

PRIVACY AND COOKIE POLICY

GENERAL PROVISIONS

UAB “ESSPO”, legal entity code 154167210, registered office address J. Biliūno g. 17, LT-29111 Anykščiai, Lithuania, tel. +370 381 58466, email info@esspo.lt (hereinafter referred to as the “Company”), respects your privacy and is committed to protecting your personal data.

The Company is the data controller of personal data processed through the website <https://www.esspo.lt> (hereinafter referred to as the “Website”).

This Privacy and Cookie Policy (hereinafter referred to as the “Policy”) provides information about the personal data processed through the Website, the purposes and legal bases of processing, data retention periods, data recipients, your rights, and the cookies used on the Website.

Personal data is processed in accordance with Regulation (EU) 2016/679 (the General Data Protection Regulation, hereinafter referred to as the “GDPR”), the Law on Electronic Communications of the Republic of Lithuania, and other applicable legislation.

WHAT PERSONAL DATA DO WE PROCESS AND FOR WHAT PURPOSES?

Handling Inquiries and Providing Offers

By submitting an inquiry through the Website, you may contact the Company regarding its products, services, or a personalised offer.

For this purpose, we process your name, email address, telephone number, and the content of your inquiry. If you voluntarily provide additional information in your inquiry, such information may also be processed to the extent necessary to respond to your request.

The data is used to contact you, respond to your inquiry, provide information, or prepare an offer. Inquiries may be forwarded to Company employees responsible for handling them.

The legal basis for processing is Article 6(1)(b) of the GDPR where processing is necessary to take steps at your request prior to entering into a contract, or Article 6(1)(f) of the GDPR where processing is necessary for the Company's legitimate interest in responding to business inquiries and maintaining business relationships.

The contact details you provide are necessary for us to respond to your inquiry. If you do not provide them, we may be unable to contact you or provide the requested information.

Inquiry data is retained for up to 2 years from the date of receipt, unless a longer retention period is necessary to comply with legal obligations or to establish, exercise, or defend legal claims.

Publication of Company Employees' Contact Information

The Website may publish the names, surnames, positions, business telephone numbers, and email addresses of Company employees.

This information is published to enable customers, suppliers, and business partners to contact the relevant Company employees.

The legal basis for processing is the Company's legitimate interest in ensuring effective business communication (Article 6(1)(f) of the GDPR).

The data is published for as long as the employee holds the relevant position or the information remains necessary for the stated purpose.

WEBSITE TRAFFIC ANALYSIS

To evaluate Website traffic, understand how the Website is used, and improve its content and functionality, the Company uses the Google Analytics 4 analytics service.

With your consent, data relating to visits to the Website, pages viewed, visit times, browsers, devices, approximate geographical location, and other technical information associated with Website use may be processed.

The legal basis for the use of analytics cookies and the related processing of personal data is your consent (Article 6(1)(a) of the GDPR).

If you do not consent to the use of analytics cookies, Google Analytics 4 must not use analytics cookies that require your consent.

Further information is provided in Section 6 of this Policy.

RECIPIENTS OF PERSONAL DATA

Your personal data may be processed by authorised Company employees who require such data to perform their duties.

Data may also be disclosed to service providers engaged by the Company, such as information technology, website maintenance, email, or analytics service providers, to the extent necessary for them to provide their services.

The Website uses Google Analytics 4, a service provided by Google, for website traffic analysis. When this service is used, certain technical and statistical data may be transferred to Google in accordance with the applicable terms of service.

Data may also be disclosed to competent public authorities where required by law or used to protect the Company's rights and legitimate interests.

TRANSFERS OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

When using the services of international service providers, including Google, personal data may, in certain circumstances, be transferred outside the European Economic Area (EEA) or accessed from outside the EEA.

Where such transfers take place, a lawful transfer mechanism under Chapter V of the GDPR must be ensured, together with appropriate data protection safeguards, such as a European Commission adequacy decision or Standard Contractual Clauses, where applicable.

For information about the specific transfer safeguards applicable to your personal data, you may contact the Company using the contact details provided in this Policy.

YOUR RIGHTS

Under the GDPR, you have the right to:

1. **Access your personal data** and obtain information about its processing.
2. **Request the rectification** of inaccurate personal data or the completion of incomplete personal data.
3. **Request the erasure** of your personal data where there is a legal basis for doing so.
4. **Request the restriction** of the processing of your personal data in the circumstances provided for by the GDPR.
5. **Object to the processing** of your personal data where it is based on legitimate interests, on grounds relating to your particular situation.
6. **Exercise your right to data portability** where the conditions laid down in the GDPR are met.
7. **Withdraw your consent at any time** where processing is based on consent. Withdrawal of consent does not affect the lawfulness of processing carried out before its withdrawal.
8. **Lodge a complaint with the State Data Protection Inspectorate of Lithuania** if you believe that your personal data is being processed in violation of applicable legislation. The Inspectorate's website is <https://vdai.lrv.lt>.

These rights are exercised under the conditions laid down in the GDPR and are not absolute.

To exercise your rights, you may contact us by email at info@esspo.lt or in writing at the Company's registered office address.

We respond to requests no later than one month after receiving them, except in cases where the GDPR allows this period to be extended. We will inform you of any extension and the reasons for it in accordance with applicable legislation.

USE OF COOKIES

What Are Cookies?

Cookies are small data files stored on your device when you visit a website. They may be used to ensure the proper functioning of the Website, save your preferences, and, with your consent, analyse Website traffic.

Categories of Cookies Used on the Website

Essential Cookies

Essential cookies are necessary for the technical operation of the Website and for saving visitors' cookie preferences.

These cookies do not require separate consent where they are strictly necessary to provide a service requested by the visitor or to transmit communications over an electronic communications network.

Analytics Cookies

Analytics cookies are used to analyse Website traffic and improve its functionality.

These cookies are used only with your prior consent. Refusing consent does not prevent you from using the main functions of the Website.

The Website currently has no identified active marketing cookies for which visitors can provide separate consent. If the technologies used change, this Policy and the cookie consent banner must be updated.

List of Cookies

Cookie Name	Purpose	Category	Retention Period
catAccCookiesMain	Saves the status of the visitor's cookie consent banner	Essential	Up to 2 years
catAccCookiesCat3	Saves the visitor's preference regarding analytics cookies	Essential for remembering preferences	Up to 2 years
_ga	Helps Google Analytics 4 distinguish between visitors	Analytics	Up to 2 years
ga*	Helps Google Analytics 4 maintain session state	Analytics	Up to 2 years

The actual use of cookies and their retention periods may depend on the Website configuration and browser restrictions.

The cookie list is updated when the technologies used on the Website or their settings change.

Google Analytics 4 and Data Processing

Google Analytics 4 is used to collect and analyse Website traffic statistics.

The use of analytics cookies depends on the preferences you select in the cookie consent banner.

Further information about Google's privacy practices is available at <https://policies.google.com/privacy>.

Consent and Cookie Management

When you visit the Website for the first time, a cookie consent banner is displayed.

You can choose one of the following options:

- **“Accept all”** – you allow the use of essential and analytics cookies.
- **“Continue without consent”** – you refuse analytics cookies; only essential cookies are used.
- **“Set privacy settings individually”** – you can choose whether to allow analytics cookies and save your preferences.

You may withdraw or change your consent to analytics cookies at any time. To enable this, the Website must provide an easily accessible way to reopen the cookie settings.

You can also delete or block cookies through your browser settings. However, this does not replace the option to manage your consent directly on the Website.

If you withdraw your consent, the further use of analytics cookies must be stopped. Cookies previously stored on your device may need to be deleted separately if the Website's consent management system does not remove them automatically.

THIRD-PARTY WEBSITES

The Website may contain links to third-party websites.

When you visit such websites, their operators may process your personal data in accordance with their own privacy policies. We recommend reviewing the data protection policies of any third-party websites you visit.

CONTACT INFORMATION

If you have any questions about this Policy or wish to exercise your rights as a data subject, please contact:

UAB “ESSPO”

J. Biliūno g. 17, LT-29111 Anykščiai, Lithuania

Tel. +370 381 58466

Email: info@esspo.lt

UPDATES TO THIS POLICY

The Company periodically reviews this Policy to ensure that it reflects actual personal data processing practices, the technologies used on the Website, and applicable legislation.

The updated version of the Policy is published on the Website. Where necessary, additional notice will be provided regarding significant changes.

Last updated: 29 October 2026.