



**DATA PROTECTION**

## Data Protection Declaration

GrECo Sagauta, UADBB

Valid from 03-12-2021

[www.greco.services](http://www.greco.services)

**GrECo,  
matter of trust.**



## 1 General information

Thank you for your interest in our website and our company.

Our website includes links to other websites, which are provided purely for the purpose of information. We check external links carefully. However, we are not responsible for the content or security of these external links.

We protect the personal data you provide when visiting our website, and maintain your data privacy in our data processing, in accordance with the legal requirements. For further details on our data handling and protection policies, please read on.

### 1.1 The Controller for the processing of your personal data is

GrECo Sagauta, UADBB  
Risk Consultants and Insurance Brokers  
Ukmergės st. 223-4, Vilnius 07156  
Legal person code: 123712730  
Website <https://www.greco.services>  
E-mai: [duomenu.apsauga@greco.services](mailto:duomenu.apsauga@greco.services)

E-mail of the data protection officer: [rusne@duomenuapsauga.eu](mailto:rusne@duomenuapsauga.eu)

Enquiries concerning data protection should be sent directly to the email address or postal address above.

### 1.2 Supervising regulatory authority

State Data Protection Inspectorate  
L. Sapiegos st. 17, Vilnius  
Phone No. +370 5 279 1445  
Website <https://www.vdai.lrv.lt/>  
E-mail [ada@ada.lt](mailto:ada@ada.lt)

## 2 How we use your data

### 2.1 What kind of personal data do we process and where do they come from?

The personal data we process include the following, provided by you in the course of our business dealings.

If you only visit our website, we process your data only to the extent specified in section 5 (below).

When we provide insurance mediation services or insurance-related advice to you (or your employer), we process data such as your personal information (name, address, contact details, date and place of birth, nationality, profession etc.), identity verification data (e.g., details of identity documents), and authentication data (e.g., sample signature). In addition, they can include details of transactions (e.g., payments), data required for the fulfilment of our contractual obligations (e.g., policy data), advertising and sales data, documentation data (e.g., consultation records), registration data, information from your electronic communications with our Group, data processing results obtained by the GrECo Group, and data required for the fulfilment of our legal and regulatory obligations.



We also process data obtained from your insurers, other GrECo Group companies, received from databases and publicly available sources (e.g., register of legal entities, real estate cadastre and register, media). We may also receive data from authorities (such as courts) or individuals acting on behalf of a public authority.

In certain circumstances, we may also process your personal data of special categories (such as health-related information) as set out in Section 3.4. below.

Depending on the specific context in which we process your data, we will provide you with additional information if it must be provided.

We only process the above-mentioned data that is necessary for the specific purpose of the processing (see section 3 for details).

## 2.2 Children's data

We do not enter into contracts with minors and are not permitted to do so. When you accept an online contract or online services etc, you confirm that you are not a child, i.e., in Lithuania, that you are over 18 years old, or that your legal guardian has given consent.

## 3 Purposes and legal basis for processing of personal data

### 3.1 Fulfilment of contract subject to GDPR Art 6 Item (1)(b)

We are independent insurance brokers and consultants. Your personal data are processed in the course of our business relationships with your or your employer as our clients or suppliers. These include electronically created, stored and archived documents (e.g., correspondence) concerning offers and acceptances of insurance contracts, or during other stages of contract preparation, or for the administration and fulfilment of our contractual rights and responsibilities, particularly in the event of damage claims, and for insurance advice; also photographs and other documents uploaded by you. Further information on our data processing is also included in your contract documents.

If the services we provide to you involve more than one GrECo company, for example where insurance is related to more than one country, your data need to be processed by each of the relevant GrECo Group companies. The relevant Group companies are listed on our website <https://www.greco.services/lt/greco-markets.html>.

### 3.2 Processing for the fulfilment of legal obligations subject to GDPR Art. 6 Item (1) (c)

There are also some legal regulations which require that we process your personal data, e.g.:

- Information provided to the state authorities in the event of administrative, civil or criminal proceedings;
- Prevention of fraud or money laundering;
- Regulations on the reporting of possible grievances.



### 3.3 Data processing to safeguard legitimate interests subject to GDPR Art. 6 Item (1) (f)

In order to safeguard the legitimate interests of the Controller and of any constituent company of the GrECo Group, data may be processed for the purpose of balancing various interests beyond the specific fulfilment of a contract.

This includes the following types of data processing in particular:

- IT services and safeguarding of network and information security;
- marketing including direct marketing;
- monitoring and optimisation of GrECo Group's range of services;
- activities for the purpose of business management and further development of services and products;
- enforcement of legal claims through judicial and extra-judicial proceedings;
- prevention of fraud, benefit fraud or money laundering;
- processing for statistical purposes;
- processing for market research;
- implementation of regulations on the reporting of possible grievances;
- communications within the GrECo Group for the above purposes.

In addition to the GrECo Group companies with which you have direct contracts, other GrECo Group companies involved in the fulfilment of contracts (e.g., for revenue management), and GrECo International Holding AG (e.g. as IT service provider) may act as sub-contractors for data processing or (joint) Controllers. GrECo International Holding AG, as a controlling and holding entity of the Group, also provides various IT services and various other services to all of the GrECo group.

With respect to the transfer of data to these GrECo companies and other third parties, we emphasise that we are obliged to maintain data privacy and confidentiality of all customer details and information provided to us in the course of our business relationship. All employees of GrECo companies who might possibly have access to your personal data, and all data processing (sub-)contractors are required to confirm in writing that they will maintain confidentiality and will only process personal data as authorised. GrECo International Holding AG in Austria, as the central IT service provider for all GrECo companies, is monitored for data security in accordance with GDPR Art. 32.

### 3.4 Data processing for which you have given consent as defined in GDPR Art.6 Item(1)(a) or Art. 9 Item (2) (a)

Data provided by you may be processed in accordance with your consent, e.g., contact details for the distribution of newsletters and other information about insurance products, insurance brokerage and other services provided by your GrECo partner, or photos provided by customers for the purpose of references or reporting on GrECo events.

Where your permission is required for a specific category of data processing, we will not proceed until we have your express consent for that specific purpose.

For the settlement of claims it is sometimes necessary to process sensitive data (e.g., details of injuries), as defined in GDPR Art. 9, or data about (suspected) offences (e.g., in the case of traffic accidents), as defined in GDPR Art. 10. Usually, such data is processed in order to submit, implement or support legal claims, legal basis of



such processing usually being GDPR Art. 9 Item (2) (f). Where the processing of such data is not already covered under the terms of our contract requirements, you grant specific consent that we may process these data and forward them to insurance companies or brokers etc. The same is applicable when such data are provided to us from another source (e.g., an insurance company).

Your consent may be withdrawn at any time. The withdrawal of consent does not affect the legality of earlier processing on the basis of that consent.

### 3.5 Are you obliged to provide us with your personal data? What happens if you do not wish to do so?

Our business dealings require customers to provide many personal details. For example, we cannot provide you with insurance without your name and address. If we do not have details of damages, we cannot help you with reporting and processing claims. We need to be able to process your personal data wherever this is necessary for contractual or legal reasons within the context of our business relationship. If you do not wish your data to be used in this way, there may be certain products or services that we cannot provide. Where your specific consent is required for us to be able to process your data, there is no obligation for you to grant this consent or provide this type of data.

### 3.6 Is there any automated decision-making, including profiling as defined in GDPR Art 22 Part 1 and Part 4?

No, there is no automated decision-making. For insurance brokerage we check credit status by means of enquiries to credit protection associations. The evaluation of this kind of information is never automated.

## 4 Transmission and retention of personal data

### 4.1 Is your personal data shared, and if so, with whom?

The security of your personal data is important to us. For that reason, your data are only shared where there is a contractual or legal requirement to do so, or where this is necessary for the protection of our legitimate interest (e.g. within the company), or with your consent. Your personal data may be shared with:

- insurance/reinsurance providers/authorised co-brokers and other contacts as necessary for arranging insurance for a specific case
- other GrECo companies within the GrECo Group, and third parties, the employees and agents of these companies, to the extent that this is necessary for the fulfilment of contractual, legal or regulatory obligations, and for the protection of legitimate interests, and particularly for the preparation or completion of insurance agreements (e.g. GrECo Risk Engineering GmbH), or GrECo companies, whose IT services (e.g. from GrECo International Holding AG in Austria as the central IT service provider for all GrECo companies) or their back office services or service lines, for the fulfilment of our associated responsibilities or otherwise for the provision of our services
- „Microsoft Ireland Operations Limited“ as a data processor (including secondary processors), using cloud services provided in EU
- suppliers of IT infrastructure, IT security or networking services
- public bodies and institutions, where we are legally required to do so (e.g., the trade licensing authority as regulatory authority, financial authorities)



- third parties acting on our instruction, e.g., lawyers third parties are contractually obliged to keep your data confidential and only to process them as necessary for the provision of service
- data may also be transmitted to third parties if you have given consent for this, e.g., to assessors in the event of a claim.

## 4.2 Are my personal data transmitted to third countries?

It is sometimes necessary to transmit data to a third country without adequate data protection regulations, e.g., in the event of cross-border insurance solutions, to the relevant partner GrECo companies in third countries (Russia, Kazakhstan, Serbia, Ukraine and Turkey). In the event that data have to be transmitted to a third country without adequate data protection, or to an international organisation, the EU standard contract clauses apply, or other guarantees of adequate data protection as defined in GDPR Chapter V.

GrECo companies in third countries are contractually obliged within the GrECo Group to uphold the standards of data protection and security as defined in the GDPR. This is also monitored, e.g., in Austria by GrECo International Holding AG, the central IT service provider of the GrECo Group. GrECo International Holding AG, as central IT service provider (computing centre), also processes data for GrECo companies in third countries.

In many cases, GrECo companies may also be joint Controllers with other companies, including in third countries (e.g., for cross-border insurance solutions, or for a database of employee schedules which may be shared by them on a voluntary basis). In such cases, contracts for joint Controllers are signed which set out detailed requirements subject to GDPR Art. 26. Where GrECo companies share data control responsibilities, your rights as a data subject and other expectations as laid down by the GDPR (see Section 6 Your rights) can apply to each and every Controller, if no specific point of contact has been communicated to you (GDPR Art. 26 Part (2)).

We do not generally use data processing agents outside the GrECo Group in third countries. When our selected data processors use services of secondary data processors outside EU, we ensure that these secondary processors are also required to uphold the data protection and security standards of the GDPR implementing proper data protection/security measures in their data processing activities.

## 4.3 How long is your personal data retained?

We will process or store your personal data for the duration of the business relationship between us or for the duration of any insurance contract brokered by us. In other cases, we will keep your data only as long as necessary to fulfil the processing purposes described above.

After our relationship with you ends, the period of data retention depends on our legal obligations to keep records and the statute of limitations for claims that may be brought between us. There are also legal provisions that determine how long we must keep data. For example, under company and tax law record keeping obligations, we are required to keep our business records for at least 10 years.

If we are not required to retain your data due to statutory record-keeping obligations, we may still retain your data until the statute of limitations has expired for any claims that may arise between us. Such claims could be filed for performance or termination of the contract, compensation for damages or fulfilment of other legal obligations. Claims under insurance contracts are generally statute-barred after 1 year. However, in some cases, the statute of limitations does not expire for 10 years.



#### 4.4 What security measures are in place for the processing of personal data?

Data protection and data security are very important to us. Our data processing is protected by technical and organisational measures. This includes in particular the protection of your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed. The centralised provision of IT services for all GrECo companies by GrECo International Holding AG, as the computing centre for Austria, supports this protection in all GrECo companies.

Protective measures include for example the use of modern security software and encryption methods, controls on physical access, authorisation concepts, pseudonymisation and other precautions to protect against and prevent external and internal attacks.

## 5 Online media

### 5.1 Cookies

Various parts of our website use cookies. With current technical progress, cookies cannot independently run programs or transmit viruses to your computer. Cookies are small text documents that recognize users each time they visit a website. However, no personal information such as name or address is stored. Thus, visitors cannot be identified based on the information in question.

### 5.2 Data of the used cookies

Name	Description	Creation moment / Validity period
CMSSESSIDX	Standard cookie used to support user session	Upon entry to the website / until closing of the website window
cookiesAgree	Cookie used to recognize whether you have consented to use of cookies in our website	Upon provision of consent / until deletion
cookiesLevelX	A cookie distinguishing the cookies to use of which on our website you consented	Upon provision of consent / until deletion

To learn more about cookies, such as how to manage or delete them, you can visit <http://www.allaboutcookies.org>.



### 5.3 Social networks

We work in cooperation with various social networks. If you use these social networks, your browser will automatically be linked to the relevant network. This transmits your IP address and other information such as cookies, if you have already visited the platform concerned.

As far as possible we avoid this kind of data transfer until you do actually interact with one of these platforms. By clicking the relevant symbol (e.g., the Facebook logo) you indicate that you are ready to communicate with the selected platform, and accept that information about you, such as your IP address, is transmitted to that social network.

Our website offers the option to interact with various different social networks via plug-ins. These are Facebook Ireland Ltd., Twitter Inc., Linked In Inc. USA and XING SE Deutschland.

We have no influence over the extent and content of the data transmitted to the operator of the social network when you click on its plug-in. If you would like to find out more about the type, extent and purpose of the data collected by the operators of these social networks, we recommend that you read the data protection policies of each social network.

### 5.4 Newsletter

On our website you can subscribe to our newsletter. You can also unsubscribe, by activating the “unsubscribe” link at the end of each newsletter or contact us directly by replying to the newsletter.

This aspect of data processing is regulated by the legal provisions of GDPR Art. 6 Item (1)(a) (Consent).

### 5.5 Contact form

The information you provide in our contact form, including personal data, is transmitted to our own mail server, processed, and saved by us so that we can respond to your enquiry. These data are not collected or forwarded without your consent. Without these data we cannot respond to your enquiry.

By using our contact form, you confirm that you are not a child, i.e., you are over 18 years old, or that your legal guardian has given consent.

The purpose of the data processing is administration of enquiries and is carried out based on GDPR Art. 6 Item (1) (f) (legitimate interest).

## 6 Your rights

You have the right of access, rectification, or erasure or to restrict the processing of your saved data, the right to object to processing and the right to data portability, at any time, subject to the conditions of the data protection laws. Please direct any enquiries on these matters to the Controller for the processing of your personal data, as defined in point 1.1.

To ensure that your data do not fall into the wrong hands, and that no-one can erase your data against your wishes, it is essential that we check your identity every time you contact us.





Any complaints may be submitted to the regulatory authority:

State data protection inspectorate  
L. Sapiegos st. 17, Vilnius  
Phone +370 5 271 2804, 279 1445  
Website <https://www.vdai.lrv.lt/>  
E-mail [ada@ada.lt](mailto:ada@ada.lt)

You have the following specific rights:

### 6.1 Right of access

According to GDPR Art. 15, Controllers must provide any data subject with access to personal data concerning themselves which is being processed.

### 6.2 Rectification and erasure

According to GDPR Art. 16 and Art. 17, you as a data subject have the right to demand the rectification and erasure of personal data concerning yourself.

### 6.3 Restriction of processing

According to GDPR Art. 18, you have the right to restrict the processing of personal data concerning yourself.

### 6.4 Data portability

According to GDPR Art. 20 you have the right to data portability. This is the right, under the conditions specified, to obtain personal data you have provided, in a structured, commonly used, and machine-readable format, and to require that these data be transmitted to a third party.

### 6.5 Right to object

According to GDPR Art. 21 Part 1, every data subject has the right, for reasons arising from their particular situation to object to the processing of personal data concerning themselves as required amongst other things for the protection of legitimate interests of the Controller or a third party. This also applies to profiling data based on this provision. You can object at any time to the processing of your personal data for the purpose of direct marketing (e.g., for a spotlight or newsletter), to be effective for the future.

## 7 Automated decision-making

We do not use automated decision-making as defined in GDPR Art. 22 for decisions on the establishment and operation of our business relationships.

## 8 Modification of this policy declaration

This policy declaration replaces all earlier versions. We reserve the right to modify this policy as necessary if circumstances change. The current version of this data protection policy is available at any time on our website at [https://www.greco.services/lt/LTG\\_data\\_protection\\_declaration\\_clients.pdf](https://www.greco.services/lt/LTG_data_protection_declaration_clients.pdf).



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**GrECo Sagauta, UADB**

Insurance brokers and Risk consultants

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