



UAB "LIGENCE"	PROCEDURE	2023-09-11
		Rev: 1.1

PRIVACY POLICY

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	Function	Name	Signature	Date
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1. DOCUMENT HISTORY

Revision	Date of enactment	Change author	Change description
1.0	2023-09-11		The document is created.

2. CLASSIFICATION

Public.

3. PURPOSE

Privacy Policy defines the basic rules and conditions of personal data processing.

4. SCOPE OF APPLICATION

Privacy Policy applies to the visitors of the website www.ligence.io, for candidates/trainees participating in Ligence selections for jobs/internships, persons applying to the Ligence, participants in biomedical research on Ligence, Ligence's representatives of partners and service providers and others.

5. RESPONSIBILITIES

Data Owner - DPO

All employees shall be trained according to and comply with the policy.

DPO and QSR are responsible for the training of employees.

In case of not complying with the policy, employee shall write explanatory act to explain the situation. Recurrent noncompliance might lead to dismissal of the employee.

6. RELATED DOCUMENTATION

No.	Title
Regulatory / normative documents	
GDPR	General Data Protection Regulation

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7. TERMS, ABBREVIATIONS AND DEFINITIONS

Terms/ abbreviations	Definitions
Organization	UAB „Ligence“

8. PROCESS DESCRIPTION

8.1. General Information

Personal data is any information collected by the Ligence about a data subject which may be used to identify the data subject and which is stored in electronic or any other form. Personal data is any information about data subjects, including but not limited to the name, surname, address, gender, e-mail, phone number of the data subject, that the Ligence collects for the purposes set out in this Privacy Policy or a consent given by a data subject, or in a bilateral agreement with the data subject.

8.2. Whose Personal Data Ligence collects?

We need your personal data that can be collected in the following ways. Privacy Policy specified what to expect when Ligence collect personal data on:

- *Individuals involved in our biomedical research;*
- *Individuals who work with us (partners/external service providers);*
- *Website visitors;*
- *Individuals who made inquiries to us;*
- *Candidates/trainees for the job/traineeship;*
- *Other.*

8.3. How Ligence receives your Personal Data?

We collect your personal data, which you provide to us about yourself when you submit your personal data through the Ligence website or contact us through the Company's contact details provided, when you participate in our biomedical research or apply to work or do an internship with us, and so on.

- *By concluding service provision/joint activity/other agreements;*
- *You provide us with your data through our website;*
- *When you apply by e-mail to the e-mail address provided by the Company;*
- *When you agree with the installation of cookies on your device;*
- *When applying for vacancies in our jobs/internships;*
- *When you participate in a biomedical research organized by us;*
- *Otherwise provide or, with your consent, receive information from third parties.*

8.4. What Personal Data we process and for what purpose?

The following personal data of research participants are processed for the purpose of conducting biomedical research:

- *Transthoracic echocardiography (TTE) images, gender, height, weight, unique hospital patient identification code.*

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The following personal data of partners/external service providers are processed for the purpose of cooperation partnership with Ligence:

- *Name, surname, telephone number, city, e-mail address, bank account number, data of the legal entity.*

The following personal data of website visitors are processed for the purpose of administration and submission of the request received through the Ligence website:

- *Name, e-mail, subject and free text.*

It should be noted that Ligence deletes redundant personal data provided by data subjects that are not necessary for the purpose of making a request and receiving a response.

The following personal data of candidates and trainees are processed for the purpose of selecting new staff/trainees:

- *Name, surname, CV, tel. No., email e-mail, certificates, diploma, image, qualifications, work experience (previous jobs).*

When a visitor logs in or visits the Ligence website, the following technical personal data is automatically collected and processed:

- *IP address;*
- *Date and time of connection;*
- *The name and universal address (URL) of the website that links to our Website;*
- *Visitor device operating system data;*
- *Visitor Internet Service Provider Information;*
- *Visitor's geographical location data;*
- *Other relevant technical information.*

8.5. Legal Basis for Processing and how much is protected

Legal basis for processing:

- *Contract (service provision/joint activities);*
- *Biomedical research permit;*
- *Legitimate interest - to respond to your inquiries, provide the information you are asking us for, etc;*
- *Fulfilment of obligations established by legal acts (fulfilment of the requirements of health care legal acts, accounting, archiving, etc.);*
- *Consent (e.g. for the processing of personal data, in the presence of biomedical research, participation in the selection of staff/trainees, etc.).*

We will protect your personal data for as long as necessary to achieve and implement the purposes set out in this Privacy Policy, depending on the nature of the services or cooperation provided to you, unless longer retention of personal data and related documents is required by applicable law and required (e.g. mandatory terms of keeping accounting and other documents, etc.) or conditioned by the protection of the legitimate interests of the data controller in judicial or other state institutions.

8.6. Participation in the Employee Recruitment for Job Vacancies

On the basis of your consent that you give as a participant in the recruitment of candidates to get employed at Ligence, we collect and process your CV and/or your motivation letter and/or other information that you provide to us.

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At the end of the selection of employees/trainees, we undertake to delete and/or destroy your personal data within 5 (five) working days after the employment/traineeship agreement has been signed with the selected candidate, unless you agree that your personal data will continue to be used for the purposes specified in your consent.

8.7. Disclosure of Data

We may disclose the information about you to our employees or service providers, if it justifiable for the purposes defined in this Privacy Policy. In certain circumstances, we may be required to transfer personal data when:

- a) we must disclose information in accordance with the law, including when we are required to disclose personal data to a tax administrator and law enforcement authorities for the purposes of crime prevention and detection;*
- b) we must disclose personal data in connection with legal proceedings or for the purpose of obtaining legal advice, or such disclosure is necessary to establish, enforce or defend our rights;*
- c) the information must be disclosed in order to protect our interests or the interests of others (for example, to prevent fraud);*
- d) the information must be disclosed to a third party that provides administrative or data processing services on our behalf. In such circumstances, we undertake to take measures to ensure that third parties store personal data in the same way as we protect them and to notify you of any changes to this Privacy Policy;*
- e) the information must be disclosed to a potential purchaser of our company's assets or organization. If your personal data is transferred to a third country and/or international organization, we will inform you in advance and ensure that the data is transferred in accordance with the requirements of the applicable legal acts.*

The list of data recipients or recipient categories listed in this Privacy Policy might change over time, therefore if you wish to be informed about the changes related to recipients of your personal data, please inform us by email indicated in this Privacy Policy, and indicate in the message body "I wish to receive information from Ligence about the changes of the recipients of my personal data. First Name, Surname".

8.8. Security of Your Personal Data

Your personal data will be processed in accordance with the General Data Protection Regulation, the Law on Legal Protection of Personal Data of the Republic of Lithuania and other statutory requirements. When processing your personal data, we implement organizational and technical measures that ensure the protection of personal data against accidental or unlawful destruction, alteration, disclosure, as well as any other illegal processing.

8.9. Your Rights

This section contains information about your rights in regard of processing of your personal data conducted by us and how you may exercise those rights. If you wish to obtain more information about your rights or how to enforce them, please contact us via email address: info@ligence.io.

Unreasonably immediately, but not later than within 1 (one) month from the receipt of the request, we will provide you with information on the action taken upon receipt of your request for the exercise of your rights.

Depending on the complexity of the request and the number of requests received, this deadline may be extended for a further 2 (two) months. Ligence may refuse to implement your rights only in the cases stipulated for by the law.

8.9.1. Right to Withdraw a Consent

If you have provided us with an explicit consent to the processing of your data, you can withdraw it at any time by notifying us at info@ligence.io.

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8.9.2. Right of Access to Your Personal Data

We strive that you fully understand how we use your personal data and would not experience any inconvenience. You may contact us at any point to inquire if we process any of your personal data. If we do store or use your personal data in any other way, you have the right to access them. To do so, please provide us with a written request to the e-mail address: info@ligence.io, get identified; observe the principles of fairness and rationality while making such a request.

8.9.3. Right to Request Further Information

We hope that you will understand that it is very difficult to discuss all possible ways to collect and use personal data. We strive to provide as clear and comprehensive information as possible and we commit to updating this Privacy Policy once there are changes in the ways we process personal data. However, if you have any questions about the use of your personal data, we will be happy to respond to them or provide any additional information we are allowed to disclose by the law. If you have any specific questions or have not understood the information we have provided, please contact us.

8.9.4. Additional Rights

Below we provide information about additional rights that you have and that can be implemented in accordance with the procedure below.

(a) You have the right to ask us to rectify any inaccuracies in the available data. In this case, we may ask you to confirm the corrected information.

(b) You have the right to ask us to delete your personal data. Please note that we will only be able to comply with such a request if:

- Your personal data is no longer needed for the purposes for which it was collected (for example, we need your personal data in order to respond to your letters);*
- we are prohibited by law from collecting, storing or using personal data;*
- Your personal data is not needed to establish, enforce or defend a legal requirement, such as in legal proceedings.*

(c) You have the right to ask us to limit the processing of your personal data or to stop processing them:

- For the period required to make sure that your personal data is accurate when you submit claims regarding the accuracy of your data;*
- When collection, storage or use of your personal data by us is unlawful but you decide not to request the erasure of the data;*
- When we no longer need your personal data but you need it to identify, enforce or defend a legal claim;*
- For the period necessary to determine if our legitimate interests to continue with your data processing overrides your rights as a Data Subject, if you have exercised your right to object to the processing of your personal data.*

(d) You have the right to transfer the data we have received from you with your consent or for the purpose of concluding the contract. Once you have exercised this right, as per instruction in your request we will transfer a copy of your data.

(e) You have the right to object to our processing of your personal data:

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- *When we process your data on the grounds of our legitimate interest but it is not sufficient to form a lawful basis for us to continue using your personal data.*
- *whenever we use your personal data to send newsletters or for direct marketing purposes. In this case, the data will no longer be used for these purposes, but may be used for other legitimate purposes.*

8.9.5. Complaints

You are important to us and it is important to us to ensure the protection of your personal data. We apply strict standards to the collection and use of personal data. So, we take any complaints about the use of your personal data very seriously and please let us know of any problems with it.

If you believe that your rights as a data subject are and/or may be violated, please contact us immediately by email: info@ligence.io. We ensure that once we receive your complaint, we will contact you within a reasonable timeframe and inform you of the progress of the complaint investigation and then about its findings.

When you contact us to make a complaint, we only use your personal data to investigate and respond to your complaint and to assess the quality of the services we provide. Upon receiving a complaint against a member of our team, we may need to disclose your identity to that person. You can indicate that you do not want your personally identifiable information to be disclosed and we will endeavor to comply with your request.

However, it may not always be possible to deal with a complaint anonymously.

If you find results of our investigation not satisfactory, you can submit a complaint directly to the State Data Protection Inspectorate (phone No. +370 5271 2804, e-mail: ada@ada.lt). You also have the right to lodge a complaint with the supervisory authority in the Member State in which you have your habitual residence, place of work or the place where the alleged infringement was committed.

8.9.6. Responsibility

You are responsible for the confidentiality of your data, as well as the accuracy, correctness and comprehensiveness of the data you provide to us. If the data you provide changes, you must immediately notify us by email.

You are responsible for the confidentiality of the data you provide and for any actions (data transfers, orders placed, etc.) performed on our Websites. You are responsible for ensuring that the information you provide to us is accurate, correct and complete. If the data you provide changes, you must immediately notify us by email info@ligence.io. We will not be liable, in any event, for any damages caused to you by the fact that you have indicated the incorrect or incomplete personal data or have not informed us of any changes.