

LLC "LTG CARGO UKRAINE"

PRIVACY NOTICE

LLC "LTG Cargo Ukraine" (hereinafter referred to as **LTG Cargo Ukraine** or the **Company** or simply **we**) protects information about you and processes your data in accordance with the Law of Ukraine "On Personal Data Protection" dated 01.06.2010 No. 2297-VI. We also apply the provisions of the General Data Protection Regulation (GDPR [1]) of the European Union and other legal acts regulating data protection as best practice in the data protection field.

This LTG Cargo Ukraine Privacy Notice (hereinafter referred to as the **Privacy Notice**) provides detailed information regarding how we process and protect your personal data.

[1] Regulation (EU) 2016/679 of the European Parliament and of the Council 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).

1. What is included in this Privacy Notice?

This Privacy Notice answers the most important questions about how we collect, use and protect information about you. Please read this important information carefully and visit our website from time to time at <https://ltgcargo.ua/> to read the latest version of the Privacy Notice published there.

2. Who is responsible for protecting information about you?

LTG Cargo Ukraine, a legal entity registered under the laws of Ukraine, legal entity code: 43987945, registered office address: Yevhena Chykalenka Street, 21, Kyiv, 01004, Ukraine, email: info@ltgcargo.ua, phone number: +38 (044) 235 14 15.

3. Why and what personal data do we process?

No	For what purpose do we process your personal data?	What personal data do we process about you?	Why do we have the right to process your personal data?	How long do we process your personal data?
3.1	Conclude and perform contracts with you and fulfil related tax obligations.	Name and surname, personal identity number and/or date of birth, address, email, phone number, power of attorney, expiry date and number of the power of attorney, signature, relationship with the represented person, represented person, position, payer code, settlement information, settlement period, debt information, bank account number, contract and its supplements, amendments and annexes, handover and acceptance certificates, conclusion dates, contract number, place of conclusion and performance of the contract, information about contract performance, contract termination information, and, as	For the purpose of entering into and performing a legal transaction (contract) to which the data subject is a party, or which is concluded in favour of the data subject, or for taking steps at the request of the data subject prior to entering into a legal transaction (para 3, Article 11 of the Law of Ukraine "On Personal Data Protection"); The necessity to comply with a legal obligation to which the personal data controller is subject (para 5, Article 11 of the Law of Ukraine "On Personal Data Protection").	During the term of the contract and for 10 years after the end of the contract.

		far as the performance of the contract is concerned, communication with you, and any other information that may be necessary for the proper performance of the contract.		
3.2	Conclude and perform contracts with the natural or legal person you represent.	Name and surname, personal identity number and/or date of birth, address, email, power of attorney, expiry date and number of the power of attorney, signature, relationship with the represented person, represented person, position, phone number, email, all information that you provide to the Company (e.g. information about the person you represent, the contract concluded, etc.) and, as far as the performance of the contract is concerned, communication with you, and any other information that may be necessary for the proper performance of the contract.	Legitimate interest to conclude and perform contracts with individuals or legal entities through their representatives (employees, legal representatives, agents, etc.) (para 6, Article 11 of the Law of Ukraine "On Personal Data Protection").	During the term of the contract and for 10 years after the end of the contract.
3.3	Ensure compliance with the sanctions lists adopted under Ukrainian law, including the Law of Ukraine "On Sanctions", and, where applicable, conduct screening against international or third-country sanctions lists to ensure compliance.	Persons to be verified: name, surname, nationality, place of birth, date of birth, address, company with which the person is associated, basis of representation, basis of association with the company, results of the sanction screening; Name, surname, position, signature or electronic signature metadata of the person who completed the questionnaire. Persons to be verified: natural persons as clients; managers and authorised representatives of legal persons as clients; beneficiaries; persons providing data on persons to be verified.	The necessity to comply with a legal obligation to which the personal data controller is subject (para 5, Article 11 of the Law of Ukraine "On Personal Data Protection"); Legitimate interest in conducting business in a transparent and socially responsible manner and in avoiding potential negative economic consequences and reputational damage by ensuring clients' compliance with sanctions or restrictions approved by third countries (para 6, Article 11 of the Law of Ukraine "On Personal Data Protection").	3 years from the date of verification.
3.4	Receive feedback from business clients and their representatives on the services provided by the Company in order to evaluate their experience and improve the quality of services.	Name, surname, email, name of the company represented, work email, name of the service provided, date of contact for participation in the feedback survey, answers provided during the survey (opinion on the services provided).	Legitimate interest to evaluate the experience of business customers with regard to the services provided for the purpose of improving the quality of services (para 6, Article 11 of the Law of Ukraine "On Personal Data Protection").	2 years after the invitation is sent.
3.5	Direct marketing to B2B (business-to-business) clients (employees) by email and telephone: providing up-to-date information on pricing changes, international sanctions regulations, self-service updates and other important communications related to service changes, as well as invitations to express opinions on services, invitations to company events, and sharing other company news.	Name, surname, position, official phone numbers and email, the company being represented, the fact, date and time of confirmation of the company's consent, the fact, date and time of withdrawal of the consent or of the refusal of direct marketing, data on direct marketing notifications sent, and the personal data provided in the opinion or survey form. Please note that the newsletter service provider will assign unique identifiers to newsletter recipients. These unique identifiers are necessary to	Consent given by an authorised representative of the company (para 1, Article 11 of the Law of Ukraine "On Personal Data Protection"); Legitimate interest to ensure the functioning and security of the newsletter service through the use of unique identifiers (para 6, Article 11 of the Law of Ukraine "On Personal Data Protection").	Consent is valid for 5 years. Data relating to consent or the withdrawal of consent/refusal of direct marketing shall be retained for an additional 2 years from the end of processing on the basis of consent.

		administer the process of sending newsletters and to ensure that they are delivered to the right recipients. Unique identifiers are also necessary for the functionality of unsubscribing from newsletters by clicking on the unsubscribe link in the email. The newsletter service cannot work without unique identifiers.		
3.6	Deal with requests, proposals, complaints or other enquiries received by post, email, in a form published on the website or through other channels.	Personal data provided by the requester, such as name and surname, email, country, phone number, subject of the enquiry, time of receipt of the enquiry, content of the enquiry, attachments to the enquiry, history of correspondence, other information relating to the enquiry, response to the enquiry.	Legitimate interest to process incoming requests, proposals, complaints or other enquiries, to ensure the quality of the service provided to applicants and to provide them with accurate information (para 6, Article 11 of the Law of Ukraine "On Personal Data Protection").	1 year after the last enquiry.
3.7	Investigate rail transport accidents and incidents.	Name, surname, contact details of the injured party, guilty party and witness, circumstances of the incident, other personal data necessary to achieve the purpose of the processing.	Legitimate interest to investigate rail transport accidents or incidents (para 6, Article 11 of the Law of Ukraine "On Personal Data Protection"); The necessity to comply with a legal obligation to which the personal data controller is subject (para 5, Article 11 of the Law of Ukraine "On Personal Data Protection").	10 years after a rail accident or incident.
3.8	Ensure the functioning of the website by using essential cookies; Improve the browsing experience of visitors to the website, the website and the services offered on the website, and carry out direct and indirect marketing, by using non-essential convenience, analytics, marketing or other cookies without which the website may still function (non-essential cookies).	IP address, the operating system version of the device you are using, the settings of the device you are using, the time and duration of your session, the search query words you have entered, the language of the website you have chosen, your cookies consent, other statistical data and any information stored using cookies on your device (see section 11 of the Privacy Notice for more information on the use of cookies).	Legitimate interest to ensure the functioning of the website by means of essential cookies (para 6, Article 11 of the Law of Ukraine "On Personal Data Protection"); Consent on the use of non-essential cookies (para 1, Article 11 of the Law of Ukraine "On Personal Data Protection").	Up to 2 years; see the description of cookies in section 11 of the Privacy Notice.
3.9	Examine a request to exercise the rights of data subjects under the Law of Ukraine "On Personal Data Protection" and considering best practice laid down in GDPR and ensure the implementation of the request.	Depending on the personal data you provide: name, surname, phone number, address, date of birth, email, time sheet number, legal entity code, copy of the personal identity document, request for the exercise of the data subject's rights, date of the request, place of the request, the specified method of responding to the request, the content of the request and other information contained in the data subject's request, the response to the data subject, other information relating to the exercise of the data subject's rights.	The necessity to comply with a legal obligation to which the personal data controller is subject, specifically regarding the exercise of data subject rights as defined in Article 8 of the Law of Ukraine "On Personal Data Protection" (para 5, Article 11 of the Law of Ukraine "On Personal Data Protection").	5 years from the date of the reply to the request.
3.10	Investigate reports on potential infringements of the law related to the Company's activities, submitted through the LTG	For more, please read in the Privacy Notice published on the whistleblowing platform https://pasitikejimas.lt/pranesimai.lt/ .	Read more there.	Read more there.

	Group's whistleblowing platform Transparency Line.			
3.11	Assert, enforce and defend the Company's rights and legitimate interests in legal proceedings.	All information mentioned in this Privacy Notice, e.g. name, surname, date of birth, address, phone number, email, power of attorney, relationship with a party to a legal proceeding, all documents and their attachments sent to persons, documents and their attachments submitted by persons, procedural documents, court orders, rulings, judgments, information about criminal offences and convictions.	Legitimate interest to assert, exercise or defend the Company's rights and legal claims in legal proceedings (para 6, Article 11 of the Law of Ukraine "On Personal Data Protection").	If it becomes necessary to process personal data for the purpose stated, 10 years after the end of the legal proceedings.
3.12	Operate and administer our social media accounts, including our LinkedIn and YouTube profiles, publish company updates, communicate with users, respond to comments and messages, moderate inappropriate or unlawful content, maintain records of communications, and review aggregated statistics or insights provided by the social media platforms.	Depending on your privacy settings and profile information such as name, surname, username; photo, contact details and country if provided, and your interactions with our social media accounts, including comments, reactions, shares, likes, messages sent to us, and communication history.	Legitimate interest to administer Company's social media profiles, communicate with users, moderate (para 6, Article 11 of the Law of Ukraine "On Personal Data Protection"). Please note that LinkedIn and Google/YouTube process personal data under their own privacy policies and terms that can be accessed on their websites.	3 years from the date of the interaction. Public comments, likes, reactions, shares and similar interactions remain visible on the relevant platform according to your settings and the platform's rules, unless deleted by you, removed by the platform, or moderated by us where possible. LinkedIn and Google/YouTube retain data under their own privacy policies.

4. What information do you have to provide to us and why?

Please see the answer to point 3 above: you must provide the information about you that is necessary to:

- 4.1. enter into contracts with you and fulfil our contractual obligations;
- 4.2. enter into contracts with the persons you represent and fulfil our contractual obligations;
- 4.3. comply properly with the legal obligations imposed on us.

If you do not provide the information requested, we will not be able to enter into contracts with you and/or the persons you represent and fulfil contractual obligations.

5. Where do we get information about you?

Most of the information is provided by you, but we may receive some information from:

- 5.1. Parent public limited company Lietuvos geležinkeliai;
- 5.2. Legal entities you represent or are employed with;
- 5.3. Information from state registers and databases of other government authorities;
- 5.4. Specialised third-party risk and compliance assessment service providers that provide digital solutions for AML/CTF, international and national sanctions and restriction requirements, in accordance with the applicable legislation.

6. Who do we transfer information about you to?

We transfer or share information about you with partners, service providers, and the entities listed below only to the extent necessary and permitted by applicable law and for the reasons listed in point 3:

- 6.1. To the Company's partners providing newsletter management services and survey management services;
- 6.2. To the Company's parent company AB Lietuvos geležinkeliai and its subsidiaries (the data may be transferred for all the purposes specified in point 3);
- 6.3. To banks carrying out settlement transactions;
- 6.4. To courts, regulators, law enforcement and other public authorities;
- 6.5. To lawyers, notaries, bailiffs, auditors, consultants, information technology maintenance service providers, electronic communications service providers, insurance companies, companies providing archiving and other services to the Company.

Please note that the Company shall only select as data processors those persons who have provided the Company with a satisfactory guarantee that they have appropriate technical and organisational measures in place to ensure the secure processing of personal data and an adequate level of data protection in accordance with the Law of Ukraine "On Personal Data Protection" and European Union legislation.

7. Will your data be transferred outside the territory of Ukraine?

In most cases, personal data are processed and transferred within the territory of the European Union and the European Economic Area [2]. We disclose information about you if permitted by law and for the reasons set out in point 6 of this Privacy Notice.

[2] The European Economic Area is made up of all the member states of the European Union plus Iceland, Liechtenstein and Norway. In accordance with Part 3, Article 29 of the Law of Ukraine "On Personal Data Protection", the member states of the European Economic Area are recognized as providing an adequate level of protection for personal data.

8. What rights do you have?

The Law of Ukraine "On Personal Data Protection", GDPR and other laws give you rights, provides for the cases in which you can exercise them, the procedures you must follow, and the exceptions in which cases you cannot exercise the rights granted. Where permitted by law, you may:

- 8.1. know the sources of collection and the location of your personal data, the purpose of its processing, the location or place of residence (stay) of the personal data controller or processor, or to issue a corresponding mandate to authorised persons to obtain this information, except in cases established by law;
- 8.2. have access to your personal data and to receive information regarding the conditions for providing access to personal data, including information about third parties to whom the personal data is transferred;
- 8.3. receive a response as to whether your personal data is being processed, as well as to receive the content of such personal data, no later than thirty calendar days from the date the request was received, except in cases provided by law;
- 8.4. ask us to correct inaccurate or incorrect information used or to complete information that is incomplete;
- 8.5. ask us to delete information we hold about you if we are using it unlawfully;
- 8.6. request us to restrict the processing of the information we hold about you where you contest the accuracy of the data or object to the processing of the data, object to the erasure of unlawfully processed data about you, or where you need the data in order to make, exercise or defend legal claims;
- 8.7. object to the use of your data where we process your data in the legitimate interests of the Company and/or third parties;

- 8.8. request us to transfer/receive data that you have provided to us under a contract or consent to the processing and that we process by automated means in a commonly used electronic format;
- 8.9. object to a fully automated decision, including profiling, where such decision-making may have legal consequences or similar significant effects on you;
- 8.10. withdraw the consents given to us for the use of information about you where we use the data on the basis of your consent;
- 8.11. be subject to the protection of the personal data against unlawful processing and accidental loss, destruction, or damage due to intentional concealment, failure to provide, or untimely provision of such data, as well as to protection against the provision of information that is inaccurate or prejudicial to the honor, dignity, and business reputation of an individual;
- 8.12. apply legal remedies in the event of a violation of the legislation on personal data protection;
- 8.13. lodge a complaint regarding the processing of your personal data with the Authorised Human Rights Commissioner of the Verkhovna Rada of Ukraine or with a court. At the same time, we recommend that you contact us first and we will try to resolve any requests or complaints with you.

9. How can you exercise your rights?

To exercise the rights set out in point 8 of this Privacy Notice, you must:

- 9.1. personally deliver the request to exercise the data subject's rights (hereinafter referred to as the **Request** [3]) to the Company's address specified in point 14 of this Privacy Notice (the Request must be accompanied by a personal identification document);
- 9.2. send the Request to the Company to the address specified in point 14 of this Privacy Notice (a copy of the person's identity document certified by a notary public or other procedure established by law must be attached to the Request);
- 9.3. submit the Request to the Company at the email address specified in point 14 of this Privacy Notice (the request submitted by email must be signed with a secure qualified electronic signature).
- 9.4. submit a proposal, complaint, and/or other inquiry regarding the processing of personal data to the Authorised Human Rights Commissioner of the Verkhovna Rada of Ukraine.

[3] The recommended form for requesting the exercise of the data subject's rights is presented [here](#).

10. Do we profile you and make automated decisions?

The Company may profile you for statistical purposes, but does not take any decisions based on automated processing that would have legal consequences for you.

11. Does our website leave cookies on your computer or device?

Yes, we use cookies as set out in the table below. Cookies are small text files that are stored in the browser of your device (e.g. computer, mobile phone or tablet) when you browse websites. Other technologies, including data we store in your browser or device, identifiers associated with your device and other software, may be used for similar purposes. Cookies are used extensively to make websites work or work better and more efficiently.

Essential cookies are cookies that are required for the proper functioning of the website. They enable the basic functions of the website, without which the website cannot function properly.

Title	Supplier	Expiry date	Purpose
cf_clearance	LTG Cargo Ukraine	8 months	The cookie is set by CloudFlare services to identify trusted internet traffic. It does not correspond to any user ID in a web application and does not store any personally identifiable information.

cookieyes-consent	LTG Cargo Ukraine	11 months	The cookie is set by the Cookie Consent Addendum and is used to store whether the user has consented to the use of cookies. It does not store any personal data.
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Optional cookies which could be managed or discarded by you:

Name	Supplier	Period of validity	Purpose
_ga	Google	2 years	Tracking cookie from Google Analytics. This cookie is used to collect personalised information about how visitors use the website. The cookie registers a unique ID which is used to identify unique visitors to the page.
_ga_VRNLS6XJKT	Google	2 years	Tracking cookie from Google Analytics. This cookie is used to collect personalised information about how visitors use the website. The cookie registers a unique ID which is used to identify unique visitors to the page.
_gid	Google	24 h	Tracking cookie from Google Analytics. This cookie collects information about user behaviour on the website and is used to report statistical information about the website. It collects personalised data about the number of visitors, where visitors came to the website from and which pages they visited.
pll_language	LTG Cargo Ukraine	1 year	The multilingual functional cookie is used to store information about the language preferences of the visitor's page.
AWSALB	Amazon	7 days	Load balancer AWS. The cookie is used for user path efficiency. This cookie does not process personal data.
AWSALBCORS	Amazon	7 days	Load balancer AWS. The cookie is used for user path efficiency. This cookie does not process personal data.
AWSALBTG	Amazon	7 days	Load balancer AWS. The cookie is used for user path efficiency. This cookie does not process personal data.
AWSALBTGCORS	Amazon	7 days	Load balancer AWS. The cookie is used for user path efficiency. This cookie does not process personal data.
CONSENT	YouTube	2 years	YouTube sets this cookie through embedded YouTube videos and records anonymous statistical data.
YSC	YouTube	Session	YouTube sets this cookie to track views of videos embedded on YouTube pages.
VISITOR_INFO1_LIVE	YouTube	5 months 27 days	YouTube sets this cookie to measure bandwidth and determine whether the user is being shown the new or old player interface.
Yt-remote-device-id	YouTube	Constant	YouTube sets this cookie to save the user's video preferences when using embedded YouTube videos. To discard this cookie, please remove cookies from your device according to the instructions below.

yt.innertube::requests	YouTube	Constant	YouTube sets this cookie to register a unique ID and store data about the YouTube videos the user has viewed. To discard this cookie, please remove cookies from your device according to the instructions below.
yt.innertube::nextId	YouTube	Constant	YouTube sets this cookie to save the user's video preferences when using embedded YouTube videos. To discard this cookie, please remove cookies from your device according to the instructions below.
Yt-remote-connected-devices	YouTube	Constant	YouTube sets this cookie to save the user's video preferences when using embedded YouTube videos. To discard this cookie, please remove cookies from your device according to the instructions below.

12. How can you manage cookies?

When you visit the website (www.ltgcargo.ua), you can choose whether you want to use cookies. You can manage cookies on the website itself and/or delete them according to your browser preferences. You can refuse the use of optional cookies on the website, which are not mandatory but may not allow the website to function fully.

You can choose which cookies you want to accept or reject in your browser settings. You can delete any cookies that are already on your computer, and most browsers can be set not to save cookies. The location of these settings depends on the browser you are using.

If you do not agree to the placement of cookies on your computer or other device, you can withdraw your consent at any time by changing your settings on the website and deleting the cookies stored in your browser. If you choose to delete cookies, please remember that any options you have set will also be removed. In addition, blocking cookies altogether may prevent many websites (including www.ltgcargo.ua) from working properly. For these reasons, we do not recommend disabling essential cookies.

13. How to remove cookies from your device?

To prevent your personal data from being processed with the help of cookies, you can change the settings of your browser so that cookies are not accepted or delete saved cookies.

You can change the cookie settings in your browser at any time. All browsers have the option to delete cookies. More detailed instructions depend on the browser you are using and can be found in the options menu of the browser you are using:

[Cookie settings in Internet Explorer](#)

[Cookie settings in Firefox](#)

[Cookie settings in Chrome](#)

[Cookie settings in Safari web and iOS](#)

For more information visit <https://www.allaboutcookies.org/>

We reiterate that removing or blocking cookies may affect the operation of the website and some of its functionalities, as well as adversely affect your use of the services available on the portal.

To learn more about cookies and how to manage or remove them, visit <https://www.allaboutcookies.org/> and your browser's help page.

14. How to contact the Company or the Data Protection Officer?

If you have any questions, comments or complaints about how we collect, use and store information about you, or if you wish to exercise your rights as a data subject, you can contact the Company at: Yevhena Chykalenka Street, 21, Kyiv, 01004, Ukraine, email: info@ltgcargo.ua, phone number: +38 (044) 235 14 15.