



DATA PROTECTION POLICY

PALADIS FINANCE UAB

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Introduction

This Data Protection Policy outlines the principles and guidelines for the protection of personal data under European law, in particular, the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679). It applies to all employees, contractors, and third parties who process personal data on behalf of Paladis Finance UAB. The policy aims to ensure compliance with applicable data protection laws, including the GDPR and other relevant European Union (EU) data protection regulations.

Scope

This policy applies to all personal data processed by Paladis Finance UAB, regardless of the format or medium in which it is collected, stored, or transmitted. It covers personal data of employees, customers, partners, suppliers, and any other individuals whose data is processed by Paladis Finance UAB.

Definitions

- a. **Personal Data:** Any information relating to an identified or identifiable natural person. This includes but is not limited to names, addresses, contact details, identification numbers, and online identifiers (Article 4(1) GDPR).
- b. **Data Controller:** Paladis Finance UAB or entity that determines the purposes and means of processing personal data (Article 4(7) GDPR).
- c. **Data Processor:** A person or organization that processes personal data on behalf of the data controller (Article 4(8) GDPR).
- d. **Data Subject:** The identified or identifiable natural person to whom personal data relates (Article 4(1) GDPR).

Principles of Data Protection

- a. **Lawfulness, Fairness, and Transparency:** Personal data shall be processed lawfully, fairly, and in a transparent manner. Data subjects shall be provided with clear and concise information about the processing of their data (Article 5(1)(a) GDPR).
- b. **Purpose Limitation:** Personal data shall be collected for specified, explicit, and legitimate purposes and shall not be further processed in a manner incompatible with those purposes (Article 5(1)(b) GDPR).
- c. **Data Minimization:** Personal data shall be adequate, relevant, and limited to what is necessary for the purposes for which it is processed (Article 5(1)(c) GDPR).
- d. **Accuracy:** Personal data shall be accurate and kept up to date. Appropriate measures shall be taken to rectify or erase inaccurate or incomplete data (Article 5(1)(d) GDPR).
- e. **Storage Limitation:** Personal data shall be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which it is processed (Article 5(1)(e) GDPR).
- f. **Integrity and Confidentiality:** Personal data shall be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing, and against accidental loss,

destruction, or damage (Article 5(1)(f) GDPR).

- g. Accountability: Paladis Finance UAB shall be responsible for demonstrating compliance with data protection principles and ensuring that appropriate measures are in place to meet legal requirements (Article 5(2) GDPR).

Lawful Basis for Processing

- a. Consent: Paladis Finance UAB shall obtain valid and freely given consent from data subjects for the processing of their personal data when required by law (Article 6(1)(a) GDPR).
- b. Contractual Necessity: Personal data may be processed when necessary for the performance of a contract with the data subject or to take steps at the data subject's request prior to entering into a contract (Article 6(1)(b) GDPR).
- c. Legal Obligation: Personal data may be processed to comply with a legal obligation to which Paladis Finance UAB is subject (Article 6(1)(c) GDPR).
- d. Legitimate Interests: Personal data may be processed based on the legitimate interests pursued by Paladis Finance UAB or a third party, except where such interests are overridden by the interests, rights, or freedoms of the data subject (Article 6(1)(f) GDPR).

Data Subject Rights

- a. Right to Information: Data subjects shall be provided with transparent information about the processing of their personal data, including the purposes, lawful basis, and retention period (Articles 13 and 14 GDPR).
- b. Right of Access: Data subjects have the right to obtain confirmation of whether their personal data is being processed and, if so, access to that data and supplementary information (Article 15 GDPR).
- c. Right to Rectification: Data subjects have the right to request the correction of inaccurate or incomplete personal data (Article 16 GDPR).
- d. Right to Erasure: Data subjects have the right to request the erasure of their personal data under certain circumstances, such as when the data is no longer necessary for the purposes for which it was collected (Article 17 GDPR).
- e. Right to Restriction of Processing: Data subjects have the right to request the restriction of the processing of their personal data under certain circumstances, such as when the accuracy of the data is contested (Article 18 GDPR).
- f. Right to Data Portability: Data subjects have the right to receive their personal data in a structured, commonly used, and machine-readable format and transmit it to another data controller (Article 20 GDPR).
- g. Right to Object: Data subjects have the right to object to the processing of their personal data, including profiling, based on compelling legitimate grounds (Article 21 GDPR).
- h. Right to Withdraw Consent: If processing is based on consent, data subjects have the right to withdraw their consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal (Article 7 GDPR).

Data Security and Confidentiality

- a. Technical and Organizational Measures: Paladis Finance UAB shall implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including protection against unauthorized access, alteration, disclosure, or destruction of personal data (Article 32 GDPR).
- b. Confidentiality: All employees and third parties involved in the processing of personal data shall respect the confidentiality of the data and only process it in accordance with Paladis Finance UAB's instructions and applicable data protection laws (Article 28 GDPR).

Data Breach Management

- a. Data Breach Notification: In the event of a personal data breach, Paladis Finance UAB shall promptly assess the risk to data subjects and, where required, notify the relevant supervisory authority and affected data subjects, in compliance with the requirements of the GDPR (Articles 33 and 34 GDPR).
- b. Internal Reporting: Employees and contractors shall report any known or suspected personal data breaches to Paladis Finance UAB's designated data protection officer or relevant contact point.

Data Protection Impact Assessments (DPIAs)

- a. DPIA Process: Paladis Finance UAB shall conduct Data Protection Impact Assessments when processing activities are likely to result in high risks to the rights and freedoms of data subjects. DPIAs shall be carried out before the processing commences (Article 35 GDPR).
- b. Consultation: Where a DPIA indicates that the processing would result in high risks, Paladis Finance UAB shall consult the relevant supervisory authority before commencing the processing (Article 36 GDPR).

Compliance and Accountability

- a. Data Protection Officer (DPO): Paladis Finance UAB shall appoint a Data Protection Officer, where required by law, to oversee data protection activities and act as a point of contact for data subjects and supervisory authorities (Article 37 GDPR).
- b. Record of Processing Activities: Paladis Finance UAB shall maintain a record of its processing activities, as required by the GDPR (Article 30 GDPR).
- c. Training and Awareness: Employees and relevant stakeholders shall receive appropriate training and awareness programs to ensure compliance with data protection laws and regulations.
- d. Regular Review: This Data Protection Policy shall be regularly reviewed and updated to ensure its continued relevance and compliance with applicable data protection laws.

Contact Information

For any inquiries, concerns, or requests related to data protection, please contact Paladis Finance UAB's Data Protection Officer at dpo@paladis.com