

Privacy Policy

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This Privacy Policy explains how the Lithuanian Investigative Journalism Charity and Support Foundation, legal entity code 307529532 (hereinafter – "Fondas PAMATAI" or "we") processes personal data when you:

- visit our website;
- submit an application, nomination, or fill out another form;
- contact us by email, through the website, or by other means;
- participate in our journalism support, awards, or similar initiatives;
- act as an expert, evaluator, selection committee member, partner, or event participant; or
- maintain any other relationship with us.

We are committed to processing personal data lawfully, fairly, securely, and transparently.

If you have questions about this Privacy Policy or about how we process your personal data, you can contact us by email at info@pamatai.org.¹ What personal data do we collect and why? A. For the operation, security, and improvement of the website

What data we collect:

- IP address;
- browser type and device information;
- operating system;
- website usage data;
- login date and time;
- referring page information;
- cookie and consent choices;
- technical logs and security-related information.

How we use the data:

- to ensure the proper functioning of the website;
- to ensure the security of the website and protect against abuse, spam, and unauthorized access;
- to save your privacy and other settings;
- to understand how the website is used and to improve it.

Legal basis:

- our legitimate interest to ensure a secure and properly functioning website;
- your consent, when required for non-essential cookies.

Retention period:

- technical logs are usually stored for up to 12 months;
- cookie data is stored until the expiration of the respective cookie or until you withdraw your consent.

B. For the administration of inquiries, messages, and other communication

What data we collect:

- first and last name;
- email address;
- the content of your message;
- attached documents;
- correspondence history.

How we use the data:

- to respond to your inquiries;
- to provide information about our activities, programs, or website.

Legal basis

- our legitimate interest in communicating with individuals who contact us;
- in certain cases – actions taken at your request prior to entering into a contract or other agreement.

Retention period

- data is usually stored for up to 2 years from the last contact, unless it is necessary to store it longer for legal or administrative reasons.

C. For the administration of awards and similar initiatives; evaluation of applications and nominations

What data we collect:

Depending on the initiative, we may collect:

- first and last name;
- contact details;
- position or profession;
- name of employer, editorial office, or organization;
- biography, CV, or professional activity information;
- content of the application or nomination;
- links to published works;

- uploaded documents and attachments;
- information about co-authors, editors, team members, or nominated persons;
- declarations, confirmations, and information about conflicts of interest;
- information about communication with you;
- publicly available information relevant to the evaluation of the application;
- if applicable – payment, invoice, bank, tax, or identity data necessary for the disbursement of the award, compensation of expenses, etc.

How we use the data:

- to accept and administer applications or nominations;
- to verify compliance with established criteria;
- to evaluate submitted works and accompanying materials;
- to organize the selection and evaluation process;
- to communicate with applicants, nominated persons, finalists, and winners;
- to provide feedback, if applicable;
- to administer the granting of awards or other financial incentives;
- to retain records for transparency, audit, and appeal purposes.

Legal basis

- our legitimate interest in administering independent, fair, and transparent journalism support initiatives;
- actions prior to concluding a contract with you or the performance of a contract, if you are granted an award or other funding;
- fulfillment of legal obligations, including accounting, tax, and document retention duties.

Retention period

- rejected applications or nominations are usually stored for up to 2 years;
- evaluation, audit, and procedural documents are usually stored for up to 5 years after the end of the respective cycle;
- accounting and tax documents are usually stored for up to 10 years, if required by law;
- data on finalists and winners may be stored longer as part of our public archive and transparency documentation.

Important:

Since our initiatives may be related to already published journalistic works, the submitted materials may contain personal data found in articles, investigations, or other accompanying documents. We process such data only to the extent necessary for the administration of the respective initiative. Please do not provide excessive personal data that is not necessary for the evaluation. D. For the selection and organization of the work of experts and selection committee members

What data we collect:

- first and last name
- contact details;
- professional information and contacts;
- declarations of independence, confidentiality, and conflicts of interest (if applicable);
- evaluation records, comments, and scores;
- contract and payment data (if applicable);
- communication history.

How we use the data:

- to organize the selection of experts and selection committee members;
- to conclude and execute a contract with the selected experts and selection committee members, and to organize their work;
- to ensure fairness, independence, and transparency;
- to ensure the prevention of conflicts of interest.

Legal basis

- our legitimate interest in organizing an independent and accountable selection process;
- performance of a contract (where applicable);
- fulfillment of legal obligations.

Retention period

- data is usually stored for up to 5 years, unless legal acts require a longer period or longer storage is necessary in the event of a dispute or audit;
- payment and accounting data may be stored longer if required by law.

E. For event organization and communication about our activities

What data we collect:

- event registration data;
- photos or video recordings;
- information about finalists, winners, speakers, or other participants;
- titles or summaries of submitted or awarded works.

How we use the data:

- to organize events;
- to announce finalists and winners;
- to publish summaries of decisions or other public information about our initiatives;
- to communicate about our mission and activities on the website, social networks, or other channels.

Legal basis

- our legitimate interest in ensuring transparency and public communication;
- your consent, when required by law.

Retention period

- event administration data is usually stored for up to 2 years;
- public announcements, photos, video recordings, and archival material may be stored as long as they are relevant to our public interest activities and historical archive.

Important:

We note that in cases where the public announcement of finalists or winners is provided for in our rules or program conditions, certain information may be made public, such as first and last name, represented organization, work title, finalist or winner status, a brief summary of the reasons for the decision, etc.F. For fulfilling legal obligations and defending our rights

What data we collect:

- identity and contact data;
- content of requests and complaints;
- documents required to confirm identity;
- other data that may be needed to respond to a specific inquiry or to defend legal claims.

How we use the data:

- to comply with legal requirements;
- to respond to requests related to personal data protection;
- to examine complaints, appeals, etc.;
- to assert, execute, or defend legal claims.

Legal basis

- fulfillment of legal obligations;
- our legitimate interest in protecting and defending our rights and interests.

Retention period

- data related to privacy requests is usually stored for up to 3 years after their examination;
- data related to legal disputes is stored until the complete resolution of the dispute and for as long as the applicable statutes of limitations provide.

2. Where do we obtain your personal data?

We usually obtain personal data:

- directly from you, when you use our website, fill out a form, send an email, etc.;
- from another person acting on your behalf or for your benefit, such as a co-author, editor, media outlet, nominating person, or team representative;
- from publicly available sources, such as published journalistic works, public websites, professional profiles, or public registers, if this is necessary for the purposes stated above;
- from our service providers, such as IT service providers;
- from state institutions, when necessary for legal compliance or resolving legal issues.

Important:

If you provide us with personal data of another person, please ensure that you have the right to do so and that the person is informed about this Privacy Policy.³ To whom do we disclose personal data?

We disclose personal data only when it is necessary to achieve the purposes stated above.

Depending on the situation, we may transfer personal data to:

- website hosting, cloud, email, IT maintenance, and cybersecurity service providers;
- analytics service providers;
- independent experts, evaluators, or commission members participating in the application evaluation process;
- legal, accounting, audit, payment, translation, and other professional consultants, banks;
- state supervisory authorities, law enforcement authorities, and courts, when required by law;
- the general public, when we publish information about finalists or winners, event materials, or other information related to the public interest.

We require all our service providers to properly protect personal data.⁴ Do we transfer personal data outside the EEA?

We aim for personal data to be stored and processed within the European Economic Area (EEA). However, some of our service providers may operate outside the EEA or have access to data from outside the EEA.

If we transfer personal data outside the EEA, we do so only by applying appropriate safeguards, such as:

- relying on an adequacy decision of the European Commission ([decision on adequacy](#)); or
- concluding the [Standard Contractual Clauses approved by the European Commission](#) and, when necessary, applying additional safeguards.

5. Cookies and similar technologies

Our website uses cookies and similar technologies. Cookies are small text files that are stored on your device when you visit the website.

We use the following types of cookies:

A. Essential cookies

These cookies are necessary for the website to function properly and securely. They may be used to:

- remember your cookie or other choices;
- maintain a session;
- ensure the submission of forms;
- protect the site from abuse or technical attacks.

Legal basis: our legitimate interest in ensuring a functional and secure website.

Typical retention period: from the session duration up to 12 months.

B. Analytical cookies

These cookies help understand how visitors use the website, for example, which pages are visited most often. If such cookies are enabled, we may use, for example, Google Analytics or a similar analytics solution.

Legal basis: your consent.

Typical retention period: up to 24 months, depending on the tool used.

C. Functional or embedded content cookies

If third-party content is used on the website, such as video recordings, maps, or social media functions, these services may use cookies or similar technologies.

Legal basis: your consent (if required).

Typical retention period: depends on the specific service provider.

How to manage cookies

You can manage non-essential cookies through the cookie settings tool. You can also manage cookies in your [browser settings](#).

Important:

If you refuse non-essential cookies, the website will function, but some additional features may become unavailable. If you block essential cookies, parts of the website or forms may not function properly.

You can withdraw your consent to cookies at any time.

6. Are you obliged to provide personal data?

In most cases, the provision of personal data is voluntary. However, certain information is necessary if you want to:

- submit an application or nomination;
- receive an award or other payment;
- contact us through a form;
- participate in an event or initiative.

If you do not provide the necessary information, we will not be able to examine your request, evaluate the application, contact you, or provide the corresponding service.⁷ Do we make automated decisions?

No. We do not make decisions that produce legal or similarly significant consequences for you based solely on automated processing of data.⁸ How long do we store personal data?

We store personal data only for as long as necessary for the purposes specified in this Privacy Policy.

In certain cases, we may store data longer when it is necessary for:

- fulfilling legal, tax, or accounting obligations;
- examining complaints or appeals, conducting audits;
- asserting, executing, or defending legal claims;
- archiving purposes in the public interest related to our activities.

When personal data is no longer needed, we delete or anonymize it.⁹ What rights do you have?

Subject to the conditions and limitations set out in legal acts, you have the right to:

- access your personal data;
- demand the rectification of inaccurate or incomplete personal data;
- demand the erasure of your personal data;
- demand the restriction of data processing;
- object to data processing when it is based on our legitimate interests;
- withdraw consent at any time when data processing is based on consent;
- receive your data in a portable format (where applicable);
- lodge a complaint with a supervisory authority.

If you are in Lithuania, you can contact the State Data Protection Inspectorate (Valstybinė duomenų apsaugos inspekcija). If you are in another EEA state, you can also contact your local supervisory authority.

If you wish to exercise your rights, please contact us by email at info@pamatai.org.

We may ask you to confirm your identity before responding.¹⁰ Changes to the Privacy Policy

We may update this Privacy Policy from time to time. We will publish the updated version on this page and change the date indicated at the top.

If the changes are significant, we will take additional steps, if necessary, to inform you about them.