

**WITSEE**  
**PRIVACY POLICY**

**The date of the last update: 06.05.2026**

**1. GENERAL PROVISIONS**

- 1.1. We are committed to safeguarding your privacy and ensuring the security of your personal data. Accordingly, we have adopted this Privacy Policy (“**Privacy Policy**”), which explains how we process your personal data, outlines your rights, and provides additional information regarding the processing of your personal data.
- 1.2. In this Privacy Policy “**Terms of Use**” refers to WITSEE’s terms and conditions, governing the use of our Mobile Application named “WITSEE”.
- 1.3. This Privacy Policy clarifies the data processing activities undertaken by us when you utilise our Mobile Application named “WITSEE” (the “**APP**”), visit our social networking sites Facebook, LinkedIn, Instagram and TikTok (“**Social Accounts**”), purchase our products or use our services, or contact us by email or other electronic communication channels.
- 1.4. In this Privacy Policy “personal data” (“**Personal Data**”) shall refer to any information or set of information from which we can directly or indirectly identify you, such as your name, surname, email address, telephone number, etc. For the purposes of this Privacy Policy, “you” shall denote a user of the APP and its services, a visitor to the Social Accounts or an individual who communicates with us.
- 1.5. In processing Personal Data, we comply with the requirements of the General Data Protection Regulation 2016/679 (EU) (“**GDPR**”), the Law on the Legal Protection of Personal Data of the Republic of Lithuania (“**LLPPD**”), other legal acts, as well as the instructions of the controlling authorities.
- 1.6. The definitions that are not described within this Privacy Policy, shall be understood as set forth in GDPR, LLPPD and our Terms of Use.
- 1.7. The APP and Social Accounts may contain links to, for example, websites of our partners or other projects of ours. This Privacy Policy does not apply to such external websites. We encourage you to review the privacy policies of any third-party sites or platforms before disclosing any personal information or proceeding further.
- 1.8. We kindly ask you to carefully read through this Privacy Policy and take note that you have been acknowledged of it.

**2. WHO ARE WE?**

- 2.1. The controller of your Personal Data is **UAB „Witsee Tech“**, a private limited liability company incorporated in the Republic of Lithuania, legal entity code 307624838, address P. Lukšio g. 5-1, LT-08221, Vilnius, the data is collected and processed in the Register of Legal Entities of the State Enterprise “Registru Centras” (hereinafter referred to as the “**Data Controller**” or “**Company**” or “**we**”). We administer the APP and provide services accessible through it.
- 2.2. You can contact our data protection officer by email [tech@witsee.com](mailto:tech@witsee.com) .

**3. HOW DO WE RECEIVE YOUR PERSONAL DATA?**

- 3.1. We receive your Personal Data:

- 3.1.1. directly from you when you provide your Personal Data to us. For example, when you register in the APP, use it and its services, make a payment, communicate with us by email or APP directly, etc.;
- 3.1.2. when you use the APP, our website or Social Accounts. For example, we may record your visit history on the APP, made purchases, IP address, service preferences, accessed URL links, etc.
- 3.2. When you provide Personal Data about yourself, you are responsible for the accuracy, completeness, and timeliness of such Personal Data, as well as for obtaining the necessary consent or informing the individual whose Personal Data is being provided to us. In certain cases, we may request confirmation from you that you have the right to provide us with Personal Data, for example, by completing registration forms.

**4. WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU?**

- 4.1. We process your Personal Data for the following purposes and in accordance with the following terms and conditions:

<b>Purposes of Personal Data processing</b>	<b>Processed Personal Data</b>	<b>Personal Data retention periods</b>	<b>Legal grounds for Personal Data processing</b>
<p>Registering and using an account on the APP.</p>	<p>Name, surname, username, email address, type of user role, phone number, age, gender, dominant player’s hand, information used for authentication through third-party services including, but not limited to, Google, Apple, Meta and others;</p> <p>Encrypted account passwords;</p> <p>Account usage history, information on interactions within the APP;</p> <p>Information on the services received via APP, service-related communications and notifications.</p>	<p>Account data is retained for the duration of the account’s use and for the period of 1 year after the last login;</p> <p>Service related data shall be retained for the duration of the account’s use and for a period of 1 year from the last login;</p> <p>When processing data based on your consent, we shall do so for the duration of your consent. In case you withdraw your consent, we shall cease processing and delete the data, unless we have another legal basis for continued processing.</p>	<p>The processing is necessary for the conclusion and performance of the contract (Article 6(1)(b) of the GDPR);</p> <p>The legitimate interests of the controller to ensure the quality of the operation of the account, the provision of services, and the proper administration of orders (Article 6(1)(f) of the GDPR);</p> <p>Consent of the data subject (Article 6(1)(a) of the GDPR).</p>

<p>Consultation regarding services available on the APP and quality assurance.</p>	<p>If provided: name, surname, email address, phone number, address of delivery;</p> <p>Subject and content of the communication (message, reply) and any data necessary to address quality issues;</p> <p>In the case of communication via Social Accounts, we may collect publicly visible information from your account;</p>	<p>The data is stored for the duration of the communication and for up to 1 year after the end of the communication (last message);</p> <p>For Social Accounts, data is stored according to their respective settings;</p> <p>When processing data based on your consent, we shall do so for the duration of your consent. Should you withdraw your consent, we shall cease processing and delete the data, unless we have another legal basis for continued processing.</p>	<p>Consent of the data subject (Article 6(1)(a) of the GDPR);</p> <p>The processing is necessary for the conclusion and performance of the contract (Article 6(1)(b) of the GDPR);</p> <p>The legitimate interests of the controller to provide information and to ensure the quality of the service efficiently and effectively (Article 6(1)(f) of the GDPR).</p>
<p>Managing subscription plans</p>	<p>User name of an account, chosen plan for subscription, status of payment (if applicable), chosen payment method, billing period.</p>	<p>The data shall be retained for the duration of the subscribed plan and for the period of 1 year after the cancellation / termination of subscription.</p>	<p>The processing is necessary for the conclusion and performance of the contract (Article 6(1)(b) of the GDPR).</p>
<p>Managing payments, accounting.</p>	<p>Name and surname of the payer;</p> <p>Personal identification number (if applicable);</p> <p>Person represented (when representing a company or another person), relationship with the person represented;</p>	<p>The data shall be retained in compliance with the legislation governing financial transactions and financial accounting and where such legislation does not specify time limits, for a period of 10</p>	<p>The processing is necessary for the conclusion and performance of the contract (Article 6(1)(b) of the GDPR);</p> <p>The processing is necessary for compliance with a legal obligation imposed on the controller to ensure</p>

	<p>Address, email address, telephone number;</p> <p>Amount of the payment, date of the payment, number of the payer's account, payment institution, confirmation of payment by the collector of the contribution;</p>	<p>years from the date of the payment.</p>	<p>proper financial accounting (Article 6(1)(c) of the GDPR) in accordance with the Law on Tax Administration of the Republic of Lithuania (Official Gazette, 2004-04-28, No. 63-2243), Law on Financial Accounting of the Republic of Lithuania (Official Gazette, 2001-11-28, No. 99-3515), Law on Companies' Financial Reporting of the Republic of Lithuania (Official Gazette, 2001-11-28, No. 99-3516), Law on Payments of the Republic of Lithuania (Official Gazette, 1999-11-17, No. 97-2775); Law on Companies of the Republic of Lithuania (Official Gazette, 2000-07-31, No. 64-1914), and other legislation;</p> <p>The legitimate interests of the controller or third party to effectively manage financial operations and debts (Article 6(1)(f) of the GDPR).</p>
<p>APP administration, development, ensuring security, fraud prevention.</p>	<p>IP address, device information, data collected by cookies, analytical data (such as visits, page views, searches, links clicked, and the date and time of those clicks), URL links directing to APP, and</p>	<p>APP data is stored as described in the Privacy Policy section "Cookies and other tracking technologies" and if not specified within the cookie information, for the duration up to 2</p>	<p>Consent of the data subject (Article 6(1)(a) of the GDPR);</p> <p>The legitimate interests of the controller in ensuring the smooth functioning, development and security of the Platform</p>

	information about data changes.	years following collection;  When processing data based on your consent, we shall do so for the duration of your consent. Should you withdraw your consent, we shall cease processing and delete the data, unless we have another legal basis for continued processing.	(Article 6(1)(f) of the GDPR).
Managing Social Accounts.	Username, comments and shares on the post, information about clicks on “like” and “follow”, information about reactions to entries, photo, details of the message and the reply to the message (time of receipt, content, attachments), rating information, and any other information you provide.	Social Accounts store information according to the terms and conditions as well as Privacy Policies set by the owners of the social networks.	Consent of the data subject (Article 6(1)(a) of the GDPR);  The legitimate interests of the controller to effectively manage social media accounts and other electronic information delivery channels (Article 6(1)(f) of the GDPR).
Conducting direct marketing campaigns, sending newsletters, conducting quality surveys for the improvement of the Company's services and activities.	Data used for sending newsletters and marketing: name, surname, email address; preferences for the content of the newsletter, service usage data for personalized newsletters; URL links to the APP, information about the recipients of the newsletters; data collected via advertising cookies.	When processing data based on your consent, we shall do so for the duration of your consent. In case you withdraw your consent, we shall cease processing and delete the data, unless we have another legal basis for continued processing.	Consent of the data subject (Article 6(1)(a) of the GDPR);  The legitimate interests of the controller to manage the mailing lists of new recipients, to analyse aggregated marketing results, to resolve problems related to the provision of news (Article 6(1)(f) of the GDPR).

<p>Organising promotional games, promotions, contests.</p>	<p>Name, surname, email address, phone number, data requested in the announcement and/or questionnaire of the contest, promotion, game, social media account information and messages shared by the account holder, winner's data, participant lists.</p>	<p>Data is retained for the duration of the game, promotion, or contest and for the period of 3 years following the conclusion of the game, promotion, or contest;</p> <p>When processing data based on your consent, we shall do so for the duration of your consent. In case you withdraw your consent, we shall cease processing and delete the data, unless we have another legal basis for continued processing.</p>	<p>Consent of the data subject (Article 6(1)(a) of the GDPR).</p>
<p>Public informing about the Company's activities.</p>	<p>Personal Data, photographs, video material, excerpts from training content contained in publications, magazines, and other presented content.</p>	<p>Data is processed for 5 years from the date of collection;</p> <p>When processing data based on your consent, we shall do so for the duration of your consent. In case you withdraw your consent, we shall cease processing and delete the data, unless we have another legal basis for continued processing.</p> <p>Publicly disclosed data (in publications, magazines, etc.) are processed until the end of their public disclosure.</p>	<p>Consent of the data subject (Article 6(1)(a) of the GDPR);</p> <p>The legitimate interests of the controller or third party to effectively manage electronic information delivery channels (Article 6(1)(f) of the GDPR).</p>

Resolving disputes and claims.	<p>Email address, content of the complaint / claim / proceeding, information related to the dispute / claim;</p> <p>Other data provided by the person: name, surname, phone number, address, etc.</p>	<p>During the resolving of the dispute and for the period of 10 years following the conclusion of the dispute procedure (or, in the case of a judicial dispute, after the final judgment has become final);</p> <p>Requests and correspondence from data subjects shall be kept for the period of 2 (two) years following the conclusion of the processing of the request.</p>	Legitimate interests of the controller or of a third party to assert claims or defend their rights (Article 6(1)(f) of the GDPR).
--------------------------------	---	--	---

- 4.2. You have the right to object to or withdraw your consent to the processing of your Personal Data at any time when such processing is based on consent.
- 4.3. In some cases, we may use the contacts you have provided to send you messages in connection with our services. Such communications are essential for the proper provision of our services and are not considered promotional communications.
- 4.4. You have the right to amend and update the information we hold about you. In some cases, it is necessary for us to have accurate up-to-date information pertaining to you and we may request that you confirm the accuracy of information we hold about you. In providing services, we may, in certain instances, employ automated decision-making based on data processing, for example, to ascertain your needs related to the service and their compliance with the requirements set by the service. Automated decision-making involves the processing of Personal Data using, for instance, software code or an algorithm which does not require human intervention. We regularly review the automated decision-making methods we use to ensure their fairness, efficiency, and impartiality. you have the right to challenge the results of an automated decision - in such a case, your situation will be assessed by our specialist.

**5. SOCIAL ACCOUNTS**

- 5.1. We post information regarding our APP, activities, services offered, changes to said services, and other news on our Social Accounts. Additionally, we may post advertisements or communicate with you through them to respond to your inquiries.
- 5.2. It is important to highlight that users of Social Accounts are subject not only to this Privacy Policy, but also to the privacy policies, rules and terms of use of the operators of the social networks on which the Social Accounts are located. When you interact with us on the Social Accounts and provide certain information (for example, by messaging us and commenting on our posts), we may see public information about your profile (such as Your name, image, email, etc.) depending on the privacy settings you have selected. This

information, for example, a comment you have posted, may also be visible to other visitors to a particular Social Account, depending on the privacy settings you have selected.

## **6. HOW DO WE USE YOUR PERSONAL DATA AND WHAT PRINCIPLES DO WE ADHERE TO?**

- 6.1. We respect your privacy and only collect and process Personal Data that is necessary to achieve our stated purposes for processing Personal Data.
- 6.2. In processing your Personal Data, we shall:
  - 6.2.1. comply with the requirements of applicable and valid legislation, including the GDPR;
  - 6.2.2. process your Personal Data in a lawful, fair and transparent manner;
  - 6.2.3. We collect your Personal Data for specified, clearly defined and legitimate purposes and we do not process it in a manner that is incompatible with those purposes, except to the extent permitted by law;
  - 6.2.4. We take all reasonable steps to ensure that Personal Data which is not accurate or complete in relation to the purposes for which it is processed is promptly rectified, supplemented, its processing is suspended, or it is destroyed;
  - 6.2.5. We retain them in a form which permits your identification for no longer than is necessary for the purposes for which the Personal Data is processed;
  - 6.2.6. We do not provide Personal Data to third parties and will not disclose it other than as set out in this Privacy Policy or as required by applicable law.
  - 6.2.7. We ensure that your Personal Data is processed securely, by implementing technical and organizational security measures, and by restricting access to your Personal Data to those of our employees who need such access for the purposes of their job functions.

## **7. TO WHOM AND WHEN DO WE TRANSFER YOUR PERSONAL DATA?**

- 7.1. We may transfer your Personal Data to processors or recipients who assist us in the performance of our activities:
  - 7.1.1. providers of financial accounting and financial transaction services UAB “Finolta”, Naugarduko str. 102-501, LT-03160 Vilnius, Lithuania.
  - 7.1.2. IT solution providers Amazon Web Services, INC.USA.
  - 7.1.3. Providers of data storage, management Amazon Web Services, INC.USA.
  - 7.1.4. cloud and hosting service providers Amazon Web Services, INC.USA.
- 7.2. To enable us to publish content on Social Accounts, we disclose data to the following operators of social networking platforms:
  - 7.2.1. Meta Platforms Ireland Limited (Ireland) and Meta Platforms, Inc., (USA), (data is transferred in accordance with an adequacy decision issued by the European Commission; active participant of EU-U.S. Data Privacy Framework and Swiss-U.S. Data Privacy Framework);
  - 7.2.2. LinkedIn Ireland Unlimited Company (Ireland) and LinkedIn Corporation (USA) (data is transferred in accordance with an adequacy decision issued by the European Commission; active participant of EU-U.S. Data Privacy Framework, UK Extension to the EU-U.S. Data Privacy Framework and Swiss-U.S. Data Privacy Framework);

- 7.2.3. TikTok Technology Limited (Ireland) and TikTok Information Technologies UK Limited (data is transferred in accordance with an adequacy decision issued by the European Commission; active participant of EU-U.S. Data Privacy Framework, UK Extension to the EU-U.S. Data Privacy Framework and Swiss-U.S. Data Privacy Framework);
- 7.2.4. Google Ireland Limited (Ireland) and Google LLC (USA) (data is transferred in accordance with an adequacy decision issued by the European Commission; active participant of EU-U.S. Data Privacy Framework, UK Extension to the EU-U.S. Data Privacy Framework and Swiss-U.S. Data Privacy Framework).
- 7.3. Given that we do not administer the aforementioned social networks listed above, but solely our own account on these social networks, you are invited to review the information regarding the storage of your Personal Data in the privacy documents of these respective social networks.
- 7.4. We may disclose data to law enforcement and pre-trial investigation authorities, courts and other dispute resolution authorities, as well as to other individuals or entities performing functions mandated by law, in accordance with the procedure stipulated by the legislation of the Republic of Lithuania. We provide these entities with information that is required by law or as specified by the entities themselves.
- 7.5. We may also transfer data, if necessary, to companies that would buy or acquire our business or engage in joint activities or other forms of cooperation with us, as well as to companies established by us.
- 7.6. We generally process Personal Data within the EU / EEA, but in some cases your Personal Data may be transferred outside the EU / EEA. The transfer of your Personal Data outside the EU / EEA is based on:
  - 7.6.1. a data processing or supply agreement that describes such transfer and includes Standard Contractual Clauses for international transfers; or
  - 7.6.2. an adequacy decision adopted by the European Commission, which means that the European Commission has recognized the country in which the third party is established and / or carries on business as providing an adequate level of protection of Personal Data; or
  - 7.6.3. a specific authorization by the data protection supervisory authority to carry out such transfer; or
  - 7.6.4. Your consent to the transfer of your Personal Data outside the EU / EEA.

## **8. WHAT RIGHTS DO YOU HAVE?**

- 8.1. As a data subject, you have the following rights in relation to your Personal Data:
  - 8.1.1. to be informed about the processing of your Personal data and to have access to your Personal Data, i.e., to receive a notice confirming whether we are processing your Personal Data and, if we are, to request access to the data processed and the information relating to it;
  - 8.1.2. to ask us to correct inaccurate or incorrect information we use or to supplement information where it is incomplete;
  - 8.1.3. to ask us to erase information we hold about you where there is a basis for erasure (an exception to this right is provided for in point 9.4.);
  - 8.1.4. to 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, you object to the erasure of your data which is unlawfully processed, or you need the data in order to assert, exercise, or defend legal claims;
- 8.1.5. to object to the use of your data where we process your data for our and / or third parties legitimate interests (including profiling, if we were to conduct such);
  - 8.1.6. to request us to transfer / receive data that you have provided to us under a contract or consent and that we process by automated means in a commonly used electronic format;
  - 8.1.7. to object to the application to you of a fully automated decision, including profiling, where such a decision may have legal consequences or a similar significant effect on you;
  - 8.1.8. to withdraw the consents you have given us to use information about you where we are using the data on the basis of your consent, including when we process Personal Data for direct marketing purposes, as well as when we conduct profiling related to direct marketing;
  - 8.1.9. lodge a complaint with the relevant data protection supervisory authority.
- 8.2. Other than data subject rights specified in paragraph 8.1., you are also entitled to submit a request that product data and related service data, which may contain personal data, be made available to you or to a third party designated by you in accordance with the Data Act as provided in the Terms of Use. In case requested product data and / or related service data contain personal data, requirements of GDPR shall prevail.
  - 8.3. We may refuse to fulfil your rights, except for the right to object to the processing of your Personal Data when it is processed based on consent, including consent for direct marketing, where we are not permitted to comply with Your request under the GDPR.
  - 8.4. If you wish to withdraw your consent for the processing of Personal data or to exercise any of your rights set out above, you may contact us by email at [tech@witsee.com](mailto:tech@witsee.com). In order to better understand your request, we may ask you to fill in the relevant request form, request a signed request with an advanced or qualified electronic signature or send the request by post.
  - 8.5. For security reasons, in some cases we will only be able to process your request after verifying your identity. We may, therefore, ask you to prove your identity, for example by providing an identity document or other pertinent information.
  - 8.6. You can exercise certain rights as a data subject (for example to withdraw your consent), by adjusting your account settings on the APP or deleting your account yourself. However, modifying your settings or deleting your account, you may lose some or all of the information stored therein.
  - 8.7. We do not typically charge any fee for exercising your rights. However, the law permits us to charge a reasonable fee or to refuse to comply with your request if it is manifestly unfounded or excessive.
  - 8.8. If you do not wish for your Personal data to be processed for direct marketing purposes, organisation of contests, surveys, including profiling, you can refuse such processing without specifying the reasons for refusal, by writing to the email address provided or in another manner indicated in the message provided to you (for example, by clicking the relevant link in the newsletter).
  - 8.9. Upon receipt of your request or instruction regarding the processing of your Personal Data, we will provide you with a response within no later than 1 month from the date of the

request and will execute the actions specified in the request or inform you why we refuse to do so. If necessary, the time limit may be extended by an additional 2 months due to the complexity and number of requests. In this case, we will notify you of the extension within 1 month of receiving the request.

- 8.10. If Personal Data is erased at your request, we may retain copies of the information as necessary to protect our legitimate interests and those of others, to comply with obligations of public authorities, to resolve disputes, to identify disturbances or to comply with agreements.

## **9. NEWSLETTER AND DIRECT MARKETING**

- 9.1. We may send information regarding our activities, services (direct marketing communications) to your email address and establish banners on the APP while you use it, contact you via email, if you have provided us with your consent to receive such information from us. In addition, we may solicit your assistance in evaluating the quality of our performance and service.
- 9.2. To provide you with tailored newsletters, we may personalize direct marketing communications based on information about your use of our services. We utilise automated decision-making, including profiling, in order to provide you with tailored and effective direct marketing services based on your needs. For this purpose, we take into account your choices and preferences based on your behaviour (for example, the type of regions you are interested in). The personalization solutions we use are solely intended to improve your experience. Should you choose not to receive our newsletters, this will not diminish your right to use our services and you will continue to receive the same quality of service.
- 9.3. Upon sending out newsletters, we may collect information about the recipients, for example, which message an individual opened, which links they clicked on, etc. Such information is gathered to offer you relevant and more tailored news.
- 9.4. Your contact details may be disclosed to our partners / data processors who provide us with newsletters or quality assessment services.
- 9.5. If you withdraw your consent, we will endeavour to cease sending you newsletters immediately; however, this may require some time. Given that our news campaigns are planned in advance, you may still receive our newsletters once more even after withdrawing your consent.
- 9.6. Withdrawal of consent does not automatically oblige us to destroy your Personal Data or to provide you with information about our processing of your Personal Data. For these actions, you should submit a separate request.
- 9.7. Participation in our games, promotions, or contests is voluntary. However, to participate in a game, promotion, or contest, you will need to provide the information specified by us, including Personal Data. We will conduct games, promotions, or contests and process Personal Data in accordance with the rules set for each specific game, promotion, or contest. You have the right to withdraw your consent for the processing and use of Personal Data for this purpose at any time. Upon withdrawing consent, you will no longer participate in the game, promotion, or contest.
- 9.8. We reserve the right to contact participants of the game, promotion, or contest and to announce winners on the APP, Social Accounts, and other channels specified by us for information dissemination. To manage the registration for the game, promotion, or contest and to determine winners, we may employ a programme based on automated decision-making. This will be indicated in the rules of the game, promotion, or contest or will be evident from the links we provide. In such a case, if you do not wish for automated

decision-making to be applied to you, you will not be able to participate in the game, promotion, or contest.

9.9. We may use your email address for direct marketing purposes, to provide you with newsletters, offers, and information about similar services we offer that, in our opinion, may be of interest to you, as well as to inquire about the quality of our services and customer service, even without your consent if you are already our customer and have not objected to the use of your Personal Data when you provided us with this information. Even if you have not expressed objection immediately, you can easily object to all or part of such Personal Data processing activities at any time. You can do this:

- 9.9.1. by changing the email subscription settings in your account on the APP;
- 9.9.2. by informing us of your objection through the method specified in electronic communications and/or offers (for example, by clicking the "unsubscribe" link in the newsletter, etc.); or
- 9.9.3. by sending us a notification of objection to the email address specified in this Privacy Policy.

## 10. HOW DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

10.1. A cookie is a small text file that is stored in the browser or on your device (computer, tablet, mobile phone). In this Privacy Policy, we use the term “cookies” to refer to cookies and other similar technologies such as Pixel Tags, Web Beacons and Clear GIFs.

10.2. Cookies may be used to analyse information flows and user behaviour, to promote trust, to ensure security and the proper functioning of the APP, to remember preferences, to personalise the content displayed, and to link the APP to Social Accounts.

10.3. We may use mandatory cookies that are necessary for the operation of the APP; analytical cookies that analyse the use of the APP, functional cookies that remember users' preferences, ensure the smooth and secure operation of the APP and help to improve the functionality of the APP; performance cookies; third party cookies; advertising cookies that are designed to show you both personalised and generic advertisements.

10.4. Cookies used on our APP:

Cookie name	Description	Creation moment	Period of validity	Data used
UXCAM	Tool used to gather insights of how users use the mobile application.	05.03.2026	1 year	<ul style="list-style-type: none"> <li>• screen interactions</li> <li>• gestures and taps</li> <li>• device information</li> <li>app performance metrics</li> </ul>

10.5. In addition, we use technological tools and solutions that record cookies and collect data:

Name of the tool	Purpose of the tool
Google Analytics	Generate statistics on the use of the APP, aiming to reduce the frequency of requests. The collected data is transmitted to the USA. You can prevent Google Analytics from working by adjusting your browser

	settings or installing a browser plug-in. For more information, please refer to: <a href="https://tools.google.com/dlpage/gaoptout?hl=en">https://tools.google.com/dlpage/gaoptout?hl=en</a> .
Google Tag Manager	Analyse the popularity of the APP. The data collected is transmitted to the USA. For more information, please refer to: <a href="https://support.google.com/tagmanager/answer/9323295?hl=en">https://support.google.com/tagmanager/answer/9323295?hl=en</a> .
Meta Pixel	Display interest-based advertising on Facebook or other sites that use this tool. The data collected is transferred to the USA. For more information, please refer to: <a href="https://www.facebook.com/business/tools/meta-pixel">https://www.facebook.com/business/tools/meta-pixel</a> .

- 10.6. Some third parties, such as social network operators, may use their own anonymous cookies to tailor the apps or applications they create to your needs. We do not control the use of these cookies. We recommend that you check the privacy policy of the third party for more detailed information.
- 10.7. On the APP, you can manage cookies by selecting the options in the cookie bar or adjusting the settings of the browser you use. You can refuse the use of optional cookies, but this may result in some of the APP's functionality not working and may slow down its performance. To manage cookies on your mobile device, please follow the official instructions for that device. For more detailed information on managing cookies, please visit <http://www.AllAboutCookies.org> or [https://www.google.com/privacy\\_ads.html](https://www.google.com/privacy_ads.html), as well as the help page of the browser you are using. You can manage the use of advertising cookies on the Network Advertising page at [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp).

## 11. HOW DO WE PROTECT YOUR PERSONAL DATA?

- 11.1. Your Personal Data is processed responsibly and securely, safeguarded against loss, unauthorized use and alteration. We have implemented both physical and technical measures to protect the information we collect from accidental or unlawful destruction, damage, alteration, loss, disclosure or any other unauthorized processing. The security measures for Personal Data shall be determined taking into account the risks involved in the processing of Personal Data.
- 11.2. Our employees are under a written obligation not to disclose or distribute our Personal Data to any unauthorized third party.

## 12. CONTACT US

- 12.1. 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 may contact us at: [[monės el. paštas][tech@witsee.com](mailto:tech@witsee.com)], <https://www.witsee.com>.
- 12.2. If you believe that the processing of your Personal Data infringes the provisions of the GDPR, you have the right to lodge a complaint with the supervisory authority. - State Data Protection Inspectorate, located at: L. Sapiegos str. 17, LT-10312 Vilnius, Lithuania, email: [ada@ada.lt](mailto:ada@ada.lt), website: <https://vdai.lrv.lt/>. We aim to promptly and amicably resolve all disputes; therefore, we firstly invite you to contact us.

## 13. FINAL PROVISIONS

- 13.1. If we were to amend this Privacy Policy, we will notify you by posting the updated Privacy Policy on the APP, via your email if you have provided one to us, or through other customary means of communication.