

POLICY REGARDING THE PROTECTION OF PERSONAL DATA APPLIED WITHIN COMELF SA Bistrita

The purpose of this policy

The purpose of this policy is to explain how our company manages your personal information. Our company is committed to protecting and observing the confidentiality of your personal data in the current legal environment.

Data Operator

If you would like to contact us about your personal information or about this policy, you can use the following contact details:

Company Name:	COMELF SA as a data operator
Address:	Str. Industriei nr. 4, Bistrita / BN, Romania
Phone:	0263 234 462,
fax:	0263 238092,
e-mail:	comelf@comelf.ro

Information gathered

As part of our business processes, in order to manufacture our products and provide our services we process data that may include:

- information from and about company personnel (employee and collaborator), according to legal regulations, internal regulation, working procedures;
- information provided by (prospective) customers and information generated by company personnel involved in customer relationship management, in accordance with legal regulations, specific policies, work procedures and, where applicable, signed contracts/agreements;
- information provided by (potential) suppliers and information generated by company personnel involved in managing the relationship with suppliers, in accordance with legal regulations, signed contracts/agreements, work procedures;
- information provided by shareholders and information generated by company personnel involved in shareholder management, according to legal regulations, specific policy, working procedures;
- information obtained through observation (for example, through security cameras), to comply with legal obligations, to ensure the safety of our visitors and our employees, to protect the company's assets.

The company's website also uses cookies to give you easy site navigation. Cookie information is stored in your browser and performs functions such as recognition when you return to our site and helps our team understand what sections of the site are more interesting and useful to visitors. We may collect information that includes: the IP address of the device you use to view our webpage, the region or general location from where you visit the site, the browser type, the operating system, the history of the visited pages, the links and the buttons accessed, the length of the session on our page. These data are anonymous, but through in-depth investigations they can lead to the identification of a particular person, so we handle them as personal data.

You have the option to set your internet browser so that it rejects certain cookies. In this case, there will be a negative impact on your site navigation.

Processing of collected information

Under the applicable legal framework, processing of personal data may include, but is not limited to, one or more of any combination of: collecting, recording, organizing, structuring, storing, modifying, consulting, using, transmitting, deleting/destroying data, data recovery.

We process your personal data only for legitimate purposes: to manufacture and deliver the required products and to provide services; for marketing purposes to improve and develop the products and services we offer; to meet legal requirements.

We process the data strictly necessary for the stated purposes and the access of the staff (employee and collaborator) to the personal data of other employees, clients, suppliers / collaborators, shareholders is controlled, according to the responsibilities assigned and described through job descriptions and internal regulations. No decision taken within our company relies on purely automated (non-human) data-processing.

The period of processing and storage of the collected information

The company's field of activity is regulated by a specific regulatory framework and subjected to verifications by several competent authorities. Thus, personal information is used and kept for legal purposes and for compliance for situations where assessments/inspections are to be performed by competent authorities. Some data are kept on paper, as required by law.

Your personal data is processed for as long as you have shares in the company and after you cease to be a shareholder in our company for the period required by applicable law, including archiving provisions.

The processed data is stored in our company's headquarters and IT systems, but sometimes we store data on the servers of our trusted service providers.

We take the necessary steps to ensure the confidentiality of the information during its storage.

Communicating information collected to other recipients

In order to meet our legal obligations or other legitimate purposes, we may transmit your personal data to:

- service providers (including consultants, lawyers, experts, auditors, IT service developers, IT platform administrators/software used to conduct our company's activities, archiving companies), financial and banking institutions and other recipients empowered expressly by our company in accordance with the applicable legislation on the protection of personal data and for the purposes of data processing;
- public authorities, judicial bodies, according to legal requirements;

but always ensuring that we put in place adequate safeguards to protect your data (for example, contractual clauses, imposing a certain procedure).

Video surveillance (CCTV)

We use closed circuit television (CCTV) for security, monitoring and crime detection purposes. We keep the information collected by CCTV only for a period of time that allows us to help regulators and law enforcement agencies. This information is kept in secure environments and access is restricted to qualified security personnel only.

To that end, we are making continuous video surveillance in and around certain areas on our premises (entrances, access ways, lobbies). We do not monitor the spaces in which your privacy or confidentiality may be violated (for example: toilets). We also do not use the recorded image for any other purpose, and we do not perform any further analysis on it. Access to recordings is granted only to a restricted group of trusted employees and is not shared with anyone except the competent authorities as evidence for the purposes of court proceedings. Recordings storage time is limited to 30 days, and after such period has expired, they are automatically overwritten, without the possibility of reconstitution.

Your rights with regard to processed personal data

We ensure the transparency of information, communications and ways of exercising your rights with respect to personal data processed by us:

- *The right of access to personal data* - you can obtain from us a confirmation that personal data are processed or not, and, if so, you can know the purposes of the processing, the personal data categories that we have, the parties or categories of parties with which your personal data is shared, the data retention period, and the source of our data that is not collected directly from you.
- *Right to a copy of your personal information* - You may request a copy of some or all personal information we hold about you.
- *Right to rectify personal data* - You may request the rectification/completion of any personal data processed by us and which is inaccurate/incomplete.
- *Right to delete data* - you can request the deletion of your personal data we hold. This right applies only in certain situations. If your personal information is required to fulfill a contractual obligation with you, our company may be unable to fulfill this obligation. Also, if your personal information is required to comply with certain legal obligations (for example, tax legislation), your request for the deletion of your personal data can not be complied with.

- *Right of withdrawal of consent* - if certain activities are done on the basis of your consent to the processing of your personal data, you may withdraw that consent.
- *The right to restrict the processing of personal data* - if you have questioned the accuracy of your data or we do not need personal data for processing but are requested by you to establish, exercise or defend your legal claims or have objected to processing on the grounds that the company considers legitimate, you have the right to request that we restrict the processing of your personal information.
- *Right to data portability* (data transfer) - if processing is based on your consent or is done by automated means, you have the right to request our company to send your data to another operator.
- *The right to oppose the processing of personal data* - you can oppose the company's use of personal data that is processed on a basis that the company considers legitimate.

In order to exercise any of the above rights, you may submit a written request to our company's contact details listed in the **"Data Operator"** section of this policy.

We will answer your request without undue delay within one month of the receipt of such request. This period may be extended by two months when necessary, taking into account the complexity and the number of applications. In such a case, we will inform you of this extension, within one month of receipt of the request, giving you the reasons for the delay.

You are also always entitled to file a complaint with the National Supervisory Authority for Personal Data Processing.

Security

Our Company implements appropriate and reasonable technical and organizational measures to protect personal data processed against unauthorized loss, use or unauthorized access, transfer, alteration or destruction of personal data, and we also observe the confidentiality of all personal data we receive and manage.

As the security of certain communications over the Internet is not fully secured, our company can not guarantee the security of the information you communicate using the Internet connection, so you assume the inherent security implications when you use the internet. Our Company is not liable for any direct or consequential loss or consequential, incidental, indirect or punitive damages arising from such a situation.

Policy changes

Whenever necessary, we retain the right to revise our *privacy policy* and we will publish the edition in force on our website and/or at all our offices.

GENERAL MANAGER,
ENG. GH. CENUSA
27.11.2018



