Privacy Notice

This **Privacy Notice is intended** to the persons who address the State Data Protection Inspectorate with a complaint or the notices related to the complaint.

Who is your personal data controller?

State Data Protection Inspectorate (hereinafter referred to as the "SDPI"), Budgetary institution, registration number: 188607912, L. Sapiegos str. 17, 10312 Vilnius, Tel. (8 5) 271 2804, 279 1445, E-mail ada@ada.lt, https://vdai.lrv.lt/. Data Protection Officer: E-mail dap@ada.lt

For what purposes your personal data will be processed and what is the legal basis for processing of your personal data?

If you decide to address the SDPI with a complaint for any actions or omission of action of the data controller or data processor, your personal data will be processed **for the purposes of complaints handling.**

In case the obligation to cooperation with other data protection supervisory authorities of the Member States of the European Economic Area (hereinafter – "EEA") arises in the course of complaints handling, for example, when a complaint concerns the processing of personal data in several countries, your personal data would also be processed **for the purposes of ensuring international cooperation including implementation of consistency.**

Note: In cases where your personal data are processed for the purpose of **international cooperation, including consistency**, other data protection supervisory authorities operating in the EEA act as **joint controllers** with the SDPI (list is available here: https://edpb.europa.eu/about-edpb/about-edpb/members_en) and in the case of consistency procedure (Article 63 of GDPR), the European Data Protection Board is also the **joint controller** (see its privacy notice here: https://edpb.europa.eu/about-edpb/legal-notices/data-protection-notice_en).

Please be notified that processing of personal data for the afore-mentioned purposes is carried out in compliance with the legal obligation (Article 6(1)(c) of the General Data Protection Regulation) which shall be set forth in:

1. Article 6(1)(c) and Article 57(1)(f) and, where applicable, Article 56(1), Article 57(1)(g), Articles 60 – 62 of General Data Protection Regulation;
2. Article 40(1)(7) and, where applicable, Article 40(1)(9) of the Republic of Lithuania Law on Legal Protection of Personal Data, Processed for the Purposes of Prevention, Investigation, Detection or Prosecution of Criminal Offences, or the Execution of Criminal Penalties, or National Security, or Defence;

3. Article 11(1), Article 11(2)(3) and, where applicable, Article 12(2)(6) of the Republic of Lithuania Law on Legal Protection of Personal Data;
4. Resolution No 875 of the Government of the Republic of Lithuania of 22-08-2007 "On the Approval of the Rules on Examination of persons' Requests and Their Service in Public Administration Institutions, Bodies and Other Public Administration Entities";
5. Order No 1T-20 (1.12.E) of the Director of the SDPI of 02-03-2021 "On the Approval of the Description of the Procedure for Complaints handling by the SDPI" and Order No 1T-19 (1.12.E) of the Director of the SDPI of 02-03-2021 "On the Approval of the Recommended Form of the Complaint";
6. other legal acts.

What your personal data is processed?

Data of the person who has lodged the complaint or the person who may provide more information on the circumstances described in the complaints

Identification data	name, surname, personal identification number (if the complaint is lodged through E-Government Gateway), date of birth (if the person does not have a personal identification number and lodged the complaint not through E-Government Gateway)
Contact details	telephone number and/or e-mail address and/or correspondence address and/or electronic consignment delivery box address
Data related to the **complaint**	fact, date, time (where applicable) of lodging a complaint to the SDPI, content of the complaint (and your personal data in the complaint or annexes to the complaint, for example, video data, health data etc.), fact, date, time (where applicable) of responding to the complaint
Relation with the data controller (data processor)	name of the represented data controller (data processor), relationship with him, position, copy of the document confirming the fact of representation
Other personal data	correspondence (where a natural person can be identified from such correspondence), workplace and signature

Data controller (data processor) where he is a natural person and/or representative of data controller (data processor) except for its employees

Identification data	name, surname, personal identification number, date of birth (if the person does not have a personal identification number)
Contact details	telephone number and/or e-mail address and/or correspondence address and/or electronic consignment delivery box address

Other personal data	correspondence (where a natural person can be identified from such correspondence), place of data processing and signature

Please be notified that the SDPI will receive your personal data directly from you or from other institutions or entities (for example, institutions or entities which have forwarded your complaint for its assessment or forwarded their response to your complaint where you sent the complaint to several addressees etc., or from state (municipal) registers and information systems, state (municipal) authorities, other data controllers (data processors) where receipt of data is necessary for the complaint-handling.

To whom your personal data will be provided?

To the State Digital Solution Agency (if a complaint is lodged through e-services, i.e. E-Government Gateway)
To the data processors providing the Inspectorate with the maintenance of information systems (including document management systems) and other related services
To public authority competent to examine the request including the request for provision of consultations (where examination of the request does not fall within the competence of the SDPI) or specified in the request as additional addressees or with which the object of the complaint is related
Person complained of
To the public authorities, data controllers or other persons of Lithuania and the European Union or, where necessary, third countries (for example, where it is necessary to provide assistance to other supervisory authorities etc.), including, where applicable, European Data Protection Supervisor
To other data controllers, for example, law enforcement authorities, to the National Audit Office etc. (in the cases set out in the legal acts and where provision of personal data is necessary and proportionate for legitimate and specific purposes)

How long your personal data will be stored?

Your personal data will be stored for the complains handling period and also the following periods for the purposes of ensuring the archiving requirements:

Decisions on lawfulness of data processing	Permanently
Records of administrative offences, decisions and correspondence with person subject to administrative responsibility and judicial institutions	5 years
Complaint-handling documents	5 years (from the date of adoption of a decision)

Register of decisions on administrative offences	25 years

What are your rights and how you exercise them?

You as a data subject have the following rights: Right to access information on data processing (Articles 13 and 14 of GDPR), Right of access data (Article 15 of GDPR), Right to rectification (Article 16 of GDPR), Right to erasure (right to be forgotten) (Article 17 of GDPR), Right to restriction of processing (Article 18 of GDPR). Note: the right to be forgotten or the right to restriction may be exercised when at least one of the conditions set out in Article 17(1) or 18(1) GDPR is met.

For information on how to exercise data subjects' rights in SDPI please read: https://vdai.lrv.lt/en/data-protection-policy/.

Please be notified that if you object to the decision on your request concerning exercise of your rights as the data subject's rights taken by the SDPI, you are entitled to lodge a complaint to Vilnius Regional Administrative Court.