KAUNAS SWIMMING SCHOOL PRIVACY POLICY

1. WHAT WILL YOU FIND IN THIS PRIVACY POLICY?

In this Privacy Policy (hereinafter referred to as the "Policy"), Kaunas Swimming School explains how we collect, use, and protect your personal data, as well as the legal rights you have regarding your personal data. This information is relevant to you in the following cases:

- You have visited:

  The „Žalgiris" Aquatic Sports Centre (hereinafter referred to as the "Pool"), located at Karaliaus Mindaugo Ave. 50, Kaunas;

  Šilainiai Pool (hereinafter referred to as the "Pool"), located at Baltų Ave. 8, Kaunas;

  Vilija Pool (hereinafter referred to as the "Pool"), located at Demokratų St. 34, Kaunas;

  Dainava Pool (hereinafter referred to as the "Pool"), located at Partizanų St. 46, Kaunas;

  Panemunė Pool (hereinafter referred to as the "Pool"), located at Vaidoto St. 13, Kaunas.

- You have visited the following websites:

  www.zalgiriobaseinas.lt (hereinafter referred to as the „Website")

  www.swim.lt (hereinafter referred to as the „Website")

  and have taken active actions, such as completing an inquiry form, subscribing to our newsletter, purchasing Pool services, registering for swimming lessons, or performing other similar activities;

- have taken active actions on our social media accounts, such as sending us a message, leaving a review and/or a comment, or engaging in other similar activities;
- have consented to receive direct marketing communications;
- have participated in quizzes, games, or promotional campaigns;
- have submitted a job application to participate in the recruitment process for an open position;
- have submitted feedback or a request/complaint form;
- Other.

We comply with the requirements of the EU General Data Protection Regulation (hereinafter referred to as the "GDPR") and other applicable data protection laws to ensure the protection of your personal data. This Privacy Policy may be updated from time to time; therefore, we recommend that you regularly visit our Website to review the latest version of this Policy.

2. WHO IS RESPONSIBLE FOR PROTECTING MY PERSONAL DATA?

As specified in Section 3 of this Policy under the respective purposes of personal data processing, the data controller responsible for the collection, use, and storage of your personal data is, as applicable:

- Kaunas Swimming School, Municipal Budgetary Institution, Company Code: 195470111, Demokratų St. 34, LT-48421 Kaunas, Lithuania zalgiriobaseinas@swim.lt .

3. HOW AND WHY DO YOU USE MY PERSONAL DATA? (1)

3.1 **For the purpose of selling goods and providing services to you.**

When is this relevant to me?	Who is the controller of my personal data?	What information do you collect about me?	Where do you obtain my personal data?	Am I required to provide this information?	Why are you entitled to collect my information?	How long do you keep my personal data?
When you ordered Pool services (e.g. rented a swimming lane, booked services in the Pool's SPA area), purchased memberships, and/or participated in organized camps.	Kaunas Swimming School, Budgetary Institution	Full name, email address, telephone number, bank account number, amount paid, purchased product/service, purchase history, and health data (if tickets for persons with disabilities are purchased and/or staff assistance is requested).	From you	This information is required in order to enter into a contract with us. If you do not provide this information, we will not be able to provide our services to you.	Performance of a contract (GDPR 6 str. 1 d. b) p.)	For the duration of the contract with you and for 10 years after its termination.
When you participated in athlete training under the non-formal education programme for the chosen sport.	Kaunas Swimming School, Budgetary Institution	Full name, permanent residential address, personal identification number, telephone number, email address (of the parent(s) or legal guardian(s) of a minor athlete), birth certificate details (if the athlete is a minor), signature (of the adult athlete or the parent(s) or legal guardian(s) of a minor athlete), and health information.	From you	This information is required in order to enter into a contract with us. If you do not provide this information, we will not be able to provide our services to you.	Performance of a contract (GDPR 6 str. 1 d. b) p.)	For the duration of the contract with you and for 10 years after its termination.

When we provide information to the parent(s) or legal guardian(s) of a minor athlete regarding the athlete's performance and conduct during training sessions and competitions.	Kaunas Swimming School, Budgetary Institution	Full name, telephone number, and email address (of the parent(s) or legal guardian(s) of a minor athlete).	From you	This information is required in order to enter into a contract with us. If you do not provide this information, we will not be able to provide our services to you.	Performance of a contract (GDPR 6 str. 1 d. b) p.)	For the duration of the contract with you and for 10 years after its termination.
When you participated in the preparation of athletes for city and national teams, sports clubs, or in the talent identification process for athletes.	Kaunas Swimming School, Budgetary Institution	Full name, telephone number, email address (of the parent(s) or legal guardian(s) of a minor athlete), signature (of the adult athlete or the parent(s) or legal guardian(s) of a minor athlete), athlete performance data, nationality, and age.	From you	This information is required in order to enter into a contract with us. If you do not provide this information, we will not be able to provide our services to you.	Performance of a contract (GDPR 6 str. 1 d. b) p.)	For the duration of the contract with you and for 10 years after its termination.
Provision of athletes with the equipment necessary for their sport.	Kaunas Swimming School, Budgetary Institution	Full name, personal identification number, email address (of the parent(s) or legal guardian(s) of a minor athlete), and signature (of the adult athlete or the parent(s) or legal guardian(s) of a minor athlete).	From you	This information is required in order to enter into a contract with us. If you do not provide this information, we will not be able to provide our services to you.	Performance of a contract (GDPR 6 str. 1 d. b) p.)	For the duration of the contract with you and for 10 years after its termination.

3.2 **For identification purposes.**

When is this relevant to me?	Who is the controller of my personal data?	What personal data do you collect about me?	Where do you collect my personal data from?	Am I required to provide this information?	What is the legal basis for collecting my personal data?	How long do you keep my personal data?
When you have a Pool membership or a sports training agreement and wish to access the Pool premises.	Kaunas Swimming School, Budgetary Institution	Full name and nSoft smart card number.	From you	This information is required in order to enter into a contract with us. If you do not provide this information, we will not be able to provide our services to you.	Performance of a contract (GDPR 6 str. 1 d. b) p.)	For the duration of the contract with you and for 10 years after its termination.

3. HOW AND WHY DO YOU USE MY PERSONAL DATA? (2)

3.4 **For the protection of the health and property of the Institution and its visitors**

When is this relevant to me?	Who is the controller of my personal data?	What personal data do you collect about me?	Where do you obtain my personal data?	Am I required to provide this information?	What is the legal basis for collecting my personal data?	How long do you keep my personal data?
When, while ordering services, purchasing memberships, or entering	Kaunas Swimming School, Budgetary Institution	Full name, date of consent, date of birth, signature, and the full name(s) of the	From you	This information is required in order to enter into a contract with	Performance of a contract (GDPR 6 str. 1 d. b.), Compliance with a legal	When you order services – for 30 calendar days from the date you give your consent.

into a sports training agreement (online or at the Pool), you agreed to the Pool's Internal Rules.		accompanying minor(s).		us. If you do not provide this information, we will not be able to provide our services to you.	obligation (BDAR 6 str. 1 d. c p.), For the purposes of preventive medicine (BDAR 9 str. 2 d. h p.).	
When you entered the Pool based on a pre-approved visitor list and/or an access permit.	Kaunas Swimming School, Budgetary Institution	Full name, the organization you represent, the event, the event date, and your signature.	From you	This information is required in order to enter into a contract with us. If you do not provide this information, we will not be able to provide our services to you.	Performance of a contract (GDPR 6 str. 1 d. b.)	For 30 calendar days from the date of your visit.
When you are a tenant and enter the Pool using an issued access permit.	Kaunas Swimming School, Budgetary Institution	Full name, the organization you represent, and the date and time of your visit.	From you	This is a contractual requirement. If you do not provide this information, we will not be able to provide our services to you.	Performance of a contract (GDPR 6 str. 1 d. b.)	For up to 24 months, except where there are reasonable grounds to believe that the recordings capture an administrative offence, a criminal offence, or other unlawful acts, in which case they will be retained until the relevant investigation and/or legal proceedings have been concluded.

When you visited areas of the Pool and/or its premises that are subject to video surveillance.	Kaunas Swimming School, Budgetary Institution	Image, location of your visit/presence, behaviour, personal property, date, and time.	From you	You are not required to provide this information.	Legitimate interests (GDPR 6 str. 1 d. f.) To ensure your safety and ours.	For up to 60 calendar days, except where there are reasonable grounds to believe that the recordings capture an administrative offence, a breach of workplace discipline, a criminal offence, or other unlawful acts, in which case they will be retained until the relevant investigation and/or legal proceedings have been concluded.

3. HOW AND WHY DO YOU USE MY PERSONAL DATA? (3)

3.5 **For the purpose of providing information about our products and/or services**

When is this relevant to me?	Who is the controller of my personal data?	What personal data do you collect about me?	Where do you obtain my personal data?	Am I required to provide this information?	What is the legal basis for collecting my personal data?	How long do you keep my personal data?
When you have consented to receive direct marketing communications or have ordered services and/or purchased products.	Kaunas Swimming School, Budgetary Institution	Full name, email address, information on whether the email sent to you was opened, which links were clicked, and	From you	You are not required to provide this information.	Consent (GDPR 6 str. 1 d. a.) LR Law on Electronic Communications 81 str. 2 d.	For 3 years from the date of consent.

		other statistical data.				
When we use the data you have provided for statistical analysis and customer traffic analysis purposes.	Kaunas Swimming School, Budgetary Institution	Full name, frequency of visits, date of birth, age, camp participation dates, and frequency of camp participation.	From you	You are not required to provide this information	Consent (GDPR 6 str. 1 d. a.)	For 3 years from the date of consent.

3.6 **For the purpose of handling your requests and/or complaints.**

When is this relevant to me?	Who is the controller of my personal data?	What personal data do you collect about me?	Where do you obtain my personal data?	Am I required to provide this information?	What is the legal basis for collecting my personal data?	How long do you keep my personal data?
When you submitted an inquiry, request, or complaint by email, in writing, or by telephone	Kaunas Swimming School, Budgetary Institution	Full name, email address, telephone number, address, inquiry, request or complaint, and any information related to the submitted inquiry, request, or complaint.	From you	You are not required to provide this information.	Consent (GDPR 6 str. 1 d. a.) – For inquiries – compliance with a legal obligation (GDPR 6 str. 1 d. c.) – For requests and complaints – compliance with a legal obligation.	For 2 years from the date of submission.
When you completed an incident/damage report, a lost	Kaunas Swimming School,	Full name, email address, telephone number, date,	From you	You are not required to provide this information.	Consent (GDPR 6 str. 1 d. a.) For lost	For 3 years from the date the form is completed, or until the relevant

property form, or any other official form at the Pool premises.	Budgetary Institution	signature, and any additional information provided in the relevant form.			property forms – compliance with a legal obligation (GDPR 6 str. 1 d. c.) – For incident and damage report forms – compliance with a legal obligation	incident has been resolved (e.g. where a lost item is found).

3.7 **For website administration purposes.**

When is this relevant to me?	Who is the controller of my personal data?	What personal data do you collect about me?	Where do you obtain my personal data?	Am I required to provide this information?	What is the legal basis for collecting my personal data?	How long do you retain my personal data?
When you visited the Pool's website.	Kaunas Swimming School, Budgetary Institution	Device information (ID), IP address, login/connection time, and cookie consent information.	From you	You are not required to provide this information.	Consent (GDPR 6 str. 1 d. a.)	For 1 year from the date of your visit to the Website.

3. HOW AND WHY DO YOU USE MY PERSONAL DATA? (4)

3.8 **For the purpose of administering the Pool's social media accounts.**

When is this relevant to me?	Who is the controller of my personal data?	What personal data do you collect about me?	Where do you obtain my personal data?	Am I required to provide this information?	What is the legal basis for collecting my personal data?	How long do you retain my personal data?

When you interacted with the Pool's social media accounts (Facebook or Instagram).	Kaunas Swimming School, Budgetary Institution	Username, comments on posts, post shares, information about your "Like" and "Follow" actions on our social media accounts, reactions to posts, profile photo, messages, the date and time a message was received, message content, message attachments, replies to messages, the date and time a reply was sent, information about your participation in our events, information about your ratings or reviews of us, and any other information you choose to provide.	From you	You are not required to provide this information.	Consent (GDPR 6 str. 1 d. a.)	The social media platform provider determines the retention periods for personal data. We recommend reviewing the privacy policy of the relevant social media platform. We periodically review and/or remove outdated content from our social media accounts every 6–12 months.

3.9 **For the purpose of organizing games, promotions, quizzes, and competitions (on social media and/or during events held at the Pool).**

When is this relevant to me?	Who is the controller of my personal data?	What personal data do you collect about me?	Where do you obtain my personal data?	Am I required to provide this information?	What is the legal basis for collecting my personal data?	How long do you retain my personal data?
When you participated in games, promotions, quizzes, or competitions on our social media accounts	Kaunas Swimming School, Budgetary Institution	Full name, comments on posts, post shares, information about your "Like" and "Follow" actions on the Pool's social media account, reactions to posts, profile photo, messages, the date and time a	From you	You are not required to provide this information.	Consent (GDPR 6 str. 1 d. a.)	For 1 year from the date the winner is announced.

and/or during events held at the Pool.		message was received, message content, message attachments, replies to messages, the date and time a reply was sent, information about your participation in Pool events, information about your ratings or reviews of the Pool, and photographs or video recordings, where these are required as a condition of participation in a competition.				
When you participated in sports competitions, sports and wellness events, or celebratory events organized by the Pool.	Kaunas Swimming School, Budgetary Institution	Full name, telephone number, email address (of the parent(s) or legal guardian(s) of a minor athlete), signature (of the adult athlete or the parent(s) or legal guardian(s) of a minor athlete), athlete performance data, nationality, and age.	From you	This information is required in order to enter into a contract with us. If you do not provide this information, we will not be able to provide our services to you.	Contract (GDPR 6 str. 1 d. b) p.)	For the duration of the contract with you and for 10 years after its termination.

3. KAIP IR KODĖL NAUDOJATE MANO ASMENS DUOMENIS? (5)

3.10 **Visuomenės informavimo, veiklos viešinimo tikslais**

When is this relevant to me?	Who is the controller of my personal data?	What personal data do you collect about me?	Where do you obtain my personal data?	Am I required to provide this information?	What is the legal basis for collecting my personal data?	How long do you retain my personal data?
When you were photographed	Kaunas Swimming	Image appearing in	From you	You are not required to	Legitimate interests (GDPR 6 str. 1 d. f.)	For 5 years from the

and/or filmed during an event and the material was published.	School, Budgetary Institution	photographs, image and/or voice recording in video recordings, event, and event date.		provide this information.	to capture and use images from events held at the Pool for promotional and representative purposes.	date of publication.

3.11 **Kandidatų į darbo vietą atrankos tikslais**

When is this relevant to me?	Who is the controller of my personal data?	What personal data do you collect about me?	Where do you obtain my personal data?	Am I required to provide this information?	What is the legal basis for collecting my personal data?	How long do you retain my personal data?
When you submitted a job application (CV) for a vacant position.	Kaunas Swimming School, Budgetary Institution	Full name, date of birth, address, telephone number, email address, employer, education, desired position, date the CV was received, personal qualities, work experience, most recent employer, length of service, position held, other work experience, language(s), foreign language proficiency (reading, writing, and speaking levels), computer software skills, other information and motivation, desired salary, and/or any other information you provide during the recruitment process.	From you	You are not required to provide this information; however, if you wish to apply for a specific position, you must provide the necessary personal data.	Consent (GDPR 6 str. 1 d. a.)	For 1 month after the end of the recruitment process, or for 1 year if you have provided your written consent.
When you have been selected for	Kaunas Swimming School,	Full name, date of birth/personal identification		This information is required in	Contract GDPR 6 str. 1 d.,	In accordance with the *"RETENTION*

a position and wish to enter into an employment contract with us.	Budgetary Institution	number, address, telephone number, email address, medical certificate details, and any other documents submitted with the job application that entitle the employee to social benefits or special rights in the workplace (e.g. disability certificate, information about the number and age of children, etc.).		order to enter into an employment contract with us. If you do not provide this information, we will not be able to enter into an employment contract with you.	compliance with a legal obligation (BDAR 6 str. 1 d. c p.), for the purposes of preventive medicine (BDAR 9 str. 2 d. h p.).	*SCHEDULE FOR INTERNAL ADMINISTRATIVE DOCUMENTS"* approved by the Order of the Chief Archivist of Lithuania and the document retention periods established in the School's documentation plan for the relevant year. Employment contracts are retained for 50 years.

3.12 **For the purpose of complying with accounting requirements established by law**

Kada man tai aktualu?	Who is the controller of my personal data?	What personal data do you collect about me?	Where do you obtain my personal data?	Am I required to provide this information?	What is the legal basis for collecting my personal data?	How long do you retain my personal data?
When you order our services, purchase our products, or register for training sessions at the Pool.	Kaunas Swimming School, Budgetary Institution	Full name, email address, telephone number, identity document details, information about the services provided, signature, amount payable for the services, invoice for the services, bank account number, and accounting documents.	From you	This is a legal requirement. If you do not provide this information, we will not be able to enter into a contract with you.	Legal obligation to process personal data (GDPR 6 str. 1 d. c p.)	10 years

3. HOW AND WHY DO YOU USE MY PERSONAL DATA? (6)

3.13 **For the purpose of protecting our rights and interests in legal proceedings**

When is this relevant to me?	Who is the controller of my personal data?	What personal data do you collect about me?	Where do you obtain my personal data?	Am I required to provide this information?	What is the legal basis for collecting my personal data?	How long do you retain my personal data?
If we become a party to judicial or other legal proceedings in which you are involved.	Kaunas Swimming School, Budgetary Institution	All of the above-mentioned information collected for other purposes, documents and attachments sent to you, documents and attachments provided by you, procedural documents, court judgments and decisions, and information relating to criminal offences and convictions.	From you, the courts, law enforcement authorities, and other public authorities.	You are not required to provide this information.	Legitimate interests (GDPR 6 str. 1 d. f.) to protect the Company's rights in legal proceedings.	For 3 (three) years from the date on which the court or authority's decision becomes final, or until the legally binding decision has been fully enforced, whichever is later.

4. WHO DO YOU SHARE MY PERSONAL DATA WITH?

We share your personal data with recipients only where this is necessary to achieve the purposes described above and where permitted under applicable law.

Recipients or categories of recipients of personal data	Purposes of personal data transfers	Country of the recipient of the personal data	European Commission decision on whether the third country ensures an adequate level of protection for personal data	Appropriate safeguards for the protection of personal data when it is transferred outside the EEA.
UAB interneto vizija	For the purposes of website administration and public information.	Republic of Lithuania	N/A	N/A

Telia Lietuva, AB	For the purposes of website administration and public information.	Republic of Lithuania	N/A	N/A
CZAR Intelligence, UAB	For the purposes of website administration and public information.	Republic of Lithuania	N/A	N/A
nSoft	For accounting, customer management, and service provision purposes.	Republic of Lithuania	N/A	N/A
Paysera	To enable you to order products and/or purchase services.	Republic of Lithuania	N/A	N/A
Facebook	For the purposes of social media account administration and marketing (advertising).	ES	N/A	N/A
Instagram	For the purposes of social media account administration and marketing (advertising).	ES	N/A	N/A
DVS "Kontora" - elektroninė dokumentų valdymo sistema.	For document administration purposes.	Republic of Lithuania	N/A	N/A
Sistema „STATS4SPORT“ - elektroninis dienynas.	For the purposes of athlete training and development.	ES	N/A	N/A
Varžybų programa "Meet manager"	For the purposes of athlete training and	ES	N/A	N/A

	recording athletic achievements.			
Video recordings and audio recordings may be disclosed to pre-trial investigation authorities, prosecutor's offices, courts, insurance companies, and other institutions or organisations.	For the protection of the health and property of the Institution and its visitors.	Republic of Lithuania	N/A	N/A
State Tax Inspectorate under the Ministry of Finance of the Republic of Lithuania, State Social Insurance Fund Board under the Ministry of Social Security and Labour of the Republic of Lithuania, State Labour Inspectorate under the Ministry of Social Security and Labour of the Republic of Lithuania, Ministry of Education, Science and Sport of the Republic of	For the purposes of the School's administrative operations.	Republic of Lithuania	N/A	N/A

Lithuania, Kaunas City Municipality, insurance companies, and other public authorities and organisations.				

5. WHAT RIGHTS DO I HAVE?

Subject to the conditions, limitations, and exceptions set out in applicable data protection laws, you have the following rights:

My right	When does this right apply to me?
Right of access to personal data	when you wish to obtain confirmation as to whether we process your personal data and, if so, to access your personal data and receive information about how it is processed.
Right to rectification of personal data	when you wish to have inaccurate personal data concerning you corrected.
Right to erasure ("right to be forgotten")	1) when the personal data is no longer necessary for the purposes for which it was collected or otherwise processed; 2) when you withdraw the consent on which the processing is based and there is no other legal basis for processing the personal data; 3) when you object to the processing and there are no overriding legitimate grounds for the processing, or when you object to the processing for direct marketing purposes; 4) when the personal data has been processed unlawfully; 5) when the personal data must be erased to comply with a legal obligation to which we are subject; 6) when the personal data was collected in relation to the offer of information society services directly to a child based on the child's consent.
Right to restriction of processing	1) when you contest the accuracy of your personal data; 2) when the processing is unlawful and you oppose the erasure of your personal data and request the restriction of its use instead; 3) when we no longer need the personal data for the purposes of processing, but you require it for the establishment, exercise, or defence of legal claims; 4) when you have objected to the processing, pending verification of whether our legitimate grounds override yours.
Right to data portability	when you wish to receive the personal data you have provided to us in a structured, commonly used, and machine-readable format, and to transmit that data to another

	data controller, where the processing is based on your consent or a contract and is carried out by automated means.
Right to object	when the processing of your personal data is based on a task carried out in the public interest, the exercise of official authority, or our legitimate interests (including profiling), or when you object to the processing of your personal data for direct marketing purposes.
Right to withdraw consent	when the processing is based on your consent and you wish to withdraw it at any time.
Right to lodge a complaint	when you wish to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work, or the place where the alleged GDPR infringement occurred.

6. DO YOU PROFILE ME OR MAKE AUTOMATED DECISIONS ABOUT ME?

We do not make decisions based solely on automated processing of your personal data that produce legal effects concerning you or similarly significantly affect you.

7. INFORMATION ABOUT THE COOKIES WE USE

When you visit the websites operated by Kaunas Swimming School, cookies are used to ensure the quality of the content and functionality provided. Cookies are small text files stored in your web browser or on your device that help us recognize you as a visitor, remember your browsing history, and tailor content to your preferences. The information collected through cookies also helps us provide a faster and more convenient browsing experience, analyse how you use our websites, and improve the services we provide.

Read more – https://www.zalgiriobaseinas.lt/lt/slapuku-politika

The following cookies are used on the website www.swim.lt :

Cookie	Website	Description	Duration	Type
wpEmojiSettingsSupports	www.swim.lt	This cookie is set by „WordPress“ when a user interacts with emojis on a „WordPress“ website. It helps determine whether the user's browser can display emojis correctly. Learn more about „WordPress“: https://wordpress.org/about/	Session only	Necessary

8. HOW CAN I EXERCISE MY RIGHTS AND CONTACT YOUR DATA PROTECTION OFFICER?

Jei turite su asmens duomenų apsauga klausimais, maloniai prašome su mūsų duomenų apsaugos pareigūnais el. paštu:

zalgiriobaseinas@swim.lt

kpm@swim.lt

Correspondence address:

Kaunas Swimming School (Municipal Budgetary Institution)

Company Code: 195470111

Demokratų St. 34, LT-48421 Kaunas, Lithuania