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## **1. WHO WE ARE**

Computer Generated Solutions Romania SRL (hereinafter "CGS", "we" or other similar items) is a Romanian registered company in, with its head office registration address in Romania, Bucharest, Splaiul Independence 391, Sector 6, confirmed registration at the Register Trade under no. J40 / 11348/2002.

We collect and process several categories of personal data from you as a user of the website romania.cgsinc.com (hereinafter "the Website"), hence in accordance with European Union data protection law, that qualifies us (CGS) as Operator of this personal data.

We take the protection of your personal data extremely seriously, so this data protection policy describes our practices on how we collect and use your personal data - respectively what personal data we collect, why we collect it and how we process it. This policy also informs you of your rights, with regards to your personal data and its processing.

**Please read this Data Protection Information Note carefully to understand how we handle your personal information**

## **2. HOW WE COLLECT YOUR PERSONAL DATA**

Your personal data can be collected or accessed in several ways, including:

- directly from you (from the data you filled in the form on the Website);
- observed by us when you browse our website (cookies, IP, website navigation, etc.)

### **2.1 Data provided directly by you**

As a visitor, you do not have to provide personal data in order to access and use the Website. However, the personal data provided by visitors specifically and voluntarily, may be collected through the Website. Our Website uses forms so you can: contact us, sign up for a recruitment procedure, subscribe to our newsletter or access the documentation we made available on the Website (e.g. materials written on various topics or product information). These forms may contain fields such as name, email address, phone number, the position held within your company. You can also provide personal data voluntarily by filling these forms, or through your comments on our materials published on the Website (not required by us).

Such personal data you provide us is processed by us based on our legitimate interest and will be used to answer your questions and / or to keep a record of your complaints, to respond to a legal request and any other similar topics. This data is stored for a maximum period of 3 years from your last interaction on the Website, or until your request us to delete it. For more details on how we are processing your personal data for your enrollment in a CGS recruitment process, please see [Notice for the Recruitment Process Candidates](#)

We do not sell your personal data to third parties, nor do we use this data to send you marketing communications unless you have expressly opted for such communications. In all cases we ensure that you have an easy option for unsubscribing (withdrawal of your consent) at any time, either within the communication or by contacting us as indicated in section no. 8 below.

## **2.2 Use of the website [romania.cgsinc.com](http://romania.cgsinc.com)**

The website automatically collects certain information and stores it in log files. The information may include Internet Protocol (IP) addresses, the region or general location from where your computer or device accesses the Internet, browser type, operating system and other, information concerning the use of the Website, including a history of the pages you have visited. We use this information to improve the design of our website and to better meet the needs of our users.

We may also use your IP address to help us diagnose eventual server issues and / or to manage our Website, to analyze trends, track visitor fluctuations, gather general demographic information to keep us up to date with trends and help us identify visitor preferences. This data is kept for a period of 2 years.

Our website also uses cookies and web beacons, to learn more about their purpose and how we use them, please read below.

## **2.3 Cookies, web beacons and other technologies**

We use cookies and similar technologies on our Website. At each subsequent visit to the Website, the browser searches for cookies. If the browser identifies cookies, it sends the information stored by that cookie to the Website. The Website downloads to your computer, tablet or mobile phone, only cookies that are strictly necessary for the operation of the Website, such as cookies that ensure the ability to quickly find the information on the Website, and cookies that are strictly necessary to provide a service that has been expressly requested by you, such as a cookie reminding you of your cookie settings. In order to download cookies that are not strictly necessary, such as cookies for collecting statistical information, CGS needs your prior consent.

If you have changed your cookie settings so that websites cannot place cookies on your computer, this Website may not be able to download the cookie that reminds you if you agreed or not with the placement of cookies. If so, you will be required to indicate your cookie preferences each time you visit the Website. If you do not want to be asked about your cookie preferences each time you visit this Website, you must change your browser settings for cookies.

For more information about how we make use of cookies and what are your options and preferences in this regard, see [Our Cookie Policy](#)

## **3. WHEN WILL WE DISCLOSE YOUR PERSONAL DATA TO THIRD PARTIES**

We will disclose your personal data only for the purposes and to the third parties described below. We will take appropriate measures to ensure that your personal data is processed, secured and transferred in accordance with applicable law.

### **3.1 Disclosure to companies within the CGS group**

Your personal information may be disclosed to any company that is a member of our group, if we consider that it is in our legitimate interest to do so, for internal administrative purposes (e.g. data storage, CRM), or for verification and monitoring our internal processes.

We may also disclose your personal data to companies in our group when they provide us with products and services, such as information technology services. Access to your personal data is limited to the personnel of our group who needs to know this kind of information, those usually are the employees of our HR, IT, Marketing and Security Departments.

### **3.2 Disclosure to third parties**

We may disclose the strictly necessary parts of your personal information, which are required to be known, to the following categories of third parties:

(a) the companies that provide us with products and services (authorized persons) of operators), such as:

(i) media agencies, such as those organizing promotional campaigns and those who manage the Website;

(ii) website services: analytical, advertising;

(iii) infrastructure agencies (other parties managing our email newsletter, SMS marketing or other marketing activities, customer support or sales activities on our behalf);

(iv) providers of information technology systems and support, including emails archiving, telecommunication providers, back-up and disaster recovery and cyber security services.

(b) companies involved in the operation of our Website, when we do not provide a service.

(c) other parties such as public authorities and institutions, accountants, auditors, lawyers and other external professional consultants, when their activity requires their knowledge or when the law requires us to disclose them.

We may also disclose your personal information to third parties:

(a) if you request or authorize this;

(b) persons who prove the legal authority to act on your behalf;

(c) when it is in our legitimate interest to do so in order to carry out, expand and develop our activity;

(i) if we sell any activity or assets related to the Web Site you are a subscriber to, we can disclose information your personal character to the potential buyer of to the respective activity or assets, to ensure the fact that the activity continues as a functional enterprise;

(ii) whether CGS or a significant portion of all its assets are purchased by a third party, in which case the information with personal property held by CGS will automatically constitute part of the assets

d) if we have an obligation to disclose or share information your personal character to comply with any legal obligation, any legal request from governmental authorities and as may be required to meet the requirements of national security and law enforcement or to prevent illegal activity; transferred;

(e) to respond to any claims, to protect our rights or to protect the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or

(f) to protect the rights, assets or safety of CGS, our employees, customers, suppliers or other persons.

Both we and some of their recipients (including our affiliates) can use your data in countries that are not part of the European Economic Area. In this regard, please refer to Section 4 below for more details

### **3.3 Restrictions on the Use of Personal Information by Recipients**

Any third parties with whom we choose to share your personal information according to the above are limited (by law and contractual) in their ability to use your personal information for the purposes specific ones identified by us. We will always make sure that any third parties with whom we choose to share your personal information are subject to data protection and security obligations in accordance with this Data Protection Information Note and with applicable laws. However, for the avoidance of doubt, this cannot be applicable when disclosure is not our decision. Except as expressly detailed above, we will never share, sell or rent any of your personal information personally to any third party without your notification and, if applicable, without obtaining your consent.

## **4. YOUR RIGHTS**

As a data subject, according to the law you have certain rights regarding the personal data we collect from you. We will respect your individual rights and address your concerns appropriately.

a) **The right of withdrawal of consent:** When you have expressed your consent to the processing of your personal data, you may withdraw your consent at any time.

b) **The right to rectification:** You can benefit from us of a rectification of your personal data. We make reasonable efforts to keep the personal data in our possession or in our control, accurate, complete, current and relevant, based on the latest information we have. To the extent possible and appropriate, we provide stand-alone internet portals where users have the possibility to review and rectify their personal data.

(c) **The right to limited data processing:** You may benefit from a limitation on the processing of your personal data if:

- if you contest the accuracy of your personal data, during the period when their accuracy is verified;
- processing is illegal, and ask to limit processing sooner than deleting your personal data;
- we no longer need your personal data, but you request them for the purpose of formulation, exercise or the defense of legal actions; or
- object to the processing during the period in which we check whether our legitimate grounds prevail over your motives.

(d) **Right of access:** You may request information from us regarding the personal data we hold about you, including information on categories of personal data that are in our possession or under our control, what is it used for, where we collect it, if not directly from you and, if applicable to whom it may be disclosed.

We will provide you with a copy of your personal data upon request. If you request other copies of your personal data, then we may charge you a reasonable fee based on administrative costs.

You have the right to information about our means of protection for the transfer of your personal data to a country outside the EU and the EEZ if you ask us to confirm whether or not we process your

personal data and whether we transfer your personal data to a country that is outside the EU and the EEZ.

**e) The right to portability:** starting with May 25, 2018 you will have the right to receive back the personal data that you have provided us and request, when this is technically feasible, to send it to another organization.

You have the right to receive your personal data in a structured format, normally used and readable electronically.

Your right to receive your personal data should not adversely affect the rights and freedoms of other people. This may apply if a transfer of your personal data to another organization also involves the transmission of the personal data of other persons (who did not give their consent to the transfer).

Your right to benefit from us transmitting your personal data to another organization, is a right that you have if that transmission is technically and legally feasible.

**(f) The right to delete data:** You have the right to ask us to delete your personal data that we process. We will comply with this request, except if the data is requested:

- for the exercise of the right of freedom of expression and information;
- for complying with a legal obligation that is binding us;
- to achieve a goal of: public interest, scientific, historical, or statistical purpose; or
- for the formulation, exercise or defense of legal actions.

**(g) The right to object:** You may object at any time with regards to the processing of your personal data, provided the fact that the processing does not occur based on your consent, but on our interests legitimate or those of a third party. In this case, we will no longer process your personal data unless we can demonstrate the legitimate grounds that compel us and an interest that prevails for processing or for formulation, exercise or defense of legal actions. If you object to the processing, please indicate if you also want your personal data to be deleted, otherwise they will only be limited. You can always object to data processing your personal character for direct marketing that was based on our legitimate interest, for whatever reason. If marketing was based on your consent, you can withdraw consent.

**(h) The right to make a complaint:** You can file a complaint at data protection authority in your country or at data protection authority in Romania:

Name: **National Supervisory Authority for Processing Personal Data (ANSPDCP )**

Address: B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, post code 010336, Bucharest, Romania

Phone: +40.318.059.211 +40.318.059.212

Fax: +40.318.059.602

Email: [anspdcp@dataprotection.ro](mailto:anspdcp@dataprotection.ro)

Noteworthy:

- **Time period:** We will try to solve your request within 30 days, term that, for specific reasons related to certain legal provisions or the complexity of your application, can be extended. In all cases, if this term is extended, we will inform you about the duration of the extension and the reasons that led to this.
- **Limiting access:** In some situations, we may not be able to provide access to all or part of your personal data due to legal provisions. If we refuse your request for access, we will inform you about the reason for the refusal.

- **Lack of identification:** In some cases, we may not be able to search or find your personal data due to insufficient identification information you have provided in your application. In such cases, where we cannot identify you as the targeted person, we will not be able to comply with your request, or your exercise of your legal rights as described in this section, unless you provide us with additional information in order to enable us identifying you. If it is the case we will inform you and give you the opportunity to provide such additional details.
- **Exercise your legal rights:** To exercise your legal rights, please contact us in writing (including the electronic format) and provide us your contact details, as shown in section 7 below.

## **5. SECURITY**

CGS is committed to protect personal information against loss, misuse, disclosure, alteration, unavailability, unauthorized access and destruction, and adopts all reasonable safeguards to maintain the confidentiality of personal information, using appropriate organizational and technical measures. The organizational measures include the control of the physical access to our headquarters, the training of the personnel and the locking of the physical files in the cabinets. Technical measures include the use of data encryption, use of passwords to access our systems, use of firewalls and anti-virus software.

While you provide us with your personal information over the Internet, although we make every effort to protect your personal information during this transfer process, the transmission of information over the Internet between you and us is not entirely secure. As such, we cannot guarantee security of the personal information you transmit us over the Internet, any such transmission being at your own risk and your full responsibility. As soon as we receive your personal information, we will use strict procedures and security features to prevent unauthorized access to them.

## **6. CHANGES TO OUR DATA PROTECTION NOTIFICATION**

At our sole discretion and at any time, we reserve the right, to change our data protection practices and to update and make changes to this Data Protection Information Note. For this reason, we encourage you to review this Information Note constantly. This data protection information note is applicable starting with the date that appears at the beginning of the document. We will process your personal data according to the Data Protection Information Note based on which they were collected, unless we have your consent to process them differently.

## **7. CONTACT INFORMATION**

Please address your questions concerning the subject of data protection and any requests in the exercise of your legal rights, to the following contact details:

**CGS - Computer Generated Solutions Romania SRL**  
**Splaiul Independenței 319G, Atrium House, Sector 6, Bucharest 060044**  
**Phone: + 4-021- 5270000**  
**Fax: + 4-021- 5270001**  
**Email: [marketing@cgsinc.ro](mailto:marketing@cgsinc.ro)**

We will investigate and try to resolve any request or complaint regarding the use or disclosure of your personal information.

If you are dissatisfied with our response, you may also file a complaint with the data protection authority, as indicated in section 5 (h) above.