**UAB “LTG LINK”**

**PRIVACY NOTICE**

Last updated in June 2023

Private Limited Company LTG Link (**“LTG Link”** or the **“Company”** or simply **“we”**) protects information about you and processes your data in accordance with the General Data Protection Regulation of the European Union (the **“GDPR”**[[1]](#footnote-2)) and other data protection legislation. This LTG Link privacy notice (the **“Privacy Notice”**) provides details of this.

1. **What is contained in this Privacy Notice?**

This Privacy Notice answers the most important questions about how we collect, use, and protect information about you. Please read this important information carefully and from time to time visit our website at <https://ltglink.lt/privatumo-pranesimas> to read the most up-to-date version of the Privacy Notice posted there.

1. **Who is responsible for protecting information about you?**

UAB “LTG Link”, legal entity code: 305052228, registered office address: Geležinkelio Str. 16, Vilnius, email address: [info@ltglink.lt](mailto:), telephone No.: 8 700 55 111

1. **What information do we collect about you and why?**

| **No.** | **Why do we collect information about you?** | **What information do we collect about you?** | **Why do we have the right to collect the information you provide?** | **How long do we use or keep information about you?** |
| --- | --- | --- | --- | --- |
|  | You are at least 14 years old, register on the website and create an account. | Name, surname, email address and telephone number (optional). If you buy a ticket, the date of the first ticket purchase is stored. | We have your consent  (Article 6(1)(a) of the GDPR). | As long as you are an active customer.  If you do not take any active steps on your account for 36 months (e.g., editing your account, buying tickets), the account will be automatically cancelled, your data will be deleted or anonymised, and you will have to create a new account and re-register. |
|  | We enter into and perform a contract of carriage of passengers with you or your children (dependants) as well as provide related services (e.g., ticket sales or refunds) and carry out related tax obligations – **you are a registered user and you purchase a single travel ticket** | Name, surname, email address, telephone number (optional), method of payment, payer’s bank account number, other payment-related information, information on tickets purchased and travel details (ticket number, itinerary, taken train number, arrival and departure stations, travel time, duration of journey, seat number, carriage and class, fare, concessions and commercial discounts granted, ticket number), information on additional services (bicycle, extra luggage, animal transport), information on how the ticket was purchased, and information on the inspection of tickets. | We enter into a contract with you and perform our contractual obligations (Article 6(1)(b) of the GDPR) and we are obliged to collect information in accordance with law (Article 6(1)(c) of the GDPR). | Three years from the date of entering into a contract with you on the purchase/change/refund of a ticket. |
| Special categories of data: information on whether a passenger requires a service of accompanying a disabled person, wheelchair transport or assistance dog services. | The processing is necessary for important reasons of public interest based on the legislation of the RL (Article 9(2)(g) of the GDPR, Law of the RL on Transport Privileges) |
|  | We enter into and perform a contract of carriage for passengers with you or your children (dependants) and provide related services (e.g., ticket sales or refunds) as well as carry out related tax obligations – **you are an unregistered user and you buy a single travel ticket.** | Email address, telephone number (optional), method of payment, payer’s bank account number, other payment-related information, information on tickets purchased and travel details (ticket number, itinerary, taken train number, arrival and departure stations, travel time, duration of journey, seat number, carriage and class, fare, concessions and commercial discounts granted, ticket number), information on additional services (bicycle, extra luggage, animal transport), information on how the ticket was purchased, and information on the inspection of tickets. | We enter into a contract with you and perform our contractual obligations (Article 6(1)(b) of the GDPR) and we are obliged to collect information in accordance with law (Article 6(1)(c) of the GDPR). | Three years from the date of entering into a contract with you on the purchase/change/refund of a ticket. |
| Special categories of data: information on whether a passenger requires a service of accompanying a disabled person, wheelchair transport or assistance dog services. | The processing is necessary for important reasons of public interest based on the legislation of the RL (Article 9(2)(g) of the GDPR, Law of the RL on Transport Privileges). |
|  | We enter into and perform a passenger carriage contract with you or your children (dependants) as well as provide related services (e.g., ticket sales or refunds) and carry out related tax obligations – **you are a registered or unregistered user and you purchase a season travel ticket**. | Name, surname, email address, telephone number (optional), payment method, payer’s bank account number, other payment-related information, information on purchased tickets and travel data (season ticket number, itinerary, arrival and departure stations, date of ticket activation, season ticket price, concessions and commercial discounts granted), information on ticket validity days (working days or calendar days), information on the method of purchase of the ticket, information on ticket inspection. | We enter into a contract with you and perform our contractual obligations (Article 6(1)(b) of the GDPR) and we are obliged to collect information in accordance with law (Article 6(1)(c) of the GDPR). | Three years from the date of entering into a contract with you on the purchase/change/refund of a ticket. |
| Special categories of data: information on whether a passenger requires a service of accompanying a disabled person, wheelchair transport or assistance dog services. | The processing is necessary for important reasons of public interest based on the legislation of the RL (Article 9(2)(g) of the GDPR, Law of the RL on Transport Privileges) |
|  | You are an unregistered user and purchase a gift voucher. | Email address, telephone number (optional), payment method, payer’s bank account number, other information related to the payment, information about the gift vouchers purchased (voucher number, voucher expiry date, value of the voucher, name of the recipient). | We enter into a contract with you and fulfil our contractual obligations (Article 6(1)(b) of the GDPR). | Three years from the purchase of the gift voucher. |
|  | You are a registered user and purchase a gift voucher | Name, surname, email address, telephone number (optional), payment method, payer’s bank account number, other information related to the payment, information about the gift vouchers purchased (voucher number, expiry date, value of the voucher, name of the recipient). | We enter into a contract with you and fulfil our contractual obligations (Article 6(1)(b) of the GDPR). | Three years from the purchase of the gift voucher. |
|  | You request an invoice. | Name, surname, address, city, country, postcode. Optional information – self-employment number, VAT ID. | We enter into a contract with you and perform our contractual obligations (Article 6(1)(b) of the GDPR) and we are obliged to collect information in accordance with law (Article 6(1)(c) of the GDPR). | Ten years after the issue of the invoice. |
|  | You use an assistance service for disabled persons (with individual needs) or persons with reduced mobility when travelling on international routes | The following information must be provided: initials of the name and surname, gender, telephone number, form of disability (blindness, impaired mobility, etc.), assistive device used during the journey (wheelchair, white cane, etc.), itinerary, departure and arrival stops, date and time of travel, carriage number.  Optional data: email address, amount of luggage, whether a passenger is travelling with an accompanying person, other additional information provided by the passenger. | We enter into a contract with you and fulfil our contractual obligations (Article 6(1)(b) of the GDPR), the processing is necessary for important reasons of public interest based on the legislation of the RL (Article 9(2)(g) of the GDPR, the Law of the RL on Transport Privileges, the rights of the data subject in the field of social security law (in accordance with Regulation (EU) 2021/782 of the European Parliament and of the Council of 29 April 2021 on rail passengers’ rights and obligations)). | The data shall be deleted not later than one working day after the provision of the assistance service. |
|  | We conclude and perform contracts with you for the lease of trains and the carriage of passengers on the route and carry out related tax obligations. | Name, surname, email address, telephone number, signature, amount due, amount of the security deposit, method of payment, payer’s bank account number, other information relating to the payment, the contract and the information contained in the contract, the date of the contract, the time of departure of the train to be rented and the itinerary, the information contained in the statement on acceptance and handover, and any other information relating to the conclusion and performance of the contract. | We enter into a contract with you and perform our contractual obligations (Article 6(1)(b) of the GDPR) and we are obliged to collect information in accordance with law (Article 6(1)(c) of the GDPR). | During the term of the contract and for ten years after the end of the contract. |
|  | We conclude and perform contracts with you for the receipt, clearance, carriage and issue of consignments and we fulfil related tax obligations. | Name, surname, city, contact telephone number, signature, service receipt, service receipt number, number and itinerary of the train on which the consignment is being transported, date of acceptance and receipt of the consignment, type of consignment, amount paid for the carriage of the consignment.  A request/complaint about damage to the packaging and the information contained therein, the amount paid for storing the consignment for more than two days, and the notes on the consignment in the consignment note. | We enter into a contract with you and fulfil our contractual obligations (Article 6(1)(b) of the GDPR). | Two years after dispatch. |
|  | We store and release: found items, items removed from electronic storage, items from oversized luggage/long-term storage. | 1) Name, surname, and telephone number of the person requesting the release of the found items, date of loss, circumstances of loss, type of packaging, description, quantity, amount paid for storage/shipping costs, signature of the person;  2) Name, surname, telephone number of the person requesting the release of the items left in the electronic storage facility, section number, locker number, receipt number, type of packaging, quantity of the items, amount paid for the storage of the items, signature of the person. | We enter into a contract with you and fulfil our contractual obligations (Article 6(1)(b) of the GDPR).  We have a legitimate interest (to ensure the safekeeping of the items found and their transfer to their owners) (Article 6(1)(f) of the GDPR). | One year from the date of application. |
|  | Through the reporting line channels, you provide us with information about possible fraud, corruption, other criminal offences, breaches of the law or breaches of work responsibilities. | If a person provides information by telephone ((8 5) 269 3600) not on an anonymous basis, the data processed are the data provided by the person themselves, such as their name, surname, etc., the content of the message, the telephone number from which the call was made, the start, end and duration of the call, and any other personal data, if the person provides it.  If a person provides the information by email ([prevencija@bekorupcijos.lt](mailto:prevencija@bekorupcijos.lt)) or via the website [www.litrail.lt](http://www.litrail.lt): email address and additional information; if the person provides the information non-anonymously: name, surname, telephone number, content of the message. | We have a legitimate interest (to prevent fraud, corruption, other criminal offences, breaches of the law, breaches of work responsibilities and other violations to prevent acts being committed, to take measures to prevent acts being committed in the future, etc.) (Article 6(1)(f) of the GDPR). | One year from the date of receipt of the information. |
|  | We enter into and perform contracts with you for the provision of advertising services and comply with related tax obligations. | Name, surname, email address, telephone number, signature, amount to be paid, method of payment, payer’s bank account number, other information relating to the payment, the contract and the information contained in the contract, the date of the contract, the layout of the advertisement, the information on the location of the advertisement, the information contained in the statement on acceptance and handover, and any other information relating to the conclusion and performance of the contract. | We enter into a contract with you and perform our contractual obligations (Article 6(1)(b) of the GDPR) and we are obliged to collect information in accordance with law (Article 6(1)(c) of the GDPR). | During the term of the contract and for ten years after the end of the contract. |
|  | We maintain relationships with the natural or legal persons you represent | Name and surname, personal identification number and/or date of birth, residential address, power of attorney, period of validity and number of the power of attorney, signature, relationship to the principal, principal’s name, job title, telephone number, email address, login to our systems, any information you provide to the Company (e.g., information about the person you are representing, any contracts you have entered into, etc.), and, in relation to the performance of the contract, communications with you, any other information that may be necessary for the proper performance of the contract. | We have a legitimate interest (to maintain a relationship with the persons you represent) (Article 6(1)(f) of the GDPR). | During the term of the contract and for ten years after the end of the contract. |
|  | After your trip, we invite you to take part in **a survey** asking for your opinion on the quality of the service you received and your experience during your trip.  The survey is open to people aged 14 and over.  Surveys help us to improve the quality of our services and develop services that meet your needs. | In order to contact you and to get your opinions and ratings, we collect the following data: your email address, information about the completed journey (e.g., itinerary, train number, date of travel, ticket type).  If you agree to be contacted to answer questions about the quality of the services provided, we additionally process: email address and/or telephone number, name (optional).  If you agree to become an active member of the community (to participate in surveys), we additionally process: email address, telephone number and name (optional).  You can cancel the receipt of surveys at any time by clicking the unsubscribe link in the survey email.  Other demographic data in the surveys are collected and used for statistical information/analysis purposes only. | We have a legitimate interest to enquire about the quality of the service after the journey (Article 6(1)(f) of the GDPR) or we have your consent (Article 6(1)(a) of the GDPR). | We will keep the information for two years from the date of sending the invitation to participate in the survey.  We will store anonymised responses in accordance with the Company’s procedures.  If you agree to be contacted to answer questions about the services provided, we will keep the data for two years after the survey invitation was sent and, after the expiry of the retention period, the data will be anonymised without any possibility of linking it to a specific individual.  If you consent to becoming a member of the community (to participating in surveys), we will carry out the surveys for 2 (two) years from the date of your consent or until you withdraw your consent. |
|  | After you have given your consent to the surveys, we ask for your opinion about offers, services or your needs.  Consent may be given by persons aged 14 and over.  Surveys help us to improve the quality of our services and develop services that meet your needs. | In order to contact you and to get your opinions and ratings, we collect the following data: your email address, information about the journeys you have made (e.g., itinerary, train number, date of travel).  If you have created an account or purchased season tickets at least once, we additionally process personal identification information such as name and surname.  You can cancel the receipt of surveys at any time by clicking the unsubscribe link in the survey email.  Other demographic data in the surveys are collected and used for statistical information/analysis purposes only. | We have your consent to use information about you for direct marketing purposes and for carrying out surveys (Article 6(1)(a) of the GDPR, Article 81(1) of the Law of the RL on Electronic Communications). | We carry out surveys  for 2 (two) years from the date of receipt of your consent or until you withdraw your consent.  We will keep the information for one year after the invitation to take part in the survey has been sent.  We will keep survey responses for two years after the survey response. |
|  | We do direct marketing intended for you by sending **newsletters** by email.  In our newsletters, we provide special offers, including personalised offers of discounted tickets for local train travel, advertisements or announcements of promotions and services that are related to the activities of the Company and the Company’s partners, which are intended only for you.  We use automated decision-making, including profiling, to provide you with tailored and effective direct marketing services.  To do this, we take into account your preferences and needs, based on your behaviour (e.g., if you are travelling with an animal and you have bought a single ticket, you may be offered a discounted season ticket with an animal-friendly place in the carriage, etc.). | We collect the following personal data for the purpose of communicating with you via our newsletters: Personal identity information: name, surname (if you have created an account or have purchased season tickets at least once).  Contact details: email address.  In order to provide you with personalised offers, we need to have: shopping history, e.g., information about previously purchased, exchanged or returned tickets (itinerary, time, class, additional services, method of purchase, discounts applied).  Personal data created by the user, such as information about activity on our information systems, behaviour in digital channels, saved shopping cart (if the passenger has accepted cookies), etc.  Communication information sent to the client. | We have your consent to use information about you for direct marketing purposes (Article 6(1)(a) of the GDPR, Article 81(1) of the Law of the RL on Electronic Communications). | For 2 (two) years from the date of receipt of your consent or until you withdraw your consent.  The content sent is stored for one year from the date of sending. |
|  | We run the Sustainable Travel Club programme, manage your registration and participation (points accumulated, discounts applied, discount vouchers received), and send you newsletters by email.  In our newsletters, we provide special offers, including personalised offers of discounted tickets for local train travel, advertisements or announcements of promotions and services that relate to the Company’s activities as well as to the activities of the Company’s partners, and we invite you to take part in our surveys.  We use automated decision-making, including profiling, to provide you with personalised offers tailored to your needs.  To do this, we take into account your preferences and needs, based on your behaviour (e.g., if you are travelling with an animal and you have bought a single ticket, you may be offered a discounted season ticket with an animal-friendly place in the carriage, etc.). | To participate in the programme, you need to provide us with your name, surname, and email address.  If you want to receive even more precise offers tailored to you, you can also provide your phone number and selected programme groups.  In order to be able to provide personalised offers, we additionally need to have the following to achieve these purposes: shopping history, e.g., information on previously purchased, exchanged or returned travel tickets (itinerary, time, class, additional services, method of purchase, discounts applied).  Personal data generated by you (if you have consented to the use of cookies), e.g., information about activity on our information systems, behaviour on digital channels, saved shopping cart, etc.  To withdraw your consent to direct marketing, automated decision-making, and profiling and to terminate your membership of the programme, you can do so using the active link at the bottom of every email you receive or by managing your Personal Account by logging into the [www.ltglink.lt](http://www.ltglink.lt) website.  If you withdraw your consent, your data will not be processed for the purposes set out in the programme. | We enter into a contract with you on the participation in the programme and fulfil our contractual obligations (Article 6(1)(b) of the GDPR).  We have your consent (Article 6(1)(a) of the GDPR, Article 81(1) of the Law of the RL on Electronic Communications). | Details of your participation in the programme:  For as long as you are a member of the programme and for three years after termination of membership.  Travel history data is stored for: Three years after the last trip taken; after the end of the set retention period, the data is anonymised.  If you do not log in to your account for 36 months, your account will be removed, and the data will be deleted or anonymised. |
|  | By communicating with you, organising competitions and games on our social networks:  **On Facebook**  <https://www.facebook.com/LTGLink>  **On Instagram**  <https://www.instagram.com/ltg_link/>  **On LinkedIn**  <https://www.linkedin.com/company/ltg-link/mycompany/?viewAsMember=true>  **On YouTube** <https://www.youtube.com/channel/UCq6S_jYD9REozJ4pKluNC3w>  **On TikTok**  [https://www.tiktok.com/@ltglink](https://www.tiktok.com/%40ltglink) | We will manage the social media account data you provide to us on our accounts, such as your account name, your account profile picture, the reactions (“likes”) you have expressed to the information posted, the comments you have left, and the content you have posted on our account (e.g., if you have shared photos or videos in comments).  For the purpose of organising games and competitions, we will process your personal data as described in this Privacy Notice.  You can exercise your right to object to the processing of your personal data on social networks in accordance with the procedures set out by the managers of the social networks. | We will process the personal data you provide on the basis of legitimate interest: to inform you about news, to communicate with our followers and visitors to our social pages, to tailor the information we provide on the basis of statistical information, and to tailor our other account activities to the needs of our account visitors. | The personal data that you provide when you take certain actions on social networks is processed and stored in accordance with the procedures and time limits established by the managers of the social networks, and we are not able to exercise any influence over it. |
|  | We will invite you to take part in competitions and games. | We will collect the following personal data for participation in competitions and games: name, surname, email address, telephone number, and other data that we will inform you about in the competition conditions. This is necessary to enable us to fulfil our contractual obligations to you. If we cannot use your data, you will not be able to enter the competition and win. In the event of winning prizes, we process personal data in order to comply with the legal requirements applicable to us. | We have your consent  (Article 6(1)(a) of the GDPR) | Six months after the end of the competition. |
|  | You submit a request, application, suggestion or complaint to us by sending an email to the general email address, by using the form on the website or through other electronic communication channels | Name, surname, email address, telephone number, subject of the request, time of receipt of the request, content of the request, attachments to the request, history of correspondence, other information provided in relation to the request made, response to the request. | We have your consent  (Article 6(1)(a) of the GDPR), we are obliged to collect information in accordance with the law (Article 6(1)(c) of the GDPR), and we have a legitimate interest (to deal with your enquiries, requests or complaints) (Article 6(1)(f) of the GDPR). | One year after the last referral  and  Two years after the complaint was lodged. |
|  | We record telephone conversations to ensure the quality of our services, to provide accurate information and advice, and to deal with queries, complaints and requests. | Telephone number, recordings of telephone conversations and data provided during the conversations. | We have your consent under Article 6(1)(a) of the GDPR (you agree to continue the conversation) and we have a legitimate interest (to ensure the quality of customer service, to provide accurate information about the services provided, to give advice, and to deal with requests, enquiries or complaints under Article 6(1)(f) of the GDPR) | One year after the conversation with you.  In exceptional cases (e.g., in the event of a dispute or complaint, to investigate an incident), the retention period of a call recording may be extended and the recording will be deleted once the basis for the extension of the retention period has expired. |
|  | To ensure the quality of our services and efficiency of our activities, we generate reports on call recordings and only provide the necessary information in the reports. | Telephone number, duration of the call, topic of the conversation, conversation evaluation score | We have a legitimate interest (to ensure the quality of our customer service and efficiency of our activities and to deal with requests, enquiries or complaints under Article 6(1)(f) of the GDPR). | One year after the conversation with you.  The information contained in the reports is anonymised at the end of the retention period |
|  | We ensure the safety of your health, your life and the safety of the Company and your property when you are on Company premises or trains under video surveillance. | Video footage (where appropriate, video is recorded alongside audio). | We have a legitimate interest (safety of property and persons) (Article 6(1)(f) of the GDPR). | Up to 30 days. |
|  | We investigate rail transport disasters, traffic accidents or incidents. | Witnesses to a rail transport disaster, traffic accident or incident: name, surname, licence plate number, photo, video footage.  Victims of a rail transport disaster, traffic accident or incident:  Name, surname, place of residence, gender, age, actions of the person killed or injured (person deliberately stood, sat, or lay on the track in front of the approaching rolling stock; person failed to react to warnings and other signals and did not move from the track; person deliberately jumped in front of the approaching rolling stock; and any other actions of a similar nature), photo and video footage.  The name and surname of the person who caused the rail transport disaster, traffic accident or incident, and any other information that we are required to process under the applicable legal obligation. | We are obliged to collect information in accordance with the law (Article 6(1)(c) of the GDPR), in accordance with the Description of the Procedure for Classification, Reporting and Provision of Information on Rail Transport Disasters, Traffic Accidents or Incidents approved by order No 3-176 of 29 March 2021 of the Minister of Transport and Communications of the Republic of Lithuania “On the Approval of the Description of the Procedure for Classification, Reporting and Provision of Information on Rail Transport Disasters, Traffic Accidents or Incidents”. | Ten years after a rail transport disaster, traffic accident or incident. |
|  | You use wireless Internet on our trains. | IP address, operating system version and settings, device name and settings (MAC, type, etc.), session start time and duration, queries entered and any information stored by cookies on the visitor’s device, the name and version of the browser used, the action and the date and time of the action, the Uniform Resource Locator (URL) to which the connection is made, the protocol used for the connection, the application used, the number of the port on which the connection is made, the amount of data downloaded/sent during the connection, and any other service data used for the purpose of establishing the connection. | We conclude and perform a contract with you (Article 6(1)(b) of the Regulation). | Up to one year. |
|  | We make sure that our website works efficiently and safely and we strive to learn about how people use the services we offer on our website so that we can improve them and develop new ones. | IP address, operating system version, the settings of the device you are using, the time and duration of the session start, the queries entered on our website and any information stored using cookies placed on your device (for more information on the use of cookies, please see paragraph 12 of the Privacy Notice). | We have a legitimate interest (to monitor the quality of our services, to improve and develop new services, to ensure that the Company’s website operates in a safe and secure manner and that visitors to the Company’s website can find the information that is relevant to them) (Article 6(1)(f) of the GDPR). | Up to one year. |
|  | We may be involved in legal proceedings concerning you. | All information mentioned in this Privacy Notice, such as name, surname, date of birth, residential address, telephone number, email address, powers of attorney, contact details, any documents sent to persons and their attachments, documents submitted by persons and their attachments, procedural documents, court orders, rulings, judgments, information about criminal offences and convictions. | We have a legitimate interest (to defend the Company’s rights in legal proceedings) (Article 6(1)(f) of the GDPR). | Ten years after the end of the contract with you or ten years after the end of legal proceedings. |
| Special categories of personal data. | The data is necessary for the establishment, exercise or defence of legal claims (Article 9(2)(f) of the GDPR). |
|  | You make a request to exercise data subjects’ rights under the GDPR and we ensure that the request is implemented. | Depending on the personal data you provide: name, surname, telephone number, address, date of birth, email address, table number, legal partner code, copy of an identity document, request for the exercise of the data subject’s rights, date of the request, location of the request, the specified method of responding to the request, the content of the request and other information provided in the data subject’s request, the response to the data subject, other information related to the exercise of the data subject’s rights. | We have a legal obligation (to enforce the rights of data subjects – Chapter III of the GDPR). | Requests are kept for five years from the date of the reply. |

1. **Processing of children’s personal data**
2. Only persons aged 14 years and over can become registered users, participate in the Sustainable Travel Club programme, and consent to direct marketing. Individual loyalty programmes or competition conditions may have a different, higher minimum age limit for participants.
3. If we have reasonable grounds to suspect that we are processing the data of individuals who are younger than the age set out in this paragraph, we will remove the data of those individuals from our databases.
4. **What information do you have to provide to us and why?**

Please see the answer to paragraph 3 above: you must provide the information about you that is necessary:

* 1. To enter into contracts with you and fulfil our contractual obligations;
  2. To enter into contracts with the persons you represent and fulfil our contractual obligations;
  3. To give you access to wireless internet on our trains (paragraph 3.26).

If you do not provide the information requested, we will not be able to enter into contracts and contractual obligations with you and/or the persons you represent.

1. **Where do we get information about you?**

Most of the information is provided by you, but we may receive some information from:

* 1. The legal persons you represent or are employed by;
  2. AB “Lietuvos geležinkeliai” (for the purposes set out in paragraphs 3.12, 3.24 and 3.25).

1. **With whom do we share information about you?**

We transfer or share information about you with partners, service providers, and the entities listed below only to the extent necessary and permitted by applicable law, and for the reasons listed in paragraph 3:

* 1. LTG Link’s parent company AB “Lietuvos geležinkeliai” and its subsidiaries (the data may be transferred for all the purposes specified in paragraph 3);
  2. Banks carrying out settlement operations (the data are transferred for the purpose set out in paragraphs 3.2 to 3.6);
  3. Courts, supervisory, law enforcement and other public authorities (the data may be transferred for all the purposes set out in the answer to question 3);
  4. Lawyers, notaries, bailiffs, auditors, consultants, information technology maintenance service providers, electronic communications service providers, insurance companies, companies providing archiving services and other services to the Company (the data may be transferred for all the purposes set out in the answer to question 3);
  5. Municipal Enterprise “Susisiekimo paslaugos” (the data are transferred for the purpose referred to in paragraph 3.21 when the complaint, request or enquiry relates to the public transport service provided by ME “Susisiekimo paslaugos” under the Combined Ticket).
  6. When you have booked an Assistance Service on an international route, the Company’s Customer Service Specialist will transfer information about you via the *UIC PRM ABT* platform (Union of International Railways’ (UIC) Person with Reduced Mobility Assistance Booking Tool) to the foreign carrier in the foreign country in order for you to be taken care of and for the Assistance Service to be provided to you in the other foreign country as well (the data is transferred for the purpose set out in paragraph 3.8).

Please note that the Company only selects as data processors those persons who have provided the Company with a satisfactory guarantee that they have appropriate technical and organisational measures in place to ensure the secure processing of personal data and an adequate level of data protection in accordance with the applicable European Union legislation.

1. **Will your data be transferred outside the European Economic Area[[2]](#footnote-3)?**

In most cases, personal data are processed and transferred within the territory of the European Union and the European Economic Area, but where necessary for the provision of certain services, they may be transferred and processed outside these territories, subject to an adequate level of protection of personal data. Where permitted by law and necessary for the reasons set out in paragraph 7 of this Privacy Notice, we disclose information about you:

* 1. On the basis of an adequacy decision of the European Commission, which means that the European Commission has recognised the country in which the third party is established and/or carries out its activities as ensuring an adequate level of protection of personal data;
  2. We have signed a contract with a third party based on the Standard Contractual Clauses approved by the European Commission;
  3. We have obtained authorisation from the State Data Protection Inspectorate;
  4. Making use, where possible, of other available safeguards and derogations for the protection of personal data.

1. **What rights do you have?**

The GDPR and other laws give you rights, provide for the cases in which you can exercise your rights, set out the procedures you must follow, and the exceptions in which cases you cannot exercise the rights granted. Where permitted by law, you may:

* 1. Access your personal data, i.e. receive a notice confirming whether LTG Link processes your personal data and, if it does, to request access to the data processed and the information relating to it;
  2. Ask us to correct inaccurate or incorrect information used or to complete information that is incomplete;
  3. Ask us to delete information we hold about you if we are using it unlawfully;
  4. Ask us to restrict the processing of the information we hold about you where you contest the accuracy of the data or object to the processing of the data, object to the erasure of unlawfully processed data about you, or where you need the data in order to assert, exercise or defend legal claims;
  5. Object to the use of your data where we are processing your data for the legitimate interests of LTG Link and/or third parties;
  6. Ask us to transfer (receive) data that you have provided to us under a contract or consent to processing and that we process by automated means in a commonly used electronic format;
  7. Object to a fully automated decision-making, including profiling, where such decision-making may have legal consequences or similar significant effects on you;
  8. Withdraw the consents given to us for the use of information about you where we use the data on the basis of your consent;
  9. Lodge a complaint with a supervisory authority, in particular in the Member State of your permanent residence or the place where the alleged infringement of the GDPR took place, and to apply to  for judicial remedies. In the Republic of Lithuania, the supervisory authority is the State Data Protection Inspectorate (L. Sapiegos Str. 17, Vilnius; email: [ada@ada.lt](mailto:ada@ada.lt)), but we recommend that you contact us first and we will try to resolve all of your requests together with you.

1. **How can you exercise your rights?**

In order to exercise your rights as set out in paragraph 9 of this Privacy Notice, you must:

* 1. Personally deliver the request to exercise the rights of the data subject (the **“Request”**)[[3]](#footnote-4) to the Company’s headquarters, the Passenger Information Centre, or to the Data Protection Officer at the addresses specified in paragraph 15 of this Privacy Notice (the Request must be accompanied by a document confirming the identity of the person for inspection);
  2. Send the Request to the Company or the Data Protection Officer to the postal addresses specified in paragraph 15 of this Privacy Notice (a copy of the person’s identity document certified by a notary or other procedure established by law must be attached to the Request);
  3. Submit the Request to the Company or the Data Protection Officer at the email addresses specified in paragraph 15 of this Privacy Notice (the request submitted by email must be signed with a secure electronic signature).

1. **Are you profiling me and making automated decisions?**

The Company may profile you for statistical purposes, and to prevent the sending of unsolicited marketing offers, we categorise you according to the date of conclusion of the contract, the duration of the contract, the status of the contract, and your age.

1. **Does your website leave cookies on my computer or device?**

Yes, we use cookies as set out in the table below. Cookies are small text files that are stored in the browser of your device (e.g., computer, mobile phone, tablet) when you browse websites. Other technologies, including data we store in your browser or device, identifiers associated with your device and other software, may be used for similar purposes. Cookies are used extensively to make websites work or work better and more efficiently.

|  |  |  |  |
| --- | --- | --- | --- |
| **Strictly necessary cookies**  **Strictly necessary cookies** are cookies that are required for the proper functioning of the website. They enable you to use certain features of the website, for example, to log in securely to an account created on the website. Cookies are used to ensure the technical functioning of the website.  If you disable cookies in your browser, some features of the website may not work partially or completely. | | | |
| **Name** | **Supplier** | **Purpose** | **Duration** |
| i18nextLng | LTG Link | To set the preferred language of the visitor. Allows the website to set the preferred language when the visitor returns. | Persistent |
| selectedCurrency | LTG Link | To save the currency selection | Persistent |
| selected\_public\_locale | LTG Link | To save language preferences | 1 year |
| turnit\_a11y\_widget | LTG Link | To save user-selected options for the accessibility widget when reloading | 1 year |
| turnit\_webshop\_access\_token | LTG Link | To save user login status | 1 week or until users disconnect |
| turnit\_gdpr\_cookie\_consent | LTG Link | Remembers the user’s consent to use cookies | 1 year |
| turnit\_basket | LTG Link | To save your basket after logging out | One year or until the expiry of the basket (20 minutes). |
| redux/persist/PREFERRED\_STOPS | LTG Link | To save a selection of search stops | Persistent |
| redux/persist/BASKET | LTG Link | To save the basket manager (id) to save the user’s existing order information after reloading | Persistent or until the expiry of the basket (20 minutes). |
| redux/persist/SEARCH\_QUERY | LTG Link | To save a search query after reloading | Persistent or until the expiry of the basket (20 minutes). |
| turnit/persistence/TRAVELING\_WITH | LTG Link | To save information if the user has searched for bicycle or pet seats to save them after reloading | Persistent or until the expiry of the basket (20 minutes). |
| turnit/persistence/COMPLETED\_PASSENGERS | LTG Link | To retain the information of passengers who have filled in passenger information (without retaining the actual information), limiting their ability to submit passenger information twice | Persistent or until the expiry of the basket (20 minutes). |
| turnit/persistence/COMPLETED\_ADDONS | LTG Link | To save information on additional services | Persistent or until the expiry of the basket (20 minutes). |
| seenNotices | LTG Link | To save the list of messages displayed on the home page | Persistent |
| **Optional cookies that you can control and refuse** | | | |
| \_ga | Google | Registers a unique ID which is used to generate statistical information about how the visitor uses the website | 2 years |
| \_gid | Google | Used to distinguish between users | 24 hours |
| \_ga\_<container-id> | Google | Used to maintain the session status in Google Analytics preferences to store and count page views. | 2 years |
| \_gac\_gb\_<container-id> | Google | Stores campaign information to provide Google Ads with tools to measure on-page customer interactions | 90 days |
| NID | Google | Used for the following purposes to serve Google ads to users who have logged out of Google services | 6 months |
| \_\_exponea\_etc\_\_ | Exponea | This cookie determines whether the customer is new or returning | 3 years |
| xnpe\_[project-token] | Exponea | The cookie is a version of the cookie above (server-side). Both of them have the same value and help to maintain the user’s identity (new or returning) in browsers | 3 years |
| \_\_exponea\_time2\_\_ | Exponea | Time stamp offset between browser and server time | 60 minutes |
| \_\_exponea\_ab\_[ABTestName]\_\_ | Exponea | Saving the name of the selected option for the A/B test | 3 years |
| \_\_zlcmid | Zendesk (customer service system) | Saves the visitor’s device ID for authenticating the visitor in the chat window | 1 year |
| \_\_zlcprivacy | Zendesk (customer service system) | Saving the shop visitor’s decision on privacy policy | 1 year |

1. **How can you manage cookies?**

When you visit the website ([www.ltglink.lt](http://www.ltglink.lt)), you can choose whether to use cookies. You can manage cookies on the website itself and/or delete them according to your browser preferences. On the website, you can refuse the use of optional cookies, which are not mandatory, but may not allow the website to work to its full functionality, e.g., you may not be able to use the chat box to help you while you make a purchase.

You can choose which cookies you want to accept and reject in your browser settings. You can delete any cookies that are already on your computer, and most browsers allow you to set your browser to not save cookies. The location of these settings depends on the browser you are using.

If you do not agree to cookies being saved on your computer or other device, you can withdraw your consent at any time by changing your settings on the website and deleting the cookies stored in your browser. If you have chosen to delete cookies, please remember that any options you have set will also be removed. In addition, blocking cookies completely may prevent many websites (including [www.ltglink.lt](http://www.ltglink.lt)) from working properly. For these reasons, we do not recommend disabling mandatory cookies.

1. **How do I remove cookies from my device?**

If you do not want your personal data to be processed via cookies, you can change the settings of your web browser so that cookies are not accepted or delete the cookies you have saved.

You can change the cookie settings in your browser at any time. All browsers include the option to delete cookies. More detailed instructions depend on the browser you are using and can be found in the options menu of the respective browser:

[Cookie settings in Internet Explorer](https://support.microsoft.com/en-us/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ede5947fc64d#ie=ie-10)

[Cookie settings in Firefox](https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer?redirectlocale=en-US&redirectslug=Cookies)

[Cookie settings in Chrome](https://support.google.com/chrome/answer/95647?hl=en&ref_topic=14666)

Cookie settings in [Safari](https://support.apple.com/lt-lt/guide/safari/sfri11471/mac) and [iOS](https://support.apple.com/en-us/HT201265)

For more information visit <https://www.allaboutcookies.org/>

We reiterate that the removal or blocking of cookies may affect the operation of the website and some of its functionalities, as well as adversely affect your use of the services available on the portal.

To learn more about cookies and how to manage or remove them, simply visit <https://www.allaboutcookies.org/> and your browser’s help page.

1. **How do I contact the Company or the Data Protection Officer?**

If you have any questions, comments or complaints about how we collect, use, and store information about you, or if you wish to exercise your rights as a data subject, you can contact:

* 1. The Company, address Geležinkelio Str. 16, Vilnius, tel. 8 700 55 111, email [info@ltglink.lt](mailto:);
  2. The Data Protection Officer, address Pelesos Str. 10, Vilnius, email [dap@ltg.lt](mailto:dap@ltg.lt)

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1. Regulation (EU) 2016/679 of the European Parliament and of 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 (General Data Protection Regulation). [↑](#footnote-ref-2)
2. The European Economic Area is made up of all the Member States of the European Union plus Iceland, Liechtenstein and Norway. [↑](#footnote-ref-3)
3. The recommended form of the Request for the exercise of the data subject’s rights can be found [here](http://www.litrail.lt/documents/10291/7935817/PRA%C5%A0YMAS+%C4%AEGYVENDINTI+DUOMEN%C5%B2%20SUBJEKTO+TEIS%C4%98/1877ecd6-e638-433b-9909-15d54c8fd322). [↑](#footnote-ref-4)