

PRIVACY POLICY

UAB “Neoparta” – a genuine spare parts wholesaler, established in 2012 and part of one of the biggest automotive groups in Lithuania, which has been in automotive business for 30 years (hereinafter referred to as "We", "Company", "Neoparta") values and protects personal data and Your right to privacy, therefore, in this policy (hereinafter referred to as the "Privacy Policy"), We provide You with a detailed description of the way We handle the personal data of individuals (hereinafter referred to as "You" or the "Data Subjects"), when You visit our website, make an enquiry, buy our products or in any other manner engage in business with us.

In processing personal data, We comply with the 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"), with the provisions of any other applicable legislation governing the protection of personal data and with the provisions of this Privacy Policy.

In this Privacy Policy, We provide You with the most important structured information about the processing of Your personal data, i.e. what personal data We collect, how and why We use it, on what legal grounds We process it, for how long We store it, to whom We transfer it, as well as our obligations in the processing of Your personal data, the rights that You have and how can You exercise them.

If You visit our website, We will assume that You have read this Privacy Policy. If You do not wish to have Your personal data processed as described in this Privacy Policy, please do not use the website and do not provide us with Your personal data in any other way.

The Privacy Policy is a constantly evolving document, and we may improve, modify and update it from time to time as necessary, so please visit the Website from time to time to ensure that You are always provided with the most up-to-date version of the Privacy Policy.

The most recent changes to the Privacy Policy have been made and are effective as of **3rd January 2025**.

TERMS

This Privacy Policy uses the following terms:

- **Personal data** means any information about an identified or identifiable natural person, or who can be identified, directly or indirectly, by reference to relevant data (e.g. name, surname, email address, vehicle registration number, etc.);
- **EEA** means the European Economic Area, consisting of the States of the European Union plus Liechtenstein, Iceland and Norway;
- **Website-** <https://neoparta.com/>.
- Other terms shall have the meanings ascribed to them and defined in the GDPR.

OUR CONTACTS

The Data controller of Your personal data is UAB “Neoparta”, legal entity code 302784493, registration address: Ozo str. 10A-10, LT-08200 Vilnius, e-mail address: info@neoparta.com, tel. +370 699 995 49. You can contact our Data Protection Officer at dpo@modus.group.

FROM WHAT SOURCES DO WE OBTAIN YOUR PERSONAL DATA?

We receive Your personal data directly from You when You send us enquiries by email or by “get in touch” form on the website, when we meet in events, enter into contract with us etc.

The Company also receives information from other sources where permitted by law and where necessary for the our defined and specific purpose:

- public registers - various publicly available information;
- Internet/communication service providers - when you visit the Website, enter the field of CCTV cameras, etc.;
- other official bodies (e.g. various police departments, tax authorities, DPAl, etc.).

FOR WHAT PURPOSES AND WHAT PERSONAL DATA DO WE PROCESS?

We process Your personal data for the following purposes:

<p>Purpose- Website administration. Legal basis for processing- consent, Article 6(1)(a) GDPR, legitimate interests, Article 6(1)(f) GDPR. Categories of personal data- Information collected by cookies.</p> <p>Full information on the use of cookies and the collection of data using cookies (including the specific cookies used and their retention periods) can be found in the cookie management tool at the bottom of each website.</p>
<p>Purpose - Administration of requests made on the website. Legal basis for processing- consent, Article 6(1)(b) GDPR. Categories of personal data - name, surname, email address, telephone number, dealership of your choice, model of car you want, additional information and documents you provide. Data retention period - 2 years after the resolution of your request.</p>
<p>Purpose - to conclude and execute the sale and purchase agreement. Legal basis for processing: performance of a contract, Article 6(1)(b) GDPR, legal obligation, Article 6(1)(c) GDPR. Categories of personal data - name, surname, address, personal identification number, e-mail address, telephone number, payment data, personal identification document of the buyer and/or representative. If you are buying a car on behalf of a company, we will also ask you to provide documents proving your right to act on behalf of the company, extracts from public registers. All communication with You via emails. Data retention period - 10 years after the date of completion of the contract.</p>
<p>The purpose- to screen clients and business partners for their presence on EU sanctions lists. Legal basis for processing: legal obligation, Article 6(1)(c) GDPR. Categories of personal data:</p> <p>Company details, bank details; trader contact information: name, surname, telephone, e-mail; company manager, representative and board members' information: name, surname, date of birth, citizenship, country of residence, basis of representation; shareholding structure: name, surname, date of birth, citizenship and country of residence, shareholding percentage; information about ultimate beneficial owners: name and surname, date of birth, citizenship, ownership percentage. Data retention period - 8 years.</p> <p>Screening of individuals and entities may be conducted either by us or by authorized third-party providers, such as UAB "Ondato" or legal consultants. When performed by us, the screening process involves reviewing various sanction lists and sources, including, but not limited to:</p> <ul style="list-style-type: none">• the UN sanctions list (scsanctions.un.org);• the EU sanctions list (sanctionsmap.eu);• the OFAC sanctions list (sanctionssearch.ofac.treas.gov);• the Lithuanian Foreign Ministry's sanctions page (urm.lt);

- the Financial Crime Investigation Service under the Ministry of the Interior of the Republic of Lithuania (fntt.lt).

Additionally, we may use Google search (google.com) to identify any relevant adverse media.

Purpose- To screen prospective business partners for 0% VAT compliance and ensure adherence to KYC requirements.

Legal basis for processing: legal obligation, Article 6(1)(c) GDPR.

Categories of personal data- Copy of personal identity document, documents proving that the person is not domiciled in Lithuania (e.g. diplomat's dispatch document or residency certificate). Information provided in the trading application form: trader, sales representative contact information (name, surname, phone number, email address, information about the manager (name, surname, address)).

Data retention period - 5 years.

Purpose - to organize the recruitment process.

Legal basis for processing - consent, Article 6(1)(a) GDPR, legitimate interest, Article 6(1)(f) GDPR.

Attention! All information on the processing of candidates' personal data is contained in the candidates' privacy policy: <https://www.modus.group/automotive-candidate-privacy-policy-lt-en>.

Purpose- to provide video surveillance of our territory and premises to ensure asset protection.

The legal basis for processing is legitimate interest, Article 6(1)(f) GDPR.

Categories of personal data- image of persons in the field of surveillance cameras. The images are recorded without sound.

Data retention period - 30 days.

TO WHOM CAN WE TRANSFER YOUR DATA?

In certain cases (e.g. to ensure the continuity of our operations, to provide You with services, to comply with legal requirements or to protect our legitimate interests) We may disclose information about You:

- other companies in the Modus Group. The Modus Group's privacy policy is available here: <https://www.modus.group/privacypolicy>;
- to our professional advisors, auditors;
- companies providing data center, hosting, cloud, website administration and related services, companies developing, providing, supporting and developing software, companies providing information technology infrastructure services, companies providing communication services;
- debt collection companies;
- public authorities as provided for by law: the State Tax Inspectorate, the Centre of Registers, the Labor Exchange, etc.;
- law enforcement authorities upon their request or on our initiative if We suspect that a criminal offence has been committed, as well as courts and other dispute resolution authorities; tax authorities.

The list of recipients or categories of recipients specified in the Privacy Policy is subject to change, so if You wish to be informed about changes in the recipients of Your personal data or detailed information about specific recipients, please notify us by email to dpo@modus.group, indicating "I would like to be informed of information about the recipients of my personal data, first name, surname".

TRANSFER OF DATA TO THIRD COUNTRIES

Your personal data will only be transferred to third countries in accordance with the requirements of applicable law.

In each case, if it is necessary to transfer Your personal data to a third country or an international organization for the purposes of after-sales service and/or other purposes set out in this Privacy Policy, one of the following conditions shall apply:

the data is transferred to a country for which an adequacy decision has been made (third countries that meet the required level of protection are approved by the Commission of the European Union);

the transfer is subject to appropriate safeguards specified by law (e.g. a legally binding and enforceable instrument between public authorities or bodies; rules binding on businesses pursuant to Article 47 of the General Data Protection Regulation; standard data protection terms and conditions adopted by the Commission of the European Union in accordance with the examination procedure referred to in Article 93(2) of the General Data Protection Regulation);

compliance with other derogations provided for in the legislation, if it is not possible to transfer data in accordance with the above sub-paragraphs.

SECURITY OF PERSONAL DATA

When processing Your personal data, We implement organizational and technical measures to ensure the protection of personal data against accidental or unlawful destruction, alteration, disclosure, as well as against any other unlawful processing. These measures include, but are not limited to:

- Strict access controls, enforced on a 'need to know' basis;
- confidentiality agreements with persons who have access to your data;
- periodic training on data protection and information security;
- documenting and implementing internal data protection procedures;

WHAT RIGHTS DO YOU HAVE AND HOW CAN YOU EXERCISE THEM?

If We process Your personal data for the purposes set out in this Privacy Policy, or if You have reasons to believe that We are processing Your personal data, then You have the following rights as a data subject under GDPR:

- The right to know - to know (be informed) about the processing of Your personal data;
- The right of access - to obtain confirmation as to whether Your personal data is being processed and, if so, to request access to and a copy of Your personal data;
- The right to rectification - to request that inaccurate or incomplete personal data be rectified;
- The right to object - to object to the processing of Your personal data;
- The right to withdraw Your consent - where We process Your data with Your consent;
- The right to restrict - to request that the processing of Your personal data be restricted for a specific period of time;
- Right to erasure/forgetting - to request the erasure of personal data that is no longer necessary for the purposes for which it was collected or otherwise processed;
- The right to portability - to receive Your personal data in a computer-readable format and to transmit those data to another controller;
- The right to complain - to lodge a complaint with the State Data Protection Inspectorate (L. Sapiegos g. 17, Vilnius, by e-mail ada@ada.lt), but We recommend that You contact us first and We will try to resolve all of Your requests together with You.

You can exercise Your rights by submitting a request to us using the contact details at the top of this Privacy Policy.

At the time of the request, You, as the data subject, must verify Your identity in one of the following ways:

- if You are making a request to one of our employees, You must provide a valid proof of identity;
- if You submit Your request by post or by courier, You must enclose a copy of a valid identity document, certified in accordance with the procedure established by law;
- if You submit Your application electronically, You must authenticate it by electronic means that allow proper identification of the person (e.g. mobile signature, qualified electronic signature, etc.).

Upon receipt of Your request regarding the exercise of the rights of data subjects, We will provide You with a reply without delay, but at the latest within 1 month from the date of the request. This period may be extended by a further 1 month if necessary, depending on the complexity and number of requests. You will be informed of such extension in the first month. The information You request will be provided free of charge. However, if We see that Your requests are manifestly unfounded or disproportionate, in particular because of their repetitive content, We have the right to charge You a reasonable fee (i.e. to request reimbursement of administrative costs) or to refuse to act on such a request.

A response will be provided in the manner chosen in Your request. If You do not specify in Your request the method by which You wish to receive the response, the response will be sent to You in the same way as the request was made.

CAN YOU REFUSE TO PROVIDE YOUR PERSONAL DATA AND/OR OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA?

Your personal data is collected and processed in order to provide the Services promptly and appropriately and to respond to Your requests, enquiries and complaints. If You do not provide Your data, if it is incorrectly provided or if You refuse to continue to provide it, We will not be able to respond properly to Your enquiries, requests, complaints and/or other requests that require our action.

WHAT IF YOU STILL HAVE QUESTIONS?

For any questions You may have, You may contact us by email at dpo@modus.group.

END OF PRIVACY POLICY