

PERSONAL DATA PROTECTION

GENERAL PROVISIONS

Perla Harghitei SA, headquartered in: *comuna Sancraieni, sat Sancraieni, Str. Garii, nr. 600, judetul Harghita*, registered with the Trade Register under no. J1991000127194, Tax ID 505623 ("**Perla Harghitei**" or "**the Company**"), as a data controller, processes your personal data in good faith and in order to achieve the specific purposes mentioned herein, in accordance with the provisions of the data protection legislation, including but not limited to Regulation (EU) 679/2016 on the protection of individuals 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 - "**GDPR**").

The purpose of this notice is to explain what personal data we process, why we process it, how we will use it, how long we will keep it, to whom we may disclose it, how you can contact us, and what your rights are.

We take confidentiality seriously and we are aware that your personal data belongs to you; therefore, we make every effort to store them securely and process them carefully. We do not disclose your personal data to third parties without informing you. We have implemented appropriate measures to protect the personal data you share with us.

The term "personal data" refers to information relating to an identified or identifiable natural person (referred to as *the "data subject"*) By "*processing*" we mean any operation or set of operations performed on personal data such as: collecting, recording, organizing, structuring, storing, adapting or modification, retrieval, viewing, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

PURPOSES, GROUNDS AND CATEGORIES OF PERSONAL DATA

The personal data processed by Perla Harghitei may be used for purposes such as:

1. ***Conclusion and performance of the Company's commercial contracts***, which includes operations such as sale/purchase, order processing, deliveries, making payments, communication with customers, suppliers and

partners of the Company, as well as the management of the commercial relationship with the above. For this purpose, the Company processes the identification data, contact details and signature of the Company's customers, suppliers and partners or of the employees/representatives indicated by them in order to conclude and execute the contract (legal basis: Article 6 paragraph 1 b) GDPR). In such cases, the Company's customers, suppliers and partners are responsible for informing their own employees/representatives designated for the conclusion and execution of the contract, with regard to the processing of their data by the Company, as the Company does not have the practical means to inform these;

2. ***Fulfilment of the legal obligations*** incumbent on the Company, such as the preparation of financial and accounting documents, the submission of reports and the performance of the formalities required by law (legal basis: Article 6 paragraph 1 c) GDPR). For this purpose, the Company processes the categories of personal data that are provided for in the applicable legal regulations;
3. ***Collection of debts / recovery of claims*** owed to the Company, including through enforcement proceedings, in accordance with any concluded contracts and the legitimate interest of the Company, pursuant to art. 6 paragraph 1 sections b) and f) of the GDPR. For this purpose, the Company processes the identification data, contact details and signature of the data subjects against whom the debt collection/recovery procedures are carried out, as well as of their representatives involved in these procedures, if required;
4. ***Defending, enforcing, ascertaining a right/claim/request*** etc. in court, before another authority/institution/natural or legal person, auditors, without limitation, based on the legitimate interest of the Company to take all necessary and appropriate measures to protect its rights and interests, according to art. 6 paragraph 1 section f) of the GDPR. To this end, the Company processes the identification data, contact details, and signatures of the data subjects in relation to whom the Company's actions and measures (documentation, defence, exercise, ascertainment) are undertaken and, where applicable, of their representatives involved in these actions and measures;
5. ***The management and maintenance of this website***, which also involves the use of functionality cookies, so as to ensure quick and easy interactions between users and the website. For this purpose, the Company will process the personal data that users provide directly while using the website. This type of data processing is based on your consent and our legitimate interest (according to art. 6 paragraph 1 sections a) and f)

of the GDPR). For further information on the use of cookies by the Company, please consult the section dedicated to them, available on this website;

6. ***Monitoring, security, and protection of persons, premises, and property of the Company***, according to the provisions of Law no. 333/2003 on the security of property, goods, values and the protection of persons, pursuant to art. 6 paragraph 1 section c) of the GDPR, but also in pursuing our legitimate interests, in the sense of art. 6 paragraph 1 section f) of the GDPR. For this purpose, Perla Harghitei processes your likeness and, where applicable, your vehicle registration number, using video surveillance devices installed at the Company's locations. Furthermore, if you are a visitor and the location keeps a visitor access log, the Company will also process your first and last name, ID number, destination, and time of arrival/departure.
7. ***Resolving requests, questions, or complaints***, based on your consent or, where applicable, to pursue our legitimate interest (legal basis: Art. 6 paragraph 1 sections a) or f) of the GDPR). For this purpose, Perla Harghitei processes the first and last name, telephone number and e-mail address of the person making the request, question or complaint;
8. ***Carrying out personnel recruitment operations***, which involves the processing of identification data and other data contained in the candidates' CV or transmitted to the Company in any other way by the candidates, as well as publicly available information about candidates, insofar as they are relevant to the recruitment process. Such processing of data shall be based on the performance of pre-contractual steps, at the request of the data subject or, where applicable, on our legitimate interest. (legal basis: Art. 6 paragraph 1 sections b) and f) of the GDPR). When you agree to have your CV and contact details stored in the Company's databases for the purpose of future contact regarding other positions similar to the one you applied for and/or other vacancies within the Company, the processing of your data is based on your consent according to art. 6 paragraph 1 section a) of the GDPR.
9. ***Managing employment relationships***, involving the processing of data for the conclusion and performance of employment contracts, the fulfilment of legal obligations in the field of employment and social security and/or the pursuit of the legitimate interests of the Company, under art. 6 paragraph 1 sections b), c) and f) of the GDPR, as the case may be. In certain specific situations, which go beyond the performance of the employment contract, Perla Harghitei processes the employees' data based on their consent (legal basis: Article 6 paragraph 1 section a) of the GDPR.)
For the purposes stated above, Perla Harghitei

processes the personal data of its employees in the manner described in the notice supplied to the employees;

10. ***Drawing up the civil liability insurance file***, in case of a traffic accident involving a vehicle belonging to the Company. For this purpose, Perla Harghitei processes personal data such as first and last name, data contained in the identity document, data contained in the vehicle registration certificate, data contained in the driving license and the signature of the driver involved in the traffic accident (legal basis: pursuing the legitimate interest of the Company, according to Article 6 paragraph 1 section f) of the GDPR.)
11. ***Conclusion and execution of deeds by which real rights are established, acquired, or alienated, and fulfillment of the related legal obligations*** (legal basis: Art. 6 paragraph 1 sections b) and c) of the GDPR). For this purpose, Perla Harghitei processes personal data such as first and last name, data contained in the identity document, data contained in the birth/marriage certificate, data contained in the inheritance certificate and data contained in the property documents;
12. ***Managing the Company's social media pages (Facebook, Instagram, LinkedIn), transmitting general information on the Company's products and services, requesting feedback and interacting with users of the social media pages; organizing marketing campaigns, contests and promotional lotteries***, in partnership with various retailers and/or on the Company's social media pages, managing participants' entries, checking eligibility, drawing winners, delivering the prize or transferring it electronically (e.g. in the case of prizes consisting of vouchers). For these purposes, Perla Harghitei will be able to process the following categories of personal data, without limitation: (i) concerning users/participants: first name, last name, data from the answers entered in the comments section of the social media pages, the ID associated with the social media page; (ii) concerning winners: first name, last name, contact details provided for the purpose of delivering the prize: delivery address, telephone number, e-mail address (for prizes to be sent to winners electronically), personal identification number (if the marketing campaign/ contest rules expressly stipulate), ID associated with the page on the social media platform. Data processing for the above-mentioned purposes is based on the consent of users/participants, as well as on the legitimate interest of the Company, in accordance with Art. 6 paragraph 1 sections a) and f) of the GDPR, as the case may be. When the financial and accounting legislation requires the registration of certain data of the participants, the processing is based on the fulfilment of the legal obligations incumbent on the Company, according to art. 6 paragraph 1 section c) of the GDPR).

When consent is the basis for the processing of personal data, Perla Harghitei will inform the data subjects of this before consent is given.

Personal data of minors (such as: first and last name, address, telephone number, educational establishment – in the case of pupils performing internships or apprenticeships within the Company or personal data of family members of employees – in order to provide facilities and benefits, according to labour legislation) will not be processed by Perla Harghitei without the prior consent of their parents/legal representatives.

In the event that Perla Harghitei intends to use the data for a purpose other than that for which they were collected, Perla Harghitei will inform in advance the persons concerned of the secondary purpose and will provide them with any other information required by law.

For the proper functioning of this website, Perla Harghitei uses cookies in accordance with its Cookie Policy.

DURATION OF PERSONAL DATA PROCESSING

Perla Harghitei processes personal data for the period of time necessary to fulfil the purposes for which it was collected (for example: for the period specified in the applicable regulations in order to comply with the legal obligations incumbent upon the Company; for the duration of the contracts, plus the limitation periods or retention periods imposed by the applicable legislation in the field of archiving; for the time necessary to achieve the legitimate interests of the Company; for the period for which the data subject has given his or her consent).

Personal data captured by video cameras are kept for a period of 30 days from the date of their recording, unless there are justified grounds to keep them for a longer period, under the law.

After the end of the storage period, personal data will be destroyed or deleted from our IT systems or transformed into anonymised data, insofar as it is necessary to use such data for scientific or statistical research purposes.

TO WHOM DO WE TRANSMIT PERSONAL DATA

There are situations in which your data may be transmitted to third parties, such as: consultants, experts, authorized evaluators, lawyers, notaries, courts and criminal investigation bodies, public institutions and authorities, insurers, auditors, as well as service providers (for example: IT, archiving, couriers, companies providing transport and accommodation services, etc.).

The personal data disclosed to third parties will be adequate, relevant, and not excessive in relation to the purpose for which they were collected and which justifies their disclosure to a specific third party.

Your personal data will not be transferred to a third country that does not provide an adequate degree of protection.

RIGHTS OF DATA SUBJECTS

Your rights regarding the processing of personal data, as provided for in the GDPR, are as follows: the right to information, the right of access to data, the right to rectification of data, the right to erasure of data, the right to restriction of data, the right to be notified of the rectification or erasure of personal data, the right to data portability, the right to object, the right not to be subject to an individual decision, the right to refer to the competent authority in the field of personal data protection and the competent courts.

WHO CAN YOU CONTACT?

To exercise these rights, you may submit an application to the Company's registered office (mentioned in the introductory part of this document) or to the e-mail address dpo@perlaharghitei.ro.

Please specify in your application if you want the information to be sent to a specific postal address or e-mail address or through a courier service that ensures personal delivery.

We will strive to process your application within 30 days. However, the deadline may be extended under the law, depending on various factors, such as the complexity of the request, the large number of requests received, or the inability to identify you within a reasonable time frame.