

# Privacy Policy



VISIONARY  
ANALYTICS

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# 1. Main Definitions

1.1. Terms used in capital letters in this Privacy Policy (hereinafter referred to as **the Policy**) have the following meanings, unless the context gives them a different meaning:

- 1.1.1. **Personal Data** – means any kind of information about a natural person who is identified or who can be identified (Data Subject); a natural person who can be identified is a person who can be directly or indirectly identified first of all with identifiers, such as name and surname, personal identification number, location data and an Internet identifier or by one or more attributes of that natural person's physical, physiological, genetic, mental, economic, cultural or social identity.
- 1.1.2. **Processing** – means any kind of any operation or sequence of operations on Personal Data or sets of Personal Data by automated or non-automated means, such as collection, recording, sorting, systematisation, storage, adaptation or modification, retrieval, access, use, disclosure by transfer, distribution or otherwise access to it, as well as comparison or merging with other data, restrictions, deletion or destruction.
- 1.1.3. **General Data Protection Regulation or GDPR** – means Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC.
- 1.1.4. **Company or we** – means UAB “Visionary Analytics”, a limited liability company established in accordance with the laws of the Republic of Lithuania, with registered office at M. Valančius str. 1A, Vilnius, the Republic of Lithuania, legal entity code 302740632, data about which is collected and stored in the Register of Legal Entities of Lithuania.
- 1.1.5. **Data Subject** – means a natural person, whose Personal Data is processed by the Company.
- 1.1.6. **Data Controller** – means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.
- 1.1.7. **Data Processor** – means a natural or legal person, public authority, agency or other body which Processes Personal Data on behalf of the Data Controller.

## 2. Introduction

- 2.1. We respect your privacy and are committed to protecting your Personal Data. This Policy explains how we collect, use, and process your Personal Data and sets out your rights as a Data Subject.
- 2.2. When Processing Personal Data, we adhere to the requirements of the GDPR, other applicable laws, as well as the guidelines set by relevant supervisory authorities.
- 2.3. When we are Processing your Personal Data, we may act either as independent Data Controller or as Data Processor, acting on behalf of another Data Controller.

## 3. When We Act as Data Processor

- 3.1. We are a research-based advisory company providing applied research, evaluation and other consultancy services to the European Union and national institutions, international organisations and agencies.

- 3.2. When we provide research, evaluation and other consultancy services to European Union and national institutions, international organisations, or agencies, we generally act as a Data Processor and Process your Personal Data according to the instructions of these entities, which are the Data Controllers of your Personal Data. We will always share their privacy statements with you so that you are informed about how your Personal Data is Processed. Please review these privacy statements carefully before engaging with us for the specified purpose (e.g., targeted consultation activities (including surveys, interviews and focus groups) in the framework of specific research project of the respective European Union institution).
- 3.3. Our interviews with you may be recorded (audio and/or video recording) for the purpose of drafting the interview write-up. The audio and/or video recording shall not be published. If you object to the recording, we shall not record the interview.
- 3.4. If you have any questions regarding the Processing of your Personal Data, please contact the relevant entity (Data Controller) indicated in the privacy statement we have provided. If you direct your inquiry to us, we will forward it to the relevant entity.

## 4. When We Act as Data Controller

- 4.1. When we act as Data Controller, we may Process your Personal Data for the following purposes:

Purposes for Processing Personal Data	Personal Data we may process	Personal Data retention periods	Legal basis to process Personal Data
To conduct various research projects	<p>Name, surname, workplace, age, occupation or profession, education, address, email, your replies to our questions, additional data depending on the specific aims of the project, recorded voice and appearance during the interview</p> <p>Unless expressly agreed by you otherwise, your answers provided during stakeholder consultations (e.g. surveys, interviews, workshops) conducted for the purpose of research project will be anonymised, aggregated and published as part of the report</p>	<p>We shall retain your Personal Data for as long as we conduct specific research project for which your Personal Data has been collected</p> <p>If you consent to your Personal Data (name, surname, organisation you work at, answers to our questions) being published in the research project's report, your Personal Data shall be processed for as long as the report shall be publicly available</p> <p>Data from remote communications is retained according to the settings selected</p>	<p>Legitimate interests of ours and the society in general to understand the society better and transform its future (GDPR 6(1)(f))</p> <p>Your consent to participate in interview and publish your Personal Data in the respective research project's report (GDPR 6 (1) (a))</p>

	Our interviews with you may be recorded (audio and/or video recording) for the purpose of drafting the interview write-up. The audio and/or video recording shall not be published. If you object to the recording, we shall not record your interview	by the remote communication platform administrators and/or users	
To administer the database of job candidates	Name, surname, date of birth, age, email address, address, education, phone number, work experience, foreign languages, ability to work with computer, recommendations and motivational letter, competencies, personal traits, contact details of the person who recommended you, other information that you disclosed (e.g., hobbies, etc)	<p>Data is stored for the duration of the selection process and for 6 (six) month after its completion if you have not given consent for further retention of your Personal Data, or for 24 (twenty four) months after the selection process if you have provided consent for your data to be retained beyond the selection period</p> <p>Data from remote communications is retained according to the settings selected by the remote communication platform administrators and/or users</p>	<p>Your consent to participate in selection process (GDPR 6 (1) (a))</p> <p>If we select your candidacy after the completion of the selection process, we shall further Process your Personal Data on the basis of the employment contract (GDPR 6 (1)(c))</p>
To send direct marketing messages	Name, surname, email	For 3 (three) years from the date of the receipt of consent	<p>Your consent to receive direct marketing messages (GDPR 6 (1) (a))</p> <p>Our legitimate interests include maintaining subscriber mailing lists, analysing marketing results,</p>

			ensuring fair and transparent management of campaigns, and resolving issues with news delivery (GDPR 6(1)(f))
To conclude contracts and manage relationship with our service providers, partners and their staff	Name, surname, job title, business contact details, contract details, content of correspondence with the staff, etc.	<p>For the duration of the contract and for 10 (ten) years after the contract's termination</p> <p>VAT invoice data and payment data are retained for 10 (ten) years from the date of invoice receipt and payment execution</p> <p>Data from remote communications is retained according to the settings selected by the remote communication platform administrators and/or users</p>	<p>If the Processing of Personal Data is necessary for compliance with a legal obligation such as complying with tax law obligations or necessity to evidence and document services received, the Processing will be based on the legal obligation basis (GDPR 6(1)(c))</p> <p>If Personal Data is Processed for other purposes (e.g., such as receiving services, managing and developing our relations and business, administering contracts, security, quality and risk management activities), we shall rely on the legitimate interest basis (GDPR 6(1)(f))</p>
To conclude contracts and manage relationship with our clients and their staff	Name, surname, job title, business contact details, contract details, content of correspondence with the staff, etc.	<p>For the duration of the contract and for 10 (ten) years after the contract's termination</p> <p>VAT invoice data and payment data are retained for 10 (ten) years from the date of</p>	<p>If the Processing of Personal Data is necessary for compliance with a legal obligation such as complying with tax law obligations or necessity to evidence and document services received, the</p>

		<p>invoice receipt and payment execution</p> <p>Data from remote communications is retained according to the settings selected by the remote communication platform administrators and/or users</p>	<p>processing will be based on the legal obligation basis (GDPR 6(1)(c))</p> <p>If Personal Data is Processed for other purposes (e.g., such as receiving services, managing and developing our relations and business, administering contracts, security, quality and risk management activities), we shall rely on the legitimate interest basis (GDPR 6(1)(f))</p>
<p>To ensure our website's <a href="https://www.visionary.lt/">https://www.visionary.lt/</a> functionality and quality, keep it safe and secure and prevent fraud</p>	<p>Session data and technical information collected during your use of the website <a href="https://www.visionary.lt/">https://www.visionary.lt/</a></p>	<p>Cookie-based information: see section 8 of this Policy</p> <p>Other data: for up to 3 (three) years from the data collection</p>	<p>Our legitimate interest to ensure functionality and safety of the website (GDPR 6(1)(f))</p>
<p>To manage our social media accounts</p>	<p>Username, comments, shares, follows, reactions (such as "likes"), photos, message details (time, content, attachments), ratings, and any other information you provide</p>	<p>According to the settings of the platform or user</p>	<p>Your consent (GDPR 6(1)(a))</p> <p>Our legitimate interests to effectively manage social media accounts (GDPR 6(1)(f))</p>

4.2. Personal Data may be stored by us for a longer period than specified above, if we need to comply with applicable laws or for establishment, exercise or defence of legal claims.

4.3. When Processing your Personal Data, we shall:

- (i) comply with the applicable laws, including the GDPR;
- (ii) process your Personal Data lawfully, fairly and transparently;
- (iii) collect your Personal Data for clearly defined and legitimate purposes and not use it beyond those, unless allowed by law;
- (iv) correct or delete inaccurate Personal Data promptly;
- (v) retain Personal Data only as long as needed for its purpose;

- (vi) not share your Personal Data with third parties and will not disclose it other than as set out in this Policy or applicable law;
  - (vii) secure your Personal Data through appropriate technical and organisational security measures and shall limit access to your Personal Data to only necessary staff.
- 4.4. We may collect your Personal Data in the following ways:
- (i) directly from you, when you contact us via email or communicate with us in other ways;
  - (ii) from public sources when your Personal Data is made manifestly public either by you or by organisation you work for.
- 4.5. If you provide Personal Data about yourself or others, it is your responsibility to ensure it is accurate, complete, and up to date, and to obtain any necessary consents from others or inform them that you shall share their Personal Data with us. We may ask you to confirm that you have the right to share such data with us.

## 5. The Rights You Have

- 5.1. As a Data Subject, you have the following rights in relation to your Personal Data:
- (i) **the right to be informed:** you have the right to be provided with clear, transparent and easily understandable information about how we use your Personal Data and your rights. This is why we are providing you with the information in this Policy.
  - (ii) **the right to access:** you have the right to access the Personal Data we hold about you;
  - (iii) **the right to rectification:** you have the right to ask us to rectify your Personal Data if it becomes inaccurate;
  - (iv) **the right to erasure:** you have the right to ask us to erase your Personal Data. However, this right is not absolute and may be limited when Personal Data is Processed for archival purposes in the public interest, for scientific or historical research purposes or for statistical purposes, where the right to request erasure may make it impossible or seriously jeopardize the achievement of the purposes of that Processing;
  - (v) **the right to restrict Processing:** you have the right to restrict Processing of your Personal Data in certain circumstances, including if we no longer need your Personal Data but you would like us to retain it to ensure its continued availability to you in connection with any legal claims;
  - (vi) **the right to data portability:** you have rights to obtain and reuse your Personal Data for your own purposes across different services in certain circumstances;
  - (vii) **the right to object:** you have the right to object at any time to processing of Personal Data concerning you which is based on legitimate interests. If we can show compelling legitimate grounds for processing your Personal Data which override your interests, or we need your Personal Data to establish, exercise or defend legal claims, we can continue to Process it. Otherwise, we must stop using the relevant Personal Data.
  - (viii) **the right to withdraw consent:** where you may have provided your consent to the Processing of your Personal Data for a specific purpose, you have the right to withdraw your consent for that specific Processing at any time;
  - (ix) **the right to lodge a complaint:** you have right to lodge a complaint with the relevant data protection supervisory authority.
- 5.2. We may refuse to fulfil your rights, except for the right to withdraw consent, where we are not permitted to comply with your request under the GDPR.
- 5.3. **Please be aware that we may only exercise your rights until we retain your Personal Data. Once it is deleted or anonymised, we shall not be able to identify you and data related to you.**
- 5.4. You can withdraw your consent or exercise any of your rights set out above by contacting us via email at [contact@visionary.it](mailto:contact@visionary.it).



- 5.5. In order to verify your identity, we may ask you to provide proof of identity, such as a copy of an identity card, passport, or to sign the request with a qualified electronic signature.
- 5.6. We do not typically charge any fee for exercising your rights. However, GDPR permits us to charge a reasonable fee or to refuse to comply with your request if it is manifestly unfounded or excessive.
- 5.7. Upon receipt of your request regarding the Processing of your Personal Data, we will respond within 1 (one) month from the date of the request and will either carry out the actions specified or inform you why we are unable to do so. If necessary, the time limit may be extended by an additional 2 (two) months due to the complexity and number of requests. In this case, we will notify you of the extension within 1 (one) month of receiving your request.

## 6. Direct Marketing

- 6.1. With your consent, we may use your Personal Data for direct marketing, such as sending you newsletters, offers, and updates on our services that we think might interest you, as well as asking for feedback on the quality of our services and your experience. We may send updates via email.
- 6.2. Your contact information might be shared with our partners who help us deliver news and assess service quality. After sending news, we may collect information on how you interact with it, like whether you opened the message or clicked on links. This helps us send you more relevant and personalized updates.
- 6.3. Even if you have given consent for us to use your Personal Data for direct marketing, you can easily withdraw it at any time. To do this, you can unsubscribe using the link or method provided in our message or send us an email.

## 7. Disclosing and Transferring Personal Data

- 7.1. There are certain circumstances where we may transfer your Personal Data to employees, contractors and to other parties:
  - (i) We may share your information with certain service providers (i.e., Data Processors). They may Process your Personal Data for us, for example, IT service providers (maintenance/support, development, etc.), hosting and cloud service providers, database providers, backup and disaster recovery service providers, email providers, other service providers. The information we provide them, including your Personal Data, will only be provided to the extent necessary for the provision of services to us.
  - (ii) If we are discussing selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable confidentiality terms.
  - (iii) If we are reorganised or sold, information may be transferred to a buyer who will continue the business.
  - (iv) If we are required to by law or if we are asked by any public authority, for example, the police.
  - (v) If we are defending a legal claim, your information may be transferred as required in connection with defending such claim.
  - (vi) To comply with local and national laws (e.g., for auditing purposes to our auditors).
  - (vii) In other circumstances, if it is necessary to share your Personal Data.
- 7.2. We commit to use only such Data Processors who provide sufficient guarantees, in particular with expert knowledge, reliability and resources, to implement technical and organisational measures, so that the Processing of Personal Data complies with GDPR and ensures adequate protection of the rights of the Data Subjects. The Processing of Personal Data by the Data Processor shall be governed

by an agreement which shall specify, inter alia, the subject matter and duration of the Processing of Personal Data, the nature and purpose of the Processing, the type of Personal Data and the categories of Data Subjects, obligations and rights of the Company.

- 7.3. Generally, we process and keep your Personal Data in the territory of the European Union, however, we may transfer your Personal Data outside the European Union, for example, when it is necessary for the conclusion and execution of the contract. Some of the countries may not benefit from an adequacy decision issued by the European Commission regarding protection afforded to Personal Data in that country. Details of these specific countries can be found here: [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en). Such transfers would then be undertaken in accordance with regulatory requirements. Appropriate safeguards under GDPR would be implemented, such as standard data protection clauses with data recipients.

## 8. Cookies and Other Tracking Technologies

- 8.1. A cookie is a small text file that is stored in the browser or on your device (computer, tablet, mobile phone). In this Policy, we use the term “cookies” to refer to cookies and other similar technologies such as Pixel Tags, Web Beacons and Clear GIFs.
- 8.2. Cookies may be used to analyse information flows and user behaviour, to promote trust, to ensure security and the proper functioning of the website, to remember preferences, to personalise the content displayed, and to link the website to social accounts.
- 8.3. Cookies used on our website:

Cookie name	Type	Description	Period of validity

- 8.4. In addition, we use Google Analytics that record cookies and collect data. Purpose of this tool is to generate statistics on the use of the website, aiming to reduce the frequency of requests. The collected data is transmitted to the USA. You can prevent Google Analytics from working by adjusting your browser settings or installing a browser plug-in. For more information, please refer to: <https://tools.google.com/dlpage/gaoptout?hl=en>.
- 8.5. Some third parties, such as social media network operators, may use their own anonymous cookies to tailor the apps or applications they create to your needs. We do not control the use of these cookies. We recommend that you check the privacy policy of the third party for more detailed information.
- 8.6. You can always review the cookies stored in your browser. You can withdraw your consent to use cookies at any time by changing your settings and deleting stored cookies. You can restrict or block

cookies through your browser settings and adjust them to notify you before any cookies are placed. You can also configure your settings to reject all cookies or only third-party cookies. You will need to adjust the settings separately for each browser, computer, or mobile device. If necessary, use your browser's help function to properly configure these settings. For more detailed information on managing cookies, please visit <http://www.AllAboutCookies.org> or [https://www.google.com/privacy\\_ads.html](https://www.google.com/privacy_ads.html), as well as the help page of the browser you are using. You can manage the use of advertising cookies on the Network Advertising page at [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp).

## 9. Final Provisions

- 9.1. We may update this Policy at any time. Such updated Policy will take effect from the date of publishing on our website <https://www.visionary.lt/>.
- 9.2. Each time our Policy is updated, we will inform you of all the changes that we deem significant by posting them on the website <https://www.visionary.lt/>.
- 9.3. Enquiries about this Policy or the use of Personal Data can be sent to [contact@visionary.lt](mailto:contact@visionary.lt).

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