#### Data Privacy Policy and the use of cookies

According to Regulation (EU) 2016/679 on the protection and processing of personal data, otherwise known as GDPR (General Data Protection Regulation), we have drawn up new rules and procedures within our organisation regarding the processing and security of personal data processing. The measures taken have been established, implemented and improved through policies, procedures, processes, organisational structures and specific data security software and hardware functions, according to the personal data processing workflow in the organisation.

Because one of the essential principles of this legal framework is transparency, we have prepared this document with the Privacy Policy through which we want to inform you about how we collect, use, transfer and protect your personal data when you interact with us in in connection with our products and services, including through our website or through interaction with our employees at Gacriva Studio workplaces or meetings at the customer's premises.

We reserve the right to modify and update this Privacy Policy periodically, to reflect any changes in the way we process your personal data or any changes according to legal requirements. In case of modification, we will publicly display the last modified version of the Privacy Policy on our website.

### **Privacy policy**

#### Who are we?

Gacriva Studio SRL is a legal entity of Romanian nationality, with its registered office in Baia Mare, George Enescu Street, no. 6/78, Maramureş county, with unique tax registration code 41258954 (hereinafter referred to as "Gacriva Studio" or "we"). In the context of data protection legislation, we are the controller when we process your personal data. We are always open to provide you with any additional information and to hear your opinions, that is why we provide you with a dedicated email address: dataprotection@Gacriva Studio.com, or you can always contact us by courier/post at: SC Gacriva Studio SRL, George Enescu, No. 6/78, Postal code: 431013, Baia Mare, Maramureş - with the mention: to the attention of the data protection officer Gacriva Studio.

#### What personal data we collect

We collect personal data from customers or potential customers. The data collected is directly from you, so you have control over the information you give us. The information and personal data collected by us are as follows:

Name and surname;

Email Address;

Home address;

Phone number;

The data required for invoicing, for example: ID card series and number.

We also collect data via various plugins from Facebook and Google. These data can be: photo, gender, nickname, phone number, date of birth, level of education, preferences, etc. – depends on what information you have public in these accounts. You can consult the privacy policies of Facebook and Google, respectively, using the following links:

https://www.facebook.com/about/privacy

https://policies.google.com/privacy

We may also collect and further process certain information about your behaviour while visiting our website in order to personalise your online experience and provide you with offers tailored to your profile. We invite you to find out more details in this regard, by consulting the section below, regarding the purposes of processing.

## Comments

When visitors leave comments on the site, we collect the data shown in the comment forms, as well as the visitor's IP address and browser type, to help us detect spam. An anonymized hash created from your email address may be provided to the Gravatar service to see if you use it. The privacy policy of the Gravatar service is available here: https://automattic.com/privacy/. After comment approval, your profile photo is publicly visible next to your comment.

# Mediate

If you upload images to our website, you should avoid uploading images that have embedded location data (EXIF GPS) included. Website visitors can download and extract all location data from images on the website.

Contact forms

By using the contact form, we collect your name, email address and IP address to help us detect spam.

# Cookies

If you leave a comment on our website, you can choose to save your name, email address and website in cookies. These are for your convenience, so you don't have to fill them in again when you leave another comment. These cookies will be valid for one year. If you have an account and log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is deleted when you close your browser.

Embedded content from other websites

Articles on this site may include embedded content (eg videos, images, articles, etc.). Embedded content from other websites behaves exactly as if visitors viewed another website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with embedded content, including tracking your interaction with embedded content if you have an account and are logged into that website.

# Analytical

We use cookies to measure traffic. These "cookies" objects come from third-party services, such as Google Analytics.

We do not collect or otherwise process sensitive data, included by the General Data Protection Regulation, in special categories of personal data. We also do not collect and process data of minors under the age of 16.

Why we collect personal data (purposes and grounds of processing) Above all, we use the collected data to provide good quality services for the benefit of our customers. The purposes and bases of the processing are:

- 1. Data required in the sales/invoicing process, required according to Romanian fiscal legislation.
- 2. Authentication in case of account creation and administration within the Gacriva Studio online store platform.
- 3. Providing support services and cases of on-site or remote service interventions, processed within the support and service ticketing system.
- 4. Ensuring equipment warranty or post-warranty service, processed within the service ticket ticketing system.
- 5. For marketing, we want to keep you informed about the best offers for products/services that interest you and are relevant to you. We base our marketing communications on your consent. You can change your mind at any time and withdraw your consent by: changing your newsletter subscription preferences, accessing the unsubscribe link displayed in the messages you receive from us; or by contacting Gacriva Studio using the contact details provided.
- 6. To improve our services, we constantly want to be the best and offer the best experiences to our customers. This requires us to analyze past data and continuously learn from our interactions. We may invite you to complete satisfaction and feedback surveys, or we may conduct, directly or with the help of partners, studies and market research.
- 7. For the defence of our legitimate interests, this may include: measures to protect the website and the users of the website against cyber attacks, measures to prevent and detect fraud attempts, including the transmission of information to the competent public authorities, measures management of various other risks. We base our processing on legal provisions, such as the obligation to ensure the security and video surveillance of goods and valuables, provided by the applicable legislation in this matter.

For the processing of personal data we base these activities on our legitimate interest to carry out commercial activities and to promote and develop our commercial activity, always taking care that your fundamental rights and freedoms are not affected.

## Who we share your data with?

Your personal data provided with your consent are processed within specific departments within Gacriva Studio, such as: the invoicing or marketing department;

Or as the case may be, we may transmit or provide access to certain personal data to the following categories of recipients:

- courier service providers, Gacriva Studio partners;
- payment/banking service providers;
- marketing/telemarketing service providers;
- market research service providers;
- insurance companies;
- IT service providers;

 other companies with whom we can develop joint programs for offering our goods and services on the market.

In cases of legal obligation or if necessary to defend a legitimate interest, we may also disclose certain personal data to public authorities.

We ensure that access to your data by third parties under private law is carried out in accordance with the legal provisions on data protection and information confidentiality, based on contracts concluded with them.

### How long do we keep your data?

We store your personal data as long as you have an account in the Gacriva Studio invoicing platform or in the ticketing platform. You may request that we delete your account or certain information at any time, and we will comply with such requests, subject to the retention of certain information, including after account closure, where applicable law or our legitimate interests require it.

Regarding the comments left on the site, it and its metadata are kept indefinitely. This way we can automatically recognize and approve all subsequent comments instead of holding them in a queue for moderation.

For users (if any) who register on our website, we also store the personal information they provide in their user profile. All users can view, edit or delete their personal information at any time (but cannot change their username). Website administrators can also view and edit this information.

### What rights do you have over your data?

According to Regulation (EU) 2016/679 on the protection and processing of personal data, otherwise known as GDPR (General Data Protection Regulation), you have a number of rights in relation to your personal data. You can always request access to your data, correction of any mistakes in our files and/or object to the processing of your personal data. You can also exercise your right to complain to the competent supervisory authority or go to court. If applicable, you can also benefit from the right to request the deletion of your personal data, the right to restrict the processing of your data and the right to data portability.

In order to exercise your rights, you can contact us using the contact details set out above. Please note the following points if you wish to exercise these rights:

- 1. Requests for personal data requests should be submitted using the email address associated with the account registered in our systems. Otherwise, we reserve the right to verify your identity by requesting additional information, which aims to confirm your identity.
- 2. Operating Fees: We will not charge you a fee to exercise any right in relation to your personal data, unless your request for access to the information is unfounded, repetitive or excessive, in which case we will charge a reasonable amount under such circumstances. We will inform you of any fees applied before we settle your claim.
- 3. Response time. We aim to respond to any valid requests from you within a maximum of one month, unless this is particularly complicated or you have made multiple requests, in which case we will respond within a maximum of three months. We will let you know if we need more than a month. We may ask if you can tell us exactly what you want to receive or what you are concerned about. This will help us act faster and shorten the response time to your request.
- 4. If you have an account or have left comments on this website, you can request to receive an export file of the personal data we hold about you, including any data you have provided to us. You can also ask us to delete any personal data we hold about

you. This does not include all data that we are required to retain for administrative, legal or security purposes.

5. Third Party Rights. We must not comply with a request if it would adversely affect the rights and freedoms of other data subjects.

You have the right to lodge a complaint with the supervisory authority regarding the processing of your personal data. In Romania, the contact details of the supervisory authority for data protection are as follows:

National Authority for the Supervision of Personal Data Processing, B-dul G-ral. Gheorghe Magheru no. 28-30, Sector 1, postal code: 010336, Bucharest, Romania, Phone: +40.318.059.211 or +40.318.059.212; Email: anspdcp@dataprotection.ro

We would like to make it clear that without affecting your right to contact the supervisory authority at any time, please contact us in advance, and we promise that we will make every effort to resolve any problem amicably.

How do we protect your data?

We support Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons (GDPR) and remind our visitors that they also benefit from all the rights conferred by Law 677/2001.

We constantly strive to protect our visitors, both by limiting personal data requirements as strictly as possible and by providing the safest possible web experience using the highest web security standards available.

To make payments, we use external services of payment processors accredited in Romania. Any payment information is encrypted using HTTPS technology with 256-bit TSL encryption.

We would like to draw your attention to the fact that the transmission of information over the Internet, in general, or through other public networks, is not completely secure, there is a risk that the data may be seen and used by unauthorised third parties. We cannot be responsible for such vulnerabilities of networks/systems that are not under our control.

## **Cookie policy**

Dear visitor, the website www.Gacriva Studio.ro uses cookies to ensure a pleasant browsing experience for users and to support efforts to provide comfortable services to users (for example: online privacy preferences, language options website etc.).

A "cookie" is a small file consisting of letters and numbers, which is stored on any terminal with Internet access (computer, mobile phone, tablet, etc.) and is installed by the request sent by a web server to a browser (Internet Explorer, Chrome, etc.) and is completely passive – it does not contain software programs, viruses, spyware and cannot access information from the user's hard drive.

The cookie itself does not request personal information in order to be used and, in most cases, does not personally identify Internet users.

If you do not want to receive a certain type of cookie, you can disable it by following the instructions below. If you change your mind, you can reactivate cookies using the same settings.

NOTE: If you disable certain cookies, it is possible to lose certain useful functions, which you were used to having when visiting the Gacriva Studio website. However, most of the content on the site is functional and without cookies.

Although we do our best to fully implement your settings, some cookies may escape us. To prevent such situations, please check the cookie settings in your browser and, if necessary, change them manually.

There are different types of cookies, which are used depending on the need:

Technical cookies: allow the website to be viewed, function correctly, create an account and perform autologin. They are essential for the site to function properly.

Cookies from third parties: in some cases, third parties (an external organisation that provides services to us) place a cookie on the device in order to obtain information related to browsing habits, which identifies the use of certain services provided. An example would be a third-party cookie indicating that a link that redirects to our website has been clicked from a search with Google or other search engines. Another example is the "Like" button on Facebook. Through this button, a cookie is generated that can be read by Facebook. This may be considered a third-party cookie.

Third-party cookie policy is not part of our cookie policy. For more information contact the third party sellers directly.

Cookie preferences can be changed. From the browser settings (Internet Explorer, Safari, Firefox, Chrome, etc.), the user can decide which cookies he wants to accept and which he does not want to accept. To find out where these settings are located, it is necessary to use the "Help" button of your browser.

Below you can find instructions for the main types of browsers:

MICROSOFT WINDOWS EXPLORER

http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies GOOGLE CHROME

https://support.google.com/chrome/answer/95647?hl=en&p=cpn\_cookies MOZILLA FIREFOX

http://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences?redirectlocale=en-US&redirectslug=Enabling+and+disabling+cookies

APPLE SAFARI http://www.apple.com/support/?path=Safari/5.0/en/9277.html

If you do not use one of these browsers, you can use the browser's "Help" button to find information about the desired settings. However, you must take into account that certain cookies, if they are refused, could jeopardise the proper functioning of the website. Use of Facebook and Google plug-ins

If the user accesses a page of the website equipped with such a plug-in, a connection will be made to the Facebook or Google server, and the plug-in will be displayed on the web page via a browser message . In this way, the pages that have been visited by the user will be communicated to the Facebook or Google server. If certain functions of the plug-in are used (e.g. click on the "Like" button or comments), this information will be added to the user's Facebook or Google account. Further information regarding the use of information by Facebook or Google can be found in the privacy policy of Facebook or Google.

## **Social Media Links**

Data that is collected by Facebook or other third parties is subject to their privacy policy. Changes to preferences and opting out

If you do not want to receive cookies from third parties ("third party cookies") on the Gacriva Studio website, you can disable this option in your browser - please check the privacy settings of the browser you are using.

If you wish to exercise the rights mentioned by the GDPR regulation regarding your data, please send your request to dataprotection@gacrivastudio.com, using the email used to create the account on our website or the email with which you wish to exercise these rights.