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Protection of personal data

TehnoWorld

Foreign policy - Information note

1 Brief description of the policy

This document highlights, in general, the way in which the company Tehno World S.R.L., as a personal data controller, processes personal data from the perspective of Regulation 679/27.04.2016 on the protection of individuals with regard to data processing of personal data and on the free movement of such data (General Data Protection Regulation) issued by the Council of the European Union and the European Parliament.

This document presents information on: the identity of the personal data controller, the categories of personal data processed, the sources of data, the methods of processing, the purposes and grounds of processing, recipients of data, rights of data subjects, and other relevant information.

We hereby inform you that, according to the legislation in force, any natural person whose personal data are processed, has the right to object to the processing under the law.

Tehno World SRL Management

2 The identity and contact details of the personal data controller

Tehno World S.R.L. (“TehnoWorld”) is a personal data controller.

Tehno World S.R.L. has its registered office in Sat Baia, Comuna Baia nr. 1616, jud. Suceava, is registered with the Trade Register under no. J33/145/2003 and has Sole Registration Code 15231305.

TehnoWorld's contact details are as follows:

Address: sat. Baia, Comuna Baia nr. 1616, jud. Suceava, DN2E km 2, RO-727020

Phone: [\(0230\) 546.696](tel:(0230)546.696); (0230) 542.002

Fax: [\(0230\) 206.090](tel:(0230)206.090)

E-mail: office@tehnworld.ro

You can also contact us through the existing contact form on our website: <https://www.tehnworld.ro/ro/contact/contact>

3 Contact details of the data protection officer

TehnoWorld has appointed a data protection officer, and he/she can be contacted at the e-mail address gdpr@tehnworld.ro

To the extent that you do not want to contact the data protection officer by e-mail, any other type of correspondence is available using the contact details of TehnoWorld mentioned in previous Chap. 2.

4 The categories of personal data that we process

Depending on the category of people you belong to, as well as on the way in which your personal data comes into our possession, we may process, in whole or in part, the following categories of personal data:

1. identification data (i.e. last name, first name, address, etc.);

2. identification data using remote (long distances) means of communication (i.e. telephone number, e-mail address, IP of a device);
3. data regarding the job/profession (i.e. title, place of work, etc.);
4. data regarding the way in which you carry out your activity (i.e. the way you negotiate the conclusion of a contract with us, the content of an e-mail sent from an address related to your place of work, etc.);
5. graphoscopic data (i.g your signature applied on a contract concluded with us, your signature applied on a document sent to us, etc.);
6. financial data (i.g your bank account, the bank where it is opened, the date of a payment, the justification of a payment, etc.);
7. your opinions (i.g your opinion regarding the services/products provided by our company, etc.);
8. other categories of personal data, including special data, depending on the circumstances (i.e. insofar as you inform us that you cannot reach a set appointment with us due to medical reasons we will process the data transmitted regarding your health condition, information regarding the children involved in the TehnoWorld Generation project etc).

5 The sources from which we obtain your personal data

The sources from which we obtain your personal data are varied, from case to case, and may consist of:

1. yourself (i.e. you send us an e-mail or contact us by phone, you send us a CV in order to be hired within our company, etc.);
2. the company/entity where you are employed (i.e. your company transmits your personal data to us in order to be able to contact you in order to initiate and carry out a dialogue on a certain topic, etc.);
3. the company /entity with which you are in a certain relationship (i.e. the company for which you provide certain goods and/or services without being its employee, etc.);
4. other persons/entities that hold your personal data (i.e. a friend, a company you have been employed by, another client of ours, etc.);

5. public sources (i.e. data provided by the Trade Register Office, search results displayed by a search engine, etc.).

6 The ways in which we process your personal data

TehnoWorld may process your personal data, in whole or in part, in the following ways:

1. collection (i.e. receiving a contract signed by you, receiving an e-mail from you, etc.);
2. storage (i.e. keeping an e-mail received from you, keeping a document sent by you, etc.);
3. registration (i.e. your registration in our customer base, etc.);
4. viewing (i.e. viewing your contact details in order to send an e-mail, etc.);
5. change (i.e. when we change your contact details, etc.);
6. encryption (i.e. when we encrypt devices that store your personal data, etc.);
7. transmission /disclosure (i.e. when we transmit your contact details to a courier etc);
8. destruction (i.e. when we erase your data, etc.);
9. any other operations performed on/in connection with your personal data (i.e. restricting access, pseudonymizing data, anonymizing data, etc.).

7 The purposes for which your personal data are processed and the legal bases of the processing of personal data

TehnoWorld processes a series of personal data based on one or more purposes, as well as one or more legal grounds, as follows.

In order to understand the purposes and legal grounds for which we process your personal data, please access the category of persons you belong to (7.1 Potential clients / clients / former clients 7.2 Potential suppliers / suppliers / former

suppliers, 7.3 Potential partners / partners/former partners and other persons related to them, 7.4 Other persons).

7.1 Potential clients/clients/former TehnoWorld clients and other people related to them

TehnoWorld processes the personal data of its potential clients /clients /its former clients, as well as of other individuals in a certain connection / relationship with them such as:

1. natural persons who have the status of representatives of potential clients/clients/former clients (i.e.: administrator, CEO, CFO, etc.);
2. individuals who have the status of employees of potential clients/clients/former clients (i.e.: employees, civil servants, contract staff, etc.);
3. natural persons who have the status of representatives of suppliers/partners/subcontractors/consultants/etc of potential clients/clients/former clients (i.e.: administrator of a transport company, the CEO of a bank where the client has opened an account etc);
4. natural persons who have the status of employees of suppliers/partners/subcontractors/consultants/etc of potential clients/ clients/former clients (i.e.: employee of a transport company, employee of an outsourced audit company etc);
5. natural persons who have the status of representatives of a public authority/institution related to potential clients/clients/former clients (i.e. an ANAF director, etc.);
6. natural persons who have the status of employees of a public authority/institution related to potential clients/clients/former clients (i.e. an ANAF (National Agency for Fiscal Administration) inspector, etc.);
7. any other natural person in any kind of connection with potential clients /clients /former clients (i.e.: a former employee of a client, etc.).

7.1.1 Pre-contractual period

Purposes of processing

TehnoWorld aims to offer/provide its services/products to as many people/companies/entities as possible.

During the pre-contractual period, TehnoWorld processes your personal data for the following purposes:

1. in order to initiate and carry out a dialogue;
2. in order to present our services/products;
3. in order to obtain information on the basis of which we can propose the most suitable services/products;
4. in order to draw up the documents in connection to the pre-contractual period (i.e. offer, contract model, etc.);
5. in order to understand the requirements and trends of the profile market (i.e. what services/products are sought, by which categories of customers, at what prices, etc.);
6. in order to understand how we can improve our services/products offered (i.e. assessing internal employees, analyzing the opportunity to hire additional staff, etc.);
7. in order to understand how we should organize our activity from all points of view (commercial/marketing/HR/IT/financial, etc.) (i.e. assessing the contracts concluded in a month as compared to contracts that could have been concluded, assessing the way in which our employees fulfill their duties, analysing the way in which we present ourselves as a company, etc.);
8. in order to protect and achieve our rights and interests (i.e. in order to contract a new client, in order to carry out our own activities, in order to achieve our object of activity, in order to carry out our activities in a way that is optimal for us from any point from a technical /economic point of view, etc.);
9. in order to fulfill some legal obligations (i.e. in order to fulfill some legal obligations regarding the provision of information at the request of a public authority/institution, such as ANAF, etc.).

Legal bases of processing

The legal grounds for the processing of your data are:

1. the processing is necessary in order to take steps at your request (i.e. we draw up a contract model, we draw up a offer customized to the needs of your company, we provide you the requested information, etc.);
2. the processing is necessary in order to fulfill some legal obligations incumbent on us (i.e. we may be compelled by a public authority/institution to provide certain information under the law, etc.);
3. processing is necessary to achieve our legitimate interests in order to fulfil the purposes set forth above (purposes of processing).

In view of the above, it is possible that TehnoWorld may contact you, either on its own initiative (i.e. we send you an e-mail) or on your own initiative (i.e. you contact us by phone, visit our website, etc.), or at the initiative of another person/entity (i.e. both you and we receive an e-mail from a third party).

To the extent that your company holds the status of TehnoWorld client or person in any connection /relationship with a client of ours, your personal data will be processed according to Chap. 7.1.2.

Data storage period

TehnoWorld will store your necessary data only for the period required to achieve the purposes set out above (Purposes of processing).

This period varies from one case to another depending on a number of circumstances (i.e. category of data provided, purpose of supply, specific purpose of processing, incidental legal obligations, etc.).

For example, to the extent that you have had the status of representative/employee of a potential client of ours, your data will be erased, definitively at the moment when it becomes certain that we will not be contracted (i.e.: you send us an e-mail by which you inform us of something, you interrupt the communication with us for a period of time that exceeds a reasonable period, we inform you that we cannot offer you the requested services/products, etc.).

7.1.2 Contractual/post-contractual period

Purposes of processing

TehnoWorld provides services/products to its clients, fulfills a series of legal/conventional obligations and adapts its business strategy according to the requirements of the profile market.

During the contractual/post-contractual period, TehnoWorld shall process your personal data for the following purposes:

1. in order to initiate and carry out a dialogue;
2. in order to perform the concluded contract;
3. in order to draw up the documents related to the contractual period (eg addenda, minutes, invoices, confirmation of balances, etc.);
4. in order to fulfill some legal obligations (i.e. the obligation to draw up the primary accounting documents, the obligation to store the accounting documents for a certain period of time, etc.);
5. in order to obtain information on the basis of which we can propose other services/products that may be suitable, other than those already contracted;
6. in order to present our services/products, other than those already contracted;
7. in order to understand the requirements of the profile market trends (i.e. what services/products are sought, by which categories of clients, at what prices, etc.);
8. in order to understand how we can improve our services/products offered (i.e. assessing internal employees, analyzing the opportunity to hire additional staff, etc.);
9. in order to understand how we should organize our activity from all points of view (commercial/marketing/HR/IT/financial,etc.) (i.e. assessing contracts concluded in a month as compared to contracts that could have been concluded, assessing the way in which our internal employees fulfill their duties, analysing of the way in which we present ourselves as a company, etc.);

10. in order to protect and enforce our rights and interests (i.e. if the value of the issued invoices is not paid and we are forced to initiate a civil trial, in order to carry out our own activities, in order to achieve our object of activity, in order to carry out our activities in a way that is as optimal as possible for us from any technical/economic point of view, etc.).

Legal bases of processing

The legal grounds for processing your data are:

1. the processing is necessary in order to fulfill some legal obligations incumbent on us (i.e. the obligation to draw up and keep primary accounting documents, such as the contract concluded, the issued invoices, etc.);
2. processing is necessary in order to achieve our legitimate interests of fulfilling the purposes set out above (Purposes of processing).

Data storage period

TehnoWorld will store your personal data only for the period needed in order to achieve the purposes set out above (Purposes of processing).

This period varies on a case by case basis depending on a number of circumstances (i.e. category of data provided, purpose of supply, specific purpose of processing, incidental legal obligations, etc.).

As a general rule, your data will be stored by us for the entire contractual period, as well as after the termination of the contractual relations for a period of 5 calendar years, calculated from January 1st of the year following the one in which the contract terminates.

To the extent that the purposes for which your data have been processed are fulfilled before the expiry of the period set out above, they will be stored only until the purposes are fulfilled.

To the extent that the purposes for which your data have been processed require the keeping thereof even after the deadline set out above, we will continue to store it until such time as the purposes are fulfilled (i.e. the Tax Code may require us to keep your data for a period of 7 years etc).

The main reasons why we store your data for the period described above are as follows:

1. during the performance of the contract the data are necessary for us in order to be able to initiate and carry out a dialogue;
2. during the performance of the contract, we need the data in order to be able to know which are the parameters that we must respect and to perform the contract (i.e. what we have to provide, where, under what conditions, with what costs, etc.);
3. during the performance of the contract, as well as afterwards, the data are included in a series of financial-accounting documents that the law binds us to keep (i.g: contract, invoices issued, payment orders, bank records, receipts, etc.);
4. during the performance of the contract, as well as subsequently, the data are necessary for us in order to be able to provide information regarding the opportunity to offer services/products other than those already contracted;
5. during the performance of the contract, as well as afterwards, we need the data in order to be able to analyze the viability/technical efficiency/cost efficiency/possible technical problems regarding the services/products offered, in order for us to better understand all technical/economic aspects of services/ products offered;
6. during the performance of the contract, as well as later, we need the data in order to understand the market trends, what type of services/products are sought, what exists on the market, what are the costs that clients are available to allocate, etc., since knowing this information helps us to adapt our business strategy in order to remain on the profile market in a way that is as competitive as possible and as close as possible to the real needs of our clients;
7. during the performance of the contract, as well as later, there is the possibility that certain misunderstandings/disputes regarding the fulfilment of the contract may occur, in which case the data are necessary for us to protect our rights (i.e. in case of a lawsuit to be able to prove that we have fulfilled our obligations, in case of a failure to pay an invoice on time to be able to prove that we have provided/achieved the services/products invoiced etc);
8. during the performance of the contract, as well as subsequently, the data are necessary for us in order to analyze our own activity and the way we carry it out (internal analysis) so as to adapt to the market in the most appropriate way (i.e. we analyze if new hires are needed,

and if so, in which department, we analyze the efficiency of our employees, we analyze the knowledge and professionalism of our employees, etc.);

9. after the performance of the contract, there is the possibility that a client/former client of ours and/or even us may be subject to a control carried out by the tax authorities/other public authorities/institutions, in which case it is necessary to prove the contractual relations between us and how they were fulfilled.

7.2 Potential suppliers/suppliers/former suppliers of TehnoWorld and other related persons

TehnoWorld processes the personal data of its potential suppliers/suppliers/former suppliers, as well as of other persons in a certain connection/relationship with them, as they are mentioned in Chap. 7.1 ..

To the extent that you have the status of a person in a certain connection/relationship with a potential supplier/supplier/former supplier of ours, we process your personal data.

In the pre-contractual period we will process the data according to the facts presented in Chap. 7.1.1. with the mention that

1. regarding the purposes of the processing, the purposes no. 3 and 5 will not be applied to you.

In the contractual/post-contractual period we will process the data according to the facts presented in Chap. 7.1.2. with the following exceptions:

1. regarding the purposes of the processing, the purposes no. 5, 6 and 7 will not be applied to you;
2. regarding the reasons underlying the data storage period, the reasons no. 4 and 6 will not be applied to you.

7.3 Potential partners/partners/former TehnoWorld partners and other people related to them

TehnoWorld processes the personal data of its potential partners/partners/former partners, as well as of other persons in a certain connection/relationship with them, as they are mentioned in chap. 7.1..

To the extent that you have the status of our potential partner/partner/former partner or the status of a person in a certain connection/relationship with a potential partner /partner/former partner of ours, we shall process your personal data.

In the pre-contractual period we will process the data according to the facts presented in Chap. 7.1.1 ..

In the contractual/post-contractual period we will process the data according to the facts presented in Chap. 7.1.2 ..

7.4 Other people

Insofar as you do not fall into any of the categories set out in Chap. 7.1. - 7.3. the provisions set out in this chapter shall apply to you.

TehnoWorld processes the personal data of persons other than those presented in Chap. 7.1. - 7.3., with which it comes into contact, such as:

1. representatives of public authorities/institutions (i.e. ANAF inspectors, etc.);
2. visitors to our headquarters;
3. visitors to our site;
4. other people we come in contact with (i.e. people we come in contact with in a fair, children participating in the TehnoWorld Generation project, etc.).

Purposes of processing

TehnoWorld aims to offer/provide its services/products to as many people/entities as possible, to fulfill its legal/contractual obligations, as well as to maintain it in the most visible and efficient way on the profile market.

TehnoWorld processes your personal data for the following purposes:

1. in order to initiate and carry out a dialogue;
2. in order to present our services/products;
3. in order to assess you and establish if we are interested in a certain collaboration (i.e. insofar as you send us a CV if you want to be hired by our company, etc.);

4. in order to obtain information on the basis of which we can suggest the most suitable services/products;
5. in order to draw up the documents related to the pre-contractual period (i.e. offer, contract model, etc.);
6. in order to understand the requirements and trends of the profile market (i.e. what services /products are sought, by which categories of clients, at what prices, etc.);
7. in order to understand how we can improve our services /products (i.e. assessing internal employees, analyzing the opportunity to hire additional staff, etc.);
8. in order to fulfill some legal obligations (i.e. the obligation to provide the documents and information requested by a public authority/institution that initiates a control in relation to us);
9. in order to understand how we should organize our activity from all points of view (commercial/marketing/HR/IT/financial, etc.) (i.e. assessing contracts concluded in a month compared to contracts that could have been concluded, assessing the way in which our internal employees fulfill their duties, analysing the way in which we present ourselves as a company, etc.);
10. in order to protect and enforce our rights and interests (i.e. in order to ensure the security of our headquarters, in order to ensure the security of the data existing on our site, in order to prove our claims before a court or a criminal prosecution body, in order to support the TehnoWorld Generation project, etc.).

Legal grounds for processing

Legal grounds for the processing of your data:

1. the processing is necessary in order to fulfill some legal obligations incumbent on us (i.e. in the situation where the law requires us to disclose certain information to a public authority/institution, etc.);
2. processing is necessary to achieve our legitimate interests in order to fulfil the purposes set forth above (purposes of processing).

Storage period

The storage period varies on a case by case basis depending on the particularities of the data (i.e. the number of visitors to our site may be kept for a period of 3 months, a period which is necessary in order to conduct a particular survey or may be kept for a period of 1 year in order to analyze the evolution etc).

However, we assure you that we will not keep your data after the purpose for which reason we processed it has been achieved.

8 Recipients /categories of recipients of your personal data

Your personal data may in some cases, depending on the circumstances, be transmitted by us to:

1. people who act under our careful guidance (i.e. our employees);
2. our associated personal data controllers (i.e. a partner company in providing the services/products offered by us, etc.);
3. persons who act under the careful guidance of our associated personal data controllers (i.e. employees of a partner company in providing the services/products offered by us, etc.);
4. the persons empowered to process personal data on our behalf (i.e. a security company, an accounting company that provides us outsourced services, etc.);
5. persons acting under the careful guidance of persons empowered to process personal data on our behalf (i.e. an employee of the security company, an employee of the accounting company, etc.);
6. you, insofar as you agree to enforce one of the rights provided by law (i.e. the right of access);
7. any other person /entity other than those set out in sections 1 to 6, for example a separate personal data controller (i.e. ANAF).

The transmission of personal data to the persons presented above will be performed only to the extent that this transmission is:

1. either imposed by the need to achieve the purposes for which we process your personal data;
2. or required by law.

9 Transfer of your personal data outside the European Union

TehnoWorld keeps your personal data, either in hard copy, or in digital format, or in both formats, on the territory of the European Union.

However, in certain situations, TehnoWorld will transmit your personal data outside the European Union.

In the latter cases, TehnoWorld will ensure that the transfer of data is carried out only to the extent that the conditions imposed by European legislation on personal data protection are met (i.e. a compliance decision issued by the European Commission, an agreement to ensure the necessary guarantees exist, etc.).

10 Your rights

Regarding your personal data you have a number of rights:

1. the right to access data;
2. the right to obtain data rectification;
3. the right to obtain the erasure of data;
4. the right to obtain the restriction of data processing;
5. the right to object to the processing of data;
6. the right to file a complaint with the competent authority in the matter of personal data processing.

For more details on the content of each right do not hesitate to contact us.

Tehno World facilitates the enforcement of your rights, which is why please do not hesitate to contact us at gdpr@tehnoworld.ro

11 Your obligation or lack thereof to provide us your personal data

As a general rule, TehnoWorld does not force you, in any way, to send us your personal data.

However, in certain situations, if you fail to transmit your personal data to us, we will not be able to fulfill the purposes set out above.

For example, insofar as you do not send us the contract bearing your signature, we cannot consider that a valid contract has been concluded between us.

12 Lack of an automated decision-making process

TehnoWorld does not own/use any automated decision-making process, including profiling in relation to you, and all decisions/actions/inactions /measures taken/adopted/performed by our company are based only on the human factor.

Although we use a number of IT equipment, the decisions we make in relation to you are made only by the people within our team, based on our own beliefs and analyses, and not automatically by an IT equipment.

13 Amendment of this policy

TehnoWorld hereby informs you that this policy for the processing of your personal data is a presentation of the way in which we, nowadays, the time when you read this material, process your personal data.

There is a possibility that we may update this policy from time to time (i.e. due to legislative changes, due to the fact that we wish to process your data for other purposes and /or on the basis of other legal grounds, etc.).

In the latter cases, the policy will be updated without affecting, in any way, your legitimate rights and interests in the matter of personal data protection.

14 The exclusive nature of this policy

This personal data processing policy was developed by Dumitru, Popescu si Asociatii S.P.A.R.L. (DPA Legal Team) in collaboration with members of the TehnoWorld team, exclusively for TehnoWorld and is the exclusive property of TehnoWorld.

Reproduction, in whole or in part, of this policy may be made only with the express written consent of TehnoWorld.

Management of company Tehno World S.R.L.