

PRIVACY NOTICE ON RECORDINGS OF TELEPHONE CONVERSATIONS

1. GENERAL PROVISIONS

This Privacy Notice shall apply to persons who use the voice-recording mobile phone numbers +370 652 09194, +370 655 76178, +370 655 72232 (hereinafter – the **Telephone Numbers**) to contact the employees of UAB KlasJet regarding the provision of air transportation services on any day of the week (24/7) and to the employees of UAB KlasJet who receive calls from persons via Telephone Numbers.

This Privacy Notice contains information on the personal data processed and the purpose and legal basis for the processing, the period of time for which the personal data are retained, the rights of the data subjects and other information required by legal acts.

2. CONTACT DETAILS OF THE DATA CONTROLLER

Data controller – UAB KLASJET, legal entity code 303163347, registered office address: Dariaus ir Girėno g. 34F, Vilnius, tel. +37052525581, email: info@klasjet.aero (hereinafter – the **Company**).

If you have any questions regarding your personal data, please contact us by email: dataprotection@klasjet.aero

3. WHAT PERSONAL DATA IS PROCESSED AND FOR WHAT PURPOSE?

Data processing purposes – recording of telephone conversations to ensure the proper provision of air transport services and the traceability of related business processes.

Personal data processed – an audio **recording*** of the telephone conversation (the recording captures the voices of the participants in the telephone conversation, the content of the telephone conversation, including the personal data of the participants in the telephone conversation, and the metadata of the recording of the telephone conversation (the telephone number from which the call is made, the date and time of the call, the duration of the call, the waiting time)).

*NB: telephone conversations shall be recorded for only incoming calls.

4. LEGAL BASIS FOR PERSONAL DATA PROCESSING

The data of a person who calls the Company on the Telephone Numbers shall be processed with the **consent** of that person (Article 6(1)(a) GDPR).

Please note that a person may object to the recording of a telephone conversation. During the telephone call, the person shall be informed of his/her right to object and not to continue the call and to contact the Company in other ways (e.g., by e-mail). If the person does not consent to the processing of personal data, the telephone conversation will not be initiated (the person will not be connected to an employee of the Company).

The personal data of employees shall be processed on the basis of the Company's **legitimate interest in** ensuring the proper provision of air transport services and the traceability of related business processes (Article 6(1)(f) GDPR).

5. PERSONAL DATA STORAGE PERIOD

The conversation Record shall be retained for **90** calendar days.

Where a conversation recording is necessary for the purpose of conducting an investigation, handling a complaint or dispute, it may be kept until it is no longer necessary for the purpose for which it was processed.

6. PROVISION OF PERSONAL DATA

Your personal data may be disclosed to public authorities in accordance with the procedure prescribed by legal acts, if a request is received from a public authority or if there is any other lawful basis for the provision of data.

Your personal data may also be disclosed to an external service provider (data processor) who processes the conversation recordings on behalf of the Company and according to the Company's instructions. The Company shall ensure that a data processing agreement is concluded between the Company and the data processor.

7. TRANSFER OF PERSONAL DATA OUTSIDE THE EU/EEA

Your personal data shall be processed and stored within the EU/EEA. Personal data shall not be transferred to third countries or international organisations.

8. DO WE APPLY THE AUTOMATED MEANS FOR DECISION-MAKING OR THE PROFILING?

We do not apply the decision-making by automated means and the profiling to your personal data.

9. YOUR RIGHTS

The following rights shall be guaranteed for you:

- the right to **know** about the processing of your personal data;
- the right of **access** to your personal data being processed;
- the right to have **rectified** your personal data being processed;
- the right to have your personal data **erased ("to be forgotten")**, where appropriate;
- the right to **restrict** the personal data processing;
- the right to **object** to the processing of your personal data where the data is processed on the basis of consent. The data subject shall also have the right to object to the processing of personal data where the personal data is processed on the basis of the legitimate interest of the Company, however, if the Company has compelling legitimate grounds, the personal data may be processed without the data subject's consent;
- the right to **withdraw** at any time your consent to the personal data processing;
- the right to receive or transmit your personal data to another data controller (**data portability**), where appropriate.

10. WHERE TO APPLY FOR THE INFRINGED RIGHTS?

If you consider that the Company processes your personal data in violation of the requirements of legal acts, you have the right to lodge a complaint with the State Data Protection Inspectorate (SDPI) at the address: L. Sapiegos g. 17, 10312 Vilnius, Lithuania, e-mail: ada@ada.lt; tel.: (8 5) 271 28 04, 279 1445, website: <https://vdai.lrv.lt/lt/>. In all cases, we recommend that you contact us before filing a complaint with the SDPI so that we can resolve the situation in a peaceful manner.

11. AMENDMENTS TO THE PRIVACY NOTICE

If legal acts are amended or other objective circumstances arise, the Company shall have the right to update this privacy notice, and you are therefore advised to review this privacy notice regularly.