

# Privacy and Personal Data Processing Policy

## The scope of this Policy

Deutsche Telekom Group has made a commitment to respect and protect all personal and confidential information it obtains in the course of its negotiations with third parties, including the personal data of natural persons (information relating to an identified or identifiable natural person).

This Privacy and Personal Data Processing Policy (hereinafter referred to as 'the Policy') will help you understand the type of information we collect in connection with issues such as the use of our web sites, the communication with third parties or other forms of interaction and of provision of our services, and also how we process that data and information.

The types of personal data which might be collected by the GTS companies include details on the name, address, telephone number, e-mail address, fax number or any other professional information that can be provided by a natural person.

The users and visitors of our web sites must read this Policy carefully before sending any personal data and/ or when filling-out any electronic form posted on the web site.

## Use of personal data

GTS Telecom SRL, a member of Deutsche Telekom Group, is hereby undertaking to respect and protect all personal and confidential information it might obtain while conducting business with third parties, including the personal data such as it is defined by the provisions of the General Data Protection Regulation (EU) 2016/679 (RO: RGPD, EN: GDPR) (hereinafter referred to as 'the Regulation').

We might collect your personal data through the registration questionnaires and forms, by personal contact with you (for example by phone) and when you send us e-mail messages containing your personal details. We will use your personal data solely in compliance with the applicable laws and regulations and where such use is relevant for the interaction between you and GTS for business purposes, for example to provide you with any of the agreed invoicing or network management services and to protect our legitimate rights and interests. We will also use your personal data in other cases in which we are allowed by law to do so without having obtained your prior agreement or for other purposes for which you have given your consent.

GTS will not sell your personal data.

## Provision of products and services

We may use your personal data in order to fulfil your requests, to process orders or to carry-out anything that might be necessary to apply or enforce the agreement concluded between you and GTS, so as to secure the functionality and safety of our products and services, to identify you as well as to prevent and investigate fraud or other unlawful behaviour.

Furthermore, under certain circumstances, GTS may act in the capacity of processor; in such circumstances, we will adapt to the requirements of the Regulation, for each specific case.

## Development of services

We may use your personal data to develop our services. Nevertheless, for the most part, we will only use aggregate and statistical data for the purpose of developing our services. We might also use your personal data to personalise our offer and provide you with relevant services, for example to make recommendations and to display personalised content on our web sites, including in regard to available advertising services. We might correlate personal data with your use of a GTS service and with other personal data we hold about you, except where the personal data was collected for a different purpose. We might develop statistical data on the basis of your personal data.

## Marketing and Communication with You

We may use your personal data for the purpose of communicating with you, for example to provide you with information on the products or services you use or to establish contact with you in view of conducting customer satisfaction surveys. The personal data might be used for marketing or research purposes, for example for conducting market research activities; in accordance with the legislation in force, we might contact you to provide information on new services or promotions we can offer. As well, part of our products and services may be used to promote services provided by other companies. Nevertheless, GTS will not disclose your personal data for marketing purposes, to any company, without having obtained your

prior consent.

We might use your contact details for the purpose of sending you electronic newsletters regarding our services or relevant news in your areas of interest, provided you have given your consent in this respect. You may withdraw your consent at any time by expressing your intent to no longer receive these newsletters, using the "Unsubscribe" button upon receiving the email in question or by writing to us at [data\\_privacy@gtstelecom.ro](mailto:data_privacy@gtstelecom.ro).

#### **Use of "Cookies"**

GTS may use "cookies" on its web site. "Cookies" represent information which a web site stores on the hard disk of the users' computer, so it can remember certain information about you when you return to that site or browse a related site. GTS will not use your personal data which was sent with a cookie for marketing purposes and will not disclose that data to third parties without having obtained your consent. GTS may use cookies for statistical purposes. In case you do not want to receive cookies from the GTS web sites, you can set your browser so that it warns you before accepting cookies and it denies cookies when your browser warns you about their presence. You can also activate the cookies on your browser or you can delete the installed cookies, yet this might affect your browsing experience on the web site.

#### **Data processing and data security means**

GTS has implemented appropriate technical and information security measures to prevent any unauthorised or unlawful disclosure, destruction or alteration, unauthorised transfer or disclosure of personal data as well as any accidental or unlawful loss, unauthorised access or other damage to personal data. Such measures include the use of firewalls, secured servers, encryption, appropriate systems for access rights and process management, careful selection of processors and other reasonable technical and commercial measures capable of providing adequate protection of your personal data against any unauthorised use or disclosure. Where appropriate, backup copies can be made and such means can be used to prevent the accidental damage or destruction in respect of your personal data. These measures provide for an adequate security level in relation to the risks which are inherent to the processing of personal data to be protected. Your personal data, stored safely, will only be accessible to the authorised personnel designated by GTS.

#### **Transfer of personal data**

Deutsche Telekom, commonly known under the name of DT or Telekom, is an international group of companies operating in several jurisdictions. Our products and services may be provided using the resources and servers listed by the DT companies, consequently your personal data could be subject to cross-border transfers outside the country in which you use the services, to one or several of the DT companies. Where the personal data protection level in a specific country does not comply with the level applied within the European Economic Area, we will make sure that there is a legal basis for the data transfer and that your personal data is subject to adequate protection in accordance with the applicable laws. A specific prior notification will be sent to you in case your data is transferred abroad.

#### **Your rights onto your personal data held by GTS**

GTS will store your information for as long as it is required by a legal provision, or for as long as it is relevant given the purposes for which the information was collected; however, in principle, the information will be stored for maximum ten years.

According to the Regulation, you will have the following rights: the right of access to personal data, the right to data rectification, the right to data erasure or to restriction of processing in accordance with the laws in force, the right to object, the right to data portability, the right to withdraw your consent and the right to lodge a complaint with the supervisory authority.

In case you want to know which of your personal data we hold, or you want to rectify or erase any incomplete, inaccurate or out-dated personal data, or you wish that the personal data processing be stopped for any purpose, you may exercise those rights by contacting us at the contact points mentioned on this web site. Please note that, in some cases, especially if you wish to have your personal data erased or your personal data processing be stopped, this may also entail that we are no longer able to continue providing you with our services.

#### **Data Protection Officer**

GTS designated a Data Protection Officer who can be contacted at the e-mail address: [data\\_privacy@gts.ro](mailto:data_privacy@gts.ro).

### **Version of the Privacy and Personal Data Processing Policy**

This Policy is in effect as of 22.05.2018 and it may be updated from time to time.

Any updates will become applicable within 15 days following the publication of the new version on the GTS web site.

For details regarding general issues on the personal data processing conducted by GTS Telecom, please see: **GTS Telecom's Personal Data Protection Policy**.

In case of inquiries on the personal data processed by GTS Telecom, please see: **Procedure on the settlement of personal data applications**.