

## INFORMATION NOTE CONCERNING THE PERSONAL DATA PROCESSING 20.02.2019

In accordance with the provisions of (EU) Regulation no. 679 of April 27th, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and for the repealing of the Directive 95/46/EC ("GDPR") and especially on the grounds of art. 12 and art. 13 of GDPR,

### **we hereby inform you that**

The Funds Transfer and Settlement Company - TRANSFOND S.A., having the registered office in Bucharest, 1<sup>st</sup> Ficusului Blvd, District 1, postal code 013971, registered at the Trade Register Office attached to Bucharest Court-of-law under no. J40/6820/2000, unique registration code RO 13215516, (further called „the Company” or "TRANSFOND"), processes your personal data in safety conditions, in good faith and in compliance with the effective legal provisions, exclusively for achieving the purposes specified below.

In the sense of the GDPR provisions, you have the quality of approved person, and your personal data are processed as a result of the fact that you have contacted TRANSFOND by the electronic communication means made available for you on the Company's website ([www.transfond.ro](http://www.transfond.ro), [www.facturielectronice.ro](http://www.facturielectronice.ro), [www.platiinstant.ro](http://www.platiinstant.ro) or [www.aliaspay.ro](http://www.aliaspay.ro)).

### **1. The processed personal data**

As far as you are concerned, the Company processes the following personal data: Surname, name, position and place of work, e-mail as well as other data that you will provide within the message.

### **2. The purposes of personal data processing**

Your personal data are processed by the Company for facilitating the communication, the resolution of your applications, as well as for the transmission of replies to you (if applicable).

The legal grounds for the processing operations are represented by the provisions of art. 6 par. 1 let. f) of the GDPR, the legitimate interest of TRANSFOND).

TRANSFOND does not process your personal data in automated decision-making processes, nor does it use it in order to create profiles, in the sense given to these terms by GDPR.

TRANSFOND processes your personal data exclusively on Romanian territory.

### **3. Storage period of personal data**

Your personal data sent by the electronic communication means or made available on the Company's websites shall be stored by TRANSFOND for a period of 1 (one) year after the

completion of the year in which the communication has been initiated/you have transmitted the request. This term is necessary so that the communication activity with you can be subject to the auditors and verifications established by the internal regulatory frame.

If your personal data is transmitted to us by request for which the law provides minimum storage and/or archiving periods, your personal data shall be kept by TRANSFOND for the duration provided by law.

If during the period of your personal data storage legal modifications occur, imposing the modification of the above-mentioned periods, TRANSFOND shall adapt these periods to the legal requirements.

#### **4. The rights of the data subject concerning its personal data:**

We also wish to inform you that, according to art. 12-22 of GDPR, you have the following rights:

- i. the right to notification and access to your personal data;
- ii. the right to rectify your data;
- iii. the right to be forgotten/the right to data deletion;
- iv. the right to the restriction of processing;
- v. the right to data portability;
- vi. the right to oppose to your data processing, in the case of personal data processing, in conformity with art. 6 par. 1, let. e) or let. f) of GDPR, respectively for the fulfilment of a task executed for the public interest or while exercising an official authority that has been assigned to the operator, respectively for the purpose of legitimate interests;
- vii. the right to not be subject to an individual decision which means the right to require and obtain the withdrawal, cancellation and reconsidering of any decision that produces legal effects on you, adopted exclusively based on a personal data processing operation through automatized means;
- viii. the right to notify the National Supervisory Authority for the Processing of Personal Data or any competent courts-of-law.

For exercising these rights, you can contact the Company by a written application, dated and signed or by e-mail at the address [dpo@transfond.ro](mailto:dpo@transfond.ro).

Your application shall be analysed and replied to within 30 days from the receipt of your application by the Company, according to GDPR.

#### **5. Recipients:**

TRANSFOND shall not transmit your personal data to other persons or organizations. Nevertheless, your personal data cannot be processed, in compliance with the legal provisions, by the auditors or other institutions with legal competencies for the verification of the TRANSFOND activity.

## **6. Miscellaneous:**

The Company guarantees the fact that it processes your data under legitimate conditions, at the same time implementing appropriate technical and organizational measures for ensuring the data integrity and confidentiality according to art. 25 and 32 of GDPR.

For the aspects related to the personal data processing, you can contact the Company at the e-mail address [dpo@transfond.ro](mailto:dpo@transfond.ro), as well as by other modalities available on the Company's website, [www.transfond.ro](http://www.transfond.ro).