

## **FITPASSU PRIVACY POLICY**

Fitpassu, UAB (hereinafter referred to as "**Fitpassu**" or "**we**") personal data protection issues are extremely important, therefore we undertake to fully respect and protect the privacy of each User (s) of the Fitpassu platform and to process personal data responsibly - in accordance with applicable legal requirements. and in accordance with the highest ethical standards.

### **GENERAL PROVISIONS**

This Privacy Policy (further - "**Policy**") governs the processing of personal data by Fitpassu as data controller by both automated and non-automated means.

This Policy is intended for individuals who use or intend to use the Fitpassu Mobile App (the "**App**") and the Fitpassu Website [www.fitpassu.com](http://www.fitpassu.com) (the "**Website**"), hereinafter referred to as the "Users".

"Personal data" means any information relating to an identified or identifiable individual person (hereinafter referred to as "**Data Subject**").

In order to provide quality services to you as your User (s), we need your personal data.

Fitpassu will collect and continue to process your personal data only if and only to the extent necessary for the purposes for which it is processed and further described in this Policy.

### **The main categories of personal data processed by Fitpassu are:**

#### **Identity data**

- This would include data such as:
  - Name of the service provider (name and surname if individual)
  - Registration code (personal code, if individual)
  - Photos of the service provider
  - Platform username (and login details)

#### **Contact information**

- This would include data such as:
  - Service provider's e-mail
  - Phone number of the service provider
  - E-mails of the persons administering the service provider
  - Service provider's address
  - Platform user e-mail

#### **Financial**

- Payment card data is not stored and is securely processed by the Stripe payment system.
- Service provider's current bank account
- Service provider's registration document's number

### Statistics on the use of the platform

- This includes information about how you use the platform, how you use the services and information.

### Consents of platform users

- Includes your wishes to receive direct advertising from us and our third parties.

The collected data will be used to understand your needs, identify and offer you the most suitable service. We first use your personal data to help you find the service that best suits your needs.

We may also use your personal data for the following purposes:

- investigate and respond to questions or complaints from you or others about our platform, products or services
- in order to monitor, improve and protect your platform and services, as well as personalize the platform, services (including your partners) according to your needs based on the information you provide and information about your use of our platform.
- Administer your account
- conduct internal research and analysis to assess how our platform, services are being used and how our business is doing
- Conduct market research and customer surveys
- Combine and publish ratings of the services offered by our partners and use them in advertising campaigns

By providing your personal data to Fitpassu, you agree to be bound by the provisions of this Privacy Policy (except for data processing activities that will require your separate consent). Users are deemed to be familiar with the Privacy Policy and to comply with its provisions when registering for the Fitpassu app. The Privacy Policy can be reviewed again at any time in the Fitpassu app and on the website [www.fitpassu.com](http://www.fitpassu.com).

### LEGAL BASIS

Fitpassu processes personal data in accordance with the 2016 April 27 Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals 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) (**Regulation (EU) 2016/679** ”), The provisions of the Law on Legal Protection of Personal Data of the Republic of Lithuania, the Law on Electronic Communications of the Republic of Lithuania and other legal acts regulating the processing and protection of personal data, as well as the instructions of data protection supervisory authorities.

**Fitpassu** collects and will continue to process your personal data only in a lawful, fair and transparent manner - with your consent, when the processing of personal data by Fitpassu is required by applicable law and when personal data is in need of being processed in Fitpassu's legitimate interest (only if the Data Subject's interests or fundamental rights and freedoms, necessary to ensure the protection of personal data do not take precedence over it).

As a general rule, the legal basis for the processing of personal data is your consent, which must be given voluntarily, in a specific and unambiguous manner, duly informing about the specific purpose (s) of the processing of personal data.

Fitpassu The User or potential User is responsible for ensuring that the personal data provided by him / her is accurate, correct and complete. If his / her personal data changes, he / she must inform Fitpassu. Fitpassu will not be liable for any damage caused to a person and / or third parties as a result of the User or potential User providing incorrect, inaccurate and / or incomplete personal data or not requesting the addition and / or change of data as a result of changes.

## **PROVISION OF PERSONAL DATA TO OTHER PERSONS**

**Fitpassu** respects the confidentiality of Users' personal data. We may share your personal information with others (a third party who is responsible for the smooth operation of the service ordered by your **Fitpassu** programmer) only to provide your ordered services, process payment transactions, provide customer service, provide your content and advertisements, and inform you about important changes in our platform.

## **RIGHTS OF DATA SUBJECTS**

**You have the following Data Subject Rights:**

### **Your Right Description**

Right of access to your personal data You can contact us with a request:

- confirm that we process your personal data;
- provide you with a copy of this data;
- provide information about the personal data we process about you, such as what personal data we collect about you, for what purpose we process it, to whom and for what purpose we disclose it, whether we transfer it outside the European Union, what security measures we apply to it and other information about your data. personal data.

### **Right to request rectification of personal data If**

- after reading your personal data, you find that your personal data is incorrect, incomplete or inaccurate and you contact us, we will also check your personal data at your request, correct inaccurate data and / or supplement incomplete personal data .

### **Right to request the deletion of personal data ("right to be forgotten")**

You can contact us with a request to delete your personal data in the following cases:

- when they are no longer necessary for the purposes for which they were collected or otherwise processed;
- when you have withdrawn your consent (if the processing of your personal data was based on consent);
- when you have exercised your right to object to our processing of personal data relating to you.
- when you think that your personal data is being processed illegally, etc.

We are not obliged to comply with your request to delete your personal data if the processing of your personal data is necessary to fulfill a legal obligation provided for in the legal acts of the European Union or the Republic of Lithuania, as well as to make, enforce or defend legal claims.

## **DIRECT MARKETING**

With your express consent or disagreement, your personal data may be processed for direct marketing purposes.

You have the right at any time to object to the processing of personal data relating to you for such purposes.

Fitpassu no longer processes (immediately destroys) your personal data for direct marketing purposes as soon as the Data Subject objects to the processing of such data for such purposes.

Your refusal to receive offers and news will not prevent you from using our services, but it will mean that we will not be able to provide you with useful offers and general information. You can inform us by e-mail about your disagreement or withdrawal of your consent. email [fitpassu@gmail.com](mailto:fitpassu@gmail.com).

For direct marketing purposes, Fitpassu will actively use your personal data for 3 years from the time you give your consent, unless you withdraw your consent.

## **COOKIES**

We want to provide you with customized information and features in the Fitpassu app and on the website. This requires cookies - small text documents with unique identification numbers that are transmitted to your computer or smart device. We use cookies to identify you as a previous visitor to our website and gadget and to analyze traffic statistics.

We use cookies on the platform, but the information related to cookies is not used to identify you and the data collected about the use of the website is under full control. All information collected by cookies is of a general nature and therefore anonymous. It is only used to improve site performance and aggregate analysts.

You have the option to choose whether or not you want to accept cookies: When you log in to the Fitpassu website [www.fitpassu.com](http://www.fitpassu.com), you will see a message informing you about the use of cookies and asking for your consent. If you do not agree to the use of cookies, you will not be able to use the Fitpassu website.

## **CURRENT SUMMARY INFORMATION**

The goal of the **Fitpassu** ecosystem is to simplify the way a user visits various sports institutions. Fitpassu generally receives personal data from the Users themselves, provided by the User (s) in the App and / or on the websites

<https://www.fitpassu.com>.

## **CHANGES**

**Fitpassu** may change this Privacy Policy at any time, in which case the latest version will always be available on our platform (Android / iOS apps and Website). We will always strive to make this Privacy Policy as clear and understandable as possible. If you have any comments or suggestions on how we can update or improve this Policy, we would appreciate it if you could email us. email [fitpassu@gmail.com](mailto:fitpassu@gmail.com).

If you have any questions or feel that this Privacy Policy does not answer your concerns, please contact us by email. email [fitpassu@gmail.com](mailto:fitpassu@gmail.com).