APPROVED
by Order of the General Director
of Umaras Private Limited Liability Company
dated 5 November 2026 No. VĮ-2026-0032

NOTICE TO WHISTLEBLOWERS ON THE PROCESSING OF THEIR PERSONAL DATA

This notice provides detailed information on the personal data we process about you, as an individual who contacts the Company with information on breaches within the Company, and about witnesses to such breaches identified in the information submitted by whistleblowers. It explains the purposes of processing, to whom we disclose the data and how long we retain them. It also provides information on your rights as a data subject.

The controller of the personal data you provide is Umaras Private Limited Liability Company (hereinafter referred to as the Company), company code: 183728582, registered office address: Pramonės g. 19A, Utena, telephone: +370 389 66000, email: info@umaras.eu.

For what purposes and on what legal grounds do we process your personal data?

If you contact the Company with information on a possible breach within the Company, or if you are a witness to such a breach, your personal data will be processed for the purpose of administering and assessing information on a possible breach within the Company.

Personal data are processed for the stated purpose in order to comply with a legal obligation to which the Company is subject (Article 6(1)(c) of the GDPR*), as laid down in Article 4(1)(1), Article 4(8) and (9), and Article 16 of the Law on the Protection of Whistleblowers of the Republic of Lithuania.

What personal data about you are processed?

The personal data listed below may be processed about you as a whistleblower or as a witness identified in a report.

Data identifying the whistleblower	First name, surname and (applicable to whistleblowers only) personal identification number, or date of birth if the person does not have a personal identification number.
Data identifying a witness named in the report	First name and surname.
Contact details of the whistleblower	Telephone number, personal email address or residential address.
Contact details of a witness named in the report	Telephone number and email address.
Data on the whistleblower's connection with the Company	Workplace (current or former employment or contractual relationship with the Company, etc.) and position.

Whistleblower data relating to the submission of information	The fact, date and time (where applicable) of the submission of information to the Company, the content of the report (and your personal data contained in it or its attachments), and, where applicable, the fact, date and time (where applicable) of the response to the report.
Other personal data of the whistleblower (at your discretion)	Correspondence (where an individual can be identified from it) and signature.
Other data of a witness named in the report	Workplace and position, the fact of submission and content of the report in respect of which you may testify, and correspondence (where an individual can be identified from it).

How long do we retain your information?

Your personal data will be retained while the report you submitted is being examined and, once the examination is completed, in accordance with the procedure laid down in the Law on Archives of the Republic of Lithuania and by the Chief Archivist. The period for which information on breaches is retained by the Company may be extended by a reasoned instruction from the competent authority.

Your rights:

- to receive information about the processing of personal data (Articles 13 and 14 of the GDPR);
- to access your data (Article 15 of the GDPR);
- to request the rectification of personal data or, taking into account the purposes of processing, the completion of incomplete personal data (right to rectification) (Article 16 of the GDPR);
- in certain cases, to have your data erased (the right to be forgotten) (Article 17 of the GDPR). This right may be exercised where at least one of the conditions set out in Article 17(1) of the GDPR applies.
- in certain cases, to request that the controller restrict the processing of personal data (right to restriction of processing) (Article 18 of the GDPR). This right may be exercised where at least one of the conditions set out in Article 18(1) of the GDPR applies;

Who can access your information?

When processing your data, we apply the necessary security measures to preserve their confidentiality. Access to the data is granted only to those Company employees who need it to perform their duties.

Data held in information systems provided and maintained by external service providers may be accessed by the employees of those providers, but strictly only for the purposes necessary to provide their services.

To whom will your personal data be disclosed?

- to the Prosecutor General's Office of the Republic of Lithuania (if you wish to obtain whistleblower status or if there are indications of a breach related to the public interest as set out in Article 3 of the Law on Whistleblowers of the Republic of Lithuania);
- to competent authorities (where the information gives reasonable grounds to suspect that a criminal offence, an administrative offence or another violation of law is being prepared, is being committed or has been committed).

Disclosure of personal data to other recipients or transfer to third countries is not envisaged.

How can you access your personal data?

By visiting us at Pramonės g. 19A, Utena, and/or contacting us by email at info@umaras.eu.

Where can you turn if your rights have been violated?

If you believe that your privacy rights have been violated, you may lodge a complaint with the State Data Protection Inspectorate, L. Sapiegos g. 17 (2nd floor), 10312 Vilnius, telephone: (8 5) 271 2804, 279 1445, email: ada@ada.lt.