

PRIVACY POLICY / PERSONAL DATA PROCESSING TERMS

Vitrecon OÜ (registry code 11087086, hereinafter *Vitrecon*) respects the privacy of its clients, partners, and employees, and ensures the protection of personal data in accordance with the applicable laws of the Republic of Estonia and the EU General Data Protection Regulation (GDPR).

This Privacy Policy describes how Vitrecon processes your personal data when you contact us, enter into a contract with us, apply for a job, visit our premises, or use our website.

1. Definitions

Personal data means any information relating to an identified or identifiable natural person.

Processing means any operation performed on personal data (e.g., collection, recording, storage, alteration, use, viewing, transmission, erasure, or destruction).

2. Purpose of Data Collection and Processing

Vitrecon collects and processes personal data to fulfil contractual and legal obligations, including but not limited to:

- identifying and communicating with clients;
- responding to inquiries and requests;
- performing and managing contracts;
- issuing and sending invoices;
- conducting customer satisfaction surveys based on Vitrecon's legitimate interest, provided the client has not opted out.

Personal data is collected via email, telephone, website forms, or in-person meetings.

3. Types of Personal Data Collected

For the purposes outlined above, Vitrecon may process the following personal data:

- first and last name;
- telephone number;
- email address;

- project or site address;
 - personal identification code (where required for contractual or invoicing purposes).
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4. Website and Social Media Communication

When you submit a request through our website, we process only the data you provide for the purpose of responding to your inquiry.

The personal data processed may include:

- name, telephone number, email address, and project address.

Our website may contain links to third-party websites. Vitrecon is not responsible for the content or security of such websites, and their use is at your own risk.

You may also contact us via our social media channels (e.g., Facebook). In such cases, we may process your message or post to respond to your inquiry.

If necessary, we may ask you to provide additional information (such as name, contact details, or project address).

Please avoid sharing sensitive personal data in public posts.

5. Processing of Personal Data During Recruitment

When applying for a position at Vitrecon, we process the data provided in your CV and/or cover letter for recruitment purposes.

We may process the following data:

- name and contact information;
- address (optional);
- education and training details (optional);
- work experience (optional);
- language skills (optional);
- driving license (if applicable);
- desired position and salary (optional);
- references (optional).

Personal data is accessed only by authorized Vitrecon employees and, where applicable, recruitment partners.

Data of unsuccessful candidates is retained for up to one year after the recruitment decision, after

which it is securely deleted.

With the candidate's consent, we may retain the data longer for potential future job opportunities.

6. Use of Security Cameras

Vitrecon uses CCTV cameras in its production facilities to ensure the safety of employees, clients, and property.

The cameras record video only (no audio) and are not monitored in real time.

Areas under surveillance are clearly marked with appropriate signage.

Video recordings are stored for a maximum of one month and can be accessed only by authorized Vitrecon employees who require access for work-related purposes.

You have the right to request a copy of any recording that contains your image.

7. Disclosure of Personal Data

Personal data is disclosed only to the extent necessary for the fulfilment of contractual or legal obligations, for example to subcontractors, tax authorities, or other public institutions as required by law.

8. Data Retention Period

Personal data is retained only for as long as necessary to achieve the purposes of processing or to protect Vitrecon's legitimate interests (e.g., for the duration of contractual limitation periods).

As a rule, data is stored for **five (5) years**, unless a longer period is required by law.

Accounting documents containing personal data are retained for **seven (7) years** in accordance with legal requirements.

9. Data Subject Rights

You have the right to:

- request access to your personal data;
- request correction or deletion of your data;
- restrict or object to processing;

- request data portability;
- withdraw consent;
- not be subject to automated decision-making;
- lodge a complaint with the **Estonian Data Protection Inspectorate** (www.aki.ee).

To submit a request, please send a digitally signed or personally signed application to the contact details below.

We will respond within a reasonable timeframe, but no later than 30 days.

10. Amendments to the Policy

Vitrecon may amend this Privacy Policy at any time to reflect changes in legislation or in its operations.

The latest version of the Policy is always available at www.vitrecon.ee.

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