

PERSONAL DATA PROTECTION

A. THE CONTROLLER OF YOUR PERSONAL DATA

NET BRINEL S.A., a Romanian legal entity, with registered office in Romania, Cluj County, Cluj -Napoca Municipality, Nicolae Titulescu Boulevard no. 4, registered at the Trade Register Office of the Cluj Court under no. J1994001648129 and with unique registration code 5800900 is the controller of your personal data. More specifically, your data will be processed by the BRINEL company that you have instructed or that provides you with IT products or services.

B. OUR COMMITMENT TO YOUR PERSONAL DATA

BRINEL undertakes to take all organisational and technical measures to implement the highest standards of confidentiality and transparency with regard to the personal data it processes in its current activity. With this INFORMATION, BRINEL provides you with a general description of the categories of your data that it processes, how and for what purposes it collects them, in which situations personal data will be transferred and the various rights and options you have in this regard. At the same time, BRINEL details how personal data is processed in the management of the relationship with its customers.

C. CATEGORIES OF PERSONAL DATA PROCESSED

Personal data that BRINEL processes may include:

- Contact information, such as your name, job title, postal address, including home address if you have provided it, business address, telephone number, mobile phone number, fax number and e-mail address;
- Additional business information processed compulsorily in a contractual relationship with BRINEL or voluntarily communicated by you, such as instructions given, payments made, requests and projects;
- Information collected from public registers;
- If legally required for compliance purposes, information regarding relevant and important litigation or other legal action brought against you or a third party affiliated with you and your interaction with us that may be relevant for any purposes relating to the provision of BRINEL's services;
- In limited situations, where the collection of such data is a legal obligation or is mandatory for the purpose of defending a legitimate right in court, BRINEL may collect special categories of personal data, such as the personal identification number ("CNP").

D. HOW YOUR PERSONAL DATA ARE PROCESSED

BRINEL may collect personal data about you in certain circumstances, including:

- Where you provide or make an offer to provide certain products and services or your organisation provides or offers to provide products and services for BRINEL;
- In the event of any kind of contractual legal relationship between you and BRINEL;
- In certain circumstances, BRINEL may collect personal data about you from public records.

E. LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

Any operation that amounts to processing (collection, storage, recording, structuring, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, destruction) of your personal data will be carried out on one of the following legal grounds:

- The processing is necessary for the performance of a contract to which you or your organisation is a party, or the processing is necessary for entering into a contract with you or your organisation;
- The processing is necessary for compliance with a legal obligation;
- The processing is carried out on the basis of your prior explicit consent;
- The processing is necessary to protect the vital interests of you or another natural person;
- The processing is necessary for the legitimate interests of BRINEL, unless your interests or fundamental rights and freedoms are overridden by these interests.

In cases where applicable legal provisions require your prior explicit consent for the processing of special categories of data, we will process such data only on the basis of your prior explicit consent. At the same time, we will take additional safeguards that any natural person or entity that communicates your special personal data to us has obtained your prior consent.

You may choose to withdraw your consent to marketing materials at any time by simply notifying us of your intention at protectiadatelor@brinel.ro.

You have the right to withdraw your consent at any time. Withdrawal of your consent will not affect the lawfulness of the processing based on your consent prior to withdrawal. In order to withdraw your consent for any processing to which you have previously consented, please send us an e-mail to protectiadatelor@brinel.ro, contact us at +40264 414 610, send us a fax to +40 264 414 617, or send us a letter to Net BRINEL SA, 4 Nicolae Titulescu Boulevard, Cluj-Napoca, Cluj County, Romania. In all cases, consent may be withdrawn in the same manner in which it was given.

As a general rule, in cases where you withdraw your consent, BRINEL will no longer allow the processing of your data and will take appropriate measures to delete any records of your personal data. However, if the processing is strictly necessary for the performance of contracts entered into by BRINEL, or the processing could be based on other legitimate grounds provided for by the applicable legal provisions, BRINEL will proceed with such processing and will inform you accordingly.

F. THE PURPOSES FOR WHICH PERSONAL DATA ARE PROCESSED

BRINEL may only use personal data for the following purposes ("Permitted Purposes"):

- Managing or administering your or your organization's business relationship with BRINEL, including payment processing, accounting, auditing, billing and collection, support services;
- Analyzing and improving our services and communications to you;
- Protecting security and managing access to our premises, IT and communication systems, online platforms, websites and other systems, preventing and detecting security threats, fraud or other criminal or malicious activity;
- For insurance purposes;
- For purposes of monitoring and evaluating compliance with our policies and standards;
- For the purpose of identifying persons authorised to transact on behalf of our customers, beneficiaries, suppliers and/or service providers;
- For the purposes of complying with court orders and exercising and/or defending our legal rights;

- For any purpose related and/or ancillary to any of the above or any other purpose for which your personal data has been provided to us. If you have expressly given us your consent, we may also process your personal data for the following purposes:
- Customer surveys, marketing campaigns, market analysis, sweepstakes, contests or other promotional activities or events.

With respect to marketing communications, we will provide you - where legally required - with that information only after you have selected this option to opt-in, and we will offer you the opportunity to opt-out at any time if you no longer wish to receive marketing communications from us. We will not use your personal data to make automated decisions that affect you or create profiles other than those described above.

G. SHARING OF YOUR PERSONAL DATA

BRINEL may share personal data in the following circumstances:

If you are a BRINEL customer, or are contracted by or an agent of a BRINEL customer, we may disclose your personal data to:

- Subcontractors, agents or other agents of BRINEL and only with your prior consent.
- We may share your personal data with any third party to whom we assign or novate any rights or obligations;
- We may share your personal data with courts, law enforcement authorities, regulators, or attorneys or other persons if it is reasonably necessary to establish, exercise or defend a legal or natural right, or for the purpose of alternative, confidential dispute resolution;
- Otherwise, we will only disclose your personal data when you instruct us or give us permission, when we are required by applicable law or regulations or requests of judicial or official bodies to do so, or as necessary to investigate actual or suspected fraudulent or criminal activity.

H. PERSONAL DATA YOU PROVIDE TO US ABOUT OTHER INDIVIDUALS

If you provide us with personal data about another person (such as one of your directors or employees, or a person with whom you have a professional relationship), you must ensure that you have the right to disclose that personal data to us and that, without further action, we may collect, use and disclose that personal data.

In particular, you should ensure that the individual concerned is aware of the various matters covered in this Notice as they relate to that individual, including our identity, how that individual may contact us, the purposes for which we collect, our personal data disclosure practices, the individual's right to obtain access to personal data and to lodge complaints about our handling of personal data, and the consequences of not providing personal data (such as our inability to provide services).

I. KEEPING YOUR PERSONAL DATA SECURE

We have implemented technical and organisational measures to maintain the confidentiality and security of your personal data in accordance with our internal procedures regarding the storage, disclosure and access of personal data. Personal data may be stored on our personal data technology systems or in hard copy format.

J. TRANSFERRING YOUR PERSONAL DATA ABROAD

BRINEL has no intention to transfer your personal data abroad and outside the EEA.

In exceptional circumstances, under the Permitted Purposes, BRINEL may transfer personal data to countries that have not been recognised by the European Commission as providing an adequate level of protection.

We will ensure that such international transfers are made subject to appropriate or adequate safeguards as required by the General Data Protection Regulation (EU) 2016/679 or other applicable laws. This includes entering into EU Standard Contractual Clauses. You can contact us at any time using the contact details below if you would like further information about these safeguards.

K. UPDATING PERSONAL DATA ABOUT YOU

If any of the personal data you have provided to us changes, for example if you change your first name, last name or e-mail address or if you wish to cancel any request to us, or if you become aware that we hold any incorrect personal data about you, please notify us by sending an e-mail to protectiadatelor@brinel.ro. We will not be liable for any loss arising from incorrect, unauthentic, insufficient or incomplete Personal Data you provide to us.

At the same time, we will take reasonable steps to periodically update our records of your personal data, but we will not be liable for any unforeseen changes to your personal data.

L. THE PERIOD FOR WHICH PERSONAL DATA WILL BE STORED

BRINEL has implemented technical and organisational measures to organise the process and criteria laid down for the deletion or removal of your personal data.

Your personal data will be deleted or erased when it is no longer reasonably required for the purposes permitted or when you withdraw your consent (if applicable) and BRINEL is no longer under a legal obligation to continue to store that data. However, we will retain your personal data when it is necessary for the exercise or defence by BRINEL of a legal right.

Unless you expressly request us to store your personal data for a longer period of time or if the personal data is necessary for the defence of a possible legal claim without a retention period, the personal data will be deleted within a maximum of 30 years from the date it was collected.

M. YOUR RIGHTS IN RELATION TO THE PROCESSING OF PERSONAL DATA

Subject to certain legal conditions, you have the following rights in relation to the processing of your personal data:

- the right to request a copy of the personal data we hold about you; if you exercise this right in a way that is manifestly abusive or unfounded, we reserve the right to reimburse you for the necessary costs incurred in processing those copies and for returning the copies within a reasonable period of time;
- the right to rectify any inaccurate personal data and the right to object to or restrict our use of your personal data;
- you may also make a complaint if you are concerned about the way we handle your personal data;
- the right to erasure of your personal data, where you have withdrawn your consent, the processing is no longer necessary or the processing is contrary to law.

If you wish to do so, please send us an e-mail to protectiadatelor@brinel.ro. We may ask you to prove your identity by providing us with a copy of a valid form of identification to comply with our security obligations and prevent unauthorised disclosure.

We will consider any requests or complaints we receive and will provide you with a timely response. If you are not satisfied with our response, you may submit your complaint to the National Supervisory Authority for Personal Data Processing - based at Bd. Gheorghe Magheru nr. 28-30, Bucharest, Romania, web address -www.dataprotection.ro

N. HOW TO CONTACT US?

It is our intention to be fully transparent and to remain in constant contact with you on any privacy issues. If you wish to contact us with any questions, comments or requests, please send us an e-mail to protectiadatelor@brinel.ro, contact us at +40 264 414 610, send us a fax to +40 264 414 617, or send us a letter to Net BRINEL SA, 4 Nicolae Titulescu Boulevard, Cluj-Napoca, Cluj County, Romania.