

INTRODUCTION

Welcome to www.alusystem.ro

At www.alusystem.ro, protecting the privacy and personal data of our users is of paramount importance. This Privacy Policy describes how we collect, use, protect and share your personal information when you visit and use our website and related services. Our aim is to ensure that all your personal data is treated in a secure and responsible manner, in compliance with the applicable regulations.

This Policy provides you with detailed information about the types of data we collect, the purposes for which we use them, your rights in relation to your personal data and the actions we take to ensure their protection.

Please read this Policy carefully to understand our privacy practices. For any questions or concerns, please feel free to contact us using the contact details.

This Policy applies to all visitors to our website, donors, volunteers and anyone else who provides us with personal information. By using our website, you agree to the collection and use of your personal information as described in this Policy.

GENERAL INFORMATION

ALUSYSTEM SRL with headquarters in Bucharest, Ion Brezoianu Street, no. 27, District 1, registered under no. J40/13000/2014, Tax Registration Code RO15451270, as author, owner and admin of www.alusystem.ro website and as "Data Controller" within the meaning of the rules established by national legislation and the General Data Protection Regulation (Regulation no. 679 drawn-up by the European Parliament and the Council of the European Union on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC) (Rom. RGPD, Eng. which enters into force on May 25, 2018, complies with the right to private life of the individuals who access the website and ensures the correct protection of the processing of Personal Data for visitors and users.

- **Visitors** – people accessing the web page, anonymously;

- **Users** – people who use the website and fill-in the contact "form".

Although you can access the content of www.alusystem.ro website without providing any personal information that could fall into the category of personal data (visitor), if you fill in this information, our company can later use it for the purpose specified in this document.

Your personal data will be processed exclusively based on the express and unequivocal consent granted by you for this processing. Therefore, providing the data and information requested via www.alusystem.ro website is deemed to represent your express consent for your personal data to be used by ALUSYSTEM SRL, in accordance with the purposes mentioned below.

We expressly warn visitors and users that all processing of personal data relates exclusively to persons who have reached the age of 16. The use of the website by young people who have not reached the age of 16 is prohibited. If, however, such a situation occurs, resulting in the processing of personal data of young people under the age of 16, we will stop the processing of these data as soon as we learn of such a fact. Parents are solely responsible for the use of the website by children.

The contact details of the Data Protection Officer are:

Mailing address: Bucharest, Ion Brezoianu Street, no 27, 1st floor, District 1
E-mail: dataprotection@bogarholding.ro

HOW WE COLLECT YOUR PERSONAL DATA

As a rule, in your capacity of visitor to our Website, we collect your personal data (any information regarding an identified or identifiable natural person) directly from you, when you visit our website www.alusystem.ro ("Website") and/or fill in the contact form available on the Website, as well as when you contact us on our LinkedIn page.

The website includes links to our LinkedIn, Facebook and Instagram pages. In this case, LinkedIn, Instagram and Facebook could process your personal data as an independent data controllers, according to their own policies,

which you can access on the website www.instagram.com and www.facebook.com.

PURPOSE OF PROCESSING AND CATEGORIES OF PROCESSED DATA

ALUSYSTEM SRL processes your personal data for the following purposes:

- Pursuing the legitimate interests of ALUSYSTEM SRL;
- Providing information about ALUSYSTEM SRL projects (eg: newsletter, electronic messages on various channels);
- Sending a response to your requests addressed via the contact form available on the Website.
- Informing about ALUSYSTEM SRL events;
- Assistance with project or service needs;
- Participation in opinion polls about ALUSYSTEM SRL projects and services;
- Monitoring the traffic on the Website by means of cookies, when you visit our Website. Processing is limited to how you interact with the Website, in order to improve your experience. For more information about our cookies, please access our Cookies Policy.

The following categories of data are processed on www.alusystem.ro:

- Name, first name, mailing address, e-mail, landline and/or mobile phone numbers, company data (if applicable).
- Your contact with us, such as a note or record of a call you made to one of our contact centres, a Customer Relations service, an email or letter sent or other records of a contact with us.
- Information regarding the legitimacy of access – we will collect passwords, clues and similar security information used for authentication and access to accounts and services;
- Your preferences for certain products, services and lifestyle when you tell us what they are or when we assume what they are, based on how you access ALUSYSTEM SRL projects and services;
- Marketing preferences;
- Information we obtain from other sources, such as public or private authorities, fraud prevention agencies, and other data providers.

These includes demographic data, interests-related data, and online browsing behavior.

- The level of services provided to you – for example, operational problems and other events that may affect our services;
- Responses to invitations and confirmations of attendance to events.
- Any other data incidentally transmitted by you in the message text
- The unique identification number assigned to the visitor
- Date and time of Website access
- The type of browser from which the Website was accessed

The personal data we process are: identification, transactional, financial, demographic, location data or other personal data that we collect directly from you or from other sources when you become our partner, or when you access our projects or services.

At the same time, we mention that, in certain cases, the personal data mentioned above may also be processed for the following purposes:

- reporting to the authorities according to the legal obligations we have, pursuant to Art. 6(1) letter c) of the Regulation;
- managing IT&C systems, such as ensuring maintenance and performing security audits on our IT networks, pursuant to Art. 6(1) letter f) of the Regulation, in order to satisfy our interest in ensuring the proper operation of IT systems;
- settling disputes, pursuant to Art 6(1) letter f) of the Regulation, in order to satisfy our legitimate interest to request the ascertain, respectively to exercise or defend our rights.

We emphasize that you can change your preferences regarding the cookies used on the Website by changing your browser settings. The "Help" feature available in any browser will guide you in setting the options. For more information on disabling cookies, you can visit www.allaboutcookies.org. For more information about our cookies, please access our Cookies Policy.

ALUSYSTEM SRL does not intentionally collect sensitive personal data from you in order to store them.

LEGAL BASIS OF PROCESSING

- The legitimate interests of ALUSYSTEM SRL, for example, preventing fraud, maintaining the security of our services, direct marketing and improving our services. Whenever we rely on this legal basis to process your data, we assess our interests to ensure that they do not override your rights. In addition, in some cases you have the right to object to this processing. The legitimate interest of ALUSYSTEM SRL to allow us to exercise the rights provided by law in our favor, to take legal action against any illegal activity or any activity causing damages to ALUSYSTEM SRL.
- Compliance with a mandatory legal requirement, for example, accounting and tax requirements, which are subject to strict internal policies (such as retention periods), procedures, and your right to restrict the use of your data, which control the scope of our services that will be provided;
- In addition, to the extent you have agreed, your consent. Personal data processing based on consent represents an additional purpose to the processing of personal data in order to execute the contract to which you are a party and does not condition the provision/execution of contractual services.
- Processing is necessary for the performance of a task carried out in the public interest;

We will collect your personal data when, for example:

- You access or use any of our projects and services;
- You register for a particular project or service;
- You subscribe to newsletters, alerts or other services offered by us;
- You contact us via various channels, or request information about a product or service;
- You have given permission to other companies, such as our business partners or associates, as well as our third party suppliers or contractors, to share with us information about you
- When your personal data are public; or
- You are the customer/beneficiary of a commercial activity that we purchase/provide.

We also collect information from certain organizations where appropriate and to the extent we have legal grounds to do so. These include fraud

prevention agencies, business directories, verification/control agencies, billing agencies and contracted service providers.

CATEGORIES OF PERSONAL DATA RECIPIENTS

For the avoidance of doubt, transfer means any disclosure or making available to third parties, either by physical transmission of personal data or by granting access to data by any other means (storing and making backups are deemed transfer for the purposes mentioned above). Any disclosure of your personal data will be carried out in accordance with the applicable law, ensuring their protection, so that your rights and freedoms are observed.

In order to achieve the purposes detailed above, we may transfer your personal data to:

- a) operational service providers, such as Website development, hosting, IT&C infrastructure maintenance and support, etc., with whom we collaborate to provide you with our services;
- b) consultants, such as external lawyers or auditors, respectively courts of law, in order to ascertain, defend or exercise our rights;
- c) regulatory authorities, professional bodies and/or public authorities, in order to comply with applicable legislation;
- d) our affiliates or partners, when there is a legitimate interest in developing/managing our activities;
- e) third parties expressly specified by you.

TRANSFERS TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

As a rule, we will not transfer your personal data outside the European Economic Area. In exceptional situations and only if necessary, the transfer of your personal data outside the European Economic Area will be done only with the application of adequate guarantees and protection measures according to the specific legal provisions regarding the protection of personal data and with your appropriate notification.

PERIOD OF RETENTION

Your personal data will not be kept longer than is necessary for the purposes for which the personal data are processed. Thus, if you have contacted us by filling-in the contact form available on the Website / sending a direct message on our Facebook page or Instagram app, your data will be kept for the duration of the general 3-year limitation period, as well as for a further duration of maximum 1 year for the data deletion activity. For the storage period of data collected through cookies, please see the Cookies Policy.

Afterwards, we will remove/delete your personal data from our systems and records and/or take steps to anonymize such data so that you can no longer be identified.

AUTOMATED DECISIONS AND CREATION OF PROFILES

Personal data referred to in this information note are not the subject of profile generation or automated decision making.

YOUR RIGHTS

The right to withdraw the consent granted, at any time, in order to stop data processing that is based on your consent. Withdrawal will not affect the lawfulness of processing based on the consent given prior to the withdrawal, for the execution of a contract, for the fulfillment of a legal obligation or for the purpose of satisfying our legitimate interests.

The right of access - means that you have the right to obtain confirmation from us as to whether or not we are processing your personal data and, if so, you have access to such data and information on how such data are processed.

The right to data portability refers to the right to receive personal data in a structured format currently used by us and which can be read automatically, as well as the right for this data to be directly sent to another operator, if this is technically feasible.

The right to object - relates to your right to object to the processing of personal data when the processing is necessary for the performance of a task that serves a public interest or that takes into account a legitimate interest of the data controller. When the processing of personal data is aimed at direct marketing or processing based on express consent, you have the right to object to the processing at any time.

The right to rectify refers to the correction, without unjustified delays, of inaccurate personal data. The rectification shall be communicated to each recipient to whom the data were transmitted, unless this proves to be impossible or involves disproportionate efforts;

The right to data deletion ("the right to be forgotten") - means that you have the right to request the deletion of personal data without undue delay if one of the following reasons applies: the data are no longer necessary to fulfill the purposes for which they were collected or processed; you withdraw your consent and there is no other legal basis for the processing; you object to the processing and there are no other overriding legitimate reasons; personal data were processed illegally; personal data must be deleted to comply with a legal obligation; personal data were collected in connection with the provision of information society services.

The right to restrict processing - can be exercised if the person disputes the accuracy of the data, for a period necessary to verify the correctness of the data; the processing is illegal and you object to the deletion of the personal data, requesting the restriction instead; in the event that ALUSYSTEM SRL no longer needs the personal data for the purpose of processing, but the person requests them for establishing, exercising or defending a right in court; if the person has objected to the processing for the period of time in which it is verified whether the legitimate rights of data controller prevail over those of the said person.

The right not to be subject to a decision based solely on automatic processing, including the creation of profiles, which generates legal effects concerning you or similarly affecting you to a significant extent, unless necessary for the conclusion or execution of a contract between you and us or is authorized by law;

The right to file a complaint to the National Supervisory Authority for Personal Data Processing(dataprotection.ro).

With the exception of the right to file a complaint with the National Supervisory Authority for the Processing of Personal Data, you can exercise the aforementioned rights by means of a written request, dated, signed and sent by mail to ALUSYSTEM SRL at Ion Brezoianu Street, no. 27, 3rd floor, District 1, Bucharest or to the e-mail address dataprotection@bogartholding.ro.

If you are not satisfied with the way we process your personal data, you have the right to contact the National Supervisory Authority for the Processing of Personal Data at G-ral. Gheorghe Magheru Avenue, no. 28-30, District 1, zip code 010336, Bucharest or at the e-mail address anspdcp@dataprotection.ro;

According to the General Data Protection Regulation (GDPR), you have the right to unsubscribe from our newsletter at any time without providing a reason. We respect your privacy and rights and have implemented clear and easy-to-use mechanisms to unsubscribe from our communications.

Right to unsubscribe

The GDPR entitles you to stop receiving direct marketing communications at any time. This means that you can unsubscribe from our newsletter at any time and we will comply with this request immediately. Unsubscribing is free and can be easily done using the methods described below.

Unsubscribing Mechanisms

To unsubscribe from our newsletter, you can use any of the following methods:

Unsubscribe link in the email:

Every newsletter email we send includes an unsubscribe link found in the lower part of the message. Click this link and follow the instructions to unsubscribe instantly.

Direct contact:

You can send an email to dataprotection@bogartholding.ro with the subject "Unsubscribe" or a clear message in the content of the email requesting your removal from our newsletter distribution list.

Contact form on the website:

Go to the contact section on our website and fill in the contact form specifying your wish to unsubscribe from the newsletter.

Unsubscribe confirmation

After you have requested to unsubscribe, you will receive a confirmation email acknowledging that your request has been processed. We assure you that once you have unsubscribed, you will no longer receive our newsletters, unless you voluntarily re-subscribe.

Data protection after unsubscribing

Even after you have unsubscribed, we will keep your personal data securely and in accordance with our privacy policies and GDPR requirements. These data will only be used to ensure that you no longer receive marketing communications from us.

Additional support

If you experience any difficulties with the unsubscribing process or have additional questions, please do not hesitate to contact us at dataprotection@bogartholding.ro. We are here to help you and make sure your rights are complied with.

To exercise these rights, as well as for any additional questions regarding this information or in relation to ALUSYSTEM SRL's use of personal data, please contact our data protection officer by selecting any of the communication methods described below.

PERSONAL DATA SECURITY

We inform you that we have implemented appropriate technical and organizational measures in order to ensure a level of security corresponding to the personal data processed. When assessing the appropriate level of security, we take into account in particular the risks presented by the processing of personal data, generated in particular, accidentally or illegally, by the destruction, loss, modification, unauthorized disclosure of or unauthorized access to the personal data transmitted, stored or processed in any other way. We also ensure that access to personal data is granted to our staff only to the extent necessary for the execution of work tasks.

CONCLUSIONS

At ALUSYSTEM SRL, we are committed to protecting the confidentiality and security of your personal data. This Privacy Policy has been developed to inform you on how we collect, use and protect the personal information you provide to us.

We understand the importance of privacy and take responsibility for complying with all applicable data protection regulations, including the General Data Protection Regulation (GDPR). We constantly review and improve our privacy practices to ensure we are aligned with industry's best practices and standards.

If you have any questions, comments or concerns about this Privacy Policy or how we manage your personal data, please do not hesitate to contact us at:

Mailing address: Bucharest, Ion Brezoianu Street, no 27, 3rd floor, District 1
E-mail: dataprotection@bogarholding.ro

We are here to provide you with answers and assistance.

By using our website and providing your personal information, you are placing your trust in us, and we assure you that we will treat this information with the utmost care and respect.

Thank you for your continued trust and cooperation.