

## DATA PROTECTION POLICY\_ CONTRACTUAL RELATIONSHIP

### 1. Introduction

This communication is made available to you – also pursuant to article 13 of European Regulation 2016/679 on the protection of personal data (“Regulation” o “GDPR”), to the current national regulations and subsequent amendments and additions – by **Hipac Romania S.R.L.** with legal address in Sat Dragomiresti-Deal, Com. Dragomiresti-Vale, Aleea Constanza nr. 1, Jud. Ilfov, as Data Controller of your personal data.

The purpose of this Policy is to inform you about the methods of processing of your personal data concerning.

### 2. Type of data processed

Data relating to your company, your employees and collaborators, acquired by us exclusively on the basis of the contractual relationship in place, and to allow us to carry out our economic activity in an appropriate manner and in accordance with the laws in force.

### 3. Purpose of treatment

Your data will be processed for “administrative-accounting”, commercial, statistical and promotional purposes.

### 4. Sharing and transfer of personal data

The data collected by Hipac Romania S.R.L. will be shared only for the purposes mentioned above; we will not share or transfer your personal data to third parties other than those indicated in this Privacy Policy.

During our activities and exclusively for the same purposes as those listed in this Privacy policy, your personal data may be transferred to the following categories of recipients:

- The company’s staff;
- Hipac Group’s companies;
- Service providers (IT system providers, cloud service providers, database providers and consultants);
- Banks, credit institutions and insurances;
- Public Administration for law purposes;
- Any public and/or private entity to whom the communication of your personal data may be necessary in relation to the purposes indicated above.

The updated list of data processors is available at the registered office of the Data Controller and will be provided upon written request.

This privacy policy also applies to the transfer of data to third countries where the level of data protection is different from that of the European Union: any transfer of personal data to third parties will be made only after having informed you and, where required, after receiving your consent. Any transfer of data to countries other than those for which the European Commission has taken a decision

### 1. Introducere

Aceasta comunicare va este pusa la dispozitie– in sensul art. 13 din Regulamentul European 2016/679 in materia protectiei datelor personale (“Regulamentul” sau “GDPR”), la reglementarile nationale in vigoare si la modificarile si completarile ulterioare – de **Hipac Romania S.R.L.** cu sediul legal in Sat Dragomiresti-Deal, Com. Dragomiresti-Vale, Aleea Constanza nr. 1, Jud. Ilfov, in calitate de operator al datelor dumneavoastra personale. Scopul acestui aviz este de a va informa despre metodele de prelucrare a datelor dumneavoastra cu caracter personal.

### 2. Tipul datelor prelucrate

Datele referitoare la Compania dumneavoastra, angajatii si colaboratorii dumneavoastra, dobandite de noi exclusiv pe baza relatiei contractuale in vigoare, si pentru a ne permite sa ne desfasuram activitatea economica intr-un mod adecvat si in conformitate cu legile in vigoare.

### 3. Scopul procesarii

Datele dumneavoastra vor fi procesate in scopuri administrativ-contabile, comerciale, statistice si promotionale.

### 4. Partajarea si transferul de date cu caracter personal

Datele colectate de Hipac Romania S.R.L. vor fi impartasite doar in scopurile mentionate mai sus; nu vom impartasi sau transfera datele dumneavoastra personale unor terte parti, altele decat acelea indicate in aceasta Politica de Confidentialitate.

In timpul activitatii noastre si in scopul celor enumerate in aceasta Politica de Confidentialitate, datele dumneavoastra personale pot fi transferate catre urmatoarele categorii de destinatari:

- Personalul Companiei;
- Companiile Grupului Hipac;
- Furnizorii de servicii, (furnizorii de sisteme IT, furnizorii de servicii cloud, furnizori de baze de date si consultanti);
- Banci, institutii de credit si asiguratori;
- Administratia Publica in spiritul legii;
- Orice entitate publica si/sau privata careia comunicarea datelor dumneavoastra personale ii poate fi necesara in legatura cu scopurile indicate mai sus.

Lista actualizata a procesatorilor de date este disponibila la sediul social al Controlorului de Date si va fi furnizata in urma unei cereri scrise.

Aceasta politica de confidentialitate se aplica si transferului de date catre tari terte in care nivelul de protectie a datelor este diferit de cel al Uniunii Europene: orice transfer de date cu caracter personal catre terti se va face numai dupa ce ati fost informat si dupa caz, dupa primirea consimtamantului dumneavoastra. Orice transfer de date catre tari, altele decat cele pentru care Comisia Europeana a

of adequacy is based on agreements using standard contractual clauses adopted by the European Commission or other appropriate guarantees in compliance with applicable laws.

#### 5. Protection of personal data

Hipac Romania S.R.L. has implemented adequate technical and organizational measures to provide an adequate level of security and confidentiality to personal data. These measures take into account:

- The state of the art of technology;
- The costs of its implementation;
- The nature of the data;
- The risk of processing.

The purpose is to protect them from accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access and from other unlawful forms of processing.

Furthermore, when managing your personal data, Hipac Romania S.R.L.:

- Receives and processes personal data that are adequate, relevant and not excessive, as required to fulfil the above purposes and
- Ensure that such personal data remain current and accurate.

#### 6. Storage periods

Without prejudice to your right to object to the processing of personal data and/or to request their deletion, Hipac Romania S.R.L. will keep your personal data only for the time necessary to achieve the purpose for which they were collected and received, or to meet legal or regulatory requirements.

#### 7. Your right

Your rights are:

- **RIGHT TO RECTIFICATION.** You have the right to obtain from Hipac Romania S.R.L. the rectification of personal data concerning you. Hipac Romania S.R.L. shall make reasonable efforts to ensure that the personal data it holds are accurate, complete current and relevant.
- **RIGHT TO RESTRICTION OF PROCESSING.** You can obtain a restriction to the processing your personal data where:
  - The accuracy of the personal data is contested by the data subject, during the period when Hipac Romania S.R.L. must verify the accuracy of the personal data;
  - The processing is unlawful and you require the erasure of personal data or the restriction of their use instead;
  - Hipac Romania S.R.L. no longer needs the personal data for the purposes of the processing, but they are required by you to establishment, exercise or defend of legal claims;

luat o decizie de adecvare se bazeaza pe acorduri care utilizeaza clauze contractuale standard adoptate de Comisia Europeana sau alte garantii adecvate in conformitate cu legile aplicabile.

#### 5. Protectia datelor cu caracter personal

Hipac Romania S.R.L. a implementat masuri tehnice si organizatorice adecvate pentru a oferi un nivel adecvat de securitate si confidentialitate datelor personale. Aceste masuri iau in considerare:

- Starea tehnologiei;
- Costurile implementarii sale;
- Natura datelor;
- Riscul procesarii.

Scopul este de a le proteja de distrugerea sau modificarea accidentala sau ilegala, pierderea accidentala, divulgarea sau accesul neautorizat si de alte forme ilegale de prelucrare.

Mai mult, atunci cand gestioneaza datele dumneavoastra personale, Hipac Romania S.R.L.:

- Primeste si prelucreaza date cu caracter personal adecvate, relevante si care nu sunt excesive, dupa cum este necesar pentru indeplinirea scopurilor de mai sus si
- Se asigura ca aceste date cu caracter personal raman actuale si corecte.

#### 6. Perioadele de stocare

Fara a aduce atingere dreptului dumneavoastra de a va opune prelucrării datelor cu caracter personal si /sau de a solicita stergerea acestora, Hipac Romania S.R.L. va pastra datele dumneavoastra numai in timpul necesar pentru atingerea scopului pentru care au fost colectate si primite sau pentru a indeplini cerintele legale sau de reglementare.

#### 7. Drepturile dumneavoastra

Drepturile dumneavoastra sunt:

- **DREPTUL LA RECTIFICARE.** Dumneavoastra aveti dreptul de a obtine de la Hipac Romania S.R.L. rectificarea datelor cu caracter personal care va privesc. Hipac Romania S.R.L. va depune eforturi rezonabile pentru a se asigura ca datele cu caracter personal pe care le detine sunt complete, curente si relevante;
- **DREPTUL LA RESTRICTIONAREA PROCESARII.** Dumneavoastra puteti obtine o restrictionare a procesarii datelor personale unde:
  - Precizia datelor personale este contestata de persoana vizata in perioada in care Hipac Romania S.R.L. trebuie sa verifice acuratetea datelor personale;
  - Prelucrarea este ilegala si solicitati stergerea datelor cu caracter personal sau restrictionarea utilizarii acestora;
  - Hipac Romania S.R.L. nu mai are nevoie de datele cu caracter personal in scopul prelucrării dar sunt solicitate de

You have objected to the processing, while Hipac Romania S.R.L. checks whether your legitimate reasons prevail over your own.

- **RIGHT TO ACCESS.** You have the right to obtain from Hipac Romania S.R.L. information about your personal data, and also information on which categories of personal data Hipac Romania S.R.L. owns or controls, for what purpose they are used, where they have been collected and to whom they may have been communicated.
- **RIGHT TO DATA PORTABILITY.** As a result of your application, Hipac Romania S.R.L. will transmit the data to another Controller on condition that the processing is based on your consent or is necessary for the execution of a contract.
- **RIGHT TO ERASURE,** Unless the processing of data is necessary for compliance with a legal obligation or to establishment, exercise or defend of legal claims. You have the right to obtain from Hipac Romania S.R.L. the erasure of personal data if:
  - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - you opposed to the processing of your personal data;
  - the personal data have been unlawfully processed.
- **RIGHT TO OBJECT.** You object at any time to the processing of your personal data, on the condition that the data processing is not based on your consent but on the legitimate interest of Hipac Romania S.R.L. or third party. Hipac Romania S.R.L. shall no longer process the personal data unless the Controller demonstrates mandatory and legitimate reasons for the processing, an overriding interest in treatment, or the exercise or defend of legal claims. When you object to processing, specify if you're going to erase your personal data or limiting the processing.
- **RIGHT TO LODGE A COMPLAINT.** You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place where the alleged infringement took place.

## 8. Amendments to this Privacy Policy

Any future changes or additions to the processing of personal data in this privacy notice will be notify in advance through an individual notification, through the usual communication channels used by Hipac Romania S.R.L. (etc. e-mail or through the internet).

## 9. Titolare del trattamento e Referente per la protezione dei dati

To exercise your rights under articles 15 and ss. of the GDPR, you may contact the Data Controller, Hipac Romania S.R.L. with legal

dumneavoastra pentru a stabili, exercita sau apara revendicari legale;

- V-ati opus procesarii, timp in care Hipac Romania S.R.L. verifica daca motivele dumneavoastra legitime prevaleaza.

- **DREPTUL LA ACCES .** Dumneavoastra aveti dreptul de a obtine de la Hipac Romania S.R.L. informatii despre datele dumneavoastra personale si de asemenea informatii despre ce categorii de date cu caracter personal Hipac Romania S.R.L. detine sau controleaza, in ce scop sunt utilizate, unde au fost colectate si cui au fost comunicate ;
- **DREPT LA PORTABILITATEA DATELOR.** Ca urmare a cererii dumneavoastra, Hipac Romania S.R.L. va transmite datele unui alt controlor cu conditia ca prelucrarea sa se bazeze pe consimtamantul dumneavoastra sau sa fie necesara pentru executarea unui contract;
- **DREPTUL LA STERGERE.** Cu exceptia cazului in care prelucrarea datelor este necesara pentru respectarea unei obligatii legale sau pentru stabilirea, exercitarea sau apararea revendicarilor legale. Aveti dreptul de a obtine de la Hipac Romania S.R.L. stergerea datelor cu caracter personal daca:
  - datele personale nu mai sunt necesare in raport cu scopurile pentru care au fost colectate sau prelucrate;
  - v-ati opus prelucrarii datelor dumneavoastra personale;
  - datele personale au fost prelucrate ilegal.
- **DREPTUL LA OPOZITIE.** Va opuneti oricand prelucrarii datelor dumneavoastra personale, cu conditia ca prelucrarea datelor sa nu se bazeze pe consimtamantul dumneavoastra, ci pe interesul legitim al Hipac Romania S.R.L. sau al unei terte parti; Hipac Romania S.R.L. nu va mai prelucra datele cu caracter personal decat daca controlorul demonstreaza motive obligatorii si legitime pentru prelucrare, un interes major pentru exercitarea sau apararea revendicarilor legale. Cand obiectati prelucrarea, specificati daca veti sterge datele dumneavoastra personale sau veti limita prelucrarea.
- **DREPTUL DE A DEPUNE O PLANGERE.** Aveti dreptul de a depune o plangere la o autoritate de supraveghere, in special in Statul Membru de resedinta, locul de munca sau locul unde a avut loc presupusa incalcare.

## 8. Modificari la aceasta politica de confidentialitate

Orice modificari viitoare sau completari la prelucrarea datelor cu caracter personal din aceasta notificare de confidentialitate vor fi notificate in avans printr-o notificare individuala, prin canalele obisnuite de comunicare utilizate de Hipac Romania S.R.L. (etc. e-mail sau prin internet).

## 9. Controler de date si Referent de protectie a datelor

Pentru a va exercita drepturile conform art. 15 si urmatoarele din GDPR, puteti contacta Controlorul de date, Hipac Romania S.R.L. cu sediul legal in Sat Dragomiresti-

address in Sat Dragomiresti-Deal, Com. Dragomiresti-Vale, Aleea Constanza nr. 1, Jud. Ilfov, telephone +40 21 3523600 and fax +40 21 3523608.

Deal, Com. Dragomiresti-Vale, Aleea Constanza nr. 1, Jud. Ilfov, telefon +40 21 3523600 – fax +40 21 3523608.

The contact person for the protection of personal data is the General Manager, e-mail [protectia\\_datelor@hipacromania.ro](mailto:protectia_datelor@hipacromania.ro).

Persoana de contact pentru protectia datelor cu caracter personal este Directorul General, e-mail [protectia\\_datelor@hipacromania.ro](mailto:protectia_datelor@hipacromania.ro).

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