



PRESSGLASS

LEADING IN EUROPE

**CANDIDATES FOR EMPLOYMENT AT PRESS GLASS UAB
AND/OR COOPERATION, PRIVACY POLICY**

2025-03-10

APPROVED
PRESS GLASS UAB
Order of the Director 2025-03-10

I. General principles

1. This policy (hereinafter referred to as the "Privacy Policy"), which has been prepared by the company PRESS GLASS UAB, whose registered office is located at Aviacijų g. 3, Sergeičikų I k., Karmėlavos sen., LT-54460 Kauno r. sav, 305710904, VAT taxpayer code: LT100013866714 (hereinafter referred to as the "Personal Data Controller", "PRESS GLASS" or "the Company"), is intended for candidates wishing to join the Company or to cooperate with the Company (hereinafter referred to as "Candidates"), who submit their applications electronically. The Privacy Policy has been developed in accordance with the provisions of 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") (hereinafter referred to as the "GDPR"), the Labour Code of the Republic of Lithuania, the Civil Code of the Republic of Lithuania, and the legal acts relating to the protection of personal data, including the Law on the Protection of Legal Protection of Personal Data
2. The submission of an application constitutes participation in the selection process for a specific job position, and therefore the Personal Data Controller acquires a basis for processing the candidate's personal data for the purposes of the specific selection process, and, with the candidate's additional consent, for the purposes of other selection processes carried out by the Company in the past and in future.
3. The candidate may voluntarily express his/her additional consent to participate in recruitment procedures carried out by other companies of the PRESS GLASS Group, including foreign companies. Once the consent has been given by submitting an application, other entities of the PRESS GLASS Group have the right to use the personal data provided by the candidate in the recruitment process. Each entity of the PRESS GLASS Group, as an individual controller of personal data, is individually liable for its own acts and omissions. In the event of termination of processing by the controller, the other entities of the PRESS GLASS Group are also not entitled to use the personal data of the candidate.

II. Personal data controller and contact details

1. The controller of personal data of natural persons applying for employment/cooperation is the company PRESS GLASS UAB, whose registered office is located at Aviacijų g. 3, Sergeičikų I k., Karmėlavos sen., LT-54460 Kauno r. sav., the company is registered in the Register of Legal Entities of the State Enterprise Centre of Registers, the code of the legal person is: 305710904, the code of VAT taxpayer is: LT100013866714.
2. The candidate may contact the Personal Data Controller:
 - a) by post to Aviacijų g. 3, Sergeičikų I k., Karmėlavos sen., LT-54460 Kauno r. sav., with the following note: "Personal data",
 - b) by email to gdp@pressglass.com.
3. The Controller has appointed a Personal Data Officer who can be contacted by email: iod@pressglass.com.

III. Purpose, scope and legal basis for processing candidates' personal data

1. PRESS GLASS processes the personal data of candidates for the purpose of selecting candidates for vacancies in the Company and for the purpose of selecting candidates who wish to cooperate with the Company.
2. The Company processes the following personal data of candidates:
 - **Identity information:** name and surname, date of birth;
 - **contact details:** email address, phone number, address;



- **information on education/qualifications:** educational institutions, education/qualifications/training received, year of graduation; information on foreign language skills;
 - **information on work experience and qualities:** work experience, functions and period of time in previous and current positions; information on past and present employers; information on the candidate's professional and professional qualities obtained from the candidate's former employer; with the candidate's consent, data relating to his/her qualifications, professional abilities and professional qualities may also come from his/her present employer(s);
 - **Other:** information on compliance with specific legal requirements (if any); evidence of medical conditions (e.g. evidence of disability) to assess the candidate's ability to work in accordance with the requirements of occupational health and safety legislation; other information provided by the candidate in his/her curriculum vitae and/or other documents provided by PRESS GLASS; the text of any correspondence with PRESS GLASS representatives; the content of information provided in the candidate's professional social networking accounts (e.g. LinkedIn), to the extent necessary to determine the candidate's suitability for a specific post.
3. PRESS GLASS may not process all of the above-mentioned data, and the scope of the data to be processed shall be determined on a case-by-case basis in accordance with the principle of data minimisation.
 4. The collection of personal data such as name, surname, contact details, education, professional qualifications, information on previous jobs, work experience in the selection process is carried out in accordance with Article 41(1) of the Labour Code of the Republic of Lithuania and Article 5(1) of the Law of the Republic of Lithuania on Legal Protection of Personal Data. Failure to provide the above-mentioned data may make participation in the selection process conducted by the Company impossible. The provision of other personal data provided in the application form is voluntary and its transfer to the Company is based on the voluntary consent of the candidate.
 5. Where personal data are processed on the basis of the data subject's consent, the provision of the candidate's personal data to the Company is voluntary.
 6. The personal data controller processes candidates' personal data on the basis of several legal grounds. Where candidates' personal data are processed in the performance of a statutory duty owed to the Company, the processing is carried out on the basis of Article 6(1)(c) of the GDPR, and where candidates voluntarily provide additional data or consent to the processing of their personal data for a specific purpose, also on the basis of their voluntary consent, in accordance with Article 6(1)(a) of the GDPR, . In the case of the intention to conclude a contract of employment or to take measures to establish cooperation, candidates' personal data shall be processed in accordance with Article 6(1)(b) of the GDPR. The controller may process candidates' personal data in accordance with Article 6(1)(f) of the GDPR for the purposes of pursuing its legitimate interests, for example, to find new employees and/or persons who wish to cooperate with the Company, to obtain information about the candidate from a former employer, to assert claims or to defend against claims received.

IV. Candidates' rights

1. In accordance with the GDPR, a candidate must:

a)	The right to have access to the content of your personal data and to obtain a copy of the personal data relating to it	The candidate has the right to receive information about the processing of his/her personal data in a transparent,
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		<p>comprehensible and easily accessible form, in clear and plain language.</p> <p>The candidate shall also have the right to obtain an explanation from the Company as to whether or not his or her personal data are being processed and, if such data are being processed, to have access to information on how the Company processes the candidate's personal data, as well as to obtain a copy of such data.</p>
b)	The right to have personal data relating to him/her rectified/corrected	The Candidate has the right to have inaccurate or incomplete personal data corrected or completed by the Company.
c)	The right to have personal data relating to him or her erased ('right to be forgotten')	<p>The candidate has the right to request the Company to erase or delete the personal data if (i) there is no valid reason why the Company should continue to process them; (ii) the personal data are no longer necessary for the purposes for which they were collected or processed; (iii) the candidate withdraws the consent on the basis of which the personal data have been processed, and there is no other legal basis to process them, or on any of the other grounds set out in Article 17 of the GDPR.</p> <p>It should be noted that Article 17(3) of the GDPR provides for exceptions to the above-mentioned cases where processing of personal data is necessary. If such exceptions apply in the case of a candidate, the Company will inform the candidate accordingly.</p>
d)	The right to request the restriction of the processing of personal data relating to him or her	<p>The candidate has the right to require the Company to restrict (or suspend) the processing of the candidate's personal data if:</p> <ul style="list-style-type: none"> – the candidate challenges the accuracy of the personal data - until such time as their accuracy is verified; – the processing is unlawful and the candidate does not consent to the erasure of the personal data and you request instead that we restrict its use; – The Company no longer needs the personal data for the purposes of processing, but the Company needs the personal data to assert, exercise or defend legal claims; – the candidate objects to the processing of his/her personal data in the following manner, pending verification that the Company's legitimate reasons override the candidate's legitimate reasons. <p>Where the processing of personal data is restricted, such personal data may only be processed (with the exception of storage) with the</p>



		consent of the candidate or for the establishment, exercise or defence of legal claims, for the protection of the rights of another natural or legal person or for an important public interest.
e)	The right to data portability at the candidate's own request	<p>The candidate has the right to receive the personal data he or she has provided to the Company in a structured, commonly used and computer-readable format, and to have that data transferred to another controller if:</p> <ul style="list-style-type: none"> – the data are processed on the basis of consent or a contract; and – the data are processed by automated means. <p>The candidate also has the right to request that the Company transfers his/her personal data directly to another controller, if this is technically feasible.</p>
f)	The right to withdraw consent to the processing of his or her personal data	If a candidate's personal data are processed on the basis of the candidate's consent, the candidate shall have the right to withdraw such consent at any time. Withdrawal of consent shall not affect the lawfulness of the processing carried out on the basis of the candidate's consent prior to its withdrawal.
g)	The right to object to the processing of his or her personal data where the processing is carried out pursuant to Article 6(1)(e) or (f) of the GDPR, including profiling	<p>The candidate shall have the right to object at any time to the processing of his/her personal data which is processed for the performance of a task carried out in the public interest or in the legitimate interest of the Company.</p> <p>Upon receipt of the relevant objection, the Company will no longer process the candidate's personal data unless it can demonstrate legitimate grounds for processing which override the candidate's interests, rights and freedoms, or if the candidate's personal data are necessary for the establishment, investigation or defence of any claim.</p>

- In order to exercise the rights set out above, the Candidate must send a written request to the contact email address set out in Part II, Section 2 of this Privacy Policy. The Company undertakes to respond to the submitted request no later than 30 days from the date of receipt of the Candidate's request, except in cases provided for by law, where such period may be extended. Where justified, the Company shall have the right to refuse the candidate's request, stating in writing the reasons for such refusal, and, in order to ensure data protection and to enable the candidate to exercise his/her rights, shall have the right to request additional information necessary to confirm the identity of the applicant.
- The candidate has the right to lodge a complaint with the State Data Protection Inspectorate if he/she considers that his/her rights to the protection of personal data or any other rights provided for in the GDPR and other legal acts governing the protection of personal data have been infringed.



4. If a candidate considers that his/her data is being processed by the Company in breach of data protection legislation, the candidate is always first asked to contact the Company directly.

V. Sources of candidate data

1. The Company usually receives the candidate's data directly from the candidate when he/she responds to the Company's job advertisement and/or submits his/her CV, candidate profile and/or other candidacy documents (CV, cover letter, etc.).
2. The Company may also obtain information about a candidate's candidature, curriculum vitae and/or other candidature documents from entities providing job search, recruitment and/or placement services, such as recruitment agencies, online job search portals, and specialised career social networks (e.g., LinkedIn).
3. The Company may also obtain certain information about the candidate from third parties, such as persons who recommend the candidate, current or former employers.
4. The Company may collect personal data relating to the candidate's qualifications, professional abilities and business qualities from the former employer after informing the candidate in advance and from the current employer only with the consent of the candidate.
5. The Company will only collect personal data of a candidate from other sources with the candidate's separate consent. For example, the Company will only check references provided by the candidate or seek feedback from the candidate's employer if the candidate has given consent to be contacted by the named employer and/or other person.

VI. Disclosure of candidates' personal data to third parties

1. The Company may share the candidate's personal data with third parties (data processors) providing services to the Company and acting on its behalf (e.g. IT service providers, etc.). The Company shall ensure that the processing of personal data by such third parties is carried out only on the lawful instructions of PRESS GLASS and in accordance with the requirements of the GDPR and other applicable legislation, and that the personal data is transferred to them only when and to the extent necessary for the provision of the relevant services.
2. In addition, personal data may be transferred to relevant recipients/independent third parties, i.e. independent data controllers, if this is necessary to ensure the proper achievement of the purposes of the processing of personal data or for the fulfilment of statutory obligations.
3. The candidate's personal data may be provided to the following recipients or categories of recipients:
 - a) to service providers who provide services on behalf of the Company, only within the scope of the purposes for which the personal data were obtained;
 - b) entities that process personal data only on the basis of an obligation arising from mandatory legal provisions. For example, the Personal Data Controller may provide personal data of a candidate to authorised public authorities,
 - c) other entities acting at the direction and on behalf of the controller, including:
 - external bodies that provide and maintain ICT (information and communication technology) systems;
 - external parties assisting in the day-to-day operations of the Personal Data Controller;
 - d) independent data controllers:
 - professional advisors, such as persons providing legal, consulting, auditing, accounting services to the Personal Data Controller (if necessary to protect the legitimate interests of the Company);



– other companies belonging to the PRESS GLASS group.

- e) other natural and legal persons, insofar as this is related to and necessary for the organisational changes of the Personal Data Controller;
- f) other natural or legal persons, only if this is necessary to ensure the proper achievement of the purposes of the processing of personal data.

4. PRESS GLASS will not transfer candidates' personal data to third countries (outside the EU/EEA) unless it is deemed necessary. The company may transfer a candidate's personal data outside the EU/EEA if the candidate's explicit consent has been obtained or if appropriate safeguards are in place in accordance with the GDPR, e.g. a decision on the eligibility of the relevant country has been made or standard contractual clauses have been signed.

VII. Measures to protect candidates' personal data

- 1. PRESS GLASS shall implement appropriate technical and organisational measures, compliant with the GDPR, to protect candidates' personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or use, as well as against all other unlawful forms of processing.

VIII. Time limits for processing and storage of candidate's personal data

- 1. The Controller shall make every effort to ensure that the processing of personal data relating to applicants for employment and/or cooperation is carried out in an appropriate and proportionate manner and for the period of time necessary to achieve the purposes for which it was collected, without prejudice to mandatory legal requirements. In this respect, and in accordance with the 'Index of retention periods for internal administration documents' approved by Order No VE-50 of 24 September 2024 of the Chief Archivist of the Republic of Lithuania, which establishes the minimum retention period for such personal data, the Personal Data Controller shall process the personal data of candidates for recruitment and/or co-operation for a maximum of 3 years from the date of the end of the selection process. After the expiry of the said period, the Personal Data Controller shall delete the candidates' personal data immediately and permanently. If a candidate expresses additional voluntary consent to participate in other selection processes, including ongoing and future ones, the candidate's personal data shall be processed for these purposes at for a maximum period of 24 months from the date of the first submission of his/her application to the Company at .
- 2. When the Company no longer has the purpose to process personal data or the consent to process personal data is withdrawn, the personal data must be permanently deleted
- 3. For the purpose of defending against legal claims, if necessary, the time limits referred to in point 1 of Part VIII, Section VIII of this Privacy Policy shall be extended by processing the candidates' personal data in the Company until the date of resolution of the relevant dispute (e.g., resolution of the claim, conclusion of a settlement agreement), and if the relevant legal procedures result in a final decision of a court or other dispute-handling authority - for a period of one year from the date of the finalisation of such decision.
- 4. Once PRESS GLASS has concluded an employment contract with a candidate, his/her curriculum vitae (CV) and other personal data provided during the recruitment process will be stored in the employee's personal file and will be deleted after the termination of the employment relationship if the data is no longer deemed necessary.

IX. Changes to the Privacy Policy



1. This Privacy Policy may be amended, in particular if the need or obligation to make such amendments arises as a result of a change in the applicable legal provisions or in the manner of recruitment, including a change in the recipients of the data or in the entities to which the personal data of the candidates will be transmitted.

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