

DATA RETENTION POLICY

1. GENERAL PROVISIONS

- 1.1. This Data Retention Policy ("**Policy**") of UAB ROIX, legal entity code 305328324, registered address Naugarduko g. 3-401, Vilnius, Lithuania ("**ROIX**" or the "**Company**"), sets out the internal procedures to ensure the proper management of personal data and information received from the Company's clients, fraud prevention, data protection, and the methods of data retention and archiving.
- 1.2. This Policy is prepared in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC ("**GDPR**"), the Law on Legal Protection of Personal Data of the Republic of Lithuania, the General Index of Document Retention Terms approved by the Order No. V-100 of the Chief Archivist of Lithuania of 9 March 2011, Regulation (EU) 2020/1503 of the European Parliament and of the Council of 7 October 2020 on European crowdfunding service providers for business, amending Regulation (EU) 2017/1129 and Directive (EU) 2019/1937 (the "**Regulation**"), and other applicable legal acts governing the Company's activities.
- 1.3. This Policy applies to all Company processes and systems, and to all information managed by ROIX, whether in paper or electronic form. This Policy applies to all ROIX employees, representatives, and service providers whose roles involve processing Company-held data (including personal and special categories of personal data).

2. DEFINITIONS

- 2.1. Capitalized terms used in this Policy shall have the following meanings unless the context requires otherwise:
 - 2.1.1. **ADTAJ** –the Law on Legal Protection of Personal Data of the Republic of Lithuania
 - 2.1.2. **GDPR** – regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC;
 - 2.1.3. **ROIX** or the **Company** – UAB ROIX, legal entity code 305328324, registered address Naugarduko g. 3-401, Vilnius, Lithuania;
 - 2.1.4. **Director** – the Chief Executive Officer of the Company;
 - 2.1.5. **Investor** – a natural or legal person who provides financing (in the form of loans) for Projects published on the Platform;
 - 2.1.6. **Client** –a Project Owner or an Investor;
 - 2.1.7. **Platform** – the publicly accessible online information system <https://invest.roix.lt/> administered and managed by ROIX;
 - 2.1.8. **Policy** – this document;
 - 2.1.9. **Project** – activities carried out by one or more small or medium-sized enterprises (SMEs), for which the Project Owner seeks financing by submitting a crowdfunding offer;
 - 2.1.10. **Project Owner** – a legal entity or natural person (entrepreneur) seeking to obtain financing via the Platform;
 - 2.1.11. **Index** – the General Index of Document Retention Terms approved by Order No. V-100 of the Chief Archivist of Lithuania dated 9 March 2011.
- 2.2. Other terms used in this Policy shall be interpreted in accordance with the Regulation, GDPR, ADTAJ, the Index, or other Company documents, unless the context clearly indicates otherwise.

3. PRINCIPLES

- 3.1. In retaining personal data, ROIX adheres to the following principles:
 - 3.1.1. data minimization – only data necessary to achieve a specific purpose is collected and retained;
 - 3.1.2. storage limitation – data is retained no longer than necessary;
 - 3.1.3. integrity and confidentiality – appropriate technical and organizational measures are applied to ensure the security of personal data during processing.
- 3.2. If the retention period for specific categories of data (or documents) is not established in applicable legal acts (e.g., the Index), this Policy, or other ROIX internal documents, such data (documents) shall be retained by ROIX for no longer than five (5) years from the date of their creation or receipt.
- 3.3. The retention periods specified in Annex No. 1 to this Policy may be extended if:
 - 3.3.1. the data (documents) are used to protect or defend the legitimate interests of ROIX or other parties;
 - 3.3.2. the data (documents) are used as evidence in civil, administrative, or criminal proceedings, or are transferred to law enforcement authorities until the conclusion of a relevant audit, investigation, or court case, or in other cases provided for by law;
 - 3.3.3. the personal data processed by the Company have been anonymized.

4. DATA SECURITY MEASURES

- 4.1. ROIX evaluates the wear and condition of data storage media used for retention and archiving purposes. When selecting electronic data storage solutions, ROIX ensures the implementation of procedures and systems that guarantee information availability and continuous protection against unauthorized access, unlawful data modification, loss, or other illegal actions.
- 4.2. The Company implements and uses adequate physical safeguards to ensure the continuous security of the data it processes.
- 4.3. The Company ensures that access to stored data within ROIX is granted only to those individuals and only to the extent necessary for the proper performance of their work functions or service provision. ROIX employees and other persons granted access to stored data must ensure the confidentiality of such data and the secrecy of personal data.
- 4.4. The specific information and communication technology tools used to process and store data are described in the Company's operational risk documentation.

5. SYSTEM FOR COLLECTING AND MANAGING DATA RELATED TO LOAN FINANCING

- 5.1. While providing crowdfunding services in accordance with the Regulation, ROIX collects and retains data related to financing transactions executed through the Platform managed by the Company.
- 5.2. Data related to financing transactions includes:
 - 5.2.1. information collected for the purpose of identifying ROIX Clients;
 - 5.2.2. information collected during the Project Owner's reliability assessment;
 - 5.2.3. the parties to the financing transaction, the date of execution, and the amount;
 - 5.2.4. information on the implementation progress of the Project, documents demonstrating the proper use of the funds granted to the Project Owner;
 - 5.2.5. documents related to assets pledged by the Project Owner and other provided collateral;
 - 5.2.6. any other relevant information related to the financing transaction.

- 5.3. ROIX stores the data listed in Clause 5.2 of this Policy in electronic form in all cases, but may also retain paper copies of such data.
- 5.4. A separate file is created for each Project Owner, in which the Company stores the data referred to in Clause 5.2 of this Policy and other data related to the respective Project Owner. The file is stored electronically, and ROIX ensures that duplicates of such information are also retained on the Company's internal servers or cloud-based servers used by the Company.
- 5.5. The Company may enter into agreements with Project Owners under which the Project Owners are required to collect and retain the information referred to in Clause 5.2.4 of this Policy. In such cases, Project Owners must, upon the Company's request, provide this information without delay, and in any event no later than within 10 business days. The information provided by the Project Owners is retained by ROIX in accordance with this Policy.

6. DATA DESTRUCTION

- 6.1. Data retained by ROIX (in both electronic and paper formats) must be regularly reviewed to determine whether the retention period set by applicable legal acts or this Policy has expired. If the retention period has expired and there is no other reason to retain the data longer (e.g., in cases specified in Clause 3.3 of this Policy), such data shall be destroyed without delay.
- 6.2. Data (documents) shall be destroyed using a specialized document shredder or, if stored electronically, deleted in a manner that ensures they cannot be restored by reasonable means. External service providers may be engaged to carry out data destruction.
- 6.3. Each individual working with the respective data is directly responsible for ensuring the timely and proper destruction of such data.
- 6.4. Proper destruction of data means that any (backup) copies or historical versions are also rendered inaccessible.
- 6.5. Data stored in electronic format may not be destroyed only in cases where such destruction would compromise the integrity, security, or processing of other electronically stored data, thereby preventing the Company from continuing its operations and/or breaching applicable legal data retention requirements.

7. FINAL PROVISIONS

- 7.1. This Policy shall be approved and/or amended by order of the Company's Director.
- 7.2. Amendments to the Policy shall enter into force on the date specified in the ROIX order, unless otherwise stated in the respective order.
- 7.3. The Director of the Company shall regularly (at least once per year or immediately upon changes to applicable legal acts governing data processing) review and, if necessary, ensure that this Policy is updated.
- 7.4. All Company employees and other persons to whom this Policy is relevant (e.g., external service providers engaged by ROIX) must be familiarized with this Policy and sign an acknowledgment of such review.

DATA RETENTION PERIODS

DATA	RETENTION PERIOD
Employee and Job Applicant Data	
Internal company acts related to hiring, transfers, substitution, termination, remuneration, parental leave, paternity leave	50 years
Internal company acts related to annual, unpaid, educational, and other types of leave	10 years
Internal company acts related to business trips, additional rest days, shortened working hours	10 years
Personal file documents (documents or copies thereof related to employment start, duration, and termination)	10 years (after end of employment or equivalent relationship)
Employment contracts and their annexes (agreements on additional conditions, etc.)	50 years (after termination of contract)
Occupational safety and health instruction documentation (registers, etc.)	10 years (from the last entry)
Employee photographs (not part of personal file documents)	Until the end of the employment (service provision) contract
Employee electronic communication data (emails, internet browsing history, etc.)	Until the end of the employment (service provision) contract, except in specific cases where email content is required for ongoing ROIX operations and processes (then retained for 2 years after end of employment)
Job applicants' CVs, cover letters, and other information received in the recruitment process	Until the end of the specific recruitment process (or as specified in the consent, if given)
Consents for the processing of personal data	1 year (after the expiration of the data retention period for which consent was given)
Client Data	
Client agreements	10 years (after expiration of the agreement)
Client contact details	8 years (from the last use of ROIX services)
Accounting documents evidencing economic operations or events (invoices, payment orders, advance reports, cash orders, etc.)	10 years
Project Owner Data	
Project files (agreements and other documents substantiating the debt, annexes, communication, and other documents related to the debt and its security)	10 years (after full settlement)
Documents related to project implementation and use of crowdfunding funds, supporting documents for expenditures	2 years (from the project's end date)
Information collected (assessed) during the Project Owner's reliability assessment	10 years (from the date of the last financing transaction)
Real estate used as mortgage collateral	8 years (from the date of the last financing transaction)

Data on real estate used as mortgage collateral	8 years (from the date of the last financing transaction)
Service Provider Data	
Agreements with service providers	10 years (after contract expiration)
Contact details of service providers	5 years (after contract expiration)
Other Data	
Data from inquiries submitted to ROIX by phone / email / other electronic or physical means, and data of the persons submitting such inquiries	3 years
Website visitor data (collected via cookies, if used)	As specified in the ROIX Privacy Policy