

## PRIVACY POLICY

### 1. THE SCOPE

- 1.1. This Privacy Policy applies to the processing of personal data carried out by GABNÉ.GABNYS law firm (hereinafter – the **we**) through the website [www.gabne-gabnys.com](http://www.gabne-gabnys.com) (the **website**).
- 1.2. This Privacy Policy governs how we process personal data in accordance with:
  - 1.2.1. all matters related to our clients, potential clients and former clients.
  - 1.2.2. the cookies that are used on our website.
  - 1.2.3. all of our obligations under the General Data Protection Regulation (the **GDPR**), Law on Legal Protection of personal data of the Republic of Lithuania, and any other legislation that may be applicable.

### 2. DATA CONTROLLER

- 2.1. **GABNÉ.GABNYS law firm**, Didžioji st. 11, LT-01128 Vilnius, Lithuania, e-mail [info@gabnys.com](mailto:info@gabnys.com), acts as a data controller of your personal data, being responsible for your personal data processed via the website.

### 3. THE LEGAL BASIS FOR PROCESSING PERSONAL DATA

- 3.1. We process your personal data in accordance with the requirements of the GDPR and the Law on Legal Protection of Personal Data of the Republic of Lithuania. The legal basis for processing personal data depends on the specific purposes for which the data is collected and used, which may include:
  - 3.1.1. consent.
  - 3.1.2. agreements.
  - 3.1.3. legal obligations.
  - 3.1.4. legitimate interests.

### 4. CATEGORIES OF PERSONAL DATA PROCESSED, PURPOSE AND LEGAL BASIS

- 4.1. We process different categories of personal data depending on your interaction with our website and services. The table below outlines the main types of personal data we collect, the purposes for which the data is used, and the corresponding legal basis under the GDPR:

Category of Personal Data	Purpose of Processing	Legal Basis
<b>Identification data</b> (e.g. name, surname, personal code, date of birth)	To evaluate your eligibility for legal services and to conclude and execute agreements	Agreement performance
<b>Contact details</b> (e.g. email address, phone number, residential address)	To communicate with you regarding your inquiry, case, or services, to provide	Agreement performance, legitimate interests

	updates or send service-related notifications	
<b>Legal matter related information</b> (e.g. documents, case facts, supporting materials, evidence, communications)	To evaluate your eligibility to claim, merits of your claim and to represent your interests	Agreement performance, legitimate interests
<b>Financial data</b> (e.g. bank account number, payment information)	To process payments, refunds related to services, accounting and tax purposes, to determine damages sustained by the aggrieved persons	Agreement performance, legal obligations
<b>Website usage data</b> (e.g. IP address, browser type, operating systems, time spent on the website)	To ensure website functionality, improve performance, maintain security, and analyse user behavior	Legitimate interest

## 5. YOUR RIGHTS

- 5.1. We are legally obliged to ensure that your personal data remains accurate and up to date. To assist us to fulfill this obligation, we request that you notify us promptly of any changes to the personal data we are processing.
- 5.2. You may exercise the following rights with respect to our processing your personal data:
- 5.2.1. **Right to be informed.** You have the right to request to obtain information about the processing of your personal data.
- 5.2.2. **Right of access.** You have the right to obtain confirmation as to whether or not we process your personal data and, if so, to request access to that data, including information about the purposes of processing, the categories of data processed, and the recipients or categories of recipients.
- 5.2.3. **Right to rectification.** You have the right to request the correction of inaccurate personal data or the completion of incomplete data concerning you.
- 5.2.4. **Right to erasure (Right to be forgotten).** You have the right to request that we delete your personal data, if the data is no longer necessary for the purposes for which it was collected, or if the data was processed unlawfully, or if the data should be erased to enable us to comply with a legal requirement.
- 5.2.5. **Right to restriction of processing.** You have the right to request that we restrict the processing of your personal data in specific situations, such as when you contest the accuracy of the data or object to its processing, we are verifying the legitimacy of such processing.
- 5.2.6. **Right to data portability.** You have the right to receive your personal data in a structured, commonly used, and machine-readable format, and to transmit that data to another controller (if it is technically feasible), in case we process your personal data based on your consent or on the basis of a mutual contractual relationship.

- 5.2.7. **Right to object.** You have the right to object to the processing of your personal data that is based on our legitimate interests or that is carried out for direct marketing purposes.
- 5.2.8. **Right in relation to automated decision-making and profiling.** You have the right to request that decisions based on your personal data and that significantly affect you are made by natural persons, not only by computers.
- 5.2.9. **Right to withdraw consent.** If your personal data is processed based on your consent, you have the right to withdraw the consent at any time.
- 5.2.10. **Right to lodge a complaint with a supervisory authority.** You have the right to file a complaint with the State Data Protection Inspectorate of the Republic of Lithuania (ada@ada.lt) if you believe that the processing of your personal data violates applicable data protection laws.

## 6. THE RECIPIENTS OF PERSONAL DATA

- 6.1. In the course of providing services via the website and fulfilling our legal and contractual obligations, your personal data may be disclosed to the following categories of recipients:
- 6.1.1. **Legal and institutional recipients.** Your personal data may be disclosed to courts, arbitration bodies, law enforcement agencies, or other competent authorities where such disclosure is required by applicable law or necessary for the establishment, exercise, or defence of legal claims, opposing parties and their legal representatives, where relevant to your case, independent experts, legal professionals, or consultants engaged in relation to the services we provide.
- 6.1.2. **Supervisory and regulatory authorities.** Where necessary, and as required by applicable legal or regulatory frameworks, we may disclose your personal data to public institutions, supervisory bodies, or regulatory authorities, including but not limited to data protection authorities, tax authorities, or financial regulators.
- 6.1.3. **Auditors and professional advisors.** We may share your personal data with external auditors, accountants, legal advisors, or other professional consultants, where such disclosure is necessary to comply with legal obligations, to conduct audits, or to pursue or defend legal claims.
- 6.1.4. **Other permitted disclosures.** In limited and specific circumstances, we may disclose your personal data in connection with business transfers, such as mergers, acquisitions, or reorganisations, provided that all necessary safeguards are implemented; where disclosure is necessary to protect our legitimate interests or the rights, safety, and security of our clients or third parties, in accordance with applicable law.
- 6.2. We ensure that all recipients of your personal data uphold appropriate confidentiality obligations and implement adequate technical and organisational measures to ensure the protection of your data in accordance with this Privacy Policy and applicable legal requirements.

## 7. SOURCES OF PERSONAL DATA

- 7.1. We collect personal data from the following sources, depending on the nature of your relationship with us and the services you use:

- 7.1.1. **Data provided directly by you.** The majority of the personal data we process is provided directly by you when you submit inquiries or forms via website, provide documentation or information related to the legal matter, communicate with us via email, phone, or other channels, engage our legal services by entering into an agreement with us.
- 7.1.2. **Data collected automatically.** When you use our website, we may collect certain personal data automatically through the use of cookies and similar technologies. This may include IP address, browser type and version, operating system, date and time of access, browsing activity and preferences. Such data is collected for the purpose of ensuring the proper functioning, security, and optimisation of our website.
- 7.1.3. **Data received from third parties.** In some cases, we may receive your personal data from third parties, including but not limited to our legal partners or representatives, courts, regulatory authorities, or other public bodies, opposing parties or their legal representatives, publicly available sources, such as official registries or databases. All such personal data obtained from third parties is processed in accordance with this Privacy Policy and applicable data protection legislation.

## 8. DATA RETENTION AND PERIOD

- 8.1. We retain your personal data only for as long as it is necessary to fulfill the purposes for which it was collected, or as required by applicable laws and regulatory obligations.
- 8.2. **Retention for legal service purposes.** Personal data processed in connection with the provision of legal services for the duration of our relationship and subsequently for a period required by law. As required by applicable laws, such data may be retained for up to 10 years following the completion of the legal matter, unless a longer retention period is necessary due to ongoing legal obligations or proceedings.
- 8.3. **Retention in compliance with legal obligations.** We are legally required to retain certain categories of data for specified periods under applicable tax, accounting, anti-money laundering, and other statutory requirements. In such cases, your data will be stored for the time strictly necessary to meet those legal requirements.
- 8.4. **Retention based on legitimate interests.** Where appropriate, we may retain personal data beyond statutory periods if it is necessary for the establishment, exercise, or defence of legal claims, or for the protection of our rights and legitimate interests. In all such cases, data will be stored no longer than necessary and subject to appropriate safeguards.
- 8.5. **Retention of technical and website usage data.** Data collected through the use of cookies and other tracking technologies on the website is retained in accordance with our Cookie Policy and only for as long as necessary to fulfill the relevant purposes, unless you withdraw your consent earlier.
- 8.6. **Data deletion.** Upon expiry of the applicable retention periods, or once the personal data is no longer required for the specified purposes, we will securely delete or anonymise the data, unless we are under a legal obligation to retain it for a longer period.

## 9. CHANGES TO THE NOTICE

- 9.1. We reserve the right to update or modify this Privacy Policy at any time to reflect changes in our data processing practices, legal obligations, or other relevant developments, such as technological advancements, regulatory updates, or changes in our services.

- 9.2. Any changes to this Privacy Policy will be published on the website with the updated effective date and will become effective as of that date. In the event of material changes that may affect your rights or the way we process your personal data, we will take appropriate steps to notify you in advance, where feasible (e.g., by providing a notice on the website or via direct communication).
- 9.3. We encourage you to review this Privacy Policy periodically to stay informed about how we process and protect your personal data.