

## **PRIVACY POLICY**

Respecting the privacy rights of those who visit the pfa.eter.spp We would like to declare that we process the data obtained in this way in accordance with national and European laws and in conditions that ensure their security, i.e. their confidentiality, availability, integrity and accountability of the activities carried out. In order to ensure the transparency of our data processing processes, we present the Company's personal data protection rules, established on the basis of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 (General Data Protection Regulation, hereinafter referred to as the "GDPR").

### **I. Who is the Controller of your personal data?**

The Controller of your personal data is the company – Eter Ro Srl (hereinafter: "Controller" or "Company"). The Controller allows contact in the following form:

- a) by post to the following address: Bucuresti, Sector 2, Sos. Mihai Bravu, nr. 136, bl. D20, sc. 2, et. 3, ap. 39
- b) after address e-mail: apps.ro@eter.app
- c) by phone: +40 724 309 087

### **II. What personal data do we process?**

In connection with the use of our website, we process the following personal data collected through *cookies* m.in. data on the IP address, information on how our website is used, browsing time, user's location, type of operating system and language version used on the device. In addition, the information indicated above may be combined with other personal data that you have provided to the Company, including in particular via the contact form provided (identification and contact details).

### **III. What is the purpose and legal basis for the processing of your personal data?**

The Controller processes your personal data in order to:

- a) enabling you to use our website for information purposes (legal basis: legitimate interest of the Controller consisting in providing access to its website and the functionality and optimization of websites and security of IT systems, i.e. Article 6(1)(f) of the GDPR),
- b) exchange of correspondence, including by responding to an inquiry sent via the contact form (legal basis: legitimate interest of the Controller consisting in providing access to its website and the functionality and optimization of websites and security of IT systems, i.e. Article 6(1)(f) of the GDPR, concluded agreement (activities aimed at its conclusion), if your contact concerns the binding of you with the Controller the agreement or intends to conclude it, i.e. Article 6(1)(b) of the GDPR and Article 9(2)(a) of the GDPR – if you provide special categories of data within the meaning of the GDPR in your correspondence on your own initiative),
- c) ongoing, interactive contact conducted in the chat service on our website (legal basis: legitimate interest of the Controller, i.e. Article 6(1)(f) of the GDPR),
- d) sending commercial information for marketing purposes, including providing information about the Company's products or services (legal basis: legitimate interest of the Company, Article 6(1)(f) of the GDPR, subject to your separate consent to the selection of a specific communication channel by ticking the appropriate checkbox, in accordance with separate regulations in this respect),
- e) to submit or defend legal claims related to the functioning of the website and to prevent and investigate crimes (legal basis: legitimate interest of the Controller, i.e. Article 6(1)(f) of the GDPR),
- f) fulfilling the obligations imposed on the Company by generally applicable laws, including in particular tax and accounting regulations (legal basis: Article 6(1)(c) of the GDPR).

### **IV. Which recipients can we share your personal data with?**

The recipient of your personal data may be authorized public authorities and entities providing services on behalf of the Controller, on the basis of concluded agreements and in accordance with the Company's instructions.

**V. For how long will we process your personal data?**

Your personal data will be processed until the legal basis for their processing expires or the purpose of processing is achieved or expires for another reason. If the basis for the processing is the legitimate interest of the Company, the personal data will be stored until the legitimate interest of the Controller pursued or you object to the processing of personal data. If we process data on the basis of a contract, personal data will be processed until the end of the term of the contract binding you with the Company, and then for the period required by law. On the other hand, personal data processed on the basis of consent will be processed until the consent is withdrawn, which will not affect the lawfulness of the processing carried out by the Company on the basis of consent before its withdrawal.

**VI. Do we make automated decisions about your data?**

No automated decisions will be made with respect to your personal data (decisions without human involvement), including your data will not be subject to automated profiling.

**VII. What rights do you have in relation to our processing of your personal data?**

The Company gives you the following rights:

- a) access to the content of the data – you are entitled to access your personal data and obtain a copy of it. In addition, you have the right to obtain information concerning, in particular, the purpose of processing, the categories of data processed, information about the recipients, the planned period of storage of your data and your rights;
- b) delete data – if your personal data is no longer necessary to achieve the purpose for which it was collected or you object to the processing of data, and at the same time there are no overriding, legitimate interests, as well as if you believe that we process your data unlawfully, you have the right to request their removal in whole or in part. However, this right does not apply to data to the extent that they are necessary for the assertion, establishment or defence of our claims or for us to comply with our legal obligation to process or store them under applicable law;
- c) restriction of data processing – if in your opinion we have incorrect data about you or we process them unjustifiably, or you do not want us to delete them because you need them to establish, pursue or defend claims, as well as in the period preceding your objection to the processing of data – you have the right to request that we limit the processing of data only to their storage or performance of others, agreed with you. Despite exercising the right indicated above, we may process your data in the event of establishing, pursuing or defending our claims;
- d) data portability – you have the right to obtain your personal data in a structured, commonly used and machine-readable format, and then request the transfer of this data to another controller, if your data is processed by us on the basis of your consent or an agreement concluded with you and if this data is processed in an automated manner;
- e) object to the processing of personal data – for reasons related to your particular situation, you can object to the processing of your personal data by us at any time, if we process it on the basis of our legitimate interest. After filing an objection, we will not be able to process personal data based on the above-mentioned grounds for processing, unless we demonstrate the existence of compelling, legitimate grounds for the processing, overriding your interests, rights and freedoms or grounds for the establishment, exercise and defence of claims;
- f) lodge a complaint with a supervisory authority – if you consider that we are processing your personal data unlawfully, you have the right to lodge a complaint with a national supervisory authority, which is the Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal.

If you exercise the rights indicated above, please send your request to the following e-mail address: apps.ro@eter.app or by post to the following address: Bucuresti, Sector 2, Sos. Mihai Bravu, nr. 136, bl. D20, sc. 2, et. 3, ap. 39 At the same time, we would like to inform you that the above-mentioned rights are not absolute and will not apply in every case of processing your personal data by us.

We would also like to inform you that before exercising the above-mentioned rights, we are obliged to verify the person making the request as the entity to which the personal data covered by the request relates.

**VIII. Is the provision of personal data voluntary?**

Providing personal data is voluntary, but necessary to use the services provided by the Controller – failure to provide the above personal data to the Controller may result in the inability to use individual services. Providing data in the contact form is voluntary, but necessary to initiate activities aimed at concluding an agreement with the Company or responding to the inquiry sent.

**IX. Changes to the Privacy Policy:**

We are entitled to change this Privacy Policy. Any changes to this document will be promptly announced on this page. We will be happy to answer any additional questions you may have about this document or the website in general.

*Last updated date 16.04.2025*