

PRIVACY POLICY

I. GENERAL PROVISIONS

- 1.1. This privacy policy (the “Privacy Policy”) explains how UAB Flow Studija, legal entity code 306712018, registered office at M. Mažvydo g. 30-4, LT-06256 Vilnius (the “Company”), processes your personal data when you use the Company’s website <https://mypilates.pro/> (the “Website”), its Facebook account https://www.facebook.com/My_Pilates and its Instagram account https://www.instagram.com/My_Pilates.
- 1.2. This document provides information about the processing of your personal data: how data is obtained and used, the purposes of processing, transfers, retention periods, your rights as a data subject and other information relating to the processing of your personal data.
- 1.3. The Company is the controller of your personal data and is responsible for its processing. If you have questions about the processing of your personal data or the information in this Privacy Policy, please contact the Company using the details below:
UAB Flow Studija
Legal entity code 306712018
Registered office: M. Mažvydo g. 30-4, LT-06256 Vilnius
Email: info@mypilates.pro
- 1.4. The Company processes your personal data in accordance with applicable legislation, including the General Data Protection Regulation (EU) 2016/679 (the “GDPR”), the Law on Legal Protection of Personal Data of the Republic of Lithuania and other legislation applicable to the Company.
- 1.5. This Privacy Policy is an informational legal notice. If you do not agree with the processing of your personal data described in this Privacy Policy, you may choose not to provide your personal data to the Company and not to use the Website, its features or the Company’s services.
- 1.6. If any of your personal data is processed on the basis of your freely given consent, you may withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

II. PRINCIPLES FOR PROCESSING YOUR PERSONAL DATA

- 2.1. When processing your personal data, the Company follows these principles:
 - 2.1.1. Lawfulness, fairness and transparency;
 - 2.1.2. The Company will collect your personal data for specified, explicit and legitimate purposes and will not further process it in a manner incompatible with those purposes, except as permitted by law (purpose limitation);
 - 2.1.3. The Company will take all reasonable steps to ensure that personal data which is inaccurate or incomplete, having regard to the purposes for which it is processed, is promptly rectified, supplemented, its processing suspended or the data erased (accuracy);
 - 2.1.4. The Company will collect personal data that is adequate, relevant and limited to what is necessary for the purposes for which it is processed (data minimisation);
 - 2.1.5. The Company will keep personal data in a form that permits your identification for no longer than necessary for the purposes for which the personal data is processed (storage limitation);
 - 2.1.6. The Company will ensure that your personal data is processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (integrity and confidentiality);
 - 2.1.7. The Company will be responsible for compliance with the principles above and must be able to demonstrate that compliance (accountability).

III. PURPOSES AND LEGAL BASES FOR PROCESSING

3.1. The Company will process your personal data only for the purposes specified in this Privacy Policy:

3.1.1. For the purpose of creating a personal account on the Website

Purpose of processing	Creating a personal account on the Website to use the Company's services.
Legal basis for processing	Steps necessary at your request before entering into a services agreement, and the conclusion and performance of a services agreement (Article 6(1)(b) of the GDPR).
Data processed	Identification data: first name, surname. Contact details: telephone number, email address.
Data subjects	Persons seeking to create a personal account on the Company's Website and use its services.
Retention period	Personal data is retained for 3 years after the provision of services ends, unless the Company has a legal obligation to retain it for a longer period prescribed by law.
Data obtained from	You directly.

3.1.2. Conclusion and performance of agreements

Purpose of processing	Conclusion and performance of a services agreement with the Company.
Legal basis for processing	Steps necessary at your request before entering into a services agreement, and the conclusion and performance of a services agreement (Article 6(1)(b) of the GDPR).
Data processed	Identification data: first name, surname, gender, date of birth. Contact details: telephone number, email address. Financial data: last four digits of the payment card, card expiry date. Membership-related data: services and classes booked (and their dates), transactions, membership details (start date, membership type, payment frequency, payment method and next payment date). Other data: mobile application version used, source (mobile application/website).
Data subjects	Prospective clients (persons seeking to purchase the Company's services) and the Company's clients.
Retention period	Personal data is retained for 3 years after the provision of services ends, unless the Company has a legal obligation to retain it for a longer period prescribed by law.
Data obtained from	You directly.

3.1.2. Direct marketing

Purpose of processing	Sending direct marketing messages (newsletters, commercial offers and other informational messages).
Legal basis for processing	Your consent (Article 6(1)(a) of the GDPR). The Company's legitimate interest in sending you offers and information by email (Article 6(1)(f) of the GDPR; Law on Electronic Communications of the Republic of Lithuania).
Data processed	Contact details: email address.
Data subjects	Persons wishing to receive the Company's direct marketing messages. The Company's clients.

Retention period	Personal data is retained until you withdraw your consent to receive direct marketing messages, but for no longer than 2 years from the date your consent was obtained. Where direct marketing messages are sent on the basis of the Company's legitimate interests, your personal data is retained until you object to such processing.
Data obtained from	You directly.

3.1.3. Communication with the Company

Purpose of processing	Communication with the Company through the Website.
Legal basis for processing	Your consent (Article 6(1)(a) of the GDPR). Steps necessary at your request before entering into a services agreement, and the conclusion and performance of a services agreement (Article 6(1)(b) of the GDPR).
Data processed	Identification data: first name. Contact details: email address. Message content.
Data subjects	Persons submitting enquiries to the Company (questions, feedback, requests, etc.).
Retention period	Personal data is retained until you withdraw your consent, but for no longer than 2 years from the date your consent was obtained. If your enquiries concern the conclusion and performance of a services agreement, we will retain your personal data for 3 years after the provision of services ends, unless the Company has a legal obligation to retain it for a longer period prescribed by law.
Data obtained from	You directly.

3.1.4. Social media

Purpose of processing	Administration of the Company's Facebook and Instagram accounts.
Legal basis for processing	Your consent (Article 6(1)(a) of the GDPR). The Company's legitimate interest in administering its accounts and ensuring their proper management (Article 6(1)(f) of the GDPR).
Data processed	Identification data: social media profile name, profile photo. Other data: your comments and enquiries and their content, shares of the Company's posts and likes.
Data subjects	Persons visiting and using the Company's social media accounts: leaving comments, likes and shares, submitting enquiries, ratings and other content.
Retention period	Personal data is retained for as long as the relevant Company social media account remains active, unless the Company or you remove the personal data you provided earlier.
Data obtained from	You directly.

3.1.5. Cookies

Information about cookies is provided in Section X of this Privacy Policy.

IV. YOUR RIGHTS

4.1. The Company informs you that you have the following rights in relation to your personal data:

4.1.1. **The right to be informed about the Company's processing of your personal data. You may receive information about the personal data processed, the purposes, legal bases and sources of processing, retention periods, the persons with whom the Company shares your personal data, your rights, including the right to lodge a complaint with a data protection**

supervisory authority, and other information relating to the processing of your personal data.

4.1.2. The right of access to your personal data processed by the Company. You may obtain confirmation as to whether the Company processes your personal data, receive a copy of that data and obtain other information relating to its processing.

4.1.3. The right to request rectification of your personal data processed by the Company. You may have inaccurate personal data corrected and request that incomplete data be completed.

4.1.4. The right to request erasure of personal data. Subject to the exceptions provided by law, you have the right to be forgotten in the following cases:

- Your personal data is no longer necessary for the purpose for which it was collected;
- You withdraw your consent to processing where the processing was based on your consent;
- We process your personal data on the basis of legitimate interests, you object to that processing and there are no overriding legitimate grounds for processing;
- Your personal data must be erased to comply with a legal obligation applicable to the Company, or your personal data has been processed unlawfully.

4.1.5. The right to restrict processing of personal data. You may restrict the Company's processing of your personal data if:

- You contest the accuracy of the personal data and the Company is verifying it;
- Your personal data has been processed unlawfully, but you oppose its erasure;
- Your personal data is no longer necessary for the purpose for which it was collected, but you require it to establish, exercise or defend legal claims;
- You have objected to processing, pending verification of whether the Company's legitimate grounds override yours.

4.1.6. The right to object to processing of personal data. You may object to the Company's processing of your personal data for direct marketing purposes and to processing in the public interest or in the Company's legitimate interests, unless, under applicable law, those interests override the reasons you have given.

4.1.7. The right to data portability. You may receive the personal data you have provided to the Company, or request its transfer to another controller, in a structured, commonly used and machine-readable format if:

- Processing of your personal data is based on your consent or an agreement between you and the Company; and
- Your personal data is processed by automated means.

4.1.8. The right to lodge a complaint with a supervisory authority. If you believe that the Company's processing of your personal data infringes your rights, you may lodge a complaint with a data protection supervisory authority in the EU Member State of your habitual residence, place of work or the place of the infringement. The Company's supervisory authority, which you may also contact, is the State Data Protection Inspectorate, L. Sapiegos g. 17, 10312 Vilnius, Lithuania; email: ada@ada.lt; website: <https://vdai.lrv.lt/>.

- 4.2. The exercise of the rights above may be subject to exceptions provided by law. Where specific legal grounds apply, the Company may refuse your request to exercise a particular right by providing a reasoned written response. The Company will inform you of such refusal within the statutory time limits.
- 4.3. To exercise the rights above, please contact the Company at info@mypilates.pro. The Company will fulfil your request as soon as possible and no later than within 1 month, unless statutory exceptions prevent the exercise of the particular right. If your request is very complex and/or a very large number of requests has been received, the 1-month period may be extended by a further 2 (two) months in accordance with applicable law. The Company undertakes to inform you of the extension and the reasons for it.
- 4.4. When giving effect to your rights and seeking to protect your personal data, the Company may ask you to verify your identity.

V. TRANSFERS OF PERSONAL DATA

- 5.1. Your personal data may be transferred only as set out in this Privacy Policy. Subject to applicable legal requirements, the Company may transfer your personal data to the following recipients:
 - 5.1.1. **Personal data processors engaged by the Company. The Company may transfer your personal data to processors with which it has entered into data processing agreements, including, without limitation, providers of server, information technology (IT), IT solutions and marketing services. Processors process your personal data on the Company's behalf and in accordance with its instructions, complying with the GDPR and ensuring appropriate technical and organisational measures for the protection of personal data.**
 - 5.1.2. **Third parties that help the Company provide services. The Company may transfer your personal data to third parties that help it provide services. Such third parties may include, without limitation, companies or institutions providing financial (payment) services and debt collection companies.**
 - 5.1.3. **State and public authorities and institutions. The Company may transfer your personal data to state and public authorities or institutions where required by law or necessary to defend the Company's rights.**
- 5.2. **Transfers of personal data to third countries. The Company may transfer your personal data to third countries, namely outside the European Union (EU) and European Economic Area (EEA), where it uses service providers established outside the EU and EEA and such transfer is necessary to provide services to you properly. If your personal data is transferred outside the EU and EEA, the Company undertakes to ensure compliance with the GDPR's requirements for data transfers (for example, by signing Standard Contractual Clauses with data recipients or ensuring other safeguards under Article 46 of the GDPR), and to ensure that the transferred personal data is adequately protected by organisational and technical measures.**

VI. SECURITY OF PERSONAL DATA

- 6.1. The Company takes care to protect your personal data and therefore implements an appropriate level of technical and organisational security measures required by the GDPR and other legislation to protect your personal data against unlawful loss, alteration, disclosure, use or other unlawful processing (Article 32 of the GDPR). The level of security measures is determined with regard to the risks arising from the processing of personal data.
- 6.2. You must provide the Company with correct and accurate data, keep your Website login details secure and not disclose them to anyone.

VII. DIRECT MARKETING

- 7.1. The Company may use your personal data for direct marketing only with your prior consent.
- 7.2. You may withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.
- 7.3. You may withdraw your consent at any time in the following ways:
 - By notifying the Company by email at info@mypilates.pro;
 - By clicking the “Unsubscribe” link at the end of an email sent to you.
- 7.4. On the basis of legitimate interests, the Company may use your personal data to market its own similar goods or services. You may object in advance by contacting the Company at info@mypilates.pro. You may subsequently object to or opt out of such use of your personal data by contacting the Company at info@mypilates.pro and/or following the instructions provided in each email.

VIII. PROFILING

- 8.1. The Company may use your personal data for profiling only with your prior consent.
- 8.2. When processing your personal data for the purposes set out in this Privacy Policy, the Company does not use automated decision-making, including profiling, that produces legal effects concerning you or similarly significantly affects you.

IX. PROCESSING OF CHILDREN’S PERSONAL DATA

- 9.1. The Company does not process the personal data of persons under 16 without prior parental consent.
- 9.2. If the Company becomes aware that a person under 16 has provided personal data without parental consent, it will not process or use that data and will immediately erase all such data.
- 9.3. If you believe that your child’s personal data is being processed without your knowledge and consent, please contact us at info@mypilates.pro and we will immediately erase that data.

X. COOKIES

- 10.1. The Company uses cookies on the Website. Cookies are small text files sent to your browser and stored on your computer, mobile phone or other device. Information collected through cookies allows the Company to make browsing the Website more convenient.
- 10.2. Cookies that are not intended to ensure the technical operation of the Website’s core functions and are not considered strictly necessary are stored on your device only if you actively confirm your consent by clicking “Accept” in the cookie banner. You may withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.
- 10.3. You may refuse cookies by clicking “Decline” / “Reject all” in the Website’s cookie banner. If you do not agree to cookies being stored on your computer or other device, you may also change your browser settings and disable all cookies. In your browser settings (Firefox, Chrome, Internet Explorer, Safari, etc.), you may choose which cookies to accept and which to reject. The location of these settings depends on your browser. In some cases, disabling cookies may slow down browsing and limit certain Website features. More information about cookies is available at AllAboutCookies.org or www.google.com/privacy_ads.html.

10.4. The Company uses Google Analytics tools to analyse how visitors use the Website. Google Analytics provides the Company with information about what interests visitors most, the browser they use, the Website content they are interested in and other information.

10.5. When these services are used, data may be collected, received and used by Google Ireland Limited and Google LLC. Information about how Google uses personal data obtained from websites and apps that use its services is available on Google's Business Data Responsibility website: <https://business.safety.google/privacy/>. Your consent choices are passed to Google so that data collection and use reflect the consent you have given or withdrawn. The Company records your consent and selected settings so that it can demonstrate consent and apply your choices. Further details about how Google technologies collect and process data are available at <https://www.google.com/policies/privacy/partners/>. To opt out of Google Analytics cookies, visit <https://tools.google.com/dlpage/gaoptout>

10.6. Cookies used by the Company:

10.6.1. Strictly necessary (technical) cookies. These cookies are essential to ensure the proper operation and functioning of the Website.

Cookie name	Provider	Type	Retention period
__cf_bm	fonts.net	HTTP	1 day
__cf_bm	myfonts.net	HTTP	1 day
app.glofox.com	app.glofox.com	HTTP	1 year
__stripe_sid	app.glofox.com	HTTP	1 day
m	m.stripe.com	HTTP	2 years

10.6.2. Statistical and advertising cookies. Statistical cookies are used to analyse Website traffic statistics. They allow visits and traffic sources to be counted. Advertising cookies provide insights into how the Company's visitors use the Website and help optimise and improve the Website and personalise advertisements.

Cookie name	Provider	Type	Retention period
_ga	glofox.com	HTTP	2 years
_gat	glofox.com	HTTP	1 day
_gid	glofox.com	HTTP	1 day
1	m.stripe.network	HMTL	Session
dd_cookie_test_#	app.glofox.com	HTTP	Session
p.gif	typekit.net	Pixel	Session

10.6.3. Functional cookies. These cookies allow the Website to remember your choices and settings, which determine how and what you see on the Website.

Cookie name	Provider	Type	Retention period
_ab	m.stripe.network	HMTL	Session
_mf	m.stripe.network	HMTL	Session
id	m.stripe.network	HMTL	Session

Cookie name	Provider	Type	Retention period
ngStorage-branches	app.glofox.com	HMTL	Persistent
ngStorage-featureFlagMap	app.glofox.com	HMTL	Persistent
ngStorage-tokens	app.glofox.com	HMTL	Persistent

XI. RIGHT TO LODGE A COMPLAINT

- 11.1. If you believe that the Company's processing of your personal data infringes your rights, you may lodge a complaint with a data protection supervisory authority in the EU Member State of your habitual residence, place of work or the place of the infringement. The Company's supervisory authority, which you may also contact, is the State Data Protection Inspectorate, L. Sapiegos g. 17, 10312 Vilnius, Lithuania; email: ada@ada.lt; website: <https://vdai.lrv.lt/>.
- 11.2. The Company seeks to resolve any disputes amicably, so you may always contact us directly before contacting the supervisory authority.

XII. CHANGES TO THE PRIVACY POLICY

- 12.1. The Company may update this Privacy Policy when its services and/or their provision change. We recommend visiting the Website regularly and reviewing the Company's Privacy Policy periodically. If the Company makes material changes to this Privacy Policy, it will inform you by email and publish a notice on the Website.
- 12.2. Additions or amendments to this Privacy Policy take effect on the date they are published on the Website.

Privacy Policy adopted on: 1 January 2023

Privacy Policy last updated on: 8 September 2026