

## Privacy Policy of the website

[www.procalvie-cro.ro](http://www.procalvie-cro.ro)

### 1. Introduction

PROCALVIE S.R.L., a company organized and operating in accordance with the Romanian laws based in Brasov, 24A Garii Street, ap.19, room 1, registered at the Trade Register Office of Braşov under no. J08 / 1134/2013, having Fiscal Identification Code R0321067475 as a personal data controller registered with the National Supervisory Authority for Personal Data Processing in the General Register under no. **8738** dated: **12/04/2019**, carries out the personal data processing. Below we present the privacy and privacy policy of this data processing that informs and explains how to use personal data and information collected on the website in the contact form on the website:

- the principles we respect when processing personal data
- what information we collect and process
- what rights you have in relation to your personal data processed by PROCALVIE;
- what purpose we use the information we collect and what is the legal basis that allows us to process the data
- what your rights are in relation to this information and data
- how we store your personal data
- communicating your personal data to others
- how much we process personal data
- security of personal data
- an automatic collection of other non-personal data

Following the registration of personal data on the website [www.procalvie-cro.ro](http://www.procalvie-cro.ro) and the acknowledgment and acceptance of the personal data processing, presented on the website, here are presented in a transparent and explicit manner the operations that will undertake PROCESSING of personal data and all relevant information.

### 2. Principles we respect when processing personal data

In the application of the legal provisions, PROCALVIE guarantees that personal data will be:

- processed fairly and transparently
- it is collected exclusively for determined, expedient and legitimate purposes
- appropriate, relevant and limited by reference to the purpose for which they are collected and further processed
- accurate and, where appropriate, up-to-date. To this end, the necessary steps shall be taken to ensure that inaccurate or incomplete data for the purpose for which it is collected and for which it is subsequently processed is erased or rectified
- stored in a form which permits the identification of the data subjects strictly for the time necessary to achieve the purposes for which the data are collected and in which they will be further processed; storing data longer than the one mentioned above, for example for statistical purposes, will be subject to the safeguards for the processing of personal data provided for in the rules governing those domains and only for the period necessary to achieve these purposes
- processed in a way that ensures the adequate security of personal data, including protection against unauthorized or unlawful processing and loss of destruction or accidental damage, by taking appropriate technical or organizational measures.

### 3. What information do we collect?

The procedure for taking personally identifiable data is done by PROCALVIE by online collection, this operation being carried out in accordance with the provisions of the applicable law and the internal rules and provisions of PROCALVIE on personal data.

PROCALVIE collects and processes the following information when completing the contact form

- a mandatory character: name, surname and telephone number
- a non-binding character: the email address.

#### 4. What rights do you have?

All individuals who have provided their personal details to fill in the contact form have the following rights: a right to information, ie the right to receive details of processing activities performed by PROCALVIE as described in this document:

- a right of access, namely the right to obtain confirmation from PROCALVIE regarding the processing of personal data related to the contact form, as well as details of the processing activities
- a right to correct the data, namely the right to obtain inaccurate data rectification by PROCALVIE, as well as the completion of incomplete data processed in the contact form
- a right not to be the subject of an individual decision, namely the right not to be the subject of a decision taken solely on the basis of automatic processing
- a right to appeal to the courts or the National Supervisory Authority for Personal Data Processing
- a right of opposition in respect of processing activities carried out for marketing purposes
- a right to request the deletion of data to the extent that the conditions provided by law are met; it is possible that as a result of the request for data deletion, PROCALVIE will anonymize this data (thus lacking its personal character) and continue in these conditions the processing for statistical purposes
- a right to data portability (i) the right to receive personal data in a structural modality commonly used in an easy-to-read format, and (ii) the right to have such data transmitted by PROCALVIE to another data controller to the extent that the conditions provided by law are met
- a withdrawal of the consent to processing personal data, when requested.

At the written request you can receive the following information free of charge:

- a confirmation that the data that concerns you are or are not processed by PROCALVIE
  - modifying, updating, blocking or deleting data whose processing is not lawful, in particular of incomplete or inaccurate data
  - a transformation into anonymous data of data whose processing is not lawful
- notifying third parties to whom the data of any transaction made under the above items has been disclosed if such notification is not impossible or does not involve a disproportionate effort to the legitimate interest which might be harmed.

For the exercise of these rights, please send us written permissions to:

- e-mail address: [office@procalvie-cro.ro](mailto:office@procalvie-cro.ro)
- address: B-dul Gării, no.24A, flat.19, room 1, 500218 Brasov, Romania.

PROCALVIE has the obligation to respond within 30 (thirty) calendar days to such requests by providing the requested data to the applicant in connection with the processing of personal data carried out in connection with the data belonging to the applicant.

Contact details of the National Supervisory Authority for Personal Data Processing: B-dul G-ral. Gheorghe Magheru, 25-30, sector 1, postal code: 010336 Bucharest, Romania, phone.: +40.318.059.211, +40.318.059.212, Fax: +40.318.059.220, e-mail: [anspdcp@dataprotection.ro](mailto:anspdcp@dataprotection.ro) website: [www.dataprotection.ro](http://www.dataprotection.ro)

#### 5. For what purpose and on what legal basis do we use the information we collect?

We use personal information for the following purposes:

- a) Facilitate sign-up on the site and fill in the contact form. This processing goal is based on the consent of visitors to the site. This processing goal is pursued to meet the legitimate interests of site visitors as well as the one in which PROCALVIE will know its customers in terms of maintaining, protecting and developing products or services in the context of its specific business.
- b) Payment of applicable PROCALVITY taxes and duties related to service activities. The purpose of the processing is to fulfill the legal obligations that PROCALVIE performs in its specific activity.
- c) Archiving personal data for statistical purposes. This processing goal is carried out in order to achieve the legitimate interests pursued by PROCALVIE in carrying out statistical analyzes of its activity.

d) Concluding and executing civil-law contracts, including service contracts. The purpose of the processing is to fulfill the legal requirements as well as to conclude and execute the contracts, according to the specific needs of the activity.

e) On the development of electronic communications services. This processing goal is being pursued in order to achieve the legitimate interests pursued by PROCALVIE as regards the making available of the Website.

f) Carrying out any campaigns with the main objective of relying on customers and measuring their satisfaction with PROCALVIE. This processing goal is based on the consent of the site's visitors, their loyalty (for example, when targeting specific marketing activities) and the legitimate interest pursued by PROCALVIE in the conduct of its activities. As far as you give your consent by checking in the pop-ups of the registration form on the website (or accessing the website), another purpose of processing this data is to send news and other notifications about content, service offers, promotions and other events on our part of our affiliates and/ or partners through the text message and/ or e-mail to the extent you provided them. When consent is requested, if the visitor to the website does not give it, the activities concerned will not be carried out. Also, the visitor to the website may at any time revert to its decision to do so. When processing is carried out under the legitimate interest of PROCALVIE, the visitor has the right to oppose the processing if he / she justifies this for reasons related to the particular situation in which he / she is.

#### **6. How do we store your personal data?**

The personal information that you fill out through the website [www.procalvie-cro.ro](http://www.procalvie-cro.ro) within the Enrollment Form on the Website is transmitted and stored on secure servers located in the European Union, the European Economic Area.

#### **7. Communicating your personal data to others:**

We may transmit the information we collect to:

- affiliated companies in the country and abroad including our partners, associates or future owners of the website
- a mandate with whom we execute maintenance contracts that smoke some services
- a service and asset provider
- a market research organization
- a contractual partner PROCALVIE
- a public authority
- a judicial body, or other recipients from Romania, the EU or non-EU area
- a public authority of all kinds and judicial authorities.

For example, PROCALVIE can pass on personal data:

- requesting specialized support to companies or individuals to perform various activities on our behalf including the provision of services, sending emails or text messages marketing consulting, data analysis, making payments with the card credit advice for customers and for accounting and billing purposes
- when requested to do so, we may cooperate with any court, tribunal, regulatory body, police authority, or any similar authority in any investigations or proceedings that concern you or which relate to the use of the website. These may include the transmission of information about notifications sent through our services to the authorities in question, where appropriate. The organizer sends personal data to EU-GDPR.

#### **8. How long do we process personal data?**

Personal data are processed and stored by PROCALVIE for one year. With the completion of this period, the personal data corresponding to the website visitor processed by PROCALVIE will be anonymized in the databases and in the PROCALVIE system, but this process may take up to 30 days from receiving the participant's request, in other cases from the start of the process. This anonymization operation is equivalent to deleting the data because it is no longer possible to create a link with the data subject whose personal data has previously been processed.

#### **9. Personal data security.**

PROCALVIE certifies that it meets the personal data security requirements according to the applicable legal provisions. PROCALVIE uses security methods and technologies along with employee policies and

procedures to protect personal data in accordance with applicable law. The internal rules of organization and operation of PROCALVIE contain regulations on the confidentiality of personal data that are processed in PROCALVIE. PROCALVIE staff is instructed on the security and privacy of personal data being processed. Access to computers containing personal data is restricted by an account / user and password in accordance with the Regulation on Information Security in the Process of Decommissioning Techniques in PROCALVIE S.R.L., as well as with the PROCALVIE Security and Confidentiality Policy. Access to databases is only allowed for authorized persons.

#### **10. Automatically collection of other non-personal data.**

In some cases, PROCALVIE may collect non-personal information about website users. Examples of such information are the type of browser used, the operating system of the computer used, and the domains of the website where the link to the [www.procalvie-cro.ro](http://www.procalvie-cro.ro) website was made. While browsing [www.procalvie-cro.ro](http://www.procalvie-cro.ro) PROCALVIE will be able to store certain user information. This information will be in the form of a "cookie" file or a similar file. These cookies help PROCALVIE to build the [www.procalvie-cro.ro](http://www.procalvie-cro.ro) website or to provide advertising that best fits the interests and preferences of users. With most Internet browsers, you can delete or block cookies or receive a warning before receiving such a file. PROCALVIE recommends users to consult their browser instructions or help file: within the Cookies Policy, which can be accessed on [www.procalvie-cro.ro](http://www.procalvie-cro.ro). To find out more about these features, visit [www.procalvie-cro.ro/About/politicadecookies](http://www.procalvie-cro.ro/About/politicadecookies).

#### **11. Final provisions.**

PROCALVIE may update the security policy information of this Privacy Policy with the privacy and privacy of the [www.procalvie-cro.ro](http://www.procalvie-cro.ro) website. In the event of changes, you will be informed of changes in the way we use personal information by a notice sent to the first email address specified in your account on [www.procalvie-cro.ro](http://www.procalvie-cro.ro) or by placing a notice visible on our website.