

## CONFIDENTIALITY POLICY

**SETRIO SOFT S.R.L.** believes that it is important to ensure the confidentiality of the personal data provided by you. This Confidentiality Policy is intended to inform you about how we process, collect, use, exchange and protect your personal data, when you use our products and services, our website, as well as when you interact in any way with Setrio.

### 1. Principles governing the processing of personal data

- Your data will be collected only for the specified, explicit and legitimate purposes. The data will not be processed to third parties in a manner incompatible with those purposes.
- The personal data will be accurate and, where necessary, updated.
- Your data will be processed in a legal, correct and transparent manner.
- All your data will be kept confidential and stored in a manner that ensures the necessary security.
- Your data will not be distributed to third parties unless this is necessary for the purpose of providing services in accordance with the agreements.
- The data subjects have the right to request the access to their personal data, their rectification and deletion, their opposition to or restriction from the data processing, as well as from the right of data portability.

### 2. What is personal data

Personal data is any information that may be related to an identified or identifiable natural person (data subject). Personal data includes all types of direct or indirect information (i.e. used in connection with other data) referring to the data subject, such as name, date of birth, addresses, e-mail addresses, telephone numbers.

### 3. Collected personal data

The categories of Personal Data concerning you, that we process, and the way we process them may vary depending on the products and services that you use and that you subscribe to, how you use the products, services and the Setrio website and how you interacted with Setrio.

The data that we are able to collect regarding you:

- a) Name, age, date of birth, citizenship, address, personal numeric code, identity document, your landline and/or mobile number, e-mail address, as well as credit/debit card or other payment details;
- b) Education, professional data (professional experience, recommendations, certifications);
- c) Information about your purchases of Setrio products and services;
- d) Information about your use of our site and/or application - data about your device and how you and the device interact with our products; data about the device and network that you use to connect to our products. These include data on the operating systems and software applications installed on your device, including product keys. They also include IP address, regional settings and language settings.
- e) Your communications with us or that you direct to us through letters, emails, chat services, calls and social networks

#### 4. Setrio processes personal data for specific purposes

SETRIO SOFT S.R.L. will collect, use and disclose personal data for the following purposes:

- a) To analyze the compliance of your training with the requirements of the position, when the data processing is carried out after receiving a CV from you;
- b) To contact you in order to conduct an interview for a job with Setrio;
- c) If you have given your consent in this regard, to retain your CV and to contact you for future recruitment;
- d) To provide our services:
  - To provide you with relevant products or services, as well as to contact you with messages regarding changes of products or services;
  - To bill you for the use of our services, or to withdraw the appropriate amount from the credit;
  - To contact you if the billing data you have provided to us is about to expire or we cannot cash in the payment;
  - To answer any questions or concerns you may have about our services;
  - To provide you with up-to-date information regarding our services;
  - To manage our relationship with you as a client and to improve our services and your experience with us;
- e) If you gave your consent in this regard, for marketing purposes, for us to:
  - check your identity, assess your needs and provide recommendations on what types of services best suit your needs;
  - transmit periodic communications regarding our services, improvements made to them, offers or promotional campaigns;

In addition, we may process your personal data in order to satisfy legitimate interests such as:

- prevent, detect and investigate offences, including fraud and money laundry or terrorist financing, as well as analyze and manage commercial risks,
- manage and prepare reports for internal purposes, request feedback or participate in surveys, as well as conduct research and/or analyses for statistical purposes or for other purposes, so that we may establish our services, understand our clients' behavior, market preferences and tendencies and be able to review, develop and improve the quality of our products and services.

#### 5. Use of personal data

We will use personal data only for the purpose for which they were collected and we will store the data only as much as necessary for the aforementioned purpose.

Access to personal data is strictly limited to Setrio staff and Setrio collaborators who have the necessary authorization and the clearly defined need to use the data.

#### 6. Disclosure of personal data to other third parties

In compliance with the applicable legal provisions, your personal data may be provided, for the purposes indicated above (as the case may be), to the following entities or third parties in Romania or in the European Economic Area:

- agents, contractors or service providers that provide operational services to Setrio, such as courier services, telecommunications, IT, payments, processing, training, storage, archiving, investigation services related to customer support or other services to Setrio;
- if you agree, third-party sellers or providers, as regards the promotions and services offered by Setrio;
- professional advisers, such as lawyers;

Unless otherwise provided by the law, we will not transfer your personal data outside the European Economic Area. Certain protection measures will be implemented in the case of such a transfer, and you will be notified accordingly.

#### 7. Processing security

Setrio will make all reasonable efforts to protect your personal data in our possession or under our control by establishing reasonable security measures to prevent unauthorized access, collection, use, disclosure, copying, modification or disposal, as well as other similar risks.

While we do our best to protect your personal data, we cannot be held liable for, and we cannot ensure the security of the information sent by you through the Internet, and we recommend you to take all precautionary measures to protect your personal data when using such platforms. We recommend that you change your passwords often, use a combination of letters and numbers and make sure you use a secure browser.

## 8. Your rights

Unless otherwise provided by law, you have the following rights regarding your personal data:

- a) To request information regarding our possession of your personal information, and, if so, what kind of information this is and why Setrio is keeping/using it.
- b) To request access to your personal information processed by Setrio.
- c) To request the rectification of the personal information that Setrio holds about you.
- d) To request the deletion of your personal information held by Setrio.
- e) To oppose the processing of your personal information if Setrio is based on a legitimate interest (or that of a third party) and there is something about your specific situation that makes you want to object to the processing for this reason. You also have the right to object if we process your personal information for direct marketing purposes.
- f) To oppose the automatic decision making, including the analysis of the profile, or not to be subject to any automatic decision as a result of using your personal information or analyzing your profile.
- g) To request the restriction of the processing of your personal data.
- h) To request the transfer of your personal data in an electronic and structured form to you or to another party - the right to "data portability".
- i) To withdraw your consent at any time regarding your personal data processed by Setrio based on that same consent.
- j) The right to lodge a complaint with the supervisory authority (National Supervisory Authority for Personal Data Processing).

In order to exercise the afore-listed rights in letters a), b) and h), please use the Form of access to personal data on our site, [www.setrio.ro](http://www.setrio.ro).

To exercise the other rights, please contact DPO Setrio at the email address: [dpo@setrio.ro](mailto:dpo@setrio.ro).

You will not have to pay a fee to access your personal information (or to exercise any of your other rights). However, we may charge a reasonable fee if your access request is obviously unfounded or exaggerated. Also, we may refuse to respond to the request in such situations.