

CLOSED JOINT STOCK COMPANY "GYM LT"

DIRECTOR

**ORDER
APPROVAL OF UAB GYM LT PRIVACY POLICY**

in 2024 April 11 No. 2024/04/14
Vilnius

In accordance with the articles of association of UAB "GYM LT",

I AFFIRM:

1. The privacy policy developed by UAB Gym LT manages the personal data of customers

I ORDER:

2. Apply these rules from 2024. April 11

ADDED: Privacy Policy

Director Greta Radzevičienė

PRIVACY POLICY

- **What does this Privacy Policy mean?**

In this privacy policy (hereinafter - **Privacy Policy**), we provide you with information about how Gym LT, UAB (hereinafter - **Lemon Gym**) processes your personal data after receiving:

- by visiting the website lemongym.lt (hereinafter - **the website**);
- by installing or using the Lemon Gym mobile application, which can be downloaded from iTunes and/or Google Play (hereinafter - **the Application**);
- Lemon Gym providing services to you;
- Your active actions on Lemon Gym's social media accounts;
- Lemon Gym's direct marketing;
- participating in Lemon Gym events;
- participating in Lemon Gym auditions;
- when executing contracts with legal entities, partners, suppliers;
- making a request to us;
- while visiting Lemon Gym sports clubs.

Below, all persons whose data is processed by Lemon Gym are called - **Customers** . The Privacy Policy also provides for certain obligations of Customers, which must be observed when visiting the Website.

- **About LemonGym**

GYM LT, UAB, legal entity code 303472404, registered office at Kareivius st. 14, Vilnius, data about the company is collected and stored in the Vilnius branch of the Register of Legal Entities of the Republic of Lithuania. Contacts of the data protection officer - privatumas@lemongym.lt .

- **What is personal data?**

Personal data is any information collected by Lemon Gym about the Customer that can be used to identify the Customer and is stored electronically or otherwise.

Personal data includes any information, including the Customer's name, address, IP address, that Lemon Gym collects about Customers for the purposes specified in this Privacy Policy or in a separate Customer consent or agreement with Lemon Gym. This data also includes the Clients' personal information in the public space, which Lemon Gym becomes familiar with when the Client contacts Lemon Gym's social media tools or performs active actions on Lemon Gym's social media accounts.

- **How do we collect your data?**

How we collect your data depends on the services **we provide to you or the nature of our cooperation.**

Lemon Gym processes data:

- **received directly from the data subject** (You), e.g. when you send us inquiries or messages through the specified contacts, sign cooperation agreements with us, or send us your resume when applying for vacant jobs, fill out questionnaires, register on our websites or organized promotions;
 - **which are generated when you use our services** , such as when you use our network and services, i.e. when you make a phone call, send a text message, browse the Internet, visit our websites, etc.;
 - **which we receive from other sources**, e.g., if there is a basis, from other institutions or companies, i.e. banks, publicly available registers, insurance companies, as well as from your employer, if he concludes a contract for the provision of services to you, etc.
- **Personal data processed in the provision of services**

Purpose of data processing	Personal data is processed	Data processing term	Basis of data processing
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<p>Contract conclusion, sale and provision of services</p>	<p>Name, surname, date of birth, e-mail postal address, residential address, telephone number, purchase-related information (purchase date, service description, product, price, quantity, payment method, discount granted), workplace, card number, subscription type, duration, nature, departments where services are provided services, number of visits, number of remaining visits, date, subscription validity date, invoice - invoice and the data specified in it, customer requests, IP address (when the contract is concluded online), information about the return of goods or the cancellation of a contract concluded by means of electronic communications . Name, surname, date of birth, place of residence, e-mail address of the parents (if the service recipient is a minor). mail, telephone number.</p>	<p>Documents confirming the conclusion of contracts are kept for 10 years from the date of termination of the contract. Customer account data is stored for 5 years from the date of the customer's last login to the customer account or the customer's last purchase. Other data - 5 years from the date of the last purchase.</p>	<p>Fulfilling a contract Art. 6 GDPR 1st point b</p> <p>Legitimate interest in providing you with services (when the data is received from the employer) - Article 6 GDPR. 1st Clause f</p>
	<p>When the service is provided to a child - information about the child's health (requirements for the service provider related to children's health). Without this information, Lemon Gym will not be able to accept children for sports.</p>	<p>The period of validity of the client's membership and one day after its expiry. In the case of a one-time visit - one day after the visit.</p>	<p>Fulfilling a contract Art. 6 GDPR 1st point b</p>
	<p>In order to extend your membership, you may need to provide Lemon Gym with a medical certificate, a military service certificate, or a pregnancy certificate. If you refuse to provide these documents, we will not be able to extend the validity period of the membership, but the</p>	<p>We only ask customers to show their certificates so that we can verify their authenticity. If necessary, we can write down certain information from them by hand - the date of issue and</p>	<p>Fulfilling a contract Art. 6 GDPR 1st point b</p>

	other terms of the performance of the contract will remain unchanged	other relevant information, but we do not copy them.	
Debt administration	Name, surname, social security code, date of birth, e-mail postal address, telephone number, amount of indebtedness, circumstances of indebtedness, circumstances of debt repayment.	Until the full repayment of the debt and 10 years after the end of this period	Legitimate interest Art. 6 GDPR 1st Clause f
Provision of services using the Application (improving the quality of services and attracting customers)	First name, last name, system ID, date of birth, club, gender, country, address, postal code, e-mail, telephone, information or the Customer is a foreigner. These data are not necessary for the execution of the contract. The application is intended for your convenience.	Application period	Consent Art. 6 GDPR 1st point a
Customer identification when entering Lemon Gym sports clubs	When identifying with a QR code: the customer is assigned his personal, individualized code	Until the end of the membership	Execution of the contract GDPR, Article 6. 1st point b
Exit reason for terminating Lemon Gym membership	Name, e-mail, phone number, reason for leaving	2 years after the termination of the contract	Consent Art. 6 GDPR 1st point a

We can also receive data about you from your employers, if you are the final recipient of the service, but the contract is concluded between Lemon Gym and your employer.

- **Direct marketing**

Purpose of data processing	Personal data is processed	Data processing term	Basis of data processing
Sending offers, newsletters and advertisements to customers and other interested persons by SMS and e-mail. by post	Name, surname, telephone number, e-mail address (mandatory data, without which we will not be able to send you direct marketing communications); data confirming the right to participate in promotional campaigns, documents confirming the fulfillment of the conditions of promotional campaigns.	1 year after consent	Consent Art. 6 GDPR 1st Point a Electronic Communications Law Art. 81 1st
Organization of lotteries and games	Photographs, video material, when necessary for participating in lotteries or games. Winner's residential address	Until the winner is determined, and the winner's data - 1 year after winning	Consent Art. 6 GDPR 1st point a

You have the right to opt out of receiving direct marketing communications at any time by clicking the "unsubscribe" button on the home page or by contacting us by email. by mail privatumas@lemongym.lt.

If you are our active Customer and you have not objected to receiving direct marketing communications from Lemon Gym, we will send you communications by e-mail based on our legitimate interest regarding goods or services that are similar to the services provided to you or the goods purchased.

If you are 14 years old, you can express your consent to receiving direct marketing messages yourself, but if you are under 14 years old, we will ask for your parental consent. In this case, we will ask you to provide the name, surname and e-mail address of your parents or guardians. email address to which we will send an inquiry regarding said consent. The personal data mentioned in this point will be processed by Lemon Gym for 1 year after receiving the consent, after which it will be deleted.

Your e-mail email address and phone number are provided to the social media networks Facebook and LinkedIn in order to display Lemon Gym advertising to you.

- **Personal offers**

Purpose of data processing	Personal data is processed	Data processing term	Basis of data processing
Providing personalized offers based on the data provided by the customer	Name, surname, telephone number, e-mail address, residential address, frequency of visits to the sports club, type of selected membership.	1 year after consent	Consent Art. 6 GDPR 1st point a

You have the right to opt out of receiving personalized offers at any time by contacting us by email. by mail privatumas@lemongym.lt

- **Participation in Lemon Gym events**

Purpose of data processing	Personal data is processed	Data processing term	Basis of data processing
Publicizing information from events organized by Lemon Gym, informing the public about Lemon Gym events and promoting Lemon Gym awareness.	The fact of your participation, name, surname and photo or video material	3 years after giving consent or participating in the event (whichever occurs later), except for exceptions permitted by law	Consent Art. 6 GDPR 1st point a

You have the right to withdraw your consent to process your photo or recording with you at any time by contacting us by e-mail. by e-mail privatumas@lemongym.lt or by contacting number [19193](tel:19193).

With your consent, your photos may be published on Lemon Gym's social media accounts, website.

Media representatives can publish your photos only in compliance with the requirements of the law applicable to them, but Lemon Gym is not responsible for the actions of media representatives.

- **Participation in selections for vacancies**

Purpose of data processing	Personal data is processed	Data processing term	Basis of data processing
Selection for vacancies	Your resume and/or cover letter and other information provided by you	Until the end of the selection (information is destroyed within 5 working days after the employment contract is signed with the selected candidate)	Consent Art. 6 GDPR 1st point a

- **Asset and data protection**

Purpose of data processing	Personal data is processed	Data processing term	Basis of data processing
Protection of property and persons in order to capture and maintain evidence of incidents (property damage, theft, illegal acts, injuries, accidents, etc.) and to investigate them	Image data	14 days	Legitimate interest Art. 6 GDPR 1st Clause f

- **Examination of inquiries, reports and complaints**

Purpose of data processing	Personal data is processed	Data processing term	Basis of data processing
Handling requests by e-mail by post	Your name, surname, e-mail email address and text of correspondence.	1 year from the time the request was processed	Consent and agreement Art. 6 GDPR 1st points a and b
Handling requests on the website	Email address, first name, last name, nickname, phone number, attended Lemon Gym club, message and/or comment and text.	1 year from the time the request was processed	Consent and agreement Art. 6 GDPR 1st points a and b

Accepting inquiries by phone	Phone number from which you are calling, recording of the phone conversation, metadata of the call - duration, time	6 months	Consent and agreement Art. 6 GDPR 1st points a and b
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Any personal data you provide when communicating with us is used only for the above purposes and to view messages and administer and manage communication flows.

We undertake not to use your personal data in any publications without your express consent in such a way that it is possible to determine your personal identity.

- **Execution of Lemon Gym contracts with partners**

Purpose of data processing	Personal data is processed	Data processing term	Basis of data processing
Execution of contracts with suppliers	Name, surname, telephone number, e-mail address of employees of suppliers or service providers (natural and legal persons). e-mail address, content of correspondence, date, other data related to the execution of the contract.	Until the end of the contract, and 10 years after the termination of the contract	Contract Art. 6 GDPR 1st point b
Execution of contracts with coaches	Name, surname, date of birth, criminal record information, residential address, photo, telephone number, e-mail, education (educational institutions, scientific degree(s) obtained), amount of honorarium, languages payment and other related skills.	Until the end of the contract, and 10 years after the termination of the contract	Contract Art. 6 GDPR 1st point b

Note - when processing the data of Lemon Gym's service provider or supplier employees, the basis for data processing is **Lemon Gym's legitimate interest**.

- **Website visitors**

You can register and create an account on the website if you are 18 years old. All information you provide to Lemon Gym by becoming a registered Customer will be held and stored with the Customer's consent in accordance with the terms of the Privacy Policy. If, in our reasonable opinion, you have violated any of the provisions of our Privacy Policy, **we have the right to block the Customer's account at any time** .

If you know or suspect that an outsider has learned your registration name or password, you must notify us as soon as possible by e-mail. by mail: privatumas@lemongym.lt .

1. Cookies

A cookie is a small file consisting of letters and numbers that we save on your browser or your computer's hard drive with your consent. We use different cookies for different purposes. Cookies also help us distinguish you from other users of the website, thus ensuring a more pleasant experience when using the website and allowing us to improve the website.

Most browsers allow you to reject all cookies, and some browsers have the option to reject only third-party cookies. So you can take advantage of these opportunities. However, please note that blocking all cookies will have a negative impact on the use of the website, and without cookies you will not be able to use all the services provided on the website.

We use the following cookies:

- **Absolutely necessary cookies** . These cookies are necessary for the website to function. The basis of the data processed by such cookies is the proper execution of the contract when the Customer visits the website, and Lemon gym ensures the quality and safety of the visit. These can be cookies that, for example, allow the Customer to log in and access protected areas of the website, use the shopping cart function, or others. services.
- **Analytical and/or performance cookies.** These cookies allow Lemon gym to recognize and count visitors to the website and to track how visitors move around the website while using it. This helps Lemon gym improve the site's performance, such as making sure users can easily find what they're looking for. The basis for processing the data collected by these cookies is the consent of the Customers.

- **Functional cookies** . These cookies are used to recognize the Clients when they return to the website, so that Lemon gym can adapt the presented content to the needs of the Clients, to remember the relevant information for the Clients. The basis for processing the data collected by these cookies is the consent of the Customers.

Detailed description of cookies :

The name of the cookie	Purpose/purpose of data processing	The moment of creation	Expiry date	Nature of the cookie (necessary, analytical, functional [RA1])
_hjSessionUser	A HotJar cookie that is set when a user first accesses a page with a HotJar script. It is used to keep the HotJar user ID unique to that site in the browser.		1 year	Functional
<i>consents_functional (name of category)</i>				
_fbp	This cookie is used by Facebook to identify the user		It is created during the first access to the website and is valid for 2 days	Functional
<i>consents_essential (name of category)</i>				
_guid	Registers a unique ID that is used to generate statistical data about how the visitor uses the website.		This cookie expires after 1 day.	Necessary

_ga	Uses Google Analytics to distinguish unique users by assigning a randomly generated number as a customer identifier. It is important to note that the _ga cookie does not collect any personal information about website visitors. The information collected is anonymous and used for statistical purposes only.		Expires by default after 2 years	Necessary
<i>consents_required (name of category)</i>				
_hjIncludedInSessionSample	Used to verify that a visitor is included in the data sample defined by the site's daily session limit.		Duration of 30 minutes, extended based on user activity.	Analytical
_hjfirstSeen	Identifies the first session of a new user.		Duration of 30 minutes, extended based on user activity.	Analytical
_hjAbsoluteSessionInProgress	Used to detect the user's first page view session.		Duration of 30 minutes, extended based on user activity.	Analytical
<i>consents_analytics (name of category)</i>				
PHPSESSID	The PHPSESSID cookie is used by the PHP programming language to identify a user's session on the website. When a		The cookie is deleted when the user closes their	Necessary

	user visits a website built with PHP, the server creates a unique session ID and sends it to the user's browser as a cookie, usually called PHPSESSID.		browser or logs out of the website.	
hjSession	Contains current session data. Ensures that subsequent requests in the session window are assigned to the same session.		Duration of 30 minutes, extended based on user activity.	Analytical
pll_language	Saves language settings		Permanent	Functional

- **Third Party Services**

The website provides the site's YouTube videos. The service provider YouTube controls all information collected when individuals view its content. The privacy notice of the service provider YouTube is available at <https://www.google.co.uk/intl/en-GB/policies/privacy/>.

- **Social media tools**

The website contains links to our social media accounts. We currently have the following accounts:

- on the Facebook network, whose privacy notice is available at <https://www.facebook.com/privacy/explanation> ;
- on the "Instagram" network, whose privacy notice is available at <https://help.instagram.com/155833707900388> ;
- on the LinkedIn network, whose privacy notice is available at <https://www.linkedin.com/legal/privacy-policy> ;
- on the YouTube network, whose privacy notice is available at <https://www.google.co.uk/intl/en-GB/policies/privacy/> .

We recommend that you read the privacy notices of third parties and contact the service providers directly if you have any questions about how they use your personal data.

- **Disclosure of data**

We may disclose information about you:

- to our professional advisors, auditors;
- to notaries, if the contract concluded with you requires a notarial form;
- bailiffs, entities providing legal and/or debt collection services,
- entities taking over the right of claim to the debt;
- for joint debtors data file managers;
- for companies providing data centers, hosting, cloud, website administration and related services, creating, providing, supporting and developing software, companies providing information technology infrastructure services, companies providing communication services;
- for companies providing advertising and marketing services;
- for companies providing archiving, physical and/or electronic security, asset management and/or other business services;
- procedure provided by law for state institutions: State Tax Inspectorate, Registry Center, Social Security, Labor Exchange, etc.;
- to law enforcement authorities at their request or at our initiative if there are suspicions that a criminal act has been committed, as well as to courts and other dispute resolution bodies;
- tax administrators.

Your personal data will not be transferred to a third country and/or international organization. Except for the cases provided in this Privacy Policy, we do not provide your personal data to any third parties.

The list of recipients or categories of recipients specified in the privacy policy may change, so if you wish to be informed about changes in the recipients of your personal data, please notify us by e-mail. by letter [to privatumas@lemongym.lt](mailto:privatumas@lemongym.lt), specifying "I would like to receive information about the change of recipients of my personal data, name, surname".

- **Third Party Materials and Third Party Websites**

Our Website and App may contain advertising provided by third parties. Such third parties are **solely responsible for the content of such advertising and must ensure that it complies with all laws and regulations applicable to them.**

You visit the third party website at your own risk. We do not accept any responsibility, direct or indirect, for the content, accuracy of information or opinions expressed on such websites, or for the quality of the goods and services offered on them.

Our informational materials may contain information sourced from third-party websites. Material taken from a third party website will be marked accordingly and may link to the original website. We are not responsible for any material taken or posted on a third party website that is linked in our information material to you, or for any personal data used by such third party.

1. Security of your personal data

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

- **Your rights**

In this section, we provide information about your rights related to our processing of your personal data and the cases when you can use these rights. If you would like more information about your rights or to exercise them, please contact us at this email address. e-mail address: privatumas@lemongym.lt.

will provide you with information about the actions taken after receiving your request regarding the implementation of your rights without undue delay, **but no later than within 1 (one) month from the receipt of the request . Considering the complexity of the request and the number of requests received, the above-mentioned deadline can be extended for another 2 (two) months .** In this case, we will inform you about such extension of the deadline and the reasons for it within 1 (one) month after receiving the request.

Lemon Gym will refuse to exercise your rights only in the cases provided for by law.

- **Right to withdraw consent.** If you have given us your express consent for the processing of your data, you can withdraw it at any time by sending an email to: privatumas@lemongym.lt.
- **The right to access your data.** We want you to fully understand how we use your personal data and not experience any inconvenience as a result. You can contact us at any time and ask whether we process any of your personal data. If we store or use your personal data in any way, you have the right to access them. To do this, send us a written request at this email address. to the e-mail address: privatumas@lemongym.lt, confirm your personal identity and, when submitting such a request, adhere to the principles of honesty and reasonableness.
- **The right to request more information.** If you have any questions about the use of your personal data, we will be happy to answer them or provide you with any additional information that we can disclose. If you have any specific questions or do not understand the information provided, please contact us by email. by mail: privatumas@lemongym.lt.
- **Additional rights**

Below we provide information about additional rights you have, which you can exercise by following the procedure described below.

- You have the right to ask us **to correct any inaccuracies in the data we hold** . In this case, we may ask you to confirm the corrected information.
- You have the right to ask us **to delete your personal data** . This right is exercised in the cases provided for in Article 17 of the General Data Protection Regulation (EU) 2016/679.
- You have the right to ask us **to limit the processing of your personal data or not to process them** :
 - during the period necessary for us to verify the accuracy of your personal data when you submit claims regarding the accuracy of the data;
 - when our collection, storage or use of your personal data is illegal, but you decide not to request data deletion;
 - when we no longer need your personal data, but you need it to establish, fulfill or defend a legal claim;
 - for the period required to determine whether we have an overriding legal basis to continue processing your personal data, if you have exercised your right to object to the processing of personal data.

- You have the right **to the transfer of data that we received from you with your consent or for the purposes of concluding a contract** . After you exercise this right, we will transfer a copy of the data you provided at your request.
- You have the right **to object to us using your personal data** :
 - when we use such data to ensure our legitimate interests, but we do not have a more important legal basis to continue using your personal data; or
 - any time 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.
- **Complaints**

If you believe that your rights as a subject of personal data are and/or may be violated, please contact us immediately with a complaint by e-mail. to the e-mail address privatumas@lemongym.lt . We assure you that only after receiving your complaint, we will contact you within a reasonable period of time and inform you about the progress of the investigation of the complaint, and later about the result.

If you are not satisfied with the results of the investigation, we inform you that you can file a complaint with the supervisory authority - the State Data Protection Inspectorate (contacts www.ada.lt).

- **Responsibility**

You are responsible for the confidentiality of your password and the data you provide, and for any actions (data transfer, orders placed, etc.) that are performed on our website and/or the App after logging in using your login data. You may not disclose your password to third parties. If the services provided on our website and/or the App are used by a third person who has logged in to the website and/or the App using your login data, we consider that you have logged in. If you lose your login data, you must notify us immediately by mail, telephone, fax or e-mail.

You are responsible for ensuring that the data you provide to us is accurate, correct and complete. If the data provided by you changes, you must immediately inform us about it by changing the relevant data in the registration form or, if the data is not specified in the

registration form, by informing us about it by e-mail. In no case will we be responsible for any damage caused to you due to the fact that you provided incorrect or incomplete personal data or did not inform us when they changed.

- **Changes to the Privacy Policy**

We may update or change this Privacy Policy at any time. Such updated or modified Privacy Policy will be effective upon its posting on our Website and/or App. You should check it from time to time and make sure that you are satisfied with the current version of the Privacy Policy.

After updating the Privacy Policy, we will inform you about what we consider to be material changes by posting them on the Website and/or in the App. If you access the Website and/or App after such notice is posted, you agree to the new requirements set forth in the update. You can refer to the "Update Date" at the bottom to see when the Privacy Notice was last updated.

The Privacy Policy was last updated on 04/11/2024
