (Such cases will be clear considering the respective circumstances and context.)

In cases where we process your personal data for any purposes other than the purposes specified in these rules, we will notify you about this by giving separate notice to that effect.

Who do we provide your personal data to?

We may provide your personal data to the following parties:

- Credit and other financial institutions operating in Lithuania;
- Insurance and reinsurance companies operating in Lithuania;
- State and municipal institutions and law enforcement authorities;
- The State Enterprise Centre of Registers;
- Our other business partners, which have been carefully selected by us: UAB Baltmeta Komunikacijos, UAB Apsaugos Komanda, UAB Verticus and UAB Pagautė. The possibilities of these companies to use your information is limited, and they may not use any of this information for any purposes other than for the purpose of providing their services to us;
- Other parties where this is required by law or necessary in order to defend our legitimate interests: competent authorities, pre-trial investigation officials, courts, etc.

In order for our business partner direct marketing messages to be sent to you, you will be asked to grant your separate consent.

To which countries is your personal data transferred?

Sometimes, we may need to transfer your personal data to other countries, in which the data protection policies may be less stringent. In these cases, we will put maximum possible effort in order to ensure the security of the transferred personal data and to ensure that one of the following security measures is implemented:

- The contract signed with the respective data recipient be based on the standard contract conditions approved by the European Commission;
- The data recipient be established in a country, which is recognised by the European Commission as applying adequate data protection standards;
- Permission from the State Data Protection Inspectorate be obtained.

What do we do to protect your information?

We have implemented reasonable and appropriate physical and technical measures in order to protect the information that we collect for the purposes of engaging in our operations. Do not forget however that, although we take the appropriate steps to protect your information, no single website, online operation, computer system or wireless communications are completely secure.

How long do we store your personal data?

We will store your personal data for a term necessary to achieve the respective goal. Upon achieving the respective goal, your personal data will be deleted, except in cases where legal acts obligate us to store the respective information for tax-related purposes or where the respective data may be required for conducting a pre-trial investigation, but the term of storage may in no case exceed 10 years. On expiry of the said term, the data will be deleted in such a manner as to ensure it is impossible to restore.

Personal data is normally stored for the following terms:

Personal data	Storage term
Data in contracts of payment, purchase and sale and other contracts	10 years after the respective payment operation
Personal data used for marketing purposes	As long as you remain our active customer and for 2 more years after your last active business cooperation with us, including search on our website
IT system logs	At least one year
Analytics	This data is normally collected automatically as you use the website and is anonymised/aggregated shortly after its receipt

Your rights

A data subject whose data is processed in the operations of the Data Controller, depending on the specific situation, shall enjoy the following rights:

- The right to know (be informed) about the processing of his/her data (the right to know);
- The right to familiarise with his/her data and with the manner in which the data is processed (the right to familiarise);
- The right to demand correction or, with consideration of the purposes for which the data is processed, supplementation of any incomprehensive personal data (the right to correct);
- The right to destroy his/her data or terminate his/her data processing actions (with the exclusion of storage) (the right to destroy and to be forgotten);
- The right to demand that the Data Controller restrict the processing of personal data in the presence of one of lawful reasons (the right to restrict);

- The right to data portability (the right to data portability);
- The right to object, at any time, to the processing of his/her personal data where such data processing is implemented to satisfy a general interest or where the data must be processed to ensure the legitimate interests of a data controller or a third party. If a data controller wishes to process personal data, the data controller must prove that the data is processed due to appropriate lawful reasons, which supersede the interests of the data subject (the right to object);
- The right to lodge a complaint with the State Data Protection Inspectorate.

We may decide to not provide you with conditions for you to implement the rights above, if, in cases envisaged by laws, there is a need to ensure the prevention, investigation and identification of crimes, violations of official or professional ethics as well as the protection of the rights and freedoms of the data subject or other parties.

Your rights will be implemented subject to prior establishment of your identity in person or by means of your e-signature.

Your rights	Certain restrictions
The right to know (be informed) about the processing of your data (the right to know)	You have the right, prior to the start of the processing of your personal data, to receive information about the data processing in a concise, simple and understandable language.
The right to familiarise with your data and the manners in which it is processed (the right to familiarise)	<p>This right means the following:</p> <ul style="list-style-type: none"> - A confirmation of whether we process your personal data or not; - Provision of a list of your personal data that is processed; - Specification of the purposes and legal grounds for the processing of your data; - A confirmation of whether we send data to third countries or not; if we do, what security measure we have implemented; - Specification of the source of your personal data; - Information on whether profiling is implemented or not; - Specification of the data storage term. <p>Upon establishment of your identity, we will provide you with the information specified above, provided that this will not infringe upon any other party rights or freedoms.</p>
The right to demand rectification or, with consideration of the purposes for which personal data is processed, supplementation of any incomprehensive personal data (the right to rectification)	Applicable if the information available to us is incomprehensive or inaccurate.

Your rights	Certain restrictions
The right to destroy your data (the right to be forgotten)	<p>Applicable if:</p> <ul style="list-style-type: none"> - The information available to us is no longer needed for achieving the respective goals; - We process data based on your consent and you revoke your consent; - We process data based on legitimate interests and, following your request, it is established that your legitimate interests supersede ours; - The respective information was received in an unlawful manner.
The right to terminate data processing actions (with the exclusion of storage)	<p>This right may be implemented for a term required for us to analyse the situation, i.e.:</p> <ul style="list-style-type: none"> - If you contest the accuracy of the information; - If you object to the processing of personal data implemented on grounds of legitimate interests; - We use information unlawfully, but you object to the deletion of the information; - We no longer need the information, but you demand that it be stored by reason of a court dispute.
The right to demand that the Data Controller restrict the processing of personal data in the presence of one of the lawful reasons (the right to restrict)	You may not permit us to use your personal data for the purpose of direct marketing.
The right to data portability	This right may be implemented, if you provided your data and we process it in an automated manner based on your consent or a contract concluded with you.
The right to object	This right may be implemented when such data processing is carried out for a general interest or it is necessary to process the data to pursue the legitimate interests of a data controller or a third party. If a data controller wishes to process personal data, it must prove that the data is processed for justified lawful reasons, which supersede the interests of the data subject. (the right to object)
The right to lodge a complaint with the State Data Protection Inspectorate	www.ada.lt

How can you implement your rights?

You can present to us a request regarding the implementation of the rights listed above as well as your complaints, notices or applications (hereinafter the Request) by e-mailing to info@trucksmarket.eu, or by sending a letter to Lentvario St. 14a, Vilnius, or by visiting our office.

Cookies, signals and similar technologies

In this Privacy Policy, the term “cookies” shall be used to define cookie files and other similar technologies, e.g. pixel tags, web beacons and clear gifs.

When you visit our website, we want to provide you with the content and functionalities that are adapted to your needs. Cookies are required for this. Cookies are small data files saved on your device. Cookies help the Data Controller to recognise you as an earlier visitor of a certain website, save your website visit history and display content based on that. Furthermore, cookies help to ensure the smooth operation of websites, allow monitoring the duration of website visits and collect statistical information about the number of website visitors. By analysing this data, we can improve our websites and make them more convenient for you. Some cookies are not necessary for the assurance of the operation of the websites, but we use them by reason of our legitimate interest to learn about our visitors, and we therefore use analytical or statistical cookies. Some cookies may be intended for displaying promotional content when you visit other websites; we will only save these cookies on your end device if we have your respective prior consent.

The following cookies are used on our website:

Name	Term	Purpose
Required	Up to 2 years	Cookies in the absence of which the website will not operate
Statistical	Up to 2 years	Cookies which collect aggregated information about website visitors

When you use your browser to access our content, you can configure your browser to accept all cookies, block all cookies or display a notification when a cookie is to be saved. Individual browsers differ and, if you are unsure how to change your cookies settings, you should consult your browser information menu. The operating system of your device may have additional cookie settings. If you do not want any information to be collected by means of cookies, you can opt for blocking all cookies on our website or in your browser settings. To find out more about the management of cookies, please visit the website at <http://www.allaboutcookies.org/manage-cookies/>.

Do not forget however that certain services may be developed in such a manner as to be operative with cookies only; consequently, if you block all cookies, you will be unable to use the respective services or part thereof.

In addition to the cookies used by the Data Controller, third party cookies may be used on our websites. In this case, third party privacy rules shall apply to the use of third party cookies.

Please note that our social network accounts are subject to the cookie policies of those respective social networks.

Contact us

Should you identify any non-compliance of this Privacy Policy or a security gap on our website or have other questions connected with the processing of your personal data, please contact us using our contact information provided above.

Final provisions

These privacy rules are reviewed at least once every two years. As soon as we update these privacy rules, we will notify you about the changes we deem material by publishing the respective notice on the respective website.

The document was last reviewed on 6 March 2019.