

INFORMATIVE NOTE RELATED TO GENERAL DATA PROTECTION REGULATION

1. Introduction

This informative note refers to the way in which our Company **processes** your personal data and to the methods by which we **ensure** that your personal data are protected.

In order to ensure the respect of your right to personal data protection, we have implemented specific protective measures, taking into consideration the Romanian legislation and the requirements established by the **(EU) Regulation 2017/679** - applicable in the entire European Union since **25th May 2018**.

The personal data represent any information by which you may be identified, in particular by an identifier such as a **surname, first name, personal identification number, telephone or e-mail address**, location data, an online identifier or one or several factors related to your physical, physiological, genetic, mental, economic, cultural or social identity.

Our company **takes all the necessary measures** to ensure the respect of your right to personal data protection, and this notification will explain why we collect your personal data, the way in which we protect these data, as well as what are your rights in relation to this data collection.

We encourage you to carefully read the document and to request us any additional information or any clarification which you deem necessary in relation to the content of this informative note.

2. The personal data which we collect, the grounds for the collection and the purposes of the collection

In the commercial relationships established or envisaged between our Company and you or the company you represent, we need to collect and process your personal data, the collection and

processing of such data being necessary mainly for concluding and carrying out the commercial relationships **under legal and optimal conditions.**

In the **table** below we present you in detail what personal data we collect, what is the legal basis for this collection, as well as the purposes for the collection of your personal data.

Depending on the situations encountered, AFFINITY processes a part or all the data detailed below.

Personal data which we collect	The basis for the collection of such data	The purposes of personal data collection
<ul style="list-style-type: none"> • Surname and first name • Position held in the company • Identification data identity card • Data contained in the identification documents : Gender, Age, Personal identification number, date of birth, photo • Professional phone number • Professional e-mail address • Handwritten signature • Identifier in the DKV application 	<ul style="list-style-type: none"> • in order to fulfill a legal obligation - art. 6.1 of the Regulation • based on a legitimate interest - art. 6.1 f of the Regulation • for the performance of a contract - art. 6.1 b of the Regulation 	<ul style="list-style-type: none"> • The need for carrying out the economic activity of AFFINITY by means and with the help of the suppliers and in order to fulfill the obligations towards the clients • The need for developing the economic activity of AFFINITY by direct marketing • Verification of the proper performance of the contracts concluded with AFFINITY clients or suppliers. • Information of the clients or suppliers about the present or future activity of AFFINITY. • Fulfillment of the accounting and tax liabilities
<ul style="list-style-type: none"> • PhotoVideo/audio recording 	based on a legitimate interest - art. 6.1.f of the Regulation	<ul style="list-style-type: none"> • The surveillance of the access to the locations where AFFINITY carries out its activity

3. The way of keeping your personal data, location, storage period

We will store your personal data for a period which **does not exceed the period necessary for the fulfilment of the purposes for which the data are processed**, and, in cases where we have a legal obligation to keep your personal data for a certain period of time, the storage period will be that stipulated by law. Depending on the concrete situation, this period may vary and it may be between *minimum 30 days (for the data obtained for access surveillance) and*

maximum 15 years (for the contact details and the data included in the accounting documents)

For a better understanding of the storage method, of the location where your personal data will be kept and of the exact period for which such data will be kept in our records or systems, please see the table below.

In order to guarantee your right to be protected with regards to the processing of your personal data, our Company has implemented for certain categories of sensitive data or which are likely

to affect your rights in a significant manner, **special technical and organizational actions** which protect these categories of personal data.

Personal data	Storage method	Storage period
<ul style="list-style-type: none"> • Surname and first name • Position held in the company • Identification data identity card • Data contained in the identification documents : Gender, Age, Personal identification number, date of birth, photo • Professional phone number • Professional e-mail address • Handwritten signature 	<p>In electronic format - within:</p> <ul style="list-style-type: none"> i. AFFINITY server, ii. the equipment (company phones, laptops, tablets, desktop units) used by the AFFINITY staff which interferes in the commercial relationship with the respective client/supplier and iii. within the GITS bookkeeping system. 	<p>10 years according to the accounting legislation</p>
<ul style="list-style-type: none"> • Surname and first name • Identification data identity card 	<ul style="list-style-type: none"> • On hardcopy in the Access Register 	<p>1 year</p>
<ul style="list-style-type: none"> • Photo • Video/audio recording 	<ul style="list-style-type: none"> • in electronic format in the video equipment for monitoring the AFFINITY locations 	<p>30 days</p>
<ul style="list-style-type: none"> • Professional phone number • Professional e-mail address 	<p>In electronic format - within:</p> <ul style="list-style-type: none"> • AFFINITY server, 	<p>During the performance of the commercial relationships and 15 years from their termination date</p>

4. Data security and protective measures

Personal data	Location/Medium where these data are kept	Special security measures
<ul style="list-style-type: none"> • Surname and first name • Position held in the company • Identification data identity card • Data contained in the identification documents : Gender, Age, Personal identification number, date of birth, photo • Professional phone number • Professional e-mail address • Handwritten signature • 	<ul style="list-style-type: none"> • Archives on hard copy - Metallic filling cabinets 	<ul style="list-style-type: none"> • access restricted to AFFINITY staff
	<ul style="list-style-type: none"> • AFFINITY server 	<ul style="list-style-type: none"> • password-based, with access restricted both physically and electronically
	<ul style="list-style-type: none"> • workstations for AFFINITY employees (including phones, tablets, etc.) 	<ul style="list-style-type: none"> • secured by technical measures (<i>username and password</i>)
	<ul style="list-style-type: none"> • Archives on hard copy including an Access Register 	<ul style="list-style-type: none"> • access restricted to AFFINITY representatives
<ul style="list-style-type: none"> • Photo • Video/audio recording 	<ul style="list-style-type: none"> • Access intercom 	<ul style="list-style-type: none"> • Managed by the owner of the premises or Affinity. Restricted access.

5. The recipients of the personal data which we collect and process

AFFINITY TRANSPORT SOLUTIONS SRL does not transfer your data to other entities, except for the situations in which these data are integrated in documents which are sent to the **tax authorities or credit institutions**, as well as in the situations in which the data are **requested**

by authorities or courts of law (for example, in case of contraventional or criminal investigations).

In the pursuit of our legitimate interest to inform you about our activity and to provide the best services to you, the data will be transferred to **Xpediator PLC**, the mother company of AFFINITY, the entity responsible for the transmission of the **commercial communications**

6. Your rights and how you can exercise them

6.1. What are your rights

In order to protect your data at the highest standard possible, you have a series of rights regulated by law which we present briefly below, asking you not to hesitate to contact us for any additional details at the phone number +40 21 407 74 75 or at the e-mail address affinity.ro@delamode-group.com.

a) *Right of access*

You have the right to obtain access to your personal data which we process, as well as the right to obtain copies thereof. At your request, we will offer you the first such copy **free of charge**, and any potential copies which you will request will be subject to a fee of **EUR 10 +VAT/request**. The copy of the personal data may be provided to you either in **electronic** format or in **physical** format, depending on your request and on the type of the data requested.

You also have the right to obtain any relevant additional information (such as the reason for personal data processing, the categories of personal data which we collect, information about the processing and disclosure of such data and any other such information).

b) *The right to data rectification*

You have the right to obtain the rectification of any inaccuracies which concern your personal data processed by us. You also have the right to complete any personal data which are incomplete. We encourage you to contact us whenever you notice that there is an inaccuracy related to your personal data or that your personal data processed by our Company are incomplete.

c) *The right to data erasure*

You have the right to obtain the erasure of your personal data from our Company. This right you have is not an absolute right, which means that the law imposes certain limitations about the exercise of such right ("***the right to be forgotten***").

d) *The right to restrict data processing*

You have the right to obtain the restriction of the processing of your personal data which we collect and process, especially in case when you contest the accuracy of the data, in case when

the data processing is unlawful or in case when the processing of such data by our Company is no longer necessary according to law.

e) The right to object

You have the right to object to the processing of your personal data by us, such as the processing made for marketing purposes or for reasons related to your particular situation.

f) The right to data portability

You have the right to receive the personal data concerning you and which our Company collects and processes. You also have the right to obtain the transfer of your personal data from our Company to other personal data operator.

g) The right to consent withdrawal

In the situations where we process the personal data based on your consent, you have the right to withdraw your consent. You can withdraw your consent at any time, as easily as you have initially given us your consent. The withdrawal of your consent will not affect, however, the lawfulness of your data processing which we have performed before the withdrawal of the consent.

Your right to withdraw the consent **is not absolute**, which means that there are cases where your data will not be deleted as a result of the consent withdrawal (for example in case when

your personal data are used by our Company to comply with a legal obligation, for the security of public health or for scientific research).

h) The right to lodge a complaint with the competent authority

You have the right to lodge a complaint with the supervisory authority for personal data processing (National Supervisory Authority for Personal Data Processing) related to the aspects which concern the processing of your personal data by our Company.

6.2. How you can exercise your rights?

In order to exercise your rights specified above, in order to ask us any question related to these rights or to ask us for clarifications related to any of the provisions of this informative note, please contact us at any time, using the contact information in **Chapter 9** below.

7. What happens if you do not provide the personal data?

The provision of your personal data represents an essential element for the **performance of the commercial relationship**, being both a **necessary condition** and, in some cases, even a **legal obligation**.

Thus, in case when you do **not** offer us the personal data or you request their withdrawal or erasure, AFFINITY will be unable to carry out the commercial relationships under optimal or legal conditions and there is the risk of their termination.

8. Modifications and information about the secondary purpose

We may change some provisions of this informative note, case in which we will inform you. Whatever change in this informative note occurs, it will not limit or reduce your rights related to your personal data, such as they are mentioned in Chapter 6 above.

In case when we decide that the utilization of your data for other purposes than those indicated is required, we **will inform you** and, if necessary, **we will request your consent or we will inform you about the new purposes**.

9. To whom you can send your requests?

In order to find out more information about your personal data, about the way in which your data are collected, processed and protected by our Company or in order to request any

clarifications related to those mentioned in this informative note, you can contact us to the following contact details.

- a. Affinity Transport Solutions S.R.L.
- b. Mailing address: Bucharest, Bd. Timisoara nr. 111-115, ground floor, office 1.1, District 6
- c. E-mail address: affinity.ro@delamode-group.com
- d. Phone number:+ 40 21 407 74 75

In order to avoid any delay in the settlement of your requests, complaints or requests for information, please **mention in the content of your correspondence that** the request concerns the **application of GDPR**.

AFFINITY TRANSPORT SOLUTIONS`S TEAM