| Data Controller | |
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| Name: | Silvestica Green Forest (Lithuania/Latvia/Estonia/Finland/: weden) and Silvestica Green Fores AB (hereinafter - the Company) |

| | Data Processing Record (Art. 30 of the GDPR) | | | | | | | | |
|---|--|--|---|--|---|------------------|---|--|---|
| | Purpose of processing | Categories of Data Subjects | Legal ground for processing | Categories of personal data | Categories for recipients | Data controllers | Deletion / storage terms by data categories (where available) | Data processors | Data storage location |
| 1 | Internal administration: conclusion / execution of employment contract, calculation and payment of salary, submission of income tax returns, management of financial resources (issuing of tangible assets, issuing of bank cards), personnel and career management; storage of documents; | Employees | Legislation Employment contracts The legitimate interest of the Company in career management, ensure communication, safety of employees and property, help the employees to fulfil his / her family obligations. | Name; surname; personal identity number; position; signature; details of non-compete agreements; social insurance details; salary data; bank data; vacation data; working schedule; business trips; children data, marital status (single mother or father, married or not), evaluation data; education data; place of residence, telephone number, e-mail | Banks, Social welfare institution, Tax Administrator, Clients, Suppliers, Travel Agents, Insurance Companies, Telecom Service Providers, Auditors, Lawyers, Courts, Dispute Settlement Agencies, Archives, Other Third Parties with Legitimate Interests or Contractual Relations with the Company, data processors | The Company | Name, surname, personal identity number, position, details of non-compete agreements; social insurance details; salary data; bank data; vacation data, working schedule, business trips are kept for the duration of the employment contract and for 3 years after the end of the employment relationship; Other data is stored during the validity of the employment contract and for 1 month after the end of the employment relationship; The personal data contained in the documents are stored under the laws (refer to the table below) | administrators of Information Systems (Navcite Consulting | From 2020 cloud server of the Company (Microsoft Azure), during 2019 also temporary in system hosted and used by accounting service in Lithuania and Estonia |
| 2 | Employee health care; storage of essential documents; | Employees | | Name, surname, other data in the medical booklet; data on the level of work capacity; data on accidents at work / injuries suffered | Health Care Institutions, State Labor Inspectorate, Courts, Lawyers, Consultants, Data Processors | The Company | The name, surname, other data contained in the medical booklet, data on the level of capacity for work are kept during the term of the employment contract; The personal data contained in the documents are stored under the laws | CRK Forest Management AB, Owners and administrators of Information Systems (Navcite Consulting AB), companies providing occupational safety and health services, accounting service provider | Cloud server of the Company (Microsoft Azure) |
| 3 | Conducting internal accounting | Client / Client's representative / Supplier / Supplier's representative / authorised persons, agents, their representatives | Legislation | Contact/identification data, VAT number, payment history (natural person) Contact/identification data, position, workplace (Legal entity's representative) | Tax Administrator, Banks, Auditors, data processors | The Company | 10 years after the operation | CRK Forest Management AB. Owners and administrators of Information Systems (Navcite Consulting AB), accounting service provider | Cloud server of the Company (Microsoft Azure) |
| 4 | Activity administration of authorized persons / agents; Storage of essential documents | Authorized persons / agents (natural persons); Representatives of authorized persons / agents (legal entities) | Service contract / authorization; Legislation; Legiitimate interest of the Company to fullfill contract with authorised persons / agents | name, surname, personal code, date of birth (for alien), address, bank account details, phone number, email address, individual activity certificate number, credentials | Tax Administrator, Banks, Auditors, Lawyers, Courts, Dispute Settlement Bodies, notaries, business partners, data processors | The Company | During the validity of the service contract / authorization and for 3 years after its expiry; The personal data contained in the documents are stored under the laws (refer to the table below) | CRK Forest Management AB, Owners and administrators of Information Systems (Navcite Consulting AB), accounting service provider | Cloud server of the Company (Microsoft Azure) |
| 5 | Publicity / marketing of the Company's activities on website | Employees / Governing body members | Consent (for image) Legitimate interest of the Company (to show their Employees / Governing body members contact information to public) (for First name, surname, position, contact data) | Image, First name, surname, position, contact data | Customers, Company partners / shareholders, website visitors, data processors | The Company | During the validity of the consent (for image) / during the validity of the employment contract / relations (for First name, surname, position, contact data) | CRK Forest Management AB, Owners and administrators of Information Systems (Navcite Consulting AB) Website Host (Loopia AB) | Website Hosting (Loopia AB) |
| 6 | Conclusion and execution of contracts for the purchase of goods / services; their storage; protection of legitimate interests of the Company (claims management). | Suppliers (natural persons) Representatives / employees of suppliers (legal entities) | Contract conclusion and execution; The legitimate interest of the Company in identifying the signatory, executing person; Legislation; Legitimate interest of the Company (to express or defend against claims) | First name, surname, Personal code (if the customer is a natural person), Position, Signature Phone Number, Workplace Address / Residence, Email address, contract execution data | Tax Administrator, Banks, Auditors, Lawyers, Courts, Dispute Settlement Authorities; data processors | The Company | During and for 5 years after the expiration of the supply contract; The personal data contained in the documents are stored under the laws (refer to the table below) | CRK Forest Management AB, Owners and administrators of Information Systems (Navcite Consulting AB), accounting service providers | Cloud server of the Company (Microsoft Azure) |
| 7 | Conclusion and execution of contracts for the sale of goods / services (rental of real estate, sale of timber); their storage; protection of legitimate interests of the Company (claims management) | Clients (natural persons) Representatives / employees of clients (legal entities) | Contract conclusion and execution; Legitimate interest of the Company in identifying the signatory, executing person (contract execution); Legislation; Legitimate interest of the Company (to express or defend against claims) | First name, surname, Personal code (if the customer is a natural person), Position, Signature, Telephone number, Workplace address / residence, E-mail address, contract execution data | Tax Administrator, Banks, Auditors, Lawyers, Courts, Dispute Settlement Authorities, State Registers; data processors | The Company | During and for 5 years after the expiration of the sale/service contract; The personal data contained in the documents are stored under the laws (refer to the table below) | CRK Forest Management AB, Owners and administrators of Information Systems (Navcite Consulting AB), accounting service providers | Cloud server of the Company (Microsoft Azure) |
| 8 | Collection and verification of data for real estate transactions (purchase, etc.) and share purchase agreements (property deals), concluding a check of reliability of the other party (natural person or shareholders, members of gov. bodies and beneficiaries of a legal entity) | Real estate owners (sellers) or buyers (natural persons); Representatives / employees of real estate owners (sellers) or buyers (legal entities), former owners of real estate, shareholders, members of gov. bodies and beneficiaries of sellers / buyers, other persons specified in Real Estate Register extracts | Contract conclusion and execution; The legitimate interest of the Company in identifying the signatory, executing person, performing legal and financial assessment, check of reliability of the other party (natural person) or shareholders; Legislation; | Name, Surname, Personal Identity Number or date of birth (if the customer is a natural person), Position, Signature, Telephone number, Workplace address / residence, E-mail address, Real estate that is the object of the transaction; participation in politics; sanctions imposed. | Lawyers, consultants, data processors | The Company | During and for 2 years after signing of the sale-purchase contract or for 1 month if contract was not concluded; The personal data contained in the documents are stored under the laws (refer to the table below) | CRK Forest Management AB, Owners and administrators of Information Systems (Navcite Consulting AB) | Cloud server of the Company (Microsoft Azure) |

| Administration of the Company's management bodies and compliance with the Law on Money Laundering and Terrorist Financing Prevention | Board members, shareholder representatives, beneficiaries | Legislation | First name, surname, personal code, date of birth (foreigners), address, position, signature, participation in politics, sanctions imposed; owned part in the company | Registers, financial institutions, auditors, lawyers, notaries, data processors | The Company | During the period of operation of the Company | CRK Forest Management AB, Owners and administrators of Information Systems (Navcite Consulting AB), accounting service providers | |
|--|---|--|---|---|-------------|---|---|--|
| 10 Debt administration | Debtors / debtors' representatives | Legitimate interest of the Company (to express claims) | Name, surname, address, personal code, position, debt / services / goods sold / payments data | Courts, Lawyers, Data processors | The Company | Until full debt recovery; The personal data contained in the documents are stored under the laws (refer to the table below) | CRK Forest Management AB, Owners and administrators of Information Systems (Navcite Consulting AB), debt recovery service providers | Cloud server of the Company (Microsoft Azure) |
| 11 Enforcement of data subjects' rights | Data subjects submitting the request | Legislation | name, surname, personal code, identity document details, contact data in the request, Company already processed Data subject's personal data | Data protection authority, courts, lawyers, data processors | The Company | 3 years after receiving the request | CRK Forest Management AB, Owners and administrators of Information Systems (Navcite Consulting AB) | Cloud server of the Company (Microsoft Azure) |