

## Cookie policy

This Cookie Policy (hereinafter referred to as the Policy) sets out the rules for the processing of personal data through the use of cookies on the website [www.mano.bank](http://www.mano.bank) (hereinafter referred to as the Website) operated by the bank AB Mano bankas (hereinafter referred to as the Data Controller).

The Policy was drafted in accordance with the guidelines of the 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 and repealing Directive 95/46/EC (hereinafter referred to as the General Data Protection Regulation), and the Law of the Republic of Lithuania on electronic communications.

### II. Concept of a cookie

2. Cookie is a small text file sent to a person's (hereinafter referred to as the visitor) computer or other device (e.g. a mobile phone) when the person visits the Website, and stored in the Website visitor's browser. A cookie is downloaded to an individual's computer or other device in order to store data, and the person responsible for installing this cookie can restore and/or update it.

### III. Types of cookies

3. In the most general sense, cookies are divided into categories in accordance with their provider, purpose, expiration and storage period and their location on the Website.
4. The following types of cookies are distinguished:
  - 4.1. By the person setting and controlling cookies:
    - 1) first party cookies are cookies created by the Website, where the information stored can only be read by the Website itself;
    - 2) third party cookies are cookies created on the Website by a third party whose external services are used by the first party mentioned above.
  - 4.2. By the lifetime of the cookie:
    - 1) persistent cookies are cookies that are stored on the visitor's device and are kept until they expire or the visitor decides to delete them;
    - 2) Short-lived (session) cookies are cookies that are automatically deleted as soon as the browser is closed (i.e. at the end of a browsing session).

4.3. By functional purpose:

- 1) Essential cookies;
- 2) Non-essential cookies:
  - Marketing,
  - Statistical (improving statistics),
  - Performance-enhancing,
  - Functional,
  - Targeted, and other.

Cookies are described in more detail below in the Policy in accordance with their functional purpose.

4.4. By type of realization:

- 1) functionalities created by mano.bank that result in the collection of cookies;
- 2) functionalities developed by third parties that result in the collection of cookies.

### **Required cookies**

5. Strictly necessary – essential cookies ensure the functionality of the Website and enable basic functions of the Website, such as visitor login or account management. Without essential cookies, the Website cannot be used properly.

### **Marketing cookies**

6. Marketing cookies are used to serve ads or other communications that are tailored to the individual visitor and of interest to them. These cookies are used to tailor information about the use of the Website to provide advertising or other targeted information of interest to the visitor.

### **Cookies that improve statistics**

7. Through the use of statistical cookies, which collect and report on anonymous information, the Data Controller can learn about how visitors interact with the Website.

### **Performance enhancing cookies**

8. Performance cookies store information about how Visitors use the Website, such as which pages are visited most often. These cookies do not collect any personally identifiable information about the Website Visitor. All information collected by these cookies is anonymous.

### **Targeted cookies**

9. Targeted cookies record a visitor's visit to the Website, the pages they visit and the links they use; also they allow the Bank to recognise visitors who visit different websites (e.g. content/marketing partners). This information will be used by the Data Controller to ensure that the Website and the advertising and other marketing tools provided on it are as relevant as possible to the interests of the visitor.

### **Functional cookies**

10. Functional cookies are used to remember visitor information on the Website (e.g. language, visitor's city, and region).

## **IV. Description of cookies**

11. When a visitor visits the website, they are asked to accept cookies and are shown all the cookies that are active at that time.
12. A visitor who has accepted cookies can always change their choice. A logo is visible on the homepage of the Website where cookies can be managed.
13. The visitor can find a report on the use of cookies on the Website here:  
<https://cookie-script.com/cookie-report?identifier=fi674Qb2ea8784ii33af533bfafcef2b>  
This report is updated once a month. During the update, the Website is scanned and all cookies found on the Website are listed.
14. The Cookie Notice provides the visitor with the following information about each cookie:
  - Name;
  - Provider;
  - Purpose;
  - Expiry date;
  - Type.

15. The cookie profile also provides the visitor with information about their:
  - the scope of the cookies selected (all cookies, only essential cookies, or also certain groups of non-essential cookies, have been approved);
  - the consent identification number (ID), which may be provided by the visitor when contacting the Data Controller in case of questions;
  - The date of consent to cookies;
  - The date on which the cookie profile was updated and the entity that updated the cookie profile.

## V. Legal basis for the use of cookies

16. Essential (technical) cookies are set automatically and do not require the visitor's consent. The visitor is informed about the use of essential cookies. The legal basis for the use of essential cookies is the legitimate interest of the Data Controller (Article 6(1)(f) of the General Data Protection Regulation). The purposes of data processing are disclosed to the visitor after he/she becomes a customer of AB Mano bankas, i.e. decides to establish a business relationship with the Bank and to start using its services (for the purpose of defining the specific purposes, it is important which services the visitor/person decides to use after becoming a Bank's customer).
17. Other types of cookies are activated on the Website only after the visitor has consented to the use of such cookies, i.e. only after the visitor has indicated his/her preference on the Website. This is done through an integrated tool for managing cookies – the user has the possibility to access cookies and to consent to their collection. The legal basis for the use of cookies for which consent is given is the consent of the visitor (Article 6(1)(a) of the General Data Protection Regulation).
18. The consent freely given and expressed by the visitor on the Website is informed (i.e., the visitor is informed in a clear and comprehensible form on the Website about the cookies and their content, and therefore clearly understands the use of which cookies he/she agrees to and the possible consequences of such a consent), and by the active actions taken (i.e. this means that the consent is given by the visitor himself or herself (i.e. by taking active steps (ticking selected cookies, etc.) and confirming them, rather than by submitting a pre-filled sample form for the visitor's approval in advance). If the visitor does not mark the choice regarding the collection and processing of unnecessary (statistical, marketing, etc.) cookies, but confirms with a click "Essential cookies only", only the essential (technical) cookies will be used.
19. The visitor may withdraw his/her consent at any time by selecting the "Cookie settings" link on the Website or by changing the settings of his/her web browser. If the visitor does not consent to the use of cookies, cookies other than essential cookies will not be installed, but a notification about the use of cookies will appear each time the visitor visits the Website.

## VI. Procedure and expediency of selecting and using Bank cookies

20. In general, the Website uses first party cookies. These cookies are set and controlled by AB Mano bankas as the Data Controller and not by an external organisation. However, the Data Controller may need to use and accept cookies from external organisations (third parties), which is communicated to the visitor on the Website (in the Cookie management integrated tool).
21. The main purposes of first-party cookies are as follows:
  - To recognize whether the Website is browsed by the same visitor who has already visited it;
  - To determine whether the visitor has consented to cookies being placed on their devices, and if so, which ones;
  - To store visitor preferences; Visitor preference cookies are set by the Data Controller and only the Data Controller can read their information;
  - To ensure the proper functioning of the Bank's Website;
  - To collect statistical and analytical data (on visitor's behaviour, website traffic, etc.).
  - To tailor the advertising shown to the visitor online based on the visitor's browsing history.
22. The Data Controller chooses the types of cookies and the specific cookies at its own discretion, after assessing the appropriateness of their use, their validity period, their compliance with legal requirements, and the best option. Within the Data Controller, the selection of cookies (i.e. the choice of cookies, the timing and appropriateness of their use, their integration and other relevant aspects) shall be carried out in accordance with the following basic principles:
23. The choice of marketing cookies (and other marketing cookies) is the responsibility of the Marketing Manager (the employee responsible for marketing);
24. The managers of the relevant area (hereinafter collectively referred to as Responsible Persons) are responsible for the selection of other cookies related to the Bank's services and customer service, cognition and analysis of cookies.
25. The persons responsible for their area of responsibility shall contact the Head of the Information Technology Service with their suggestions and initiatives on the appropriateness and integration of specific cookie choices.
26. The Head of Information Technology is responsible for the selection of the necessary cookies, the proper functioning of all cookies (not only the necessary ones), the integration of the cookies received from other units of the Data Controller (services, managers, departments, etc.), their design, the proper management of the visitor's consent process, and all other related issues. The technical selection of cookies, their

modification, updating and all other issues related to the Policy, as well as the proper implementation of new projects, shall be managed by the Head of the Information Technology Service, taking into account the suggestions and needs of the Responsible Persons, and the recommendations of the Data Protection Officer (the introduction of new cookies must be coordinated with the Data Protection Officer in all cases).

27. It should be noted that, in certain cases, the use of cookies, the validity period and other aspects may depend on the will of a third party (third parties) rather than the Data Controller (or not only the Data Controller), in particular in the case of third party cookies. The Data Controller must in all cases make every effort to inform the visitor to the maximum extent relevant to the visitor at the time of the use of such cookies.

## VII. Managing cookies

### **Removing cookies from your device**

28. All cookies can only be removed from a visitor's device by the visitor himself or herself clearing the browsing history in the browser or the browsing history on the Website. This will remove all cookies from all websites you visit. Please note that by deleting cookies or disabling the use of cookies in the future, you may not be able to access certain parts or features of our Website.

### **Blocking Cookies**

29. In newer browsers, the visitor can set their device to not store any cookies, but then the visitor may have to adjust some options each time they visit the Website, and some services and features may not work properly at all (e.g., logging in using profile data).

## VIII. Cookie retention period

30. Many cookies are short-lived (session) and disappear when the user ends the session (i.e. closes the browser). Other cookies (e.g. statistical, advertising cookies) are long-lasting and are stored on the computer or other device for a certain period of time. The retention periods for cookies are indicated on the Website in the integrated Cookie Management Tool.
31. Short-term (session) cookies are stored from the moment the user opens the browser until the moment they close it. These cookies are automatically deleted when the browser is closed.
32. Long-term cookies are stored on the computer until they are deleted by the user in the browser or expire.
33. The detailed retention periods for cookies are listed at the time of consent and in the cookie report.

## **IX. Ensuring the security of personal data of visitors to the Bank's Website grounds and procedures**

34. Personal data collected by cookies are processed and their security is ensured in accordance with the provisions of the General Data Protection Regulation, the Law of the Republic of Lithuania on Legal Protection of Personal Data, the Law of the Republic of Lithuania on Electronic Communications and other legal acts regulating the protection of personal data and data security, and the Rules for the Processing of Personal Data in force at the Bank. In accordance with legal requirements, we have security measures in place to prevent the unauthorised disclosure and use of personal data.
35. If the visitor believes that the Data Controller has violated the legal protection of his/her personal data, the principles and requirements of personal data processing, he/she shall have the right to contact the Data Protection Officer of the Data Controller at the e-mail address indicated: [dpo@mano.bank](mailto:dpo@mano.bank)

Contact details of the Data Controller. For more information on the use of cookies, the visitor can contact the Data Controller using the following details:

AB Mano bankas

Company code: 112043081

Registration address: S. Moniuškos g. 27, LT-08115 Vilnius

Tel. +370 5 240 9389

Email: [hello@mano.bank](mailto:hello@mano.bank)



















