

## CONFIDENTIALITY POLICY - PROTECTION OF PERSONAL DATA

**We, ALUTERM GROUP SRL**, we have taken technical and organizational measures to comply with the personal data protection against loss, modification, or to eliminate the risks of unauthorized access.

Thus, the personal data processed by us are in compliance with the legal provisions on personal data protection and EU Regulation 2016/679 (hereinafter called GDPR)

**The type of personal data** - the personal data to be processed by ALUTERM GROUP SRL are data such as: *name, e-mail, phone number, address*.

**The modalities of data collecting is done by:** filling in a form for requesting information / offers or subscribing to the newsletter **ALUTERM GROUP SRL**

At the same time, we specify that our site addresses people over the age of 18.

### I. DEFINITIONS:

- a. **Personal data** - any item of information relating to an identified or identifiable natural person ("the data subject"); an identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier, or one or more specific elements of his physical, physiological, genetic, psychic, economic, cultural or social identity
- b. **Data operator** - means the person transferring personal data
- c. **Technical and organizational security measures** - means measures designed to protect personal data against accidental or unlawful destruction or accidental loss, alteration, disclosure or unauthorized access, in particular where the processing involves the transmission of data in a network and against any other form of processing.
- d. **Categories of processed data** - personal data (surname, name, address, telephone number, e-mail address, etc.) are processed by us only if the data are entered by the person concerned in the fields created on the site (e.g., the information / offer request or subscription to the newsletter)
- e. **Processing of personal data:** means any operation or set of operations performed on personal data or on personal data sets with or without the use of automatic means such as collecting, recording, organizing, structuring, storing, adapting or modifying, extracting, consulting, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### II. THE PERSONAL DATA WE PROCESS

We use your personal information to benefit from our services as follows:

**a. Data for the newsletter service:**

We process your data consisting of the name and email address for subscribing to our newsletter.

Once you have access to the website, the option to subscribe to our newsletter is visible in which, in order to subscribe, it is necessary to click on the "Newsletter subscription" button.

Following this step on the subscription agreement, you are asked to enter a series of data about you that will allow us to send you relevant offers and information, as well as to express your agreement on how you want to communicate.

With this subscription, you will benefit from the direct marketing activities specific to our segment of activity and will keep you up to date with our products, services and campaigns, respecting the legal provisions in force.

The data usage ceases as soon as you quit the newsletter service. You can also give up the newsletter service at any time by: by checking the "Unsubscribe" option in the newsletter or sending an email to [marketing@aluterm.ro](mailto:marketing@aluterm.ro) by expressly requesting unsubscribe or accessing the following link:

<https://aluterm.us5.listmanage.com/unsubscribe?u=2c770b0c5d4a80323075e9b5c&id=e3dbdc86e2>

**b. Data for requesting information / offers**

By filling in the contact forms for potential clients or partners, we give you access to your contact information that we will use to answer your inquiries and questions.

**c. Social network plugins and cookie usage**

Our website uses "plugins" from social network operators (e.g. [www.facebook.com](http://www.facebook.com)). All social network plugins on our website are clearly and distinctly marked. Through these plugins, ALUTERM GROUP SRL does not collect / store personal data of clients. Besides our clients, according to the way of social networking, there is the possibility that the virtual friends of our clients can view our page as a result of the appreciation of our web page.

Regarding the use of cookies (the terminology includes "Internet Cookie", "cookie browser", "HTTP cookie" or simply "cookie") we specify that these are files or information that can be stored on your computer or on mobile devices , with Internet access (smartphone or tablet) when you access the Internet. The cookie is installed through a web browser request from a browser (e.g. Internet Explorer, Chrome) and cannot access the information on the user's computer / mobile device. We mention that this technology does not contain software, viruses or spyware.

We use cookies to make the site more user-friendly and to better adapt it to our interests and needs through our offers. Cookies are also used to speed up your future activities and experiences on our site.

### **III. PURPOSE OF DATA PROCESSING**

In general, all the items of information collected are used for the intended purpose, for which you have sent it to us, mentioned at the time of collection or in the privacy policy. We may use your personal data for one of the following purposes:

- we use your contact information to answer your requests communicated either by using the contact form or directly using our email or postal address;
- we use the email address you provided us to receive commercial information such as newsletter, promotions, offers, etc., if you have given your consent to that effect;
- we use the information collected through cookies, pixels or plug-ins to give you an optimized experience when you can not use our site
- we can use your data for statistical purposes to assess the degree of customer satisfaction with our services. Your responses are strictly confidential and will only be used to improve our services; data is collected and processed through an external application so there will be no connection between your personal data and your answers through these questionnaires.

If you choose not to provide any personal information when requested, you may not be able to participate in certain personalized activities and features on our sites and have limited access to special services and offers. For example, if you refuse to share your email address, you will not be able to receive any newsletters and you will not be able to contact us via the form on the site.

However, to simply search our sites and find out more about our products, you do not have to give us any personal information.

### **IV. DATA TRANSFER**

We guarantee that your data will not be sold or leased to other natural or legal persons so that it can be used by other companies without your consent. However, we will be able to communicate your data to third parties to ensure that you benefit from our services, such as service providers that provide site functionality, marketing agents that provide newsletter, authorities, or public institutions to fulfil legal obligations etc.

### **V. RIGHTS CONCERNING THE PROCESSING OF PERSONALLY PROVIDED DATA:**

According to the RGPD, as a target person you benefit from a cumulative right, namely:

**a. Right to information and access to personal data:** the right to obtain a confirmation that personal data concerning you are processed or not, and, if so, access to that data.

**b. Right to rectification:** the right to request the Operator and to obtain, without undue delay, the rectification of inaccurate personal data that concerns you and / or to obtain the completion of your personal data that is incomplete, with the mention of the case of an online account being able to make these changes personally from the account data editing section.

**c. The right to delete data ("the right to be forgotten"):** the right to obtain the deletion of personal data concerning you, without undue delay, if some of the reasons mentioned in RGPD.

**d. The right to restrict the processing:** the right to obtain restriction of processing in certain cases.

**e. The right to data portability:** the right to receive personal data that concerns you and to send them to another operator.

**f. Right to opposition:** the right to oppose at any time the processing of personal data that you are looking at, under the conditions RGPD.

**g. The right not to be the subject of a decision based solely on automatic processing, including the creation of profiles,** which produces legal effects that will affect you or will affect similarly to a significant extent.

**h. The right to address, through a complaint to the National Supervisory Authority for Personal Data Processing (ANSPDCP)** if you believe that your data has not been processed in accordance with the law.

### **The National Supervisory Authority For Personal Data Processing**

28-30, General Gheorghe Magheru Blvd,

010336, Bucharest,

Romania

Tel: 031 805 9211

[www.dataprotection.ro](http://www.dataprotection.ro)

For the exercise of these rights, please provide us with a written and signed application using the following contact details:

e-mail address: [marketing@aluterm.ro](mailto:marketing@aluterm.ro)

postal address: **Sos. Dudesti-Pantelimon, nr 42, incinta RAMS, firma Aluterm Group**

## **VI. UPDATING OF THE CONFIDENTIALITY POLICY**

We reserve the right, at our discretion, to add, modify, or eliminate in the future elements of this Privacy Policy to ensure that the information contained herein provides relevant and adequate information about the collection and processing by us of your personal data.