

Personal Data Protection (PDP)

Q'NET INTERNATIONAL S.R.L. is a trading company registered with the Trade Register Office under no. J40/7697/2011, Fiscal Code: RO 28672605, with the head office in Fecioarei St. no.13, 2nd District, Bucharest, 020103, (the 'Company'), phone no.: +40-(0)212117855/11, fax no.: +40-(0)212107640, which provides Information Technology products, solutions and services and whose activities imply the processing of personal data.

By this Declaration on the protection of personal data that we process, deeply concerned with complying the current legal and regulatory requirements on personal data processing and protection as strictly as possible – Regulation (EU) 2016/679, and the legislation for its application, we hereby inform you and answer briefly at several essential questions, which may be in your interest, as data subjects, regardless of whether you are a customer or another interested party, contact person/representative of a customer, supplier or another business partner, employee or collaborator of the Company.

What type of PERSONAL DATA can we collect from you?

- ✓ Identification data or contact data, such as: name, office address or home address, position, phone number, e-mail address;
- ✓ The registration of the interactions between you and the Company, if the case may be, through the Registrar's or Dispatch's Office of the Company, or of other correspondence or communication between you and the Company:
- ✓ In limited situations, when it is required by the law, the data from your ID Card, including social security number (SSN) and place of birth;
- ✓ When you visit us at our head office, or if you contact us via e-mail or phone with different requests or something else of your interest, we can collect your name and contact data, as well as other personal data you send us directly.

***** WHERE can we obtain your data from?

- ✓ Directly from you or from persons who act on behalf of the customer, supplier or business partner of the Company;
- ✓ Public institutions and authorities or publications and databases which are publicly or contractually available;
- ✓ If you visit us at our head office or contact us by phone for various requests or aspects that are of your interest, we collect the data that you give us.

❖ What PURPOSES do we have to process your personal data?

- ✓ In order to conclude a contract or to manage the business relationship between the Company and a customer or another interested party, supplier of a business partner;
- ✓ In order to respond at your requests or at the requests of the public authorities, or in order to fulfil the legal requirements;
- ✓ Under the reserve of the conditions foreseen by the law, in order to prevent or investigate frauds, and also to defend or exercise our legal rights;
- ✓ To internally manage the Company, inclusively in relation to the investigations made by the State's authorities on legal domains, audits of the contractual activities with the manufacturers/ suppliers, audits of the activities in the domains of Integrated Management System Quality Environment, Health and Occupational Security, Information Security and Service Management, for archiving purposes and for the physical protection of the employees, of the rooms and areas, and of the assets owned by the Company;
- ✓ To improve the products/solutions and services we provide;
- ✓ To make statistics, analyses, communications on the status of the contractual relationship or new opportunities.

❖ What LEGAL BASIS do we have to process your data?

- ✓ The legitimate interest of the Company to document the performance of the contract and to manage the
 business relationship with a customer or another interested party, supplier or business partner, and to
 manage the activities and internal afferent processes;
- ✓ The legitimate interest related to the defence or exercise of the legal rights of the Company, inclusively to guarantee the security of the employees, the rooms and areas and the assets owned;
- ✓ Your consent, in those cases when data processing requires this basis;
- ✓ Compliance of the Company with a legal obligation (for example: fiscal and accounting legislation, laws for the prevention of money laundering or for the financing of the acts of terrorism).



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❖ To whom do we TRANSFER your personal data?

- ✓ The Company may transfer your personal data to other persons or entities that provide or perform operations during the normal process of the activities or for managing the Company's activities;
- ✓ The Company may use or disclose personal data when there is necessary (for example: to the public authorities, when there is a legal obligation in this regard) or when the law allows to do such things;
- ✓ The Company shall not allow the access or transfer of the personal data to any natural person or legal entity who is not established in the European Union.

* HOW LONG do we keep your data?

✓ The Company shall process your data during the period that is necessary for the Company to fulfil the purpose it was collected for, or, if the processing is based on a consent, until you take back your consent, except for the case when the law foresees another period of keeping the data or if the keeping of the data is necessary for the Company to exercise and defend its rights.

❖ Which PRINCIPLES stand at the basis of our policy of protecting your personal data?

- ✓ Your personal data shall be processed in a legal, correct and transparent manner;
- ✓ Your personal data shall be collected only in specific, explicit and legitimate purposes, and the data shall not be processed further, in a manner that is incompatible with those purposes;
- ✓ The data collection shall be adequate, relevant and limited to the information that is necessary for the purpose of processing;
- ✓ Your personal data shall be accurate and, whenever necessary, updated;
- ✓ All the necessary measures shall be taken to make sure that the incorrect data is deleted or corrected without delay;
- ✓ Your personal data shall be kept in a form that allows the identification of the data subject and for a period no longer than the period when the personal data is processed;
- ✓ All data shall be kept confidentially and stored in a manner that guarantees its security;
- Personal data shall not be distributed to third persons except for the case when it may be necessary in order to provide services in accordance with the contracts concluded.

❖ What RIGHTS do you have and what RIGHTS does the Company have?

- ✓ You may ask the access at your personal data held by the Company and at the correction of such data, if you consider that it is inaccurate. If the processing is based on your consent or on a contract signed personally by you with the Company, you may ask us to transmit your data in a structured, commonly used and machine-readable format or you may ask us to transmit your personal data to another processor/controller;
- ✓ You may withdraw your consent anytime (if data processing is based on the consent), you may oppose to the processing of your personal data, or you may require the deletion of such data, as well as you may ask for the processing of your personal data to be restricted;
- ✓ You may send the above requests in relation to your rights, you may send questions or demands related to these rights, or even you may file a complaint related to the processing of your data, anytime, contacting the Company at the address:
 - Q'NET INTERNATIONAL S.R.L., Fecioarei St., no.13, 2nd District, Bucharest, 020103;
 - dpo@gnet.ro
- ✓ All the requests, questions and complaints shall be processed by the Data Protection Operator (DPO, e-mail: dpo@qnet.ro) in due time and in accordance with the internal procedures;
- ✓ If you consider that you have suffered damages because of the violation of your rights related to the personal data protection and that the Company has not treated your complaint properly, you are entitled to file a complaint with the National Supervisory Authority for Personal Data Processing, at the following address: General Gheorghe Magheru Blvd. no.28-30, 1st District, Bucharest, 010336, phone no.: +40318059211, E-mail: anspdcp@dataprotection.ro;
- ✓ The Company may ask additional information that is necessary to confirm your identity before allowing access at your personal data or before acting in relation to the exercise of your rights referred above;
- ✓ In justified cases, the law allows the Company to refuse acting in accordance with the above requests, case in which the reason of such refusal shall be explained in writing.