

## General Data Privacy Policy

### GENERAL PROVISIONS

JSC “Guruma” (hereinafter called **GuruMA**, Ltd), registration address Knygnesiu str. 79, LT-47258 Kaunas, Lithuania, company code 304834379, is committed to protecting the privacy of our employees, candidates, contractors, clients and visitors of our website.

We will ensure that the personal data submitted to us is processed fairly and lawfully and only used for the purposes set out within this policy.

### POLICY

This Policy explains when and why we collect personal data about the people. This policy also explains how we use personal data, the conditions under which we may disclose the data to others and how we keep personal data secure. At GuruMA, Ltd we are committed to protecting and respecting data privacy and are transparent in everything we do. We may change this Policy from time to time. Policy version and effective data are used to document the changes.

#### What information will we collect?

We will collect both personal data (such as Contact Information) and sensitive personal data (such as but not limited to information in CV, Contractual Agreement and Employment Contract). Depending on the relevant circumstances, an applicable local laws and requirements and our legitimate interest, we may collect some or all of the information listed below to enable us to offer the services, request service proposal or to offer employment opportunities which are tailored to labor market circumstances and individual subject interests. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data in those jurisdictions.

- Name, Surname
- Address
- Country of residence
- Phone/Mobile number
- E-mail
- Skype address
- LinkedIn address
- Education Details
- Employment history
- Past experience
- Extra information the subject choose to tell us on his/her free will.
- Extra information that our clients may tell us, or that we find from other third party sources such as job sites
- The dates, times and frequency with which the subject access our services

On the top of the above for the contractual agreement purposes we will collect:

- Bank account and any other tax-related information
- Details about current and expected service fees, information on subject interests and needs regarding future proposals, both collected directly and inferred, for example from publicly available sources, e.g. websites and social networks, e.g. LinkedIn
- Referee details
- Extra information that subject referees tell us

On the top of the above for the employment contractual agreement we will collect:

- Social security number (or equivalent)
- Details about current remuneration, pensions and benefits arrangements
- Nationality/citizenship/place of birth
- Immigration status / need for work permit (only if country of residence and the country of employment are not the same)
- Physical or mental health, including disability-related information (only if applicable to disclose according to Labor Law and your job function)

## **How will we use subject personal data?**

The personal data and sensitive personal data will be stored, processed, used and disclosed by us in the following ways:

- To request a proposals on subject services
- To provide our proposals for subject on his/her services
- To provide our recruitment proposals to subject and to facilitate the recruitment process
- To compare subject personal data against client requests which we deem suitable for subject
- To send subject information to client(s) to assess his/her eligibility for the services
- To answer subject questions and enquiries
- We use third party service providers in our routine daily work, e.g. lawyers, bookkeepers, travel agencies. We share subject personal data with other third-party service providers that may assist our processes and are administering ours activities.
- To carry out our obligations arising from any contract entered between subject and us.

From time to time we may seek subject consent to process, use or disclose his/her information for any other purpose not listed above.

We may collect information about the use of our electronic information resources including but not limited to our website and LinkedIn including details of individual subject visits such as pages viewed and the resources accessed. Such information includes traffic data, location data and other communication data.

## **Can information be amended, modified or be deleted?**

Each subject may request that we confirm what information we hold about him/her at any time and may request us to modify, update or delete such information. We will require the subject to verify his/her identity and may ask for more information about the request. Where we are legally or contractually permitted to do so, we may refuse the subject request and will give the reasons for doing so. We will seek to act on each individual subject request in the timescale required by applicable data protection laws.

Separate data privacy management email account <[dataprivacy@gurumedicalaffairs.com](mailto:dataprivacy@gurumedicalaffairs.com)> has been opened to comply with each subject wish to contact us with respect to the above matters.

## **How long will information be held for?**

We only retain personal data for as long as is necessary for the purpose of a continuous customer relationship with the subject. After 2 years of inactivity, personal data will be automatically archived for 3 years and then deleted, except where otherwise provided by law (e.g. in connection with a contractual arrangement or pending litigation).

The data collected during the employee recruitment process will be retained as long as it is necessary for the purpose of assessing the employment relationship. To keep the subject informed about new job vacancies after the completion of the role specific recruitment process applicant personal data will be archived in HRM system for 3 years and then deleted, except where otherwise provided by law (e.g. in connection with a contractual arrangement or pending litigation).

In case of establishing the employment relationship with the subject his/her personal data will be managed according the contractual agreement in line with local Labor Law and relevant GuruMA, Ltd SOP(s) .

We will use reasonable endeavors to ensure that each individual subject Personal Data is maintained and up to date. However, each subject is under a duty to inform us of all changes to his/her Personal Data to assist with this and we will delete and update the Personal Data accordingly.

Each subject may to object or to express the request by emailing us at: [dataprivacy@gurumedicalaffairs.com](mailto:dataprivacy@gurumedicalaffairs.com).

Each subject has the right to ask for a copy of the information we hold about him/her. If the subject wish to raise a complaint on how we have handled his/her personal data, we recommend to contact GuruMA, Ltd Managing Director Nidas Jurjonas at [nidas.jurjonas@guruma.eu](mailto:nidas.jurjonas@guruma.eu).

## **How do we safeguard personal data?**

Data security is of great importance to GuruMA, Ltd and to protect subject personal Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected.

We endeavor to do our best to protect subject personal Data. However, transmission of information over the internet is not entirely secure and is done at your own risk. We cannot ensure the security of the Data transmitted to us via electronic channels of communication.

## **Keeping Children Safe**

We are concerned to protect the privacy of children aged 18 or under. Any subject aged 18 or under must get his/her parent/guardians permission beforehand whenever provides us with personal information. If we learn that we have collected the personal information of a child under the relevant minimum age without parental consent, we will take steps to delete the information as soon as possible. Parents who believe that their child has submitted personal information to us and would like to have it deleted have to contact us at [dataprivacy@gurumedicalaffairs.com](mailto:dataprivacy@gurumedicalaffairs.com)

## **How do we store and transfer personal data?**

Data, which we collect from individual subject, will be stored and processed within European Economic Area (EEA). We also share information with our clients, some of which are located outside the EEA, therefore in a rare circumstances the data may be transferred to countries outside of the European Economic Area (EEA). These countries may not have data protection laws equivalent to those in force in the EEA. If we transfer data in this way, we will take steps with the aim of ensuring that data privacy rights continue to be protected as outlined in this privacy policy and GDPR. Each data subject expressly agree to such transfer of Data.

## **What are cookies and how are they used?**

Cookies are files that are recorded in temporary Internet Folders on web site visitor PC. They provide information regarding the computer used by a visitor. We may use cookies where appropriate to gather information about our web site visitor computer to assist us in improving our website.

We may gather information about web site visitor general internet use by using the cookie. Where used, these cookies are downloaded to web site visitors computer and stored on the computer's hard drive. Such information will not identify the subject personally. It is statistical data which does not identify any personal details whatsoever.

Website visitors don't have to accept cookies. Most browsers allow to refuse cookies by activating the relevant setting. However, selecting this setting may mean website visitor is unable to access certain parts of our site. Each website visitor can adjust the settings on his/her computer to decline any cookies if wish so. This can easily be done by activating the reject cookies setting on the visitor computer.

## **Profiling**

We may analyze subject personal information to create a profile of individual interests and preferences so that we can contact the subject with the relevant information. We may make use of additional information about subject when it is available from external sources to help us do this effectively. We may also use your personal information to detect and reduce fraud risk.

## **Social media features and links to other websites**

GuruMA, Ltd website includes social media features, such as the Facebook, Tweeter or LinkedIn Like button, and widgets, such as the Apply with LinkedIn button or interactive mini-programs that run on our sites. These features may collect website visitor IP address, pages visited on our sites, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our website. This Privacy Policy does not apply to these features. Website visitor interactions with these features are governed by the privacy policy and other policies of the companies providing them.

Our website may contain links to other websites run by other organizations, these are out of our control and are not covered by this policy. This privacy policy applies only to our website, so we encourage website visitor to read the privacy statements on the other websites he/she visit. We cannot be held responsible for the privacy policies and practices of other sites even if accessed using the links from our website.

In addition, if website visitor linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third part site and recommend that the website visitor check the policy of that third party site.

## **Consent – subject individual rights**

If data subject is EEA resident he/she have the following data protection rights:

- The answer to his/her questions and enquiries
- The right to be informed about the personal data the Company processes on the subject
- The right of access to the personal data the Company processes on the subject
- The right to rectification of subject personal data
- The right to erasure of subject personal data in certain circumstances

- The right to restrict processing of subject personal data
- The right to data portability in certain circumstances
- The right to object to the processing of subject personal data that was based on a public or legitimate interest
- The right not to be subjected to automated decision making and profiling
- The right to withdraw consent at any time.

### **CHANGES OF THIS POLICY**

GuruMA, Ltd reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately reflected on General Data Privacy Notice, General Data Privacy Consent and our Website Data Privacy Policy, posted on the website.

### **RESPONSIBILITIES AND AUTHORITIES**

Managing Director is responsible for the review of this Policy and implementing of any changes if necessary.

### **CONTACT DETAILS**

For all the inquires related to this policy please contact GuruMA, Ltd on [dataprivacy@gurumedicalaffairs.com](mailto:dataprivacy@gurumedicalaffairs.com)  
If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the <https://www.ada.lt/>