

147training.com PRIVACY POLICY

GENERAL PROVISIONS

Data Controller UAB FL Technics: number of legal entity 300517602, address Rodunios kelias 2, 02189 Vilnius, Lithuania, e-mail info@fltechnics.com (hereinafter “FL Technics”, “We”, “Ours”) processes personal data of the subjects in accordance with the highest legal and technical standards of personal data security. Our Data Protection Officer's contacts: privacy@aviasg.com

In processing the personal data, we responsibly comply with Regulation No 2016/679 of the European Parliament and of the Council as 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 (GDPR), the Republic of Lithuania Law on the Legal Protection of personal data, the Republic of Lithuania Law on Electronic Communications, and other directly applicable legal acts regulating the protection of personal data, as well as instructions from competent authorities.

If you have any questions regarding this Privacy Policy, or requests regarding the processing of your personal data, please send us an email to: privacy@fltechnics.com

WHEN THIS PRIVACY POLICY APPLIES

This Privacy Policy applies to the Data Controller’s Website www.147training.com (hereinafter “Site”) and any service provided by the Company that is provided by the Data Controller, including the Site support, regardless of the devices used by the customer of the Data Controller and/or the visitor to the website to visit the website or use the Services provided by the Data Controller. The terms and conditions of the Privacy Policy apply to you every time you access the content and/or the service we provide, regardless of which device (computer, cell phone, tablet, TV, etc.) you are using.

This Privacy Policy does not apply to references to other entities' websites provided on the Site; therefore, we recommend that you read the personal data processing rules applied on such websites.

WHAT PERSONAL DATA WE PROCESS AND FOR WHAT PURPOSE

When you create an Account and acquire the status of the Registered User and use any services provided on the Site, FL Technics may collect and store the following Personal Information (if the Registered User submits such data) (hereinafter “Purpose of service provision”):

- Your first and last names, company name, email address, phone/fax number, physical contact information, date of birth, country (required for training certificate) and other personal information that identifies you;

- financial information, such as credit card or bank account numbers, and other information you provide to purchase the services (Training Courses or any other services available on the Site). By using the Site, you acknowledge being aware of the fact that Internet transmissions may not be completely private or secure; other information from your interaction with the Site, the Site Services, content and advertising, including discussions, chats, requests, correspondence through the Site etc.

- the Account’s password;

- additional information from you or about you in other ways not specifically described hereinabove (for example, information related to your contacts with FL Technics, storing results when responding to a survey, etc.).

The personal data provided above may be processed also for archiving purposes and/or FL Technics defending its legal interests.

The collection of personal data by cookies is covered in the Cookie Policy.

The Registered User may check, review and amend most of his/her Personal information provided on the

Site by signing on to his/her Account and using settings on the Site (if available) unless in particular case it is stated otherwise.

KNOW YOUR CUSTOMER (KYC)

For the purpose of KYC procedure implementation, we process the following of your personal data:

- Full company name;
- Company code;
- Address;
- Bank details;
- E-mail address;
- Website address;
- Telephone number;
- Date of the company's incorporation;
- Full names of the management;
- Full names of Board members;
- Full names of shareholders/ ultimate beneficial owners;
- Full names of other relevant company's employees;
- Copies of Shareholders'/ ultimate beneficial owners' identity documents;
- Amount of shares shareholders/ ultimate beneficial owners hold.

Your personal data for KYC implementation purpose can be processed in the following ways:

- you may receive a letter due to the needed information or documentation for the proper KYC procedure implementation by e-mail;
- you may be requested the needed information due to proper KYC procedure implementation;
- other processing operations regarding the KYC process.

DIRECT MARKETING

For direct marketing purposes, we process data in the following cases:

- when we obtain your explicit consent to such processing;
- when you are a customer of ours who has not objected to the processing of personal data for the purposes of direct marketing, marketing of similar services or products. Please be informed that if you have purchased or used our service (became our customer), FL technics may be sending you similar service offers in the future, but please be advised that you may opt out of such e-mails at any time.

For the purpose of direct marketing, we process the following of your personal data: email address, name and surname if provided.

With your expressed consent to receive direct marketing messages or newsletters you subscribe to, you agree to receive updates from the Data Controller about new services and products, or invitations to events of the Controller.

Please be informed that you may at any time refuse our newsletters or other promotional messages by clicking on a respective link in our outgoing newsletters and/or messages.

You can also at any time refuse to receive information about events, or any other information we send, by sending an email to info@147training.com.

HOW WE OBTAIN YOUR DATA AND ON WHAT LEGAL BASIS WE PROCESS IT

- When you submit your data to us through our websites;
- By concluding both electronic ("Term and Conditions", "General rules") or/and paper service or other contracts;

During events/meetings, by submitting business cards or other personal data;
By email when contacted at our general email addresses: privacy@fltechnics.com,
info@147training.com or submitting your request via 147training.com contact form ;
When you contact any of our employees by email;
When you agree to provide your data, for example, by subscribing to a newsletter;
When you access your account through third party accounts (Facebook, LinkedIn, Google);
When you agree to the installation of cookies on your device;
Or otherwise, when you provide to us, or when we obtain information from third parties with your consent.

BASICS OF LAWFUL MANAGEMENT

Contract (sale/purchase of products/services);

Consent to receive offers and news from us. You may revoke your consent to processing your personal data at any time. Unless the Company has any other legal basis for processing personal data, the Company will terminate the processing of such personal data and destroy the data;

Legitimate interest is to respond to your queries, to provide the information you request, to improve our service quality and products, statistics and analytics, personalised services, etc.

Implementation of legal obligations (accounting, archiving, data breach notification, etc.).

HOW LONG WE WILL RETAIN YOUR PERSONAL DATA

We will retain your personal data for as long as necessary to achieve and fulfil the purposes set out in this Privacy Policy, taking into account the nature of the services provided to you and the contracts you enter into, unless longer storage of personal data and related documents is required by applicable laws and regulations and is necessary (e.g. mandatory time limits for accounting and others, etc.) or is required for the defence of the Data Controller's legitimate interests in judicial or other public institutions.

We ensure and take all necessary measures to avoid storing outdated or unnecessary information about you and to keep your data up-to-date and accurate.

We will use your data for direct marketing purposes for 3 (three) years after you have given consent or after the end of the contractual relationship (direct marketing of similar services or products).

HOW WE PROTECT YOUR DATA

We responsibly implement appropriate organisational and technical data security measures intended for the protection of personal data against accidental or unlawful destruction, alteration and disclosure, as well as against any other unlawful processing. **The security measures we implement include the protection of personnel, information, IT infrastructure, internal and public networks, as well as office buildings and technical equipment.**

We recommend that you additionally comply with the following minimum safeguards for personal data protection:

- do not visit suspicious websites;
- do not open links of uncertain origin;
- update your software regularly;
- independently take care of using antivirus protection.

Unfortunately, the transmission of any information on the Internet is not completely secure. Although we are endeavouring to protect your personal data, it is not possible to ensure the full security of personal data when you provide the data on the Website, therefore, you must assume the risks associated with the transfer of personal data to the Site.

In the event of personal data breach of security that could seriously jeopardise your rights or freedoms and determine the circumstances under which unauthorised access to personal data has been obtained, we will immediately inform you about it.

TO WHOM YOUR DATA IS DISCLOSED

Your personal data may only be accessed by a limited number of our employees and by our company's IT, legal, personnel service providers, and only to the extent necessary for the proper processing of your personal data, and subject to strict confidentiality requirements.

To achieve the purposes set out in this Privacy Policy, we may transfer or grant access to your data to the following data recipients/processors:

Certain technical data on your website visits (IP address, cookies, technical information of your browser, other information related to the browser's activity and browsing the site) may be transmitted or made available to the website for statistics, analysis and related purposes both for entities operating in the EU and outside the EU (e.g., when we use the *Google Analytics* service). For the provision of some of our services, data can also be transferred to the companies of the Avia Solution Group, which we belong to (<https://avia.com/en/media/logos>), including those located outside the European Economic Area (EEA).

within the interest and according to the order of data processors who provide services and process your data on our behalf (e.g. consultants, etc.) We note that our data processors process your data only on the basis of our explicit instructions, by committing to ensure the proper processing of data protection, organizational and technical measures compliant to confidentiality and security requirements, as specifically discussed in the agreements concluded between us and the service providers regarding the processing of data.

Entities entitled to receiving information in accordance with legal requirements (e.g. courts, state and municipal authorities, etc.) only to the extent necessary for the proper performance of the requirements of the legislation in force.

other business entities, in case of merger or acquisition of FL Technics or transfer of the Site or assets related to the Site. In such case, FL Technics will require that the new entity will follow this Privacy Policy with respect to the Registered Users' Personal Information. If your Personal Information is used contrary to this Privacy Policy, you will be given a prior notice as soon as possible.

DATA TRANSFER OUTSIDE THE EU AND EEA

Please note that in non-EEA states, personal data may be subject to less protection than within the EEA, but we carefully evaluate the conditions under which such data will be processed and stored after being transferred to the above-mentioned entities.

Please note that if the European Commission has determined that the third country, territory or one or more specified sectors in that third country or international organization concerned provides an adequate level of data protection, the transfer must take place in the same manner as in the EU. Please be informed that you can have access to the information regarding the states in respect of which the decision of the European Commission has been taken, here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.

In other cases, we take all necessary measures to ensure that your data is transferred to the recipient safely processing the data. The tools we use: a contract with a non-European recipient of personal data includes specific clauses for the secure processing of the data. In certain cases, we ask for your consent to transfer your data outside the Republic of Lithuania, the EU or the EEA.

RIGHTS GUARANTEED TO YOU

We guarantee the implementation of these rights and the provision of any related information at your request or in case of your query:

- know (be informed) about the processing of your personal data;
- get access to your personal data which is processed by the Data Controller;
- request correction or addition, adjustment of your inaccurate, incomplete personal data;

require the destruction of personal data when it is no longer necessary for the purposes for which it was collected;

request the destruction of personal data if it is processed illegally or when you withdraw your consent to the processing of personal data or do not give such consent, when is necessary;

disagree with the processing of personal data or withdraw the previously agreed consent;

request to provide, if technically possible, the provision of your personal data in an easily readable format according to your consent or for the purpose of performing the contract, or request the transfer of data to another data controller;

in case person deems that his/her rights have been violated, he/she has the right to file a complaint with the State Data Protection Inspectorate L. Sapiegos g. 17, Vilnius, tel. (+370) 271 28 04, (+370) 279 1445, e-mail: ada@ada.lt (for more information see <https://vdai.lrv.lt/>).

In order to exercise your rights, please send us an e-mail to: privacy@fltechnics.com or directly. Upon receipt of your request, we may ask you to provide proof of identity, as well as any additional information required by us for the request, which we undertake to delete after identification.

Upon receipt of your request, we will respond to you within 30 calendar days of receipt of your claim and the due date for submission of all documents necessary to prepare the answer.

If we think we need to, we will stop the processing your personal data, except for storage, until your application is resolved. If you have legally waived your consent, we will immediately terminate the processing of your personal data and within no more than 30 calendar days, except in the cases provided for in this privacy policy and in the cases provided for by law when further processing of your data is binding on us by the legislation in force, the legal obligations we are facing, court judgements or binding instructions from the authorities.

By refusing to comply with your requirement, we will clearly indicate the grounds for such refusal.

CONTACT US

If you have any request concerning the processing of your data or any question relating thereto, please email us at privacy@fltechnics.com, or contact us at Rodūnios kelias 2, 02189, Vilnius, Republic of Lithuania.

HOW I LEARN ABOUT CHANGES TO THIS POLICY

This Privacy Policy is reviewed at least once every two years. Once we update our Privacy Policy, we will notify you of the update by posting a notice on our website. In addition we will invite you to familiarize yourself with the updates upon logging into your account. If you login or use our content and/or services after such a notice was posted, we will assume that you agree to the new requirements specified in the update notice.

This Privacy Policy applies from the date it is posted on the Website.

Last review of the Privacy Policy: 12 October, 2020