

PERSONAL DATA PROTECTION

Information on the processing of personal data by Trans Sped S.A.

Trans Sped S.A. it is constantly concerned that the personal data of all natural persons, named and data subjects, with whom we interact are processed in full compliance with the applicable legal provisions and with the highest standards of security and confidentiality.

Starting May 25, 2018, Regulation 679/27-Apr-2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (General Regulation on data protection) (hereinafter referred to as "GDPR") is applied in all EU countries. The present Information regarding the processing of personal data aims to inform you, according to the provisions of art. 13 - 14 of the GDPR, about the way we understand to regulate and integrate at our company level the GDPR policy and is an integral part of the Agreement / Contract for the provision of qualified reliable services concluded with Trans Sped S.A.

1. The quality of Trans Sped S.A. regarding the processing of personal data?

Trans Sped S.A., with its registered office in Bucharest, Str. Despot Voda, No. 38, Sector 2, registered with the Trade Register under no. J40 /781/23.01.2004, is a personal data operator in accordance with the provisions of art. 4, paragraph 7 of Regulation (EU) 679/2016 on the protection of natural persons with regard to the processing of personal data and on freedom circulation of these data and the subsequent legislation applicable in the field.

Processing means operations such as: collecting, recording, organizing, storing, modifying, extracting, consulting, using, transmitting, combining, blocking, restricting, deleting, destroying, archiving personal data.

2. What personal data do we process?

In pursuit of its purposes, Trans Sped S.A. processes the following personal data:

- Name and surname
- Persona Identification Number
- Series and no. C.I./B.I./Passport
- Home address
- E-mail
- Cell Phone Number
- Copy of C.I./B.I./Passport, with all personal data contained in these documents;
- Video capture (image + sound) necessary to identify the data subject, in the case of remote video identification process.

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3. What are the reasons and purposes for the processing of personal data by Trans Sped S.A.?

The processing of your personal data as a data subject is carried out for the following purposes:

- for the provision of services purchased or ordered from Trans Sped S.A. .;
- to be contacted and answered in connection with the services you use or expect to use from Trans Sped S.A. .;

- to keep in touch with you and to provide you with the necessary information through our website: www.transsped.ro;
- for marketing communication; we will only make these communications if we have the consent of the data subject.

The legal grounds on which Trans Sped S.A. processes personal data are the following:

- Consent of the data subject - if the data subject chooses remote video identification;
- Execution of a contract to which the party concerned is a party: - obligations to prepare and keep financial-accounting documents; keeping personal data throughout the contractual relationship and archiving documents; conducting audits; management of controls performed by authorities; implementation of personal data security measures (including by making backups); formulating defenses in case of a possible litigation;

Fulfilling the legal obligations applicable in the field of activity of Trans Sped S.A., Trans Sped has not implemented an automated decision-making process, including the creation of profiles as defined according to art.22, para. (1) & (4) of the GDPR.

4. Who owns the personal data processed by Trans Sped S.A.?

Personal data that is processed by Trans Sped S.A. belong to the following categories of data subjects: clients or potential clients whose data we will use to draw up, conclude and execute the contract and to provide the services requested by them, the contact persons designated by the contractual partners, legal or conventional representatives of them, the collaborators, the employees, the personnel of a public authority, whose data we use to fulfill our legal obligations, candidates for a position that Trans Sped SA has it free, visitors to our site: www.transsped.ro or people who have interacted with any of our accounts on social networks and / or other categories of individuals with whom we are in business relations (named together generic, in the following, "Data subjects"). These personal data are included in the documents transmitted to Trans Sped S.A. at the beginning of the contractual relations with the contractual partners or during their course.

5. To whom do we transmit your personal data?

Currently we do not transfer data outside the European Economic Area (EEA), our data being stored in locations in Romania.

6. How long does Trans Sped S.A. processes and keeps personal data?

In order to achieve the aforementioned purposes, the personal data will be processed by Trans Sped throughout the contractual relationship and after its completion in order to comply with the legal obligations applicable in the field, including, but not limited to, the archiving provisions.

We have a legal obligation to keep data for 10 years from the date of expiry of the qualified digital certificate, according to the applicable law, Regulation (EU) no. 910/2014 (eIDAS). After the expiration of the filing period, the data will be irreversibly deleted. The applications for obtaining / renewal of unfinished certificates are kept for the entire period of time mentioned above.

7. To Whom Trans Sped S.A. transmit or disclose your personal data?

As a rule, Trans Sped S.A. does not disclose the data it holds and processes, about all categories of data subjects, to other natural or legal persons. The cases in which the customer data Trans Sped S.A. may be disclosed to other companies or natural persons are those in which other companies, natural or legal persons act as persons empowered in relation to Trans Sped S.A. In these cases, we will disclose the data for legitimate reasons related to the performance of a contract, the preparation of

documentation necessary for the performance of the contract, finding, defending and exercising our rights or interests.

Your personal data is collected for the purpose of issuing qualified digital certificates and may be disclosed to the auditors, to third parties who base their conduct on the certification services provided by Trans Sped SA, in the relationship with which you use the certificate, to the supervisory body according to the applicable law. , to public authorities and institutions based on public law obligations, lawyers to represent us in case of a dispute or for consulting, the judicial executors for contractual communications or the execution of the eventual judgments, debt recovery companies, contractual partners of Trans Sped SA (courier companies, etc.), affiliated companies Trans Sped S.A. and in any other situations justified with your prior notification, but only in order to fulfill the purpose mentioned above and aiming at protecting the rights of the data subject with priority.

In all these cases Trans Sped S.A. shall make all reasonable efforts to ensure that the recipients of the data process them under conditions of security and confidentiality, in accordance with the purpose for which they were transmitted and with respect for the rights of the data subjects.

8. What are your rights?

You have, as a data subject, the following rights:

a) **The right to information and access to personal data**

The data subject has the right to request a copy of the personal data held by Trans Sped S.A.;

b) **The right to rectify personal data**

The data subject has the right to rectify the data, if they are not correct.

c) **The right to be deleted**

The data subject has the right to request the operator to delete the personal data concerning him in the following cases without delay:

- personal data are no longer required for the purposes for which they were processed;
- the data subject opposes the processing and there are no legitimate reasons to prevail regarding the processing;
- personal data were processed illegally;
- personal data must be deleted in order to comply with the law.

WARNING: Data deletion will not occur if:

- the data are necessary for the fulfillment of a legal obligation;
- for archiving purposes in the public interest;
- for finding, exercising or defending a right in court.

d) **The right to restrict the use of your personal data**

In case the data subject appreciates that the personal data that Trans Sped S.A. holds them regarding it are incorrect or should not be processed, will contact Trans Sped S.A. at headquarters for a discussion on his rights. In certain circumstances, the processing restriction may be required.

e) **The right of opposition to the use of personal data**

In certain circumstances, the data subject has the right to oppose the processing by Trans Sped S.A. of his personal data including the processing of data for direct marketing purposes.

f) **The right to data portability**

The data subject has the right to request the personal data concerning him and provided to Trans Sped S.A. in a structured format that can be read automatically.

g) **The right not to be the subject of a decision based exclusively on automatic processing**

The data subject has the right to request and obtain the withdrawal / annulment / reassessment of any decision that produces legal effects in his respect, adopted exclusively on the basis of the processing of personal data.

h) The right to withdraw the consent at any time

Withdrawal of the consent can take place at any time and will produce effects for the future only, the processing carried out before the withdrawal will remain valid.

i) The right to lodge a complaint with the National Authority for the Supervision of Personal Data Processing and to go to court

The data subject has the right to submit a complaint to the National Authority for the Supervision of Personal Data Processing (www.dataprotection.ro) and to the judiciary, through written, dated and signed requests, addressed to the supervisory authority and the competent court, according to the law.

9. What can happen if a person does not want to send us personal data?

In most cases, data subjects have no obligation to communicate their personal data.

However, your refusal to transmit our personal data, leads to the impossibility of providing / providing services related to the main activities of Trans Sped S.A., including the provision of qualified digital certificates.

10. Where can you go for exercising your rights and what is the response deadline?

The exercise of the aforementioned rights will be made on the basis of a written request addressed to the headquarters of Trans Sped S.A. or by email at dpo@transsped.ro.

The answer deadline for any request regarding your rights is 30 days, except in cases where the request is complex or there are a large number of requests, when the deadline can be extended by another 60 days. If you are not satisfied with the solution received, you can contact the National Supervisory Authority for Personal Data Processing - the contact details can be found at www.dataprotection.ro.

11. Effective date:

This Information is valid from 24 February 2020.

Updated on: 26.07.2021

I have read and agree with the rights and obligations arising from the GDPR Information on the processing of my personal data by Trans Sped SA, in compliance with the legal provisions on the protection of individuals with regard to the processing of personal data and the free movement of these data found.