

## GENERAL INFORMATION NOTE REGARDING THE PROCESSING OF PERSONAL DATA

### 1. WHO ARE WE?

**SAFETECH INNOVATIONS SA**, CUI RO 28239696, No.Reg.Com. J40/3550/2011, with registered office in Strada Frunzei no. 12-14, Frunzei Center, et. 1-3, sector 2, Bucharest (hereinafter also referred to as the **Company** or **Safetech**), processes personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 (**Regulation** or **GDPR**) and to the other legal provisions applicable to the processing of personal data.

This information notice describes why and how we process personal data and provides information on your rights when the Company acts as a Personal Data Controller.

### 2. HOW CAN YOU CONTACT US?

You can send us:

- an email to the email address: [office@safetech.ro](mailto:office@safetech.ro) OR
- a message via the contact form on our website,
- a letter to the address of our registered office: Strada Frunzei no. 12-14, Frunzei Center, et. 1-3, sector 2, Bucharest OR
- you can submit a written address at our headquarters.

The Safetech data protection officer can be contacted at the following email address: [dpo@safetech.ro](mailto:dpo@safetech.ro).

### 3. DATA OR CATEGORIES OF PERSONAL DATA PROCESSED BY THE COMPANY

Our policy is to collect the personal data necessary for the purposes determined by us in relation to the Company's activities, and we request the data subjects to communicate to us the personal data necessary for these purposes. It is possible to process several categories of personal data, which vary according to the type of product / service / activity / purpose of processing.

The main data / categories of data processed by the Company may be, as the case may be and depending on the purposes associated with the processing, data such as:

a) **If you benefit from our products or services such as webinars or other events organized by us:**

a.1. Generic and contact data

- o name, surname
- o contact details (email address/es, telephone numbers, etc.)
- o function/position held, the company in which you work

a.2. Other data and information such as

o preferences, testimonials and opinions submitted in writing by you in relation to our services

**b) If you are a visitor to our online site/pages or contact us through them:**

o data obtained in the light of accessing the Company's online platforms, the Company's websites and pages (such as the online identifier), processed for the purposes mentioned in the Cookies Policy related to the respective page/site,

o potential data received from/collected via social media platforms

o data obtained by you completing the various online forms on our sites/pages, data such as name, surname, phone number, email address, function/position held, the company in which you work

o if you subscribe to the newsletter, we will process the name and email address used for subscription

o username to the extent that the site/page contains the option to create user accounts

o other data that you voluntarily provide via chat bot, email, contact form, etc

**c) if you are a representative of one of our partners, customers, suppliers, legal entities**

o name, surname

o contact details (email address/es, telephone numbers, etc.)

o function / position within the employer

o signature.

#### **4. SOURCE OF PERSONAL DATA**

We generally collect personal data directly from you as the data subject. However, in certain situations, we may process personal data also collected from other sources such as social networks through which you contact us.

#### **5. THE PURPOSES FOR WHICH PERSONAL DATA ARE PROCESSED**

The company processes personal data for multiple purposes, and the methods of collection, legal basis for processing, use, disclosure, retention periods, etc. they can be different depending on each purpose. We may use personal data for one or more of the purposes described in this notice. If the Company will subsequently process the personal data for a purpose other than that of which you have already been informed and which is not compatible with the purposes for which the data were initially collected / which were brought to your attention, the Company will provide information regarding that secondary purpose and any additional relevant information.

We use personal data mainly for the following purposes:



- [Provision of services to you](#). Carrying out the object of the Company's activity, namely the provision of services in the field of cyber security, making statistical reports, managing the services provided, informing you about the results of the services, managing the necessary documents in connection with the provision of services; the organization of webinars / training sessions or other similar events or activities.
- [Compliance with legal and/or regulatory requirements](#), such as those of a fiscal nature or those required by special normative acts that regulate our object of activity or, as the case may be, archiving.
- [Managing our relations with customers, suppliers, professionals from various fields of activity](#), correspondence, offers, negotiations, management of contractual relations.
- [To fulfill the contractual obligations and commitments assumed towards you](#), to manage requests as well as notifications/complaints in relation to our services, in order to be able to resolve any reported issues,
- [Managing the risks related to our activity](#), meaning that we take security measures to protect personal data, measures that involve the detection, investigation and resolution of security threats. Personal data may be processed as part of physical security monitoring or at the level of the IT applications we use.
- [Improving the Company's activity and services](#) in relation to our customers and partners, conducting surveys, identifying potential problems with our existing services in order to improve them (including by conducting audits); testing improvements to our services or our new services; solving your complaints.
- [Commercial communications](#). We offer our customers who have given their consent in this regard information about us, news about the solutions and services we offer, information of interest in the field of cyber security, including in relation to services of the type contracted by our customers or for which they have expressed their interest in purchasing them, marketing and advertising activities, recall messages. In accordance with applicable law, we use customer contact details (phone, email, email) to directly or indirectly provide information that we believe is of interest to them.
- [In the case of visiting our websites or our pages on social networks](#), it is possible to process some information through online tools such as cookies for the purposes mentioned in the Company's Cookie Policy (link to the cookie policy) or other potentially received personal data /collected through these platforms and/or from social networks or other public digital sources to be able to respond to your requests.
- [Establishing, exercising or defending a right in court](#). In this context, data is processed for the resolution of possible disputes.
- [Video surveillance](#). The CCTV systems installed for the surveillance of the premises and the security of goods and persons and other possible purposes according to the specific information notice displayed in the respective location and which will complete the provisions of this information.

## 6. LEGAL BASIS AND CONDITIONS OF LEGALITY ON WHICH DATA PROCESSING IS BASED

The legal bases of the processing take into account the provisions of the Regulation and the normative acts on the processing of personal data adopted at the level of Romania, the provisions of the legislation applicable in the Company's field of activity, the Civil Code, the Fiscal Code and related legislation in the fiscal field.

The processing is based on at least one of the following **conditions of legality of the processing**:

- processing is necessary in order to conclude a legal relationship/contract and/or for its execution;
- processing may be necessary in order to fulfill a legal obligation incumbent on the Company (e.g. those relating to the management of supporting documents from a fiscal point of view);
- processing is necessary for the performance of a task that serves a public interest or may be necessary for archiving operations;
- processing is necessary for the purpose of the legitimate interests pursued by the Company or a third party, respectively:
  - for the administration of our activity, the provision of services related in particular to the main activity of the Company, as well as in relation to other related activities, including the promotion of the company Safetech Innovations and or all the products and services offered by publishing testimonials on our website , as well as on various social networks;
  - for the management of our relations with potential customers and our customers or partners, including but not limited to the promotion of our services and/or products or those of our partners, associated activities,
  - for the management of risks related to our activity,
  - handling notifications/complaints in relation to our services, in order to be able to resolve any reported issues, respectively to be able to improve our products and/or services,
  - establishing, exercising or defending a right in court.
- processing can be based on your consent, only if we are in one of the cases expressly provided by the Regulation in this regard.

## 7. HOW LONG DO WE KEEP PERSONAL DATA?

7.1. We retain personal data processed by us only for as long as is necessary for the purpose for which it was collected (including in accordance with applicable law or regulation), such as:

- During the development of the contract / legal relationship for the personal data necessary for its execution, including personal data with which the Company may come into contact in the development of the legal relationship, including the limitation period provided by law (see paragraph 8.2. below);



- For the duration provided by law in situations where there are applicable normative acts in this regard (e.g. in the case of mandatory accounting registers and supporting documents that form the basis of financial accounting records);
- During the existence of the site / pages on social networks for the posting of photo images, testimonials and the like on its sites and pages available on the Internet, to the extent that no other cause of termination occurs sooner such processing;
- During the management of the relationship with potential customers/customers, respectively until the exercise of the right of opposition (opt-out), for the data used for the purpose of sending commercial communications regarding our services and/or products or those of other persons, as the case may be;
- Until the withdrawal of consent for the processing of personal data based exclusively on your consent/agreement if the term from 7.2 has not previously occurred;
- During the period of archiving in the public interest mentioned by the law or in the applicable policies of the Company, as the case may be, for the data contained in the documents for which the law or the Company have provided archiving;

7.2. In any other cases or in the absence of specific legal, regulatory or contractual requirements, our reference period for keeping personal data is at least 3 years from the date of termination of civil relations / the last contact between the Company and you, respectively 5 years in relation to documents justifications from the perspective of tax legislation that also contain your personal data.

7.3 Any data may be kept by the Company, with the exception of the previous provisions, if applicable, until the expiry of the limitation period (civil or fiscal), regarding situations in which the Company would have a legitimate interest in keeping certain data with personal character in relation to a potential dispute that could arise between the parties, for example in the context of the possible engagement of the legal liability of the Company or you.

7.4. In any case, except as provided by applicable law, we delete your data at the time you request it. The exceptional situations provided by law and applicable at that time will be communicated to the applicant through the response sent to him by our company in connection with the data deletion request.

## 8. YOUR RIGHTS AND HOW TO EXERCISE THEM

Our company is responsible for facilitating the exercise of any of your rights mentioned below. Any of these rights can be exercised by sending a request using the contract data from point 2 above.

**For the protection of your data, to prevent the abuse of malicious persons who would seek access to your data, we may ask you to go through some identification steps in advance, to ensure that you are the person exercising the rights mentioned below . If we receive a request from you to exercise any of the rights, we may ask you for additional information to verify your identity before acting on the request.**



If you make a request in electronic format to exercise your rights, the information will also be provided by our company in electronic format where possible, unless you request a different format.

We will try to respond promptly to any request from you and, in any case, within the time limits expressly mentioned by the applicable legal provisions (usually 30 days from the registration of the request). In certain situations expressly provided by applicable law, we may charge an access request which will take into account the administrative costs necessary to fulfill the request.

If, as a result of the application of some legal provisions, our company cannot comply, in whole or in part, with a request received from you as a data subject, then the applicable exceptional situations will be communicated to you through the response submitted by Company in connection with the application in question.

***The right of access***

You have the right of access, according to article 15 of the Regulation, respectively to obtain from the Company a confirmation whether or not it processes personal data concerning you and, if so, the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients from third countries or international organizations;
- d) where possible, the period for which the personal data is expected to be stored or, if this is not possible, the criteria used to establish this period;
- e) the existence of the right to request the rectification or deletion of personal data or the restriction of the processing of personal data or the right to oppose the processing;
- f) the right to submit a complaint to a supervisory authority;
- g) where personal data is not collected from you, any available information regarding its source;
- h) the existence of an automated decision-making process including the creation of profiles, referred to in Article 22 paragraphs (1) and (4) of the Regulation, as well as, at least in the respective cases, pertinent information regarding the logic used and regarding the importance and expected consequences of a such processing for you.

If personal data is transferred to a third country or an international organization, you have the right to be informed of the appropriate safeguards under Article 46 of the Regulation relating to the transfer. At your request, the Company provides a copy of the personal data that is the subject of processing.



*The right to  
rectification of data*

You have the right to obtain from the Company, without undue delay, the rectification of inaccurate personal data concerning you, according to article 16 of the Regulation. Taking into account the purposes for which the data were processed, you have the right to obtain completion of personal data that is incomplete, including by providing an additional statement.

When possible or necessary we will make corrections (as appropriate) based on updated information and inform you of this, if applicable.

*The right to data  
deletion*

You have the right to obtain from the Company the deletion of your personal data (according to Article 17 of the Regulation), without undue delay, except in certain cases provided for in the Regulation, if one of the following reasons applies:

- a) personal data are no longer necessary to fulfill the purposes for which they were collected or processed;
- b) you withdraw your consent on the basis of which the processing takes place to the extent that the processing is based exclusively on consent and there is no other legal basis for the processing;
- c) you object to the processing carried out for the purpose of a public interest or for the purpose of the legitimate interests pursued by the Company or a third party and there are no legitimate reasons that prevail over your interests/fundamental rights and freedoms with regard to the processing or you object processing for direct marketing purposes;
- d) personal data were processed illegally;
- e) personal data must be deleted to comply with a legal obligation incumbent on the Company under Union law or the internal law to which it is subject;
- f) other situations provided by the Regulation to the extent that they are applicable;

*The right to  
restriction of  
processing*

You have the right to obtain the restriction of processing (according to article 18 of the Regulation) in the following cases:

- a) Contest the accuracy of the data, for a period that allows the Company to verify the accuracy of the data;
- b) The processing is illegal and you object to the deletion of the personal data, requesting instead the restriction of their use;
- c) The company no longer needs the personal data for the purpose of processing, but you request them for establishing, exercising or defending a right in court; or
- d) You objected to the processing in accordance with Article 21 paragraph (1) of the Regulation, for the period of time in which it is verified





whether the legitimate rights of the operator prevail over those of the data subject.

***The right to data portability***

You have the right to receive your personal data (according to article 20 of the Regulation) that you have provided to the Company, in a structured, commonly used and machine-readable format, and upon their transmission to another operator, without obstacles from the Company, if:

- (i) the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) of the Regulation or on a contract pursuant to Article 6(1)(b) from the Regulation; and
- (ii) the processing is carried out by automated means. In the case of exercising the right to portability of personal data, they may be transmitted directly from the Company to another operator expressly indicated by you, where this is technically feasible.

***Right to object to processing for the purposes of legitimate interests pursued by the Company or a third party***

At any time you have the right to object, for reasons related to your particular situation, to the processing carried out for the purpose of a public interest or for the purpose of legitimate interests tracked by the Company or a third party, including profiling. In this case, the Company will no longer process your personal data, unless it demonstrates that it has legitimate and compelling reasons that justify the processing and that prevail over your interests, rights and freedoms, or that the purpose is to ascertain, exercise or defending a right in court.

***Right to object to processing for direct marketing purposes***

When the processing is for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for this purpose, including the creation of profiles, to the extent that is related to that direct marketing.

***Right to withdraw consent***

If the processing is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent does not affect the legality of the processing carried out on the basis of consent before its withdrawal. The assumption of withdrawal of consent is not applicable in cases where the basis of processing is not consent.

## **9. RIGHT TO FILE A COMPLAINT OR COMPLAINT**

If you wish to complain about issues concerning the processing of your personal data, please contact us in any of the ways and using the contact details mentioned in point 2 hereof. We will review and respond within the legal time frame to any complaint we receive.



You also have the right to file a complaint with the National Authority for the Supervision of Personal Data Processing ("ANSPDCP").

## 10. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA:

As a rule, we do not disclose your data to other companies, organizations, entities or individuals. In certain situations, however, the Company may transmit / grant access / disclose personal data mainly to the following categories of persons / entities:

- Collaborators or partners of the Company, as well as other IT service providers (each of them being obliged by law and/or by the contract concluded with us to keep your data confidential);
- Other authorized persons who process personal data on behalf of the Company, in accordance with instructions received from us and comply with this notice, data protection laws and any other appropriate privacy and security measures (such as IT service providers who can have access to personal data, marketing service providers, etc.);
- Public authorities and entities, control and regulatory entities, courts / arbitration / administrative bodies (such as tax authorities, other control and regulatory entities in the Company's field of activity, etc.);
- Partners and service providers (professionals in various fields of activity such as accountants, auditors, lawyers, other external consultants, debt recovery service providers, specialized archiving services, etc.);
- Third parties in connection with photo images, testimonials and other such that can be posted on the Company's website, available on the Internet, to the extent that you have agreed to it;
- The data collected through cookies or other similar online tools can be transmitted to third parties according to the Cookies Policy, if you have accepted third party cookies (which belong to entities other than our company - e.g. cookies used by Google).

Transfers and disclosures are generally not made to entities outside the European Union. If the Company transmits your personal data to a third country or to an international organization, we will ensure that it is properly protected, i.e. that we transmit the data to a country that provides an adequate level of protection according to the evaluation of the European Commission or if it is considered that the country in question does not have laws equivalent to EU data protection standards, we will ask the third party to enter into a legally binding contract/agreement/instrument that reflects the latter standards or to provide other adequate guarantees in this regard.

## 11. CONSEQUENCES OF REFUSAL TO PROVIDE PERSONAL DATA

In the event that personal data is collected directly from you, we inform you that, as a rule, you are not obliged to provide your personal information to the Company, except in cases where providing it constitutes a legal or contractual obligation or a obligation necessary to conclude a legal relationship/contract.

Thus, to the extent that you opt for one or more of the Company's services, enter into a legal relationship with the Company or otherwise benefit from our services/products, the provision of personal data is a necessity from the perspective of legal requirements and/or of the legal relationship with us, because this information is necessary for honoring the obligations assumed by the Company in relation to you or for the provision of services and/or products to you.

So, in certain situations, depending on the data you refuse to provide, it is possible that:

- our company is unable to conclude the contract or to continue the contractual relationship with you
- our company is made unable to partially / fully honor its obligations towards you.

If you believe that the information contained herein is ambiguous or contains ambiguities, you can request clarifications in this regard from us at any time at the email address [dpo@safetech.ro](mailto:dpo@safetech.ro).