

# Privacy Policy

This Privacy Policy for personal data (hereinafter referred to as the Privacy Policy) applies to all information that the Internet resource "Spamguard" located on the domain name [www.spamguardapp.com](http://www.spamguardapp.com) (hereinafter referred to as the Site) can receive about the User while using the Site, Site's programs and products.

## 1. DEFINITION OF TERMS

1.1. The following terms are used in this Privacy Policy:

1.1.1. "Site's Administration" (hereinafter - the Site's Administration, Administration) - employees of **UAB "Euroneka" Vilniaus r. sav., Rukainių sen., Mūrininkų k., Mūrininkų g. 25**, acting on behalf of these legal entities and authorized to manage the Site, who organize and (or) processes personal data, and also determines the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.

1.1.2. "Personal data" - any information relating to an identified individual or an individual that can be identified.

1.1.3. "Processing of personal data" - any action (operation) or a set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution,

provision, access), depersonalization, blocking, deletion, destruction of personal data.

1.1.4. "Confidentiality of personal data" is a mandatory requirement for the Administration or other person who has gained access to personal data to prevent their dissemination without the consent of the subject of personal data or other legal grounds.

1.1.5. "Site User" (hereinafter referred to as the User) is a person who has access to the Site via the Internet and uses the Site.

1.1.6. "Cookies" is a piece of data sent by a web server and stored on the User's computer, which the web client or web browser sends to the web server every time in an HTTP request when trying to open the page of the corresponding site.

1.1.7. "IP-address" is a unique network address of a node in a computer network built using the IP protocol.

## **2. GENERAL PROVISIONS**

2.1. Use of the Site by the User means acceptance of this Privacy Policy and the terms of processing of the User's personal data.

2.2. In case of disagreement with the terms of the Privacy Policy, the User must stop using the Site.

2.3. This Privacy Policy applies only to the Site. The Site does not control and is not responsible for third-party sites to which the User can click on the links available on the Site.

2.4. The Administration does not verify the accuracy of the personal data provided by the Site User.

## **3.SUBJECT OF THE PRIVACY POLICY**

3.1. This Privacy Policy establishes the obligations of the Administration to not disclose and ensure the privacy protection of personal data that the User provides at the request of the Administration when registering on the Site or when placing an order to purchase goods (services).

3.2. Personal data allowed for processing under this Privacy Policy is provided by the User by filling out special registration forms on the Site and includes the following information:

3.2.1. last name, first name, patronymic (if applicable) of the User;

3.2.2. User's contact phone number;

3.2.3. e-mail address (e-mail);

3.2.4. place of residence of the User;

3.2.5. the content of the User's order;

3.2.7. User's order history;

3.2.8. the User's payment card type and expiration date, the last four digits of the payment card number.

3.3. Site protects personal data that is automatically transmitted when viewing ad units and when visiting pages on which the statistical system script is installed:

- IP address;
- information from cookies;
- information about the browser (or other program that provides access to the display of advertising);
- access time and place (geolocation);
- the address of the page on which the ad unit is located;
- referrer (address of the previous page).

3.3.1. Disabling cookies may result in the inability to access parts (sections) of the Site that require authorization.

3.3.2. The site collects statistics about the IP addresses of its visitors. This information is used to identify and solve technical problems, to control the legality of financial payments.

3.4. Any other personal information not specified above (browsers used, operating systems, etc.) is subject to secure storage and non-proliferation, except as provided in cl. 5.2 and 5.3 of this Privacy Policy.

3.5. The Administration does not collect or store the full payment card numbers of Users, while all transactions are processed by a third-party payment processor

## **4. PURPOSES OF COLLECTING PERSONAL USER INFORMATION**

4.1. The User's personal data may be used by the Administration for the following purposes:

4.1.1. Identification of the User registered on the Site for placing an order and (or) concluding a contract (public offer) remotely;

4.1.2. Providing the User with access to the personalized resources of the Site;

4.1.3. Establishing feedback with the User, including sending notifications, requests regarding the use of the Site, the provision of services, processing requests and applications from the User;

4.1.4. Determining the User's location to prevent, identify and investigate potentially prohibited or illegal activities, including fraud, and to ensure compliance with our security conditions;

4.1.5. Confirmation of the accuracy and completeness of personal data provided by the User.

4.1.6. Creating an account to receive services, if the User has agreed to create an account;

4.1.7. User notifications about the User's order status;

4.1.8. Processing and receiving payments, confirming tax or tax benefits, challenging the payment;

4.1.9. Providing the User with effective customer and technical support in case of problems related to the use of the Site.

4.1.10. Providing the User, with his consent, updated information about goods (services), special offers, prices, distribution of newsletters and other information on behalf of the Site or on behalf of the Site's partners;

4.1.11. Implementation of advertising activities with the consent of the User.

4.1.12. Providing the User with access to the sites or services of the partners of the Site in order to receive products, updates and services.

4.2. The Administration collects and uses Users' personal information solely for the purpose of achieving these goals, by lawful and fair means and, if necessary, with the knowledge or consent of the interested person.

4.3. Personal data must correspond to the purposes for which they are to be used, and, to the extent necessary for these purposes, must be accurate, complete and up-to-date.

## **5. METHODS AND TERMS OF PROCESSING PERSONAL DATA**

5.1. The processing of the User's personal data is carried out without any time limit, in any legal way, including in personal data information systems using automation tools or without using such tools.

5.2. The User agrees that the site Administration has the right to transfer personal data:

5.2.1. to third parties, in particular, courier services, postal communication organizations, telecommunication operators, IT infrastructure specialists (hosting provider, e-mail operator, computer network management company) solely for the purpose of fulfilling the User's order placed on the Site, as well as ensuring the functioning of the Site;

5.2.2. companies, agents or contractors who are engaged to provide services to the Site Administration (in order to ensure the provision of services to Users) or directly to Users. In particular, these third parties are involved in providing marketing, advertising, communication, infrastructure and IT services, personalization and optimization of the Site, processing transactions by bank cards or other payment methods, providing user services, collecting debts, analyzing and improving data (including data on User interaction with the Site), as well as processing and administering consumer surveys.

5.3. In case of loss or disclosure of personal data, the Administration informs the User about the loss or disclosure of personal data.

5.4. The Administration takes the necessary organizational and technical measures to protect the User's personal information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

5.5. The Administration, together with the User, takes all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of the User's personal data.

## **6. OBLIGATIONS OF THE PARTIES**

### **6.1. The User is obliged:**

6.1.1. Provide information about personal data necessary to use the Site;

6.1.2. Update, supplement the provided information about personal data in case of changes in this information.

### **6.2. The Administration is obliged:**

6.2.1. Use the received information about personal data exclusively for the purposes specified in section 4 of this Privacy Policy;

6.2.2. Ensure the storage of confidential information in secret, do not disclose without the prior written permission of the User, and also do not sell, exchange, publish, or disclose in other possible ways the transferred personal data of the User, with the exception of cl. 5.2 and 5.3 of this Privacy Policy;

6.2.3. Take precautions to protect the confidentiality of the User's personal data in accordance with the procedure usually used to protect this kind of information in the existing business;

6.2.4. Block personal data related to the relevant User from the moment of contact or request of the User or his legal representative, or the authorized body for the protection of the rights of subjects of personal data for the period of verification, in case of revealing inaccurate personal data or illegal actions.



## **7. LIABILITY OF THE PARTIES**

7.1. The site administration, which has not fulfilled its obligations, is liable for losses incurred by the User in connection with the unlawful use of personal data, in accordance with the legislation of the Republic of Lithuania, with the exception of cases provided for in cl. 5.2, 5.3 and 7.2 of this Privacy Policy.

7.2. In case of loss or disclosure of personal data, the Site Administration is not responsible if this personal data:

7.2.1. Became public domain before its loss or disclosure;

7.2.2. Was received from a third party before it was received by the Administration;

7.2.3. Was disclosed with the consent of the User.

## **8. DISPUTE RESOLUTION**

8.1. Before going to court with a claim for disputes arising from the relationship between the User and the Administration, it is mandatory to submit a claim (a written proposal for a voluntary settlement of the dispute).

8.2. The recipient of the claim within 30 calendar days from the date of receipt of the claim shall notify the applicant of the claim in writing about the results of the consideration of the claim.

8.3. If an agreement is not reached, the dispute is subject to judicial review.

8.4. This Privacy Policy and the relationship between the User and the Site Administration are subject to the current international legislation on the protection of personal data, including in terms of the provision of services by electronic means.

## **9. ADDITIONAL TERMS**

9.1. The Administration has the right to make changes to this Privacy Policy without the consent of the User.

9.2. The new Privacy Policy comes into force from the moment it is posted on the Site, unless otherwise provided by the new edition of the Privacy Policy.

9.3. All suggestions or questions about this Privacy Policy should be reported to the Site's Administration by using the email [support@spamguardapp.com](mailto:support@spamguardapp.com).

9.4. The current Privacy Policy is posted on the page at:

<https://spamguardapp.com/privacy-policy/>