

PRIVACY POLICY

The protection of your private sphere during the processing of personal data as well as the security of all personal data including business data is a major concern for Autonet Import SRL, as data controller (hereinafter referred to as "Autonet", "We" or "Us"), that we take into consideration in our business processes.

Data protection and information security are an integral part of our corporate policy.

Therefore, we take care to process your personal data in accordance with the principles set forth in the data protection legislation applicable in Romania, including (EU) Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and to the free movement of such data (Directive 95/46/EC "GDPR").

As provided by GDPR, personal data represents any information relating to an identified or identifiable natural person, and an identifiable person is that person that may be identified directly or indirectly, particularly by reference to an identification number or to one or more factors specific to its physical, psychological, mental, economic, cultural or social identity.

This privacy policy regards the personal data of our clients natural persons, business partners, other persons contacting and visiting us and of the representatives thereof, potential employees and it applies to data collected through our web-sites, which have indicated that this privacy policy is applicable, as well as to all other personal data we collect through e-mail or other off-line contacts.

This privacy policy describes:

- the purposes for which we collect and use your personal data;
- the processing grounds for such purposes;
- the categories of personal data we collect from you and process, and the data source
- the duration of processing of such data;
- your rights as data subjects and the manner in which you may exercise them;
- to whom we may disclose your personal data.

PURPOSES, GROUNDS FOR PROCESSING AND CATEGORIES OF PERSONAL DATA

In the context of your interaction with Autonet, you, as a natural person, may be subject to the data processing activities that we perform. Thus, we use your personal data in the following cases:

1. If you are an existing individual client or potential individual client of Autonet:

1.1. Providing the services/and/or products requested from us

We process your relevant personal data in order to prepare and provide the services and/or products you order from us. For instance, when drafting the contract/s to be signed with you, when you are providing payment guarantees, we may have to rely on your personal data of relevance for our business relationship. We rely in this case on the execution of our agreement as grounds for processing.

1.2. Communicating with you

We use your contact details in order to communicate with you with respect to your orders and any other relevant business-related matters. We rely in this case on execution of our agreement as grounds for processing.

1.3 Data processing as obligation imposed by the law

We may process some of your data in the context of providing the goods/products or services you request, based on legal obligations. In such case, the grounds for processing is the legal obligation.

1.4 For marketing purposes, respectively for sending newsletters

We may also process your contact data in order to provide to you by e-mail and / or SMS our special offers/ other information related to our business but only if you have subscribed and, hence, given your express consent to such processing of your personal data. **You can at any time withdraw your consent** expressing your option not to receive our newsletters in the future by clicking “Unsubscribe” when you receive the respective e-mail / SMS or by writing to: privacy@autonet.ro.

1.5 For marketing purposes, respectively for the organization of various campaigns/programmes/events

We process your personal data if you participate in various marketing campaigns/programmes/events that we organize. In this case, the basis for the processing of your personal data consists in: (i) the contract concluded with you and represented by the terms and conditions, rules of organization or any other document describing the terms of the marketing campaigns/programmes /events that we organize or (ii) the legitimate interest of Autonet, if the participation in campaigns/programs/events that we organize is not covered in a document you acknowledge and undertake by participating. The legitimate interest of Autonet consists in promoting its products and services by organizing various initiatives.

The categories of data processed in the context of our relationship with you are your name, e-mail, phone and fax no., as well as other personal data you may provide directly to us.

2. If you are a representative, contact person or an employee or other collaborator of our client or potential client of ours

2.1. Providing the services/and/or products requested from us

We process your relevant personal data in order to prepare and provide the services/products orders requested from us. For instance, we may use the personal data to manage the relationship with the client

you represent. We rely in this case on the legitimate interest of Autonet in providing our services according to our area of activity and managing the relationship with our clients.

2.2. Communicating with you

We use your contact details in order to communicate with you with respect to your requests and any other relevant business-related matters. We also rely in this case on the legitimate interest in providing our services according to our area of activity.

2.3 Data processing as obligation imposed by the law

We may process some of your data in the context of providing the services/products you order from us, based on legal obligations. In such case, the grounds for processing is the legal obligation.

2.4 For marketing purposes, respectively for sending newsletters

We may also process your contact details in order to provide to you by e-mail and / or SMS our special offers/ other information related to our business but only if you have subscribed and, hence, given your express consent to such processing of your personal data. **You can at any time withdraw your consent** expressing your option not to receive our newsletters in the future by clicking “Unsubscribe” when you receive the respective e-mail / SMS or by writing to privacy@autonet.ro.

2.5. For marketing purposes, respectively for the organization of various campaigns/ programmes/ events

We process your personal data if you participate in various marketing campaigns/programmes/events that we organize. In this case, the basis for the processing of your personal data consists in: (i) the contract concluded with you and represented by the terms and conditions, rules of organization or any other document describing the terms of the marketing campaigns/programmes /events that we organize or (ii) the legitimate interest of Autonet, if the participation in campaigns/programs/events that we organize is not covered in a document you acknowledge and undertake by participating. The legitimate interest of Autonet consists in promoting its products and services by organizing various initiatives.

The categories of data processed in the context of our relationship with you are your name, e-mail, phone and fax no., as well as other personal data you may provide directly to us.

3. If you are a business partner of Autonet

3.1 Maintaining our contractual relationship with you

We process your relevant personal data in order to maintain our contractual relationship with you. We rely in this case on the execution of our agreement as grounds for processing.

3.2 Communicating with you

We process your contact details in order to communicate with you with respect to any relevant business-related matters. We rely in this case on the execution of our agreement as grounds for processing.

3.3 Data processing as obligation imposed by law

We may process some of your data in the context of providing the services/products you order from us, based on legal obligations. In such case, the grounds for processing is the legal obligation.

3.4. For marketing purposes, respectively for the organization of various campaigns/ programmes/ events

We process your personal data if you participate in various marketing campaigns/programmes/events that we organize. In this case, the basis for the processing of your personal data consists in: (i) the contract concluded with you and represented by the terms and conditions, rules of organization or any other document describing the terms of the marketing campaigns/programmes /events that we organize or (ii) the legitimate interest of Autonet, if the participation in campaigns/programs/events that we organize is not covered in a document you acknowledge and undertake by participating. The legitimate interest of Autonet consists in promoting its products and services by organizing various initiatives. The categories of data processed in the context of our relationship with you are your name, e-mail, phone and fax no. as well as other personal data you may provide directly to us.

4. If you are a representative, contact person, employee or other collaborator of our business partner

4.1. Maintaining our contractual relationship with our business partner

We process your relevant personal data in order to maintain our contractual relationship with our business partner. We rely in this case on the legitimate interest in ensuring that the contractual relationship is managed properly.

4.2. Communicating with you

We process your contact details in order to communicate with you with respect to any relevant business-related matters. We rely in this case on the legitimate interest of ensuring that the contractual relationship is adequately carried out.

4.3 Data processing as obligation imposed by law

We may process some of your data in the context of providing the services/products you order from us, based on legal obligations. In such case, the grounds for processing is the legal obligation.

4.4. For marketing purposes, respectively for the organization of various campaigns /programmes/ events

We process your personal data if you participate in various marketing campaigns/programmes/events that we organize. In this case, the basis for the processing of your personal data consists in: (i) the contract concluded with you and represented by the terms and conditions, rules of organization or any other

document describing the terms of the marketing campaigns/programmes /events that we organize or (ii) the legitimate interest of Autonet, if the participation in campaigns/programs/events that we organize is not covered in a document you acknowledge and undertake by participating. The legitimate interest of Autonet consists in promoting its products and services by organizing various initiatives.

The data is provided either directly by you or by the business partner. The categories of data processed in the context of our relationship with you are your name, e-mail, phone and fax no.as well as other personal data you may provide directly to us.

5. If you are a job applicant:

We use your personal data in order to assess the applicants' qualifications for a position within Autonet, respectively to ensure the compliance with the legal requirements, based on the following grounds for processing:

- i. the legitimate interest of Autonet, which consists in the organization and performance of the recruitment process to fill the vacancies in the organization. After completion of the recruitment process, if you will be selected for a position in Autonet, the ground for processing shall be the individual labour contract and
- ii. the legal obligations incumbent upon Autonet as a potential employer

If you will not be selected for the position for which you applied, with your consent, Autonet shall consider your application for other vacancies similar to the one for which you have applied/your application was considered, for maximum one year from the time that you communicated/we learned about your application. Providing your consent for this purpose is voluntary, your refusal for this purpose shall not attract negative consequences for you. If you choose to consent to your data processing for this purpose, you have the right to withdraw your consent at any time by communicating us your desire in this regard using the contact details contained herein.

The categories of data processed in the context of our relationship with you are your name, e-mail, phone and fax no., personal data included in CVs, education and training details, professional qualifications, as well as other personal data you may provide directly to us. Autonet collects your personal data also from the following sources:

- recruitment platforms/websites (i.e.: Ejobs, Bestjobs, OLX) – *if you send us your application via these platforms*. The personal data collected from these sources are the following: your name, e-mail address, phone number, fax, personal data included in the CV, details regarding your education, training and professional qualifications;
- social networks (Facebook page of the Autonet company, LinkedIn) and other publicly available sources. The personal data collected from these sources are the following: your name, e-mail address, phone number, fax, personal data included in the CV, details regarding your education, training and professional qualifications;
- Autonet's employees - *if you send us your application through them or if the employees of Autonet recommend you to fill a vacant position within Autonet*. The personal data collected from these

sources are the following: your name, e-mail address, phone number, fax, personal data included in the CV, details regarding your education, training and professional qualifications;

- Your references (for example, from former employers). The personal data collected from these sources are the following: your name, e-mail address, phone number, fax, personal data included in the CV, details regarding your education, training and professional qualification;

6. If you are a visitor of our premises:

We process your personal data in order to ensure the security of our premises, assets and personnel. In this case, we base our data processing on the legitimate interest of Autonet, namely the protection of such premises, assets and personnel.

The categories of data processed in this context are your name as well as other personal data you may provide directly to us.

7. If you are a user of our Internet websites:

We process the personal data we collect from you when you visit our Internet sites, in order to monitor the traffic and improve the content of the website. We base this data processing activity on our legitimate interest in ensuring the proper functioning of our Internet websites, as well as its improvement.

The categories of data processed in this context are the hour and date of accessing the Internet websites and the IP address from which our Internet websites were accessed.

For more information please see the Cookies Policy.

Also, we process your personal data in the context of using the section “Notifications” and “Contact” available on our Internet sites. In this case, the ground for processing consists in either (i) the contract negotiated/concluded with you - if the notification is related to the completion/execution thereof, or (ii) the legitimate interest of Autonet which consists in the proper management of notifications and complaints received, including improving the relationship with the clients/potential clients and the offered services.

The categories of data processed in this context are your name, surname, email address, phone number, city, county, as well as any other personal data that you send us in the contents of your notification/request. In order to settle your notification/request, Autonet shall perform checks on its internal systems and if necessary, publicly available sources.

For all above categories of data subjects, we may also process your data in the context of changes in structure or similar transactions involving any Autonet affiliated/mother legal entities. In this case, the grounds for processing may be represented by the legal obligation, the performance of the agreement concluded by Autonet in the context of such transaction (if you are a party to such agreement) or the

legitimate interest of Autonet to carry out the transaction in the most effective manner (in the rest of the cases).

PROVIDING THE PERSONAL DATA

When the data is required directly from you, Autonet will ask you to provide all categories of personal data we request in the aforementioned purposes, as otherwise we shall not be able to carry out our activity (including, among others, to provide you with our products/services), or to fulfil the legal obligations incumbent upon us

Providing your personal data in order for us to send you offers regarding the products, services and promotions that we are making available to you, is voluntary. Refusal to provide data to Autonet for this purpose shall not have negative consequences for you. If you provide to Autonet the personal data of other individuals, we are kindly asking you to inform them before this disclosure about how Autonet intends to process their personal data, as described in this Privacy Policy.

If you applied for a job within Autonet, providing and processing of your personal data is necessary to manage the recruitment process, to draw up the work documentation in the case you are selected, as well as to meet the obligations for which Autonet is responsible as potential employer. In principle, the refusal to provide such data entails the impossibility of managing your application and fulfilment of legal obligations.

DISCLOSURE OF YOUR PERSONAL DATA

As a rule - we shall not disclose your personal data to any third parties.

However, there may be cases where:

- we disclose your contact details to our affiliates within Autonet Group of companies;
- we reveal your personal data to our contractual partners, for example, IT service providers, consultants
- we disclose relevant personal data to relevant authorities, in the context of providing the products/services you have ordered from us.

DURATION OF PROCESSING

We intend to keep your personal data for the duration of the contract signed between the parties, as well as afterwards, according to our internal policies and the legal obligations incumbent upon us.

In case the data is not collected in the context of a signed contract, such data will be kept for as long as necessary in order to satisfy the purpose of the envisaged data collection.

THE RIGHTS YOU HAVE IN THE CONTEXT OF AUTONET PROCESSING YOUR PERSONAL DATA

In your capacity as data subjects, the GDPR provides you with a series of rights including:

- **the right of access** – allowing you to obtain from Autonet the confirmation that your personal data is being processed by us and, if affirmative, the relevant data and details of such processing activities;
- **the right to rectification** – allowing you to obtain from Autonet the rectification of your personal data if inaccurate;
- **right to erasure** – allowing you to obtain from Autonet the erasure of your personal data in certain cases (e.g., if the data is no longer necessary in relation to the purposes for which it was collected);
- **right to restriction** – allowing you to obtain from Autonet the restriction of processing your personal data in certain cases (e.g., when you contest the accuracy of your personal data, for a period enabling us to verify such accuracy);
- **the right to object** – allowing you to object to further processing by Autonet of your personal data within the conditions and limits set forth by law;
- **right to data portability** – allowing you to receive from Autonet the personal data concerning you that you have provided to us, in a structured, commonly used and machine-readable format or to transmit this data to another data controller, within the conditions and limits set forth by law;
- **the right to not be the subject of a decision based solely on automated processing, which produces legal effects or similarly affects you in a significant way or to require human intervention when such decisions are permitted by the legislation on personal data protection;**
- **the right to withdraw your consent** at any time for the consent-based processing. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

We are committed to ensure your exercise of these rights.

You may exercise the afore mentioned rights and find out more about such rights as follows:

- by a written request to:
Autonet Import SRL, Aurel Vlaicu street no. 78, 440122, Satu Mare, Romania; or
- contacting the Personal Data Protection Officer within Autonet by e-mailing us at:
privacy@autonet.ro.

You also have the right to file a complaint with the **National Supervisory Authority for Personal Data Processing**, with its registered office in B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, postal code 010336, Bucharest, România.

We shall always treat your requests with the highest degree of attention and address any queries you may have in the shortest time possible.

VERSIONS TO THIS PRIVACY POLICY

This Privacy Policy is in force as of March 24, 2022.

We reserve the right to make modifications to our security and data protection measures, insofar as this is necessary due to the technical development. In these cases, we will also adapt our privacy policy accordingly and Autonet shall inform you about any such amendments. Therefore, please note the currently valid version of our privacy policy.