
DATA STORAGE PROCEDURE

1. GENERAL PROVISIONS

- 1.1. The present Data Storage Procedure (“**Procedure**”) of UAB Crowdpear (“**Company**”) describes the storage period of the data (documents) processed by the Company and determines the rules and procedure for the destruction of these data (documents).
- 1.2. The Procedure has been prepared in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (“**GDPR**”), the Law on Legal Protection of Personal Data of the Republic of Lithuania (“**LLPPD**”), Index for the General Documents Storage Period approved by the Order No. V-100 of the Senior Archivist of Lithuania of 9 March 2011 (“**Index for Storage Period**”), Law on Crowdfunding of the Republic of Lithuania and other legislation regulating the protection of personal data.
- 1.3. The definitions used in the present procedure are the same as the definitions used in GDPR, LLPPD, Index for Storage Period and other legislation.
- 1.4. The present Procedure applies to all processes and systems of the Company and to all information managed by the Company (in paper and electronic format).
- 1.5. The procedure applies to all employees of the Company , representatives and service providers whose duties include the data processing in the Company (including the processing of personal data and special personal data).
- 1.6. The exact storage period of data processed by the Company are set out in the Annex to the Procedure that is an integral part of this Procedure.

2. DATA STORAGE PRINCIPLES

- 2.1. In storing and processing the personal data, the Company follows GDPR, national legislation and the following principles:
 - 2.1.1. **Data reduction** – the data necessary to achieve the set purpose is collected and stored only;
 - 2.1.2. **Storage period limitation** – the data is stored no longer than it is necessary;
 - 2.1.3. **Integrity and confidentiality** – the appropriate technical and organizational measures are applied during the data processing to ensure the security of personal data.
- 2.2. If the storage period for a specific category of data (or documents) is not established in the applicable legislation (for instance, Index for Storage Period), the present Procedure or other internal procedures of the Company, the Company stores such data (documents) for 5 years from their creation or receipt.
- 2.3. The storage period specified in the Annex to the present Procedure may be extended in case of the following circumstances:
 - 2.3.1. If the data (documents) is used for the protection and defence of the legitimate interests of the Company or other persons;
 - 2.3.2. If the data (documents) is used as evidence in a civil, administrative or criminal case or data (documents) are transferred to law enforcement authorities until the end of the relevant inspection, investigation or trial or in other cases prescribed by law;
 - 2.3.3. if the personal data processed by the Company has been anonymized (depersonalized).

3. MEANS OF DATA STORAGE

- 3.1. The Company takes into account the depreciation of data storage and archiving media. If the Company chooses the electronic means of data storage, the Company ensures that procedures and systems will be implemented that would ensure the availability of information during the storage periods, as

well as permanent protection against possible unauthorized access, unauthorized data correction, loss or other illegal actions.

- 3.2. The Company installs and uses sufficient physical measures for the continuous security of the data processed by the Company.
- 3.3. The access to the data stored in the Company is granted only to those persons and only to the extent that familiarization with this data and/or other processing of such data is necessary for the proper performance of the work functions of these persons or the provision of services.
- 3.4. The employees of the Company and other persons who are granted access to the data stored by the Company must ensure the confidentiality of this data and the secrecy of personal data.

4. COLLECTION AND MANAGEMENT SYSTEM OF DATA RELATED TO THE LOAN FINANCING

- 4.1. While performing the activities of the crowdfunding platform operator in accordance with the Law on Crowdfunding of the Republic of Lithuania, the Company collects and stores the data related to financing transactions concluded through the crowdfunding platform managed by the Company.
- 4.2. The data related to the financing transaction consists of:
 - 4.2.1. Information and data collected to determine the identity of the Company's customers;
 - 4.2.2. Information collected during the reliability assessment of the project owner;
 - 4.2.3. Parties of financing transaction, date of conclusion and amount;
 - 4.2.4. Information about the progress of project implementation, documents proving the proper use of funds;
 - 4.2.5. Documents related to the property mortgaged by the project owner and other security measures and/or guarantees provided;
 - 4.2.6. Any relevant information related to the financing transaction.
- 4.3. The Company aims to store the data specified in the Clause 4.2 of the Procedure in electronic format in all cases, but reserves the option to store paper copies of this data, if necessary.
- 4.4. The project owner's file is created in the Company for each project owner where the data related to the relevant project owner and specified in the Clause 4.2 of the procedure are stored. The project owner's file is stored in electronic format and the Company ensures the storage of duplicates of such information on the Company's internal or cloud servers used by the Company.
- 4.5. The Company is entitled to enter into agreements with the project owners, on the basis of which the project owners would undertake to collect and store the information provided for in the Clause 4.2.4 of the Procedure. In such cases, it is expected that at the request of the Company, the project owners will provide this information immediately, but in any case, no later than within 10 business days. The Company stores such information provided by the project owners under the conditions provided for in the present Procedure.

5. DATA DESTRUCTION

- 5.1. The data (documents) stored by the Company in electronic and paper format must be regularly reviewed to determine whether the data (documents) storage period specified in legislation or the Procedure has not expired.
- 5.2. If the data storage period has expired and there are no other reasons to store this data longer (for example, in the case specified in the Clause 2.2 of the present Procedure), such data is destroyed immediately.
- 5.3. The data (documents) without any sensitive information can be destroyed by disposing them in the trash bin or deleting them from the electronic file. Each person working with such data is directly responsible for the timely and proper destruction of such data.
- 5.4. The data (documents) with the sensitive or confidential information, as well as personal data, are destroyed using a special document shredder or, if the data is stored in electronic form, they are

deleted so that such data can no longer be recovered by reasonable means.

- 5.5. The Company can also use external service providers for the data (documents) destruction.
- 5.6. The person appointed by the Manager of the Company is responsible for the timely and proper destruction of data (documents) containing sensitive or confidential information, as well as personal data.
- 5.7. The person appointed by the Manager of the Company must properly document the data destruction process by indicating the category of data, the date and the method of destruction.
- 5.8. The proper destruction of data means that their copies (backup) or historical versions are no longer available.
- 5.9. The data stored in electronic form cannot be destroyed only if such destruction could harm the integrity, security and management of other data stored in electronic form and as a result the Company would not be able to properly carry out its activities and/or it would breach the requirements set by applicable legislation related to data protection storage.

6. FINAL PROVISIONS

- 6.1. The present Procedure is approved, amended or supplemented by the order of the Manager of the Company. The amendments and supplements of the Procedure come into force on the date of order of the Company's Manager, unless the order provides otherwise.
- 6.2. The Procedure is reviewed and updated once a year or when the legislation governing the data processing change.
- 6.3. The employees and other persons are familiarized with the present Procedure or its amendments by signature or by electronic means ensuring the familiarization.

DATA STORAGE TERMS

| DATA | STORAGE PERIODS |
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| Data of employees and candidates for employees | |
| Internal legal acts of the Company regarding the hiring, transfer, replacement, dismissal, salary, child care leave and parental leave | 50 years |
| Internal legal acts of the Company regarding the annual, unpaid, study and other leave | 10 years |
| Internal legal acts of the Company regarding the business trips, additional days off, reduced working hours | 10 years |
| Documents of personal file (documents or their copies related to the commencement, progress and end of work) | 10 years (upon termination of employment or equivalent relationships) |
| Employment contracts and their annexes (agreements on additional conditions of the employment contract, etc.) | 50 years (upon termination of contract) |
| Accounting documents for employee safety and health training (logs and others) | 10 years (from the last entry in the accounting document) |
| Photos of employees (not classified as personal file documents) | Until the termination of employment (service provision) contract |
| Electronic communication data of employees (emails, browsing history, etc.) | Until the termination of employment (service provision) contract, except for individual cases when the content of the emails is necessary to ensure the continued operation and processes of the Company (in these cases, the specified data is stored for 2 years after the end of the employment relationship) |
| Curriculum vitae (CVs) of employee candidates, their motivational letters and other information received regarding the employment by the Company | Until the end of specific recruitment (upon receipt of consent, by the deadline specified in the consent) |
| Consents regarding the personal data processing | 1 year (after the end of the storage period of personal data for which the consent was given) |
| Client data | |
| Agreements with clients | 10 years (after the expiration of agreement) |
| Client contacts | 8 years (from the last use of the Company's services) |
| Accounting documents confirming the economic transaction or economic event (invoices, payment orders, advance accounting, cash receipt and expense orders, etc.) | 10 years |
| Data of the project owners of crowdfunding platforms administered by the Company | |
| Documents making up the project file (agreements | 10 years (upon final and proper settlement) |

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| and other documents justifying the fact of the debt, their annexes, communication with the project owner and other documents related to the debt and its guarantee) | |
| Documents related to the project implementation (documents related to the project implementation, the use of crowdfunding funds according to their intended purpose, documents justifying the expenses) | 2 years (from the date of project end) |
| Information, data and documents collected (assessed) during the reputation and creditworthiness assessment | 10 years (from the date of conclusion of the last financing transaction of the project owner) |
| Data of the real estate, the mortgage of which ensures the fulfilment of obligations under the agreement | 8 years (from the date of conclusion of the last financing transaction of the project owner) |
| Data on real estate, the mortgage of which guarantees the fulfilment of contractual obligations | 8 years (from the date of conclusion of the last financing transaction of the project owner) |
| Service provider data | |
| Agreements concluded with the service providers | 10 years (after the expiration of agreement) |
| Contacts of the service providers | 5 years (after the expiration of agreement) |
| Other data | |
| Data of requests submitted to the Company by phone / email / other electronic or physical means and data of the persons who submitted the requests | 3 years |
| Website visitor data (obtained with the help of cookies, if uses) | According to the period set in the Company's Privacy Policy |

The data not mentioned in the table of data storage period presented above or in other internal procedures of the Company are stored for the period specified in the Law on Crowdfunding of the Republic of Lithuania, the Index for Storage Period and/or other applicable legislation.