

PRIVACY POLICY

Content

1. Introduction	2
2. Definitions	3
3. What is Personal Data and how is it processed?	4
4. Purposes, scope, retention period and legal basis for the processing of personal data by the Company	5
1. Processing of children's personal data	9
2. Sources of data received and processed by the Company	10
3. Cases and grounds for transfer and disclosure of personal data to third parties	10
4. Jurisdiction and Territory of the Personal Data Processed	12
5. Security of Personal Data Processed by the Company	12
6. Rights of the data subject	13
7. Company contacts	15
8. Procedures for handling requests from data subjects	15
9. Final provisions	16

1. Introduction

- 1.1. This Privacy Policy (hereinafter referred to as the "Privacy Policy") establishes how the data controller UAB "Ateities verslo investicijos" (the owner of the hotel Park Inn by Radisson Vilnius Airport), legal entity code: 304639468, registered office address Oreiviu str. 32, LT-02188 Vilnius, Lithuania, Lithuania (hereinafter referred to as the "Company" or "Hotel") collects, stores and otherwise processes personal data in a manner that respects your privacy.
- 1.2. The Data Controller manages the hotel Park Inn by Radisson Vilnius Airport under a licence agreement with Radisson Hospitality Belgium SRL.
- 1.3. All of your personal data is processed in accordance with the General Data Protection Regulation (EU) 2016/679 (the "Regulation"), national legislation on the protection of personal data (including the Law on the Legal Protection of Personal Data of the Republic of Lithuania), and any other legislation on the protection of personal data applicable to the data controller.
- 1.4. Ensuring the right to the protection of personal data, as well as respecting the right to personal privacy, is one of the Company's core missions.
- 1.5. The purpose of this Privacy Policy is to inform you about:
 - 1.5.1. The types of personal data we may collect about you, the types of personal data we may collect about you and the ways in which we may process it;
 - 1.5.2. Any disclosure of personal data to third parties;
 - 1.5.3. Your ability to correct, update and delete your personal data;
 - 1.5.4. The security measures we have in place to prevent the loss, misuse and/or alteration of personal data under our control;
 - 1.5.5. Storage periods for personal data.
- 1.6. In this Privacy Policy, we also provide information about how we process data subjects' personal data in the course of the Company's business, including the processing of reservations and the provision of our other services.
- 1.7. We undertake to be transparent and to provide clear information about what Personal Data we process, the purposes for which we process it, the retention period of the Personal Data, the legal basis for the processing of the data, the rights of your data subjects, and any other information that we are required to provide under applicable law.

1.8. If you use our Services, it means that you have read this Privacy Policy and understood the purposes, methods and procedures for processing your Personal Data as set out in it.

2. Definitions

Consent of the data subject any freely given, specific, informed and unambiguous indication of the Data Subject's will by which he or she expresses his or her consent, either by a statement or by a clear affirmative action, to the processing of Personal Data concerning him or her.

Data Controller a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data. For the purposes of this Privacy Policy, the Data Controller is the Company.

Data processing any operation or series of operations which is performed upon Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, sorting, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination with other data, restriction, erasure or destruction.

Data Processor a natural or legal person, public authority, agency or other body that processes Personal Data on behalf and for the account of the Data Controller.

Data recipient the natural or legal person, public authority, agency or other body to which the Personal Data is disclosed, whether or not a third party.

The data subject (or you) the identified or identifiable natural person whose Personal Data is processed. An identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, a location, an online identifier, or to one or more factors specific to that natural person's physical, physiological, genetic, religious, economic, cultural or social identity.

Regulation 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 (*General Data Protection Regulation*).

2.1. Other terms have the meanings defined and assigned to them in the Regulation.

3. What is Personal Data and how is it processed?

3.1. Personal data means any information about you that can be used to identify you, directly or indirectly, by name, surname, personal identification number, location data, IP address and other physical, physiological, genetic, mental, economic, cultural or social aspects of your identity.

3.2. In processing your Personal Data, the Company adheres to the following principles of Personal Data processing:

3.2.1. Your Personal Data shall be processed only to the extent necessary to achieve the relevant, clearly defined and legitimate purposes;

3.2.2. Your Personal Data is adequate, relevant and only necessary for the purposes for which it is processed;

3.2.3. Your Personal Data is processed in strict compliance with the requirements for the clear and transparent processing of Personal Data set out in the legislation;

3.2.4. Your Personal Data will only be processed in a form which permits your identification for no longer than is necessary for the purposes for which the Personal Data is processed;

3.2.5. The processing of your Personal Data is subject to appropriate technical and organisational measures to ensure the security of your Personal Data, including protection against unauthorised processing and accidental loss, destruction or damage.

4. Purposes, scope, retention period and legal basis for the processing of personal data by the Company

4.1. Provision of company accommodation and related services:

4.1.1. Management (and archiving) of Hotel registration cards:

Categories of personal data	Name, surname, date of birth, passport number, date of issue of passport, bank card number and expiry date, home or office address, country, city and postcode, nationality, gender, email address, telephone number, date of arrival, date of departure, information relating to the room reservation.
Legal basis for processing	Article 6(1)(b) of the Regulation (for the purpose of concluding and/or performing a service contract); Article 6(1)(c) of the Regulation (obligation for the controller).
Storage period	1 year from the last stay/reservation.

4.1.2. Arrival and departure registration of the Guests at the Hotel:

Categories of personal data	Name, surname, date of birth, passport number and expiry date, bank card number and expiry date, home or office address, country, city and postcode, nationality, gender, email address, telephone number, arrival date, departure date, details of the visit, Radisson Rewards membership number, company address (where the guest's expenses are paid for by the guest's employer and/or the booking is made by the guest's employer).
Legal basis for processing	Article 6(1)(b) of the Regulation (for the purpose of concluding and/or performing a service contract).
Storage period	1 year from the date of departure.

4.1.3. Administration and management of services provided to Hotel guests:

Categories of personal data	Name, surname, date of birth, passport number, date of issue of passport, bank card number and expiry date, home or office address, country, city and postcode, nationality, gender, email address, telephone number, arrival date, departure date, details of the visit, car registration number (if
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	applicable), Radisson Rewards membership number, company address (where the guest's expenses are paid and/or booked by their employer).
Legal basis for processing	Article 6(1)(b) of the Regulation (for the purpose of concluding and/or performing a service contract).
Storage period	1 year from last stay/reservation

4.1.4. Reservation management:

Categories of personal data	Name, surname, details of the visit, email address, phone number.
Legal basis for processing	<ul style="list-style-type: none"> • Article 6(1)(b) of the Regulation (for the purpose of concluding and/or performing a service contract); • Article 6(1)(f) of the Regulation (for the legitimate interests of the Company in the proper management of cancelled bookings).
Storage period	5 years from the day of reservation

4.1.5. Gift card management:

Categories of personal data	Gift card details.
Legal basis for processing	Article 6(1)(b) of the Regulation (for the purpose of concluding and/or performing a service contract).
Storage period	Until the value of the Gift Card is fully used.

4.1.6. Obtaining a bank card as a guarantee and/or deposit for accommodation services:

Categories of personal data	Bank card number and expiry date, name and surname of the cardholder.
Legal basis for processing	<ul style="list-style-type: none"> • Article 6(1)(b) of the Regulation (for the purpose of concluding and/or performing a service contract).

Storage period	Until check-out and full payment for services rendered.
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4.1.7. Debt management:

Categories of personal data	Name, surname, ID number, payment information, debt information.
Legal basis for processing	Article 6(1)(f) of the Regulation (on the legitimate interests of the Company in relation to debt management and the recovery of outstanding payments for services rendered).
Storage period	1 year after full payment of the debt.

4.1.8. Creating and updating Client's profile in the Hotel management system:

Categories of personal data	Name, surname, date of birth, passport number, date of issue of passport, bank card number and expiry date, residential or business address, country, city and postcode, nationality, gender, email address, telephone number, date of arrival, date of departure, details of the visit, Radisson Rewards membership number, business address (where the guest's expenses are paid and/or booked by their employer).
Legal basis for processing	Article 6(1)(b) of the Regulation (for the purpose of concluding and/or performing a service contract).
Storage period	1 year from the last stay/reservation.

4.1.9. Conference hall reservation:

Categories of personal data	Contact person/event organiser (contact details, name and surname), information related to the event/conference being organised.
Legal basis for processing	Article 6(1)(b) of the Regulation (for the purpose of concluding and/or performing a service contract).
Storage period	1 year from the end date of the event.

4.2. Management of requests, complaints and inquiries:

Categories of personal data	Content of the enquiry, request and/or complaint, email address, name.
Legal basis for processing	<ul style="list-style-type: none"> • Article 6(1)(b) of the Regulation (for the purpose of concluding and/or performing a service contract); • Article 6(1)(f) of the Regulation (on the grounds that processing is necessary for the establishment and/or defence of legal claims for the purposes of legitimate interests).
Storage period	1 year from the date of resolution of the enquiry, request and/or complaint.

4.3. Video surveillance to ensure the safety of the Company's employees and Hotel guests and their property, to record and preserve evidence of incidents, and to prevent such incidents:

Categories of personal data	Camera data.
Legal basis for processing	Article 6(1)(f) of the Regulation (legitimate interests of the Company to ensure the safety of hotel guests and staff, to maintain public order and to protect guests and hotel property).
Storage period	30 days from the time the video was recorded.

4.4. Invoicing, accounting:

Categories of personal data	Name, surname, payment account number, invoices issued/paid and their content (e.g. amount, type of service, quantity, etc.).
Legal basis for processing	<ul style="list-style-type: none"> • Article 6(1)(b) of the Regulation (for the purpose of concluding and/or performing a service contract); • Article 6(1)(c) of the Regulation (under national law).
Storage period	10 years (according to the Resolution of the Government of the Republic of Lithuania "On the General Index of Document Retention Periods").

4.5. Selection of job candidates:

Categories of personal data	Name, surname, date of birth, residential address, email address, telephone number, work experience, knowledge of foreign languages, professional experience, education, any other information provided
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	voluntarily by the candidate in his/her curriculum vitae and/or any other documents submitted.
Legal basis for processing	<ul style="list-style-type: none"> • Article 6(1)(a) of the Regulation (based on the data subject's consent); • Article 9(2)(a) of the Regulation (based on the data subject's consent) (if applicable).
Storage period	Until the end of the selection process or until the consent is withdrawn.

If you have any questions about the processing of your Personal Data as a Job Candidate, or if you wish to exercise your data subject rights, you can contact us by email: privacy.vilnius@parkinn.com.

4.6. Promotion of the company in the media:

Categories of personal data	Image (photo/video clip).
Legal basis for processing	Article 6(1)(a) of the Regulation (based on the data subject's consent).
Storage period	5 years after receipt of the data or until withdrawal of consent.

4.7. Use of Wi-fi connection:

Categories of personal data	Name of the device, IP address assigned, MAC address of the device, details of the access point used (name), name of the room, duration of the connection session, amount of data sent, amount of data received.
Legal basis for processing	Article 6(1)(a) of the Regulation (your consent by connecting to and accepting the terms and conditions of the Wi-Fi network).
Storage period	Until the end of the wi-fi session.

5. **Processing of children's personal data**

5.1. We protect the privacy of data received from children under the age of 16. If you are under the age of 16, you must obtain your parent's or legal guardian's consent or authorisation for any processing of Personal Data you provide.

6. Sources of data received and processed by the Company

- 6.1. We usually receive your Personal Data directly from you in our communications with you in connection with the provision of our services.
- 6.2. You can always choose whether to provide us with your Personal Data. In the event that you choose not to provide your Personal Data and the Personal Data would be necessary to comply with a legal obligation to which we are subject and/or the Personal Data would be necessary to enter into and/or perform a contract, we may not be able to provide you with certain services, such as (i) if you do not wish to provide your name, email address, or name and address, and (ii) if you do not wish to provide us with the information we need to provide you with the information we need. If you do not provide your name, email address or telephone number when you make a reservation, we will not be able to make the reservation; or ii) you will be required to fill in certain Personal Data required by law on the check-in/check-out sheet that you will fill in when you arrive at our hotel, and if you do not wish to fill in these mandatory fields, we will not be able to accommodate you.
- 6.3. In order to provide you with the right level of hospitality and the best service, we may also collect information about you from third parties as described below:
 - 6.3.1. **From other Radisson group companies** for purposes similar to or related to the purposes for which the Personal Data was collected;
 - 6.3.2. **From our business partners:** for example, travel agencies, online travel agencies such as www.booking.com, event organisers etc;
 - 6.3.3. **Candidates' CVs and other relevant data from job search portals such as** www.cvbankas.lt, www.cvmarket.lt etc;
 - 6.3.4. **From public authorities where we** are obliged to process Personal Data under applicable law.

7. Cases and grounds for transfer and disclosure of personal data to third parties

- 7.1. In order to ensure business continuity and the proper provision of services, we may disclose your Personal Data to our employees, suppliers, subcontractors and service providers where reasonably necessary for the purposes of the processing of Personal Data.
- 7.2. We may also transfer your Personal Data to other Radisson group companies and third parties who process and/or have access to your Personal Data on our behalf and at our direction, such as IT system providers and others who help us to provide you with services in an appropriate manner.

- 7.3. In order to provide you with the right level of hospitality and high quality service, your data may be transferred from a Radisson Group hotel to another Radisson Group hotel or to the company's headquarters.
- 7.4. We provide your data to our service providers and other third parties as follows:
- 7.4.1. **To suppliers:** in order to provide our services, in some cases we will need to transfer certain of your Personal Data to our service providers. These service providers are our data processors and process Personal Data on our behalf under our instructions (e.g. IT software maintenance, accounting services);
- 7.4.2. **Radisson Hospitality Belgium SPRL/BVBA and Rezidor Hotels ApS Danmark:** see point 8.1 below;
- 7.4.3. **to our hotel operator - data processor UAB Apex Alliance Hotel Management** for the purposes set out in clauses 4.1 - 4.5;
- 7.4.4. **For events or conferences:** if you are staying at our hotels as a participant in the event or conference in question, the information needed to plan the event or conference may be shared with the organisers of those events and, where necessary, with the guests organising or attending the event;
- 7.4.5. **Business partners: in some cases,** we work with other companies to provide you with products, services or offers. For example, we may offer you car rental or intermediate additional services related to products that we do not offer;
- 7.4.6. **Public authorities and/or bodies, such as** the Statistical Department under the Government of the Republic of Lithuania in accordance with national legislation (statistical data only / depersonalised data), etc.: (i) in accordance with the provisions of applicable legislation, (ii) in response to their requests, (iii) in cases of public interest (e.g.: national security).
- 7.5. The privacy of your Personal Data is important to us, and therefore Personal Data, as described above, is only transferred to recipients who have undertaken to ensure an adequate level of protection and privacy, to ensure that your Personal Data is processed securely and that such information is provided in accordance with applicable law and applicable regulations. In any event, we will only ever pass on to recipients the information that is strictly necessary for the purpose in question.
- 7.6. In order to ensure an adequate level of protection, to ensure that the processing of Personal Data complies with the requirements of the Regulation and to ensure the protection of the data subject's rights, we only work with service providers who are obliged to implement the necessary technical and organisational security measures.

8. Jurisdiction and Territory of the Personal Data Processed

8.1. We process your Personal Data within the territory of the European Union, except for the exceptions set out below.

8.1.1. We may transfer your data to Radisson Hospitality Belgium SPRL/BVBA and Rezidor Hotels ApS Denmark, (i) Check-in and check-out registration; (ii) Administration and management of the services provided to hotel guests; (iii) Reservation management; (iv) Creation and updating of the customer profile in the hotel management system; (v) Gift card management; (vi) Management of requests, complaints and enquiries; and (vii) Organisation and execution of the loyalty programme. The Radisson Hotel Group Privacy Policy is available at: <https://www.radissonhotels.com/en-us/privacy> .

8.2. Please note that some of the Personal Data that we collect when you browse our website, or that we obtain when you visit our website, may be transferred to or made available to companies operating both within the European Economic Area (EEA) and in third countries, such as the United States of America and other countries outside of the EEA (such as Google Analytics, Facebook Ads, or other similar services, features, and goods).

8.2.1. We have no control over these third party websites or the content contained therein and you acknowledge that we are in no way responsible or liable for any of these third party websites, including, without limitation, their content, policies, failures, promotions, products, services, or actions, and/or for any damages, losses, failures, or problems arising out of, relating to, or resulting from these websites.

8.3. In order to ensure an adequate level of security of Personal Data and to guarantee the lawful transfer of data outside the EU and EEA, we comply with the conditions set out in Chapter V of the Regulation.

9. Security of Personal Data Processed by the Company

9.1. To ensure the security of your Personal Data, we use appropriate organisational and technical measures to protect your Personal Information from loss, misuse, alteration or destruction. The security measures in place will be reviewed regularly in light of legal and technical developments.

9.2. In order to adequately protect your Personal Data on our systems, we take appropriate technical and organisational measures, including but not limited to:

9.2.1. Ensuring strict access controls and restricting access to data to those with a need to know;

9.2.2. Access to Personal Data shall be protected by passwords of an appropriate level;

9.2.3. We enter into confidentiality agreements with those who have access to your Personal Data;

9.2.4. We monitor access to Personal Data, etc.

9.3. Personal data shall be processed securely and provided only to those persons who are necessary for the performance of their duties and obligations in order to achieve the purposes of Personal Data processing described in this Privacy Policy. In order to protect your data, we also require our business partners to implement the necessary technical and organisational security measures.

10. Data subject rights

10.1. As a data subject, you have rights under the Regulation and other legislation and can exercise them freely. In this privacy policy, we set out the rights guaranteed to you by the Regulation and the main ways in which you can exercise your rights.

10.2. Your data subject rights:

10.2.1. The right to receive information about the processing of Personal Data:

10.2.1.1. At the time we collect your data, we provide you with information about the processing of your Personal Data. You can always find information about how we process your Personal Data in this Privacy Policy or by submitting a request to privacy.vilnius@parkinn.com.

10.2.2. Right of access to Personal Data processed:

10.2.2.1. You have the right to access your Personal Data and to obtain from us confirmation of how we process your Personal Data, including information about the basis for processing your Personal Data, the categories of Personal Data, the data processors and other information. You have the right to receive your Personal Data in a structured, commonly used and computer-readable format. You will not be able to exercise this right where it may adversely affect the rights and freedoms of third parties. We have the right to refuse to provide the Personal Data we process if there are legal restrictions on the basis of which Personal Data is not provided.

10.2.3. The right to rectification of your Personal Data:

10.2.3.1. You have the right to rectify or amend, supplement or correct your Personal Data.

10.2.4. The right to request the erasure of Personal Data (right to be forgotten):

10.2.4.1. You can exercise this right when:

- 10.2.4.1.1. The personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- 10.2.4.1.2. You have withdrawn your consent and there is no other legal basis for processing the data;
- 10.2.4.1.3. You object to processing on the grounds of our legitimate interest or the interest of a third party;
- 10.2.4.1.4. The data is processed for direct marketing purposes;
- 10.2.4.1.5. The processing of personal data was unlawful;
- 10.2.4.1.6. Personal data must be erased in accordance with the legal requirements applicable to us. In some cases, you may not be able to exercise your right to be forgotten due to certain exceptions. These exceptions include cases where the processing of Personal Data is necessary to:
 - 10.2.4.1.6.1. Exercise your right to freedom of expression and information;
 - 10.2.4.1.6.2. To meet our legal obligations;
 - 10.2.4.1.6.3. To bring, exercise or defend legal claims.
- 10.2.5. The right to restrict the processing of your Personal Data:
 - 10.2.5.1. You can exercise this right:
 - 10.2.5.1.1. When you challenge the accuracy of data;
 - 10.2.5.1.2. Where Personal Data is processed unlawfully but you do not wish to have your Personal Data erased;
 - 10.2.5.1.3. Where there is no need to process your Personal Data, but you request the data in order to assert, exercise or defend legal claims.
 - 10.2.5.2. Where you restrict the processing of your Personal Data on the basis of our legitimate interest or that of a third party, the data will be processed until the basis/reason for your restriction is verified.
 - 10.2.5.3. Please note that due to the restriction of processing, we may continue to store your data without processing it during the period of such restriction, except:
 - 10.2.5.3.1. To bring, exercise or defend legal claims;
 - 10.2.5.3.2. To protect the rights of natural or legal persons;
 - 10.2.5.3.3. For important reasons of public interest.
- 10.2.6. Right to object to processing.

10.2.6.1. You have the right to object to the processing of Personal Data where the processing of Personal Data is based on our legitimate interests. To exercise the right referred to in this paragraph, please submit a written request to privacy.vilnius@parkinn.com.

10.2.7. Right to data portability.

10.2.7.1. You can exercise this right where we process your data by automated means (computers, etc.) and the legal basis for processing is:

10.2.7.1.1. Your consent;

10.2.7.1.2. Performance of the contract or our actions taken at your request before entering into the contract.

10.2.7.2. At your request and where technically feasible, we will transfer your data to another controller.

10.2.8. The right to withdraw consent to the processing of your Personal Data.

10.2.8.1. Where we process your data on the basis of your consent, you have the right to withdraw your consent at any time and the processing based on your consent will cease. Withdrawal of consent will not affect the lawfulness of the processing prior to withdrawal.

10.2.9. Right to lodge a complaint with a supervisory authority.

10.2.9.1. If you believe that we are processing your data in breach of the requirements of the Personal Data Protection Legislation, please always contact us directly first. If you are not satisfied with the resolution of the problem, you have the right to lodge a complaint with the State Data Protection Inspectorate at ada@ada.lt.

11. Company contacts

11.1. If you have any questions about how we process your data, or if you have any requests or comments, please contact us: privacy.vilnius@parkinn.com.

12. Procedures for handling requests from data subjects

12.1. In order to protect Personal Data against unauthorised disclosure, the data subject shall confirm his or her identity when submitting a request for the exercise of the rights of the data subject:

12.1.1. If the request is made to an employee of the Company, upon presentation of a valid ID;

12.1.2. If the application is submitted by post or courier, it shall be accompanied by a copy of a valid identity document, certified in accordance with the procedure laid down by law;

- 12.1.3. Where the application is submitted electronically, the identity shall be verified by electronic means of communication which allow the person to be properly identified.
- 12.2. The data subject may exercise his/her rights himself/herself or through a representative.
- 12.3. If the request is submitted to the Company by a representative of the data subject, the request shall specify the name, surname, place of residence and contact details of the representative, as well as the name, surname and place of residence of the represented person, and shall include information on the specific right of the data subject sought to be exercised, including the scope of the exercise, and shall be accompanied by a document of representation.
- 12.4. In order to verify your identity, we may also ask you to provide relevant data (e.g. name, surname, date of birth, email address or telephone number) or send a control message (by SMS or email) to request an authorisation action, and we may also ask you to provide additional documents or data. If the verification procedure is unsuccessful, we will be obliged to declare that you are not the data subject of the requested data and we will have to reject your request.
- 12.5. Upon receipt of your request for the exercise of any of your rights, and upon successful completion of the verification procedure referred to above, we undertake to provide you with information on the action we have taken in response to your request without delay, but in any event no later than 1 (one) month from the date of receipt of your request and the completion of the verification procedure. Taking into account the complexity and number of requests, we have the right to extend the period of 1 (one) month for a further period of 2 (two) months by informing you before the end of the first month and stating the reasons for such extension.
- 12.6. If you submit your request electronically, we will also respond to you electronically, unless this is not possible (e.g. due to the particularly large volume of information) or you request a different response.
- 12.7. We have the right to refuse your request by providing a reasoned written reply under the conditions and on the grounds provided for by law. We will provide you with the information free of charge, but if the requests are manifestly unfounded or disproportionate, in particular because of their repetitive content, we may charge you a reasonable fee to cover our administrative costs, or we may refuse to comply with your request.

13. Final provisions

- 13.1. We have the right to change this Privacy Policy from time to time to properly inform you about how we process your Personal Data.

13.2. If we make significant changes, we will notify you by posting on the website or by other means, such as email, so that you can review the changes before visiting our website.

13.3. If any provision of the Privacy Policy is found to be invalid or unenforceable, that provision will not affect the legality and validity of the remaining provisions of the Privacy Policy.

13.4. Last update: 2023/12/12.