

APPROVED BY  
Order No V-104 of 18 August 2022  
of the General Manager  
of the National Kaunas Drama Theatre

**PRIVACY POLICY**  
**OF THE NATIONAL KAUNAS DRAMA THEATRE**  
**Last updated: 18 August 2022**

**I. GENERAL INFORMATION**

1. By applying this Privacy Policy (hereinafter referred to as the “PP”), BĮ National Kaunas Drama Theatre (hereinafter referred to as the “Data Controller”) sets the terms and conditions for the processing of personal data when using the websites [www.dramosteatras.lt](http://www.dramosteatras.lt) (with the installed electronic ticket distribution system [www.dramosteatras.koobin.com/](http://www.dramosteatras.koobin.com/)), [www.teatrofabrikas.lt](http://www.teatrofabrikas.lt), [www.nerkas.lt](http://www.nerkas.lt), [www.babel.lt](http://www.babel.lt) and official accounts on social media *Facebook*, *Instagram*, *LinkedIn*, and *YouTube*, managed by the Data Controller; the terms and conditions apply every time you access the content and/or service provided by us, regardless of the device (computer, mobile phone, tablet, TV, etc.) used.

2. Data Controller details:

Legal entity code: 290754450

Office address: Laisvės al. 71, LT-44304 Kaunas. Tel.

+370 37 22 41 98

E-mail: [info@dramosteatras.lt](mailto:info@dramosteatras.lt)

3. Supervisory authorities: The Ministry of Culture of the Republic of Lithuania and the State Data Protection Inspectorate.

4. Data on the Data Controller is collected and stored in the Kaunas branch of the State Enterprise Centre of Registers.

5. It is essential that you carefully read the PP, because every time you visit the websites or social network accounts owned by the Data Controller, you agree to the terms and conditions described in this PP. If you do not agree with these terms and conditions, please do not visit our websites/social network accounts and do not use our content and/or services.

6. We confirm that the data of visitors of the Data Controller’s websites and social network accounts will be collected in accordance with the requirements of the valid legislation of the European Union and the Republic of Lithuania and the instructions of the supervisory authorities. All reasonable technical and administrative measures are applied to protect the data collected by us on the visitors of the websites and social network accounts (hereinafter referred to as the “Visitor”) against loss, unauthorised use, and changes. The staff of the Data Controller has a written obligation not to disclose or distribute the information received at the workplace to third parties, including information on the website Visitors.

7. Individuals under the age of 14 cannot submit personal data through our website(s) and social media accounts. If you are an individual under the age of 14, you must obtain the consent of your parents or other legal guardians and provide it to us before submitting personal information.

8. The terms used herein are understood as they are defined in the General Data Protection Regulation No 2016/679 (EU).

## **II. COLLECTION OF INFORMATION RELATING TO PERSONS**

### **9. Information you provide directly:**

9.1. Websites and social network accounts. Websites and social network accounts allow you to provide information directly to us. For example, on the websites [www.dramosteatras.lt](http://www.dramosteatras.lt), [www.teatrofabrikas.lt](http://www.teatrofabrikas.lt), and [www.nerkas.lt](http://www.nerkas.lt), it is possible to subscribe to the most relevant information of the NKDT and receive it by e-mail. When registering, we ask you to provide certain information about yourself (e-mail address) so that we can send you newsletters on a regular basis.

9.2. In order to purchase goods or services on the NKDT electronic ticket distribution system [www.dramosteatras.koobin.lt](http://www.dramosteatras.koobin.lt), it is necessary to create a personal account by filling in the electronic registration form. The personal account is designed to ensure secure e-ticket submission, payment confirmation, and secure identification of the purchaser. During registration, you are asked to provide your first name, last name, e-mail address, date of birth, gender, place of residence, country, contact phone number, and language.

9.3. The Theatre Factory database. If you are registering on the young artist database at [www.teatrofabrikas.lt](http://www.teatrofabrikas.lt), you are asked to provide your first name, last name, and e-mail address in order to create a creative CV. The privacy rules of this data are presented in detail at [www.teatrofabrikas.lt](http://www.teatrofabrikas.lt).

9.4. Sending promotional messages, offers of goods and/or services, newsletters (UAB “MailerLite”). We send you the listed offers or other offers that are useful to you only if you are at least 14 years old and you have granted such a right by ordering our goods and/or services and filling in relevant surveys and/or inquiries, as well as clearly provided your consent by performing the requested active actions, such as you have ticked a mark, provided written consent or submitted your e-mail. This personal data is stored for 5 years from the receipt of consent.

### **10. Information on the use of our websites:**

10.1. In addition to the information you provide, we collect information about how you use our websites. For example, we may collect the following information:

10.2. Device information, i.e., the IP address, operating system version, and device settings you use to access the content/goods.

10.3. Login information, i.e., the time and duration of your session, the terms of the requests you enter on our websites and any information stored in the cookies we set on your device (Cookie Policy is provided below).

10.4. Location information, i.e., your device’s GPS signal or information about the nearest WiFi access points and cell towers, which may be transmitted to us when you use the content of our websites.

### **11. Information from third-party sources:**

11.1. We may obtain information about you from public and commercial sources (to the extent permitted by applicable legislation) and combine it with other information we receive from you or

about you. We can also receive information about you from third-party social network services when you connect to them, for example, through the accounts of the National Kaunas Drama Theatre on *Facebook, Instagram, YouTube, and LinkedIn*.

## **12. Other information we collect:**

12.1. We may also collect information about you, your device, or your use of the content of our websites with your consent.

## **13. Image collection and use:**

13.1. We may take photos and videos during the Theatre events and as a result of these actions your image may be captured in photographs and/or videos which we may use only for public information purposes, informing the public about the events taking place and/or having taken place. We undertake not to violate your honour and dignity by using such photos and to publish them only on our social media accounts (*Facebook, Instagram, LinkedIn, and YouTube*) and on the websites: [www.dramosteatras.lt](http://www.dramosteatras.lt), [www.nerkas.lt](http://www.nerkas.lt), [www.teatrofabrikas.lt](http://www.teatrofabrikas.lt), [www.babel.lt](http://www.babel.lt). We carry out photography and filming activities based on Article 13 of the Law on the Provision of Information to the Public. If you would like your image, which we publish on our social media accounts and/or website, to be anonymised, please contact us by e-mail: [spauda@dramosteatras.lt](mailto:spauda@dramosteatras.lt). Please note that media representatives can publish your photos only in compliance with the legal requirements applicable to them. We do not control and are not responsible for the actions of media representatives. We store the image for 5 years from the date it was taken.

13.2. In the case of visits to filmed premises, in order to ensure the safety of the territory, premises, and persons, your image, place/location, behaviour, personal property, time, and date may be recorded. We store such data for up to 3 days. Except for cases where there is a reason to believe that misconduct, a violation of labour discipline, a criminal act, or other illegal actions were committed (then such data is stored until the end of the relevant investigation and/or trial). A detailed procedure for using security cameras is provided in the **Description of Using Video Surveillance Cameras and Processing Video Data**.

## **III. USE OF INFORMATION**

### **14. We may use the information collected for the following purposes:**

14.1. To send content (e.g., tailored offers, newsletters, advertisements, promotions) on relevant topics by e-mail, SMS, telephone for marketing purposes\*, e.g., to evaluate and analyse our market, customers, products, and services (including the collection of your opinions about products and services and organisation of customer surveys);

14.2. To organise contests, games, or promotions as permitted by law;\*

14.3. In other ways with your consent;\*

\*We inform you that you have the right to object to the processing of your data for the purposes indicated above, marked with an asterisk, or at any time withdraw your consent by informing the data protection officer by e-mail: [ada@dramosteatras.lt](mailto:ada@dramosteatras.lt), or in other ways indicated below. The Data Controller will try to terminate the processing of the user's data for the purpose of direct marketing as soon as possible but will do it no later than in 30 (thirty) working days.

14.4. We can publish the information collected during various contests, games, or promotions on the websites and/or social network accounts managed by the National Kaunas Drama Theatre; for

example, we can publish the names and surnames of the winners, the competition works of the participants.

#### **IV. INFORMATION DISCLOSURE CONDITIONS**

##### **15. We may disclose your information to the following subjects:**

15.1. Companies that help us to organise contests/games/promotions, such as advertising agencies and marketing agencies. These companies are limited in their ability to use your information; they may not use this information for purposes other than providing services to us;

15.2. Other parties when required by the law or when it is necessary to protect the information society services we provide.

##### **16. Cases in which we may disclose your information to other parties:**

16.1. In order to comply with the law or in response to a mandatory requirement of a legal process (such as obtaining a lawful warrant or search warrant or other court order);

16.2. To confirm the legality of our actions;

16.3. To protect the Data Controller, its property or ensure their security;

16.4. We may disclose your information to a related third party in the event of a reorganisation;

16.5. In other cases, with your consent or at your legitimate request.

#### **V. PROTECTION OF INFORMATION**

17. We have implemented reasonable and appropriate physical and technical measures to protect the information we collect for the purpose of providing the content/services. However, please remember that although we take reasonable steps to protect your information, no website, online transaction, computer system, or wireless connection is completely secure.

#### **VI. RIGHTS OF THE VISITORS**

##### **18. The visitor who has submitted a document confirming their identity to the Data Controller or, has confirmed their personal identity by using electronic means of communication, which allow the proper identification of the person, has the right to:**

18.1. Know (be informed) about the processing of their data (right to be informed);

18.2. Become familiar with their data and how it is processed (right of access);

18.3. Demand rectification or, taking into account the purposes of personal data processing, to supplement incomplete personal data of a person (right to rectification);

18.4. Erase data or stop the processing of the data (except for storage) (right to erasure and right to be forgotten);

18.5. Demand that the Data Controller would restrict the processing of personal data for one of the legitimate reasons (right to restriction of processing);

18.6. Transfer data (right to data portability).

19. You must submit requests regarding the user's personal data in writing (including a message sent to the e-mail specified in the Data Controller's contacts).

20. We will provide answers to your inquiries no later than within 30 (days) from the date of the receipt of the inquiry and all necessary documents.

21. The Data Controller will not provide personal data if the Visitor does not confirm their identity, requests data about another person, as well as in other cases established by law that limit the disclosure of data to the Visitor.

22. The Data Controller may not provide the conditions for the Visitor to exercise the rights listed above, when, in cases provided by law, it is necessary to ensure the prevention, investigation, and detection of violations of integrity or professional ethics, as well as the protection of the rights and freedoms of the data subject or other persons.

## **VII. THIRD-PARTY WEBSITES, SERVICES, AND GOODS ON THE WEBSITES OF THE THEATRE**

23. The Data Controller's website or social network accounts may contain third-party banners, links to their websites and services, which are not under the control of the Data Controller. The Data Controller is not responsible for the security and privacy of information collected by third parties. You must be careful and read the privacy policies of the third-party websites and services you use.

## **VIII. COOKIES, SIGNALS, AND SIMILAR TECHNOLOGIES**

24. In this PP, we use the term "cookies" to refer to cookies and other similar technologies, such as Pixel Tags, Web Beacons, and clear GIFs.

### **25. Use of cookies:**

25.1. When you visit the Data Controller's websites, we want to provide content and features that are tailored to your needs. This requires cookies. These are small pieces of information stored in your web browser. They help the Data Controller to recognise you as a previous Visitor of a specific website, to save the history of your visit to the website and to adapt the content accordingly. Also, cookies help us to ensure the smooth operation of websites, allow us to monitor the duration and frequency of visiting websites and collect statistical information about the number of website Visitors. By analysing this data, we can improve our websites and make them more convenient for you to use.

### **26. Some examples of the use of cookies:**

26.1. Cookies make it possible to recognise you as a user so that duplicate information does not need to be collected in the future;

26.2. Cookies allow us to recognise how many unique users browse the website at the same time, which helps to ensure its smooth and fast operation;

26.3. Cookies allow us to analyse the collected information about the browsing of unique users, which helps to adapt the operation of the website to your needs.

### **27. The cookies used on our websites can be grouped into the following types:**

27.1. Essential cookies are strictly necessary for our respective website to perform its basic functions. These cookies allow you to navigate the website and use the features you prefer, such as providing

access to secure sections of the website. Without these cookies, we would not be able to provide the services that enable this website to function;

27.2. Performance cookies collect anonymous information about how visitors use the website. By providing information about the sections visited, time spent on the website, and any problems encountered, such as error messages, these cookies help us to understand how Visitors behave on the website. This information helps us to improve the performance of the website;

27.3. Functionality cookies improve your experience on the website. For example, these cookies can remember information, such as your username, and use third-party services, such as social media functions.

**28. The following data is collected with the help of cookies:**

28.1. When administering websites and diagnosing failures on servers we may use the IP addresses of Visitors’ computers. An IP address is a unique code that identifies a computer in networks. It may be used to identify the Visitor and collect various demographic information. This is done by the administrators of the absolute majority of Internet servers.

28.2. We use cookies to collect data about the use of services. Types of cookies used on our websites:

The name of the cookie	Purpose	Expiry date
OptanonConsent	Information about the categories of cookies used by websites and whether Visitors have given or withdrawn their consent to the use of each category is stored.	1 year
_hjid	A Hotjar cookie is set the first time a customer accesses a page with a Hotjar script. It is used to store a Hotjar user ID unique to that browser website. This ensures that the behaviour of subsequent visits to the same site will be attributed to the same user ID.	1 year
_ga	The name of this cookie is linked to Google Universal Analytics, a significant update to Google’s most commonly used analytics service. This cookie is used to distinguish users by assigning a randomly generated number as a customer identifier. It is included in each website page request and is used to calculate Visitor, session, and campaign data for website analytics reports.	2 years
OptanonAlertBoxClosed	It is set after Visitors see a cookie information message and, in some cases, only when they actively close the message. This allows the website not to display the message more than once to the user. It does not contain any personal information.	1 year
_gid	Used to distinguish users.	24 hours
PHPSESSID	Used to provide features on all pages.	Session
pll_language	Used to save language settings.	Constant
cookieconsent_status	Used to save cookie consent settings.	Min. session
_ajs_anonymous_id	Used to save the last visit.	1 year
__Secure-3PSIDCC, __Secure-3PSID, __Secure-3PAPISID	A profile of the interests of website Visitors is created to deliver relevant and personalised advertisements through retargeting.	2 years
SID, SIDCC, HSID	A security cookie to authenticate the Visitor, prevent fraudulent use of login details, and protect the Visitor’s data from unauthorised access.	2 years
SSID	Google collects visitor information for YouTube-hosted videos in maps integrated with Google Maps.	Constant
SAPISID	Google collects visitor information for videos hosted on YouTube.	Constant
APISID	Personalised Google advertisements on websites based on recent searches and interactions.	2 years

NID	The cookie stores Visitor's preferences and personalises advertisements on Google sites based on recent searches and interactions.	6 months
IP_JAR	Based on recent searches and past interactions, Google displays customised advertisements on websites.	1 week
OGPC	Google Ads optimisation	-
CONSENT	Saves Visitors' preferences and personalises advertisements.	Constant
ANID	Listings on Google sites are based on recent searches.	Constant

**29. How to manage and delete cookies?** When you use your browser to access the content we provide, you can configure it to accept/reject all cookies or notify you when a cookie is downloaded. Every browser is different, so if you do not know how to change your cookie settings, check its help menu. Your device's operating system may have additional cookie controls. If you do not want the information to be collected with the help of cookies, use the simple procedure available in most browsers that allows you to refuse the use of cookies. To learn more about how to manage cookies, please visit: [www.cookiecentral.com](http://www.cookiecentral.com) However, please note that some services may be designed to only work with cookies, and if you disable them, you may no longer be able to use them or certain parts of them.

**30. Other information related to the use of cookies:**

30.1. The following privacy policies of third parties apply to the social network accounts managed by the National Kaunas Drama Theatre:

Facebook's privacy policy is available at

<https://www.facebook.com/policy.php>

Instagram's privacy policy is available at <https://help.instagram.com/402411646841720>

Youtube's privacy policy is available at <https://www.youtube.com/yt/about/policies/#community-guidelines>

LinkedIn's privacy policy is available at <https://www.linkedin.com/legal/privacy-policy>.

**IX. EXCLUSIVITY OF THE PRIVACY POLICY OF THE KOOBIN TICKET DISTRIBUTION SYSTEM**

31. The general PP is applied to the theatre website [www.dramosteattras.koobin.com](http://www.dramosteattras.koobin.com), which functions as a ticket distribution system.

32. Your data as a purchaser (first name, last name, e-mail address, date of birth, gender, place of residence, country, telephone number, and language) is collected for the purpose of creating a personal account at [www.dramosteattras.koobin.com](http://www.dramosteattras.koobin.com), identifying you when you are logging into the system, forming your shopping cart, providing the requested service, providing products, managing accounts, and performing related communications.

33. The following personal data is processed: date of the creation of your account and login history, date and time of a visit, duration of a visit, source of referral and website navigation methods when you visit our website, as well as navigation actions; IP address and location; service purchase history; links to social networks; the history of the user's consent to the privacy policy; first name; last name; telephone number (simple, mobile); e-mail address; city; postal code; gift voucher code; data on gift voucher recipients provided by the purchaser; when issuing proforma and VAT invoices, information on persons representing legal entities (first and last name of the

person representing the legal entity). The term of data processing is 3 years from the last login or reservation.

34. The registered Visitor undertakes to provide correct and complete information about oneself. Registration using third-party data is prohibited.

35. The user, using the services of [www.dramosteatras.koobin.com](http://www.dramosteatras.koobin.com) and accepting the available offers, acts independently and is responsible for all the consequences and obligations arising from such actions and their own behaviour.

## **X. EXCLUSIVITY OF THE PRIVACY POLICY OF THE THEATRE FACTORY (TF)**

36. The website [www.teatrofabrikas.lt](http://www.teatrofabrikas.lt) (hereinafter referred to as the “Website”) of the Theatre Factory (hereinafter referred to as the “TF”) is subject to the general PP. The Website can be used by both registered and unregistered Visitors. Some services are available only to registered Visitors. Visitors’ registration (hereinafter referred to as the “Registration”) is performed by entering your data (hereinafter referred to as the “Login data”) into the Registration form on the Website or by logging in by using other ways indicated on the Website (with the help of social networks, etc.). Registration instructions are provided in the Website’s Registration form.

37. The Website [www.teatrofabrikas.lt](http://www.teatrofabrikas.lt) acts as an advertising operator; that is, it only provides technical means for the publication of information. The Data Controller does not participate in finding or recruiting artists and other procedures related to the published advertisements. The Data Controller is also not an agent, representative, intermediary, etc. of any persons. Publication of an advertisement is considered an offer of the person who published it and not of the Data Controller.

38. The registered Visitor undertakes to provide correct and complete information about oneself. Registration using third-party data is prohibited.

39. The user, using the services of the TF Website and accepting the offers of the advertisements, acts independently and is responsible for all the consequences and obligations arising from such actions and behaviour.

### **40. The Visitor agrees that the Website owner is not and will not be responsible for:**

40.1. Any damage and/or loss that may be incurred by the Visitor when using the Website and/or services and when sending, publishing, and in any other way transmitting information or making it publicly available;

40.2. The illegality, inconsistency, inaccuracy or falseness of the advertisements and other information on the Website (except for the information provided by the Website owner) and the resulting negative consequences for the Visitor or third parties.

## **IX. CONTACT DETAILS**

41. If you notice a discrepancy in this PP, a security hole on our website or have any other questions, please contact us in one of the ways convenient for you:

By mail: Laisvės al. 71, LT-44304 Kaunas

By phone: +370 37 32 42 05

By e-mail: [info@dramosteatras.lt](mailto:info@dramosteatras.lt)

Data protection officer’s e-mail: [ada@dramosteatras.lt](mailto:ada@dramosteatras.lt)



## **XII. FINAL PROVISIONS**

42. This PP is reviewed at least once every two years. The latest version of the PP is always available here: [www.dramosteatras.lt](http://www.dramosteatras.lt).

43. The Privacy Policy may be changed and updated due to the changes in the provisions of applicable legislation, changes in the functionality of the software or in other unforeseen circumstances; we will notify you of such changes on our website.

44. When visiting our websites and official social network profiles, please ensure that you are familiar with the latest version of this Privacy Policy. The Privacy Policy was last updated on **4 August 2022**.

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