

PRIVACY NOTICE FOR CANDIDATES APPLYING FOR JOB OPENINGS AT THE CORPORATE GROUP OF AB "LIETUVOS GELEŽINKELIAI"

Updated: December 1st, 2025

Important information about how your personal data is collected, used and stored

The companies of the AB Lietuvos geležinkeliai group of companies (hereinafter referred to as **AB "Lietuvos geležinkeliai"** or **LTG**) process your personal data in accordance with the General Data Protection Regulation of the European Union¹ (hereinafter referred to as the **GDPR**) and other legal acts governing the protection of personal data.

This privacy notice for candidates applying for job openings at the corporate group of AB "Lietuvos Geležinkeliai" group of companies (hereinafter referred to as the **Candidate Privacy Notice**) contains detailed information on the conditions of processing personal data.

1. What is included in this Candidate Privacy Notice?

In this Privacy Notice we provide answers to the most important questions, such as how we collect, use and protect your personal data. Please read this important information carefully.

Please note that your personal data is not processed for all the purposes specified in the Candidate Privacy Notice, that depends on the nature of the position you are applying for or other circumstances.

We have the right to change the content of this Candidate Privacy Notice at our discretion by notifying you.

The latest version of the Candidate Privacy Notice is available on the LTG Group Career website karjera.litrail.lt.

2. Who is responsible for the protection of your personal data?

When you apply for a job vacancy offered by the LTG group of companies, the LTG Group of Companies company for which you are applying, is responsible for the security of your personal data as the data controller, as well as UAB "LTG Kompetencijų centras" (the company of LTG Group responsible for organizing the recruitment process).

If you have any questions, comments or complaints about how we process your personal data, or if you want to exercise your rights as a data subject, depending on which position in the LTG group of companies you are applying for, you can contact the following data controllers:

2.1. **AB Lietuvos geležinkeliai**, legal entity code 110053842, registered office address Geležinkelio g. 16, Vilnius, Lithuania, address for correspondence Pelesos g. 10, Vilnius, Lithuania, e-mail info@ltg.lt, phone (+370 5) 269 2038;

2.2. **AB LTG Cargo**, legal entity code 304977594, registered office address Geležinkelio g. 12, Vilnius, Lithuania, address for correspondence Pelesos g. 10, Vilnius, Lithuania, e-mail info@ltgcargo.lt, phone (+370 5) 202 1515;

2.3. **UAB LTG Link**, legal entity code 305052228; registered office address Geležinkelio g. 16, Vilnius, Lithuania, e-mail info@ltglink.lt, phone +370 700 55 111;

2.4. **AB LTG Infra**, legal entity code 305202934, registered office address Geležinkelio g. 2, Vilnius, Lithuania, e-mail info@ltginfra.lt, phone (+370 5) 269 3353;

2.5. **UAB Geležinkelio tiesimo centras**, legal entity code 181628163, registered office address Trikampio g. 10, Lentvaris, Lithuania, e-mail info@gtc.lt, phone (+370 5) 269 3202;

2.6. **UAB Rail Baltica statyba**, legal entity code 303227458, registered office address Geležinkelio g. 16, Vilnius, Lithuania, e-mail info@rail-baltica.lt, phone (+370 5) 202 1165;

2.7. **UAB LTG Kompetencijų centras**, legal entity code 307037118, registered office address Pelesos g. 10-102, Vilnius, Lithuania, e-mail info@ltgkc.lt, phone (+370 5) 269 2038.

¹ 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, and repealing Directive 95/46/EC.

Contact details of the data protection officers of the LTG group of companies: address for correspondence Pelesos g. 10-102, Vilnius, Lithuania, e-mail dap@ltg.lt.

3. Why and what your personal data do we process?

No.	For what purpose do we process your personal data?	When is it relevant to you?	What personal data do we process about you?	Why do we have the right to process your personal data?	How long do we process your personal data?
3.1.	Administration of accounts in the Candidate Information System	When you create a profile in the Candidate Information System	Name, surname, e-mail address, password, phone number, address, attachments (CV, cover letter), forwarding the candidate to a colleague, invitation to the candidate to participate in another application, application data.	We have your consent (Article 6(1)(a) of the GDPR), we have a legitimate interest (Article 6(1)(f) of the GDPR)	Profile data – 3 months after the last login. Application data – 1 year after the last action in the application. If your account was created by an LTG group employee to whom you provided data during an event or recommendation, or by a representative of an external recruitment agency, your profile, personal data provided in it, and applications for positions will be deleted 3 months after the account was created, if you do not log in yourself and do not perform any actions in the account.

3.2.	We carry out the employee selection process, organize the recruitment process and provide data to other companies within the LTG Group	When you apply for a vacancy at LTG Group	Name, surname, date of birth, place of residence (country, city) or home address, e-mail address and / or telephone number, your CV and information on work experience contained in it (employer, period of employment, duties, responsibilities and/or achievements), education (educational establishment, duration of studies, level of education and/or qualification acquired), further training (courses attended, certificates obtained), language skills, IT skills, driving skills, other competences, as well as other information you provide in your CV, letter of motivation or other application documents), job references from your current or previous employers as well as other persons uploaded by you.	We have consent given by you (point (a) of Article 6(1) of the GDPR)	If you accept the terms and conditions for processing your personal data when signing up, the profile you create will be valid for three months after last login.
			Personal data related to qualifications, professional skills and business qualities, collected from a former and / or current employer.	We have your consent (point (a) of Article 6(1) of the GDPR) to collect personal data from your current employer. We rely on the legitimate interest (point (f) of Article 6(1) of the GDPR) to collect personal data from your former employer.	Until the closure of the relevant job application.
3.3.	We seek to conduct security screening and	When you apply for the job which is	Name, surname, address of residence, position for which you are applying, consent to personal	We seek to conclude an employment contract with	One year after preparation of the conclusion of reliability

	verify suitability for the job being sought	subject to the statutory requirements, and it is therefore necessary to verify that you meet them in order to hold the office and perform the duties	reliability check and personal data contained in this document, date of submission and/or withdrawal of consent to personal reliability check, signature (including electronic), personal identification number – if an electronic signature is used, personal data specified in Article 9(2) of the Republic of Lithuania Law on Prevention of Corruption and Article 17(2) of the Republic of Lithuania Law on the Protection of Objects Critical for National Security.	you (Article 6(1)(b) of the GDPR), we are obliged to process personal data in accordance with the requirements of legal acts (Article 6(1)(c) of the GDPR), we have your consent to carry out the check (Article 6(1)(a) of the GDPR)	and suitability for the position sought.
			Name, surname, signature (including electronic), date of birth, personal identification number – if an electronic signature is used, citizenship (current / former), contact phone number, email address and other data specified in the LTG group's Candidate Reliability and National Security Compliance questionnaire (if it is completed).	Legitimate interest in assessing potential threats related to national security interests (Article 6(1)(f) of the GDPR)	5 years from the end of the selection process (candidate selection / rejection).
3.4.	Identify potential conflicts of public and private interests of employees of the LTG Group of companies (in the process of employment relationships), as well as possible cases of nepotism, cronyism, which have a significant impact on their activities and the overall	When you are applying for a position that has legal requirements and therefore we are required to check whether the position you are applying for would not give rise to a	Name, surname, place of work, position, date of completion of the declaration, contacts with legal persons; other places of employment and duties held at the time of filing of the declaration; legal persons in whose activities a person may exercise decisive influence by holding shares or votes, membership in enterprises, bodies, organisations, foundations (to be specified only when that can give rise to a conflict of interest); contacts with other natural persons	It is in the legitimate interest to ensure that employees of the companies of the LTG Group contribute to the transparency, management and prevention of conflicts of interest in the activities of LTG as a strategically important company (Art.	3 years (from the end of the admission procedure)

	activities of the LTG Group of companies in order to control possible conflicts of interest by eliminating these conflicts to ensure that the activities of both the employee and the LTG Group as a whole comply the highest transparency requirements stemming from the LTG Group's own pursuit of value-based operations, ISO 37001: 2016 requirements, legislative provisions, as well as expectations of the shareholder — the Ministry of Transport and Communications.	conflict of interest	(including close persons) which could give rise to a conflict of interest for the declarant, other circumstances specified by the declarant which may give rise to a conflict of interest.	6(1)(f) of the GDPR).	
3.5.	We prepare the documents necessary for your employment	When we select your candidacy after the selection process is complete	<p>Name, surname, personal data contained in the identity document, address of residence, personal data processed in documents confirming education, personal data processed in documents certifying the birth, adoption, or custody of a child (copies of a system record, etc.), personal data processed in documents proving that a person is raising a child (children) alone.</p> <p>Image maintained in electronic document</p>	<p>We conclude an employment contract (Art. 6(1)(b) of the GDPR)</p> <p>We have a legitimate interest in</p>	During the period of validity of the employment contract, some personal data is stored after the termination of the employment relationship in accordance with the document storage period index approved by the Chief

			photo (for employee access control)	ensuring security within the LTG group of companies (Art. 6(1)(f) of the GDPR)	Archivist of Lithuania.
			Data from documents confirming the level of work capacity (disability), work restrictions (certificates of pregnancy, etc.), disability of a child or nursing (care) of a close family member, data contained in a medical book or certificate	We conclude a contract with you (Art. 6(1)(b) of the GDPR), we are obliged to process personal data in accordance with the requirements of legal acts (Art. 6(1)(c) and 9(2)(b) of the GDPR, Labor Code, Law on Safety and Health at Work)	
3.6.	Subscription to newsletters, job vacancies	When you agree to receive newsletters, you subscribe to job vacancy notifications.	Email address, date and time of consent, preferences for job vacancy notifications ordered (e.g. city(s) of interest, positions, LTG group company)	We have your consent (Art. 6(1)(a) of the GDPR)	Consent is valid as long as you have an active account or until you revoke your consent.
3.7.	Surveys about the selection that took place	After the selection is complete	E-mail - only for the purpose of sending the questionnaire. We note that the questionnaire itself is anonymous and the data provided in it is not linked to a specific person.	We have a legitimate interest in assessing the quality of selection processes and improving the candidate experience (Art. 6(1)(f) of the GDPR)	1 month from the date of sending the survey questionnaire.
3.8.	Implement the necessary technological control measures to ensure the protection of personal data: management and	When you visit the Candidate website karjera.lit.ait	Credentials (login, password) of the user connected to the network or information system, the IP of the device, the actions performed in the system and the time they were performed (logs)	We comply with legal requirements (Art. 6(1)(c) of the GDPR).	As long as your profile is active in the system.

	authentication of access to networks and information systems, keeping logs and monitoring their changes.				
3.9.	Ensure compliance with the GDPR by examining your requests for the exercise of the rights of the data subject, managing personal data security breaches.	You contact us with a data subject request, notify us of a personal data breach or we investigate a breach on our own initiative	Depending on what personal data you have provided: name, surname, telephone number, address, date of birth, e-mail address, personal data processed in the personal identity document, date of exercise of the data subject's rights, place of request, specified method of response to the request, content of the request and other personal data specified in the request, the response to the request of the data subject, other personal data related to the exercise of the rights of the data subject. Also depending on the personal data breach of security: name, surname, telephone number, address, date of birth, e-mail address, information system, user actions, consequences of personal data security breach, measures taken, content of informing data subjects about the breach, all others with personal data security breach and personal data relating to its management.	We must collect information in accordance with the legal requirements (Art. 6(1)(c) of the GDPR).	The register of data subject requests and personal data security breaches shall be kept for 5 years from the last entry. Data subjects' requests and their examination documents and personal data breach management documents shall be kept for 5 years from the date of submission of the response to the received request to the data subject.
3.10.	Assert, enforce and defend the rights and legal claims of the LTG Group of companies in	In the event of a judicial/ext rajudicial dispute	All the above-mentioned personal data (including special categories) related to other specified purposes, personal data contained in documents sent to you and provided	We have a legitimate interest in asserting, exercising or defending the rights and legal	From the moment it becomes necessary to process personal data

	legal proceedings.		by you, procedural documents, court decisions, orders, data relating to crimes and convictions.	claims of the LTG Group of companies in legal proceedings (Art. 6(1)(f) of the GDPR). Processing of special categories of data is necessary for the pursuit, exercise or defence of legal claims (Art. 9(2)(f) of the GDPR)	for this purpose and for 10 years after the conclusion of legal proceedings.
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4. Where do we get your personal data?

Most of the personal data is provided by you, some of the personal data is generated in the LTG Candidate information system, but some of the personal data we receive from:

- 4.1. employment agencies, and job search, selection and/or mediation providers;
- 4.2. career social networks (e.g. LinkedIn), where we invite you to apply for vacant positions within the LTG Group of Companies;
- 4.3. current or previous employers (in accordance with the conditions of Article 5(3) of the Law on the Legal Protection of Personal Data of the Republic of Lithuania), at the initiative of other persons who have recommended you;
- 4.4. the Special Investigation Service of the Republic of Lithuania, the Ministry of the Interior of the Republic of Lithuania, the Department of State Security of the Republic of Lithuania, Chief Official Ethics Commission and other public authorities;
- 4.5. judicial, law enforcement and other state bodies.

5. To whom do we transfer your personal data?

We transfer your personal data to the following entities only when this is necessary and/or permitted by applicable law, as well as for the reasons listed in point 3:

- 5.1. to companies of the LTG group (if these companies are looking for employees who meet your qualification and professional requirements, we will transfer your personal data only if you choose to include your personal data in the LTG candidate database when registering);
- 5.2. courts, state institutions conducting supervision, law enforcement, personal security checks, and other state institutions;
- 5.3. to lawyers, notaries, bailiffs, auditors, other third parties who, in accordance with the instructions of the LTG group of companies, provide services related to the selection of candidates, their assessment and internal administration (e.g. personnel selection, information technology supervision, etc.). In such cases, we provide only as much personal data as is necessary to fulfill our specific instruction or provide specific services;

We note that we select as data processors only those persons who have provided sufficient guarantees that they apply appropriate technical and organisational measures to ensure the safe processing of personal data and an adequate level of data protection in accordance with the applicable legislation of the European Union.

6. Can your personal data be used for other purposes?

We process your data only for the designated, clearly defined and legitimate purposes and we do not continue to process your data in a manner incompatible with those purposes, and we are guided by the principle of purpose limitation.

In certain cases, we also use personal data for other (secondary) purposes, for example, the data, together with personal data, may also be used for data analysis purposes in order to make data-driven decisions related to the efficiency of the activities of the companies of the LTG Group and its processes. Data analysts shall in all cases seek first to anonymise or pseudonymise the personal data contained in the selected data sets.

In the case of secondary use of personal data, we first assess whether the secondary purpose of processing personal data is compatible with the primary purpose of processing them, we consult with the Data protection officers of the LTG Group of companies on these issues.

7. Will your personal data be transferred outside the European Economic Area?

In most cases, personal data are processed and transferred within the territory of the European Economic Area, but where necessary for the provision of certain services, personal data are transferred and processed outside those territories, subject to an adequate level of protection of personal data. Where permitted by law and necessary for the reasons set out in Section 5 of this Privacy Notice, we will only disclose your personal data in accordance with Chapter V of the GDPR.

8. What rights do you have?

The GDPR and other legislation governing the protection of personal data give you rights, stipulate the cases in which you can exercise them, the procedures you must follow, as well as exceptions in which cases you cannot exercise the rights granted. Where permitted by law, you have the right to:

8.1. get acquainted with your personal data, i.e. obtain confirmation as to whether the companies of the LTG Group process your personal data and, if they do, request access to your personal data processed;

8.2. submit a request to us to correct inaccurate personal data processed or to supplement it where it is incomplete;

8.3. submit a request to us to delete your personal data that we process if you reasonably believe that we are processing it unlawfully;

8.4. submit a request to us to restrict the processing of your personal data when you dispute their accuracy or object to the processing of personal data, do not consent to the erasure of your unlawfully processed personal data, or you need the personal data in order to assert, exercise or defend legal claims;

8.5. object to the processing of personal data when we process your data for the legitimate interests of companies of the LTG Group and/or third parties;

8.6. submit a request to us to transfer personal data that you have provided to us pursuant to an agreement or consent to the processing of personal data and that we process by automated means in a commonly used electronic form;

8.7. refuse to be subject to a decision based on fully automated processing of personal data, including profiling, if such a decision may have legal consequences or a similar significant effect on you;

8.8. withdraw the consents you have given us for the processing of your personal data where we process personal data on the basis of your consent;

8.9. lodge a complaint with a supervisory authority, first of all in the Member State where you are domiciled or where a suspected breach of the GDPR has occurred and/or seek judicial remedies. In the Republic of Lithuania, the supervisory authority is the State Data Protection Inspectorate (L. Sapiegos g. 17, Vilnius; e-mail: ada@ada.lt), but we recommend that you contact us first, and we will try together with you to resolve all your requests.

9. How can you exercise your rights?

In order to exercise your rights set out in Section 8 of this Candidate Privacy Notice, you must:

9.1. personally present to the LTG Group of companies or the LTG Group data protection officers a request to exercise the rights of the data subject at the addresses specified in Section 2 of this Candidate Privacy Notice (the request must be accompanied by an identity document); or

9.2. send a request to the companies of the LTG Group or the data protection officers of the LTG Group of companies to exercise the rights of the data subject at the postal addresses specified in Section 2 of this Candidate Privacy Notice (a copy of the identity document certified by a notary or other legal procedure must be attached to the request); or

9.3. submit a request to the companies of the LTG Group or the data protection officers of the LTG Group of companies to exercise the rights of the data subject at the e-mail addresses specified in Section 2 of this Candidate Privacy Notice (the request submitted by e-mail must be signed with a secure electronic signature);

9.4. if the data subject's request is submitted on your behalf by a representative, it is necessary to submit documents confirming the representative's authority along with the request.

When submitting a request from a data subject, we recommend using the [Request Form](#) for the exercise of data subject's rights.
