

# PRIVACY POLICY

## 1. INTRODUCTION

We treat the confidentiality of personal data with seriousness and responsibility, and their security is a priority for us. Therefore, we undertake to comply with the new rules imposed by European Regulation no. 2016/679 called “Regulation” (supplemented by law 190/2018) regarding the processing of personal data and the free movement of such data. By using this policy, we explain to you what personal data we process, how we collect it, how we use it and, especially, how we protect this data. We also inform you about the rights you enjoy and guide you on how to exercise them.

## 2. ABOUT US

A.D. SCHELE S.R.L. is a Romanian legal entity, with its registered office in Bucharest, 4<sup>th</sup> District, 5 Savinesti Street, Building B, 11<sup>th</sup> floor, Apt. 66, Composed Of Level 1 Plus Level 2, Tax Identification Number RO18472820, Company Registration Number J40 /4148/2006.

The legal representative of the company is Mr. DVIR DORON and can be contacted at address Bucharest, 4<sup>th</sup> District, 5 Savinesti Street, Building B, 11<sup>th</sup> floor, Apt. 66, Composed Of Level 1 Plus Level 2, and at the e-mail address [a.d.schela@gmail.com](mailto:a.d.schela@gmail.com).

From the point of view of EU Regulation 679/2016, A.D. SCHELE S.R.L. is a personal data controller and has designated responsible person DVIR DORON who can be contacted:

- by email at [a.d.schela@gmail.com](mailto:a.d.schela@gmail.com);
- by mail to: Bucharest, 4<sup>th</sup> District, 5 Savinesti Street, Building B, 11<sup>th</sup> floor, Apt. 66, Composed Of Level 1 Plus Level 2.

## 3. WHAT DATA WE COLLECT AND HOW WE COLLECT IT

We only use those information strictly necessary and relevant for our business and for your consumer needs and we collect them through our website which is hosted and managed in Romania. We take possession of your data, mainly due to the fact that you choose to disclose it to us voluntarily but also by automatic capture, when accessing our page, as a result of the use of specific technology and software. Although you can visit our website without having to reveal your identity, you can provide us directly with your personal data, when you use:

#### 1. Contact form \*.

\* Available at: <https://www.schela.com/contact.php>

We use your personal data in order to take over your request for a request for quotation and to communicate with you in the event of unforeseen situations.

Data collected:

- Name;
- Telephone number;
- Email address;
- Subject;
- Message.

If you do not agree to disclose this information to us, we will be unable to honor your request. Information on your rights regarding personal data collected and processed through the Site and their exercise can be found in the corresponding section of this privacy policy.

Automatic data capture is done through:

- **cookie technology**; cookie is a piece of information transmitted from the web page, saved by the browser on your computer's hard drive and which we can access later. It retains the statistical information needed for a web page to personalize the browsing session (eg. by displaying dynamic images

with products of interest) such as previously visited web pages, downloads made, internet provider used, site visitor's home country.

The most common cookies are:

- **Technical:** these cookies are absolutely necessary to ensure the efficiency of the site from a technical perspective,
- **Functionalities:** they memorize your choices and help us improve your shopping experience on our website,
- **Performance:** helps us measure site performance using information about how visitors navigate the site,
- **Redirect:** helps us place public ads on other web pages you use
- **Social media plug-in:** to connect customers to different social media channels.

We collect and process data provided by cookie technology only if you allow us to do so.

- **standard web server log files** provide us with statistical information on the number of visitors and allow us to assess the technical capacity of our page. Through them we collect some information regarding the IP address, however they are not able to identify you directly, but to provide us with statistical data related to the traffic on the page.

## **Google Analytics**

Our website uses the web analytics service “Google Adwords / Analytics ” by Google Inc., for statistical purposes. This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"), which in turn uses cookies. The information generated by the cookie about your use of the site will be transmitted to and stored by Google on servers in the United States.

If IP address anonymization is enabled, your IP will be shortened in the Member States of the European Union or other third parties in the European Economic Area. Only in exceptional cases will the entire IP address be transmitted to a Google server in the US and shortened there. IP anonymization is enabled for this

site. Google will use this information on behalf of the site operator for the purpose of evaluating your use of the website, generating site activity reports for website operators and providing other services relating to site activity and Internet usage.

The IP address that your browser transmits will not be associated with other data held by Google. You can refuse the use of cookies by selecting the appropriate settings on your browser, but in this situation you may not be able to use all the functionalities of the site. You can also choose not to use Google Analytics in the future by downloading and installing Google Analytics Opt-out Browser Addon for your browser: <https://tools.google.com/dlpage/gaoptout?hl=en>.

In order to agree or withdraw your consent to the automatic processing through the programs or technologies mentioned above, set this option in the welcome message you receive when you access the website / make the appropriate settings in your browser. For more details, access our cookies policy. If you choose to browse without these technologies or programs, some functions or features of the website will not be able to work. If you fill in the form posted on the website and accept the full use of the automatic capture programs and technologies, we will collect the following data:

- identity data: name and surname, name of the company you represent
- contact details: e-mail address, telephone, possibly contracting and billing address
- data on commercial transactions: services and products purchased from us, the payment method
- technical data: connection data, including IP, system and operation platform, browser identification, location, technologies used on the devices used to access the site
- usage data: of the website, of our services.

#### **4. PURPOSE OF THE COLLECTION and LEGAL BASIS**

We collect information containing personal or technical data mainly for:

1. To fulfill our contractual obligations to you (processing and responding to requests for quotation).

The basis of the collection is a legal one and necessary to conclude a contract between you and our company.

2. Improving our services and your browsing experience on our site. In order to carry out this activity we rely on our legitimate interest to carry out commercial activities but we are also careful to respect your rights and freedoms so we offer you the easy possibility to unsubscribe from using the programs and technologies we use in the collection and processing. data.

3. Direct marketing

We base our marketing communications on your prior consent. You can change your mind at any time by accessing the unsubscribe button in the messages you receive from us.

4. Security reasons for our hardware and software infrastructure.

The basis for collection and processing for this purpose is both a legal one, respectively the obligation to guard the goods and one based on our legitimate interest to protect our business. To the extent that we use the information held for purposes other than those stated above, we will expressly request your consent and explain why you have new rights in this situation.

## **5. IMPOSSIBILITY / REFUSAL TO PROVIDE US WITH CERTAIN PERSONAL DATA**

If you do not provide us with the requested information, it is very likely that you will not be able to use our site in normal parameters and also that we will not be able to accept and process your request and we will not be able to provide you with products or services of interest.

## **6. USERS**

Your data is used by A.D. SCHELE S.R.L. (<https://www.schela.com/>) and we will never share your personal information with any third party for purposes other than those described in this Policy.

We may pass on your personal information to our trusted partners who are able to provide guarantees regarding the security and confidentiality of your data and who process the data only in accordance with our instructions.

Our partners are generally third-party service providers we work with and work in areas such as: IT services and maintenance, internal and EU database hosting, behavioral analysis services (Google Analytics), accounting and taxation, consulting and support, legal, marketing, financing, advertising, public authorities.

## **7. STORAGE PLACE**

Both the website and the physical and electronic database containing personal information are hosted / stored on secure servers in Romania.

To the extent that we transfer certain personal data to entities located in the European Union or outside the Union, including in countries for which the European Commission has not recognized an adequate level of protection of personal data, we will take measures to protect your rights and interests.

Transfers will be protected by contractual terms or other guarantees such as the certification schemes, of which the Privacy Shield for the protection of personal data transferred from within the EU to the United States of America is a part of.

## **8. SECURITY MEASURES**

Although your data is collected online, some of it is also stored on paper (eg. invoices).

A.D. SCHELE S.R.L. (<https://www.schela.com/>) is especially and constantly concerned with the implementation of effective security measures to protect your personal data and to avoid security breaches both in terms of information stored on-line as well as on physical support. Regardless of how they are stored, your data is stored in secure environments that benefit from measures to protect against unauthorized access, use, disclosure, modification or destruction. We also implemented special measures regarding network security and data transfer,

auditing and testing of infrastructure, trained staff, data transfer outside Romania made only to entities that can provide similar protection, etc.

## **9. STORAGE PERIOD**

If we process your data for the performance of pre-contractual / contractual obligations, we will store the data for as long as is necessary for the performance of the contract and for an additional subsequent period.

If we process your data by virtue of a legal obligation or in the public interest, we will store the data for as long as is necessary to comply with legal obligations or as long as the interest is qualified as being of public utility.

If we process your data to protect our legitimate business interests, we will store the data until you ask us to stop unless we can demonstrate that the reason we collect and store is a priority over your interests, rights and freedoms.

If we process your data based on your express consent, we will store the data until you ask us to stop.

We store personal data collected through the offer request form for 12 months.

We store personal data collected through the contact form for 12 months.

## **10. AUTOMATION OF THE DECISION-MAKING PROCESS**

A.D. SCHELE S.R.L. (<https://www.schele.com/>) does not use automated processes that can generate legal effects that concern you or that can affect you to a significant extent.

You can request at any time not to be subject to a decision based solely on automatic processing if that decision has legal effect on you or affects you in a similar and significant way.

You cannot benefit from this right of option if the decision taken as a result of automatic data processing is necessary for us to conclude or execute a contract or

if it is allowed by law and there are adequate guarantees for your rights and freedoms. If you have given us your consent to the automatic processing and then change your mind, you can withdraw this consent at any time by making a written request and communicate it to us using the data mentioned in the Contact section of the site.

## **11. RIGHTS**

**1. The right to information** - you have the right to know if your personal data is processed; what data is collected, where it is obtained from and why, by whom it is processed, for what period and whether this data is subject to automatic processing that is likely to produce legal effects or significantly affect you.

**2. Right of access** - you have the right to access, free of charge and at reasonable intervals, the data collected from you / about you. This includes your right to request and obtain a copy of the personal data collected.

**3. Right to update / rectification** - you have the right to request the rectification or updating of your personal data, which are inaccurate or incomplete.

**4. Right of deletion** - if you have withdrawn your consent, object to the processing of the data, the processing does not comply with the provisions of the Regulation or is no longer necessary to achieve the purposes for which the data were collected and processed, you can request that your personal data will be deleted from our records.

**5. Right to restrict the processing** - if certain conditions apply, you have the right to restrict the processing of your personal data.

**6. Right of opposition** - in some cases you have the right to object to the processing of your personal data, for example in the case of direct marketing.

**7. Right of opposition in connection with automatic processing** - if your personal data is subject to automated processing, including the creation of profiles, which may produce legal effects or significantly affect you, you are entitled to request that we exclude your data from any individual automated decision-making process.



**8. Right to data portability** - you have the right to obtain your personal data in an appropriate format or, if possible, by direct transfer from one processor to another.

**9. Right to help from the supervisory authority** - you have the right to seek the help of a supervisory authority and the right to other remedies, such as claiming compensation.

**10. The right to withdraw consent** - you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of the processing prior to its withdrawal.

**11. Right to file a complaint** - if you want to make a complaint about the way we process your personal data, we invite you to contact us:

- by e-mail to [a.d.schela@gmail.com](mailto:a.d.schela@gmail.com);
- by mail to Bucharest, 4<sup>th</sup> District, 5 Savinesti Street, Building B, 11<sup>th</sup> floor, Apt. 66, Composed Of Level 1 Plus Level 2 for the attention of the PERSONAL DATA MANAGER.

We assure you that all your complaints and grievances will be treated with seriousness, professionalism and complete confidentiality.

However, if you are dissatisfied with the way we have responded to your complaints, you can contact the authorities that have a role of control over our activity in matter of personal data.

In Romania, this authority is represented by the National Authority of Supervision of the Processing of Personal Data, the contact information of which are:

- Address: Bucharest, 28-30 Gen. Gheorghe Magheru Ave., 1<sup>st</sup> District, postal code 010336, Romania
- Telephone: +40.318.059.211 or +40.318.059.212;
- E-mail: [anspdcp@dataprotection.ro](mailto:anspdcp@dataprotection.ro)