

## **Privacy Policy**

We make every effort to protect your confidentiality by complying with all the rules and regulations in force regarding data protection, including the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

This policy, in addition to the Terms and Conditions of this website and all the documents referred herein have the purpose to inform you about the personal data we collect from you or you communicate to us by means of this website, and how we will process these data. Please read the information below carefully in order to understand our opinions and procedures on personal data and the way we process these data.

### **1. Who we are**

The data controller is **Energy Policy Group (EPG) Association**.

### **2. What types of personal data do we process and for what purposes and reasons?**

For the operation of this website, the Company collects certain information (“personal data”) concerning natural persons identified or identifiable, data provided by the website users directly (e.g. first name, last name, post address, e-mail address, telephone number) or indirectly (e.g. IP address). Please find below information concerning certain purposes why we process the personal data based on the legal reasons specified for each of the following:

#### **2.1. Website navigation. Use of cookies**

When you visit our website, we use cookies to automatically collect technical information for user identification, such as IP address, type of Internet browser used to navigate our website, operating system, name or host of the domain used by the user to navigate the website.

The main purpose of cookies is to provide a better navigation experience, but they also have advertising purposes, to provide you with content that matches your interests and preferences. Subsequently, we use cookies to provide you with customized and relevant navigation experience on our website and to understand how you interact with our advertising content.

For more information regarding the use of cookies on this website and the purposes why they are used, as well as the possibilities to control and/or deactivate them, please see our policy on cookies.

#### **2.2. Creation of a website user account and interaction with you (communications)**

In your interaction with us, when you sign up on our website with an account, we collect and process certain personal data.

In view of creating and maintaining your account, we collect and process the following information: last name, first name, gender, company, title/position, address, telephone number (mobile and landline), e-mail, county, locality, data related to preferences/customs/behaviors (related to the options for participation in events/conferences), as well as the user name and password assigned to your account.

#### **Purpose. Legal grounds**

Creating and maintaining the user account. Processing is based on your consent.

#### **2.3. Answer to questions, requests or claims**

We are processing your personal data, i.e. first and last name, e-mail address, telephone number and any information or details you communicate to us in your correspondence in order to respond to your questions, claims or requests, based on the communication channel you contact us on, as described below.

#### **Purpose. Legal grounds**

Answer to questions, claims or requests by electronic mail (e-mail) or by phone. Processing is based on a legitimate interest, that enables us to provide answers to your questions, claims or requests.

#### **2.4. Participation in business events**

We are processing the personal data collected from you by filling in online forms with a view to organizing business events. Your participation in these business events is voluntarily. Consequently, you decide whether or not to provide personal data by filling in forms on our website.

#### **Purpose. Legal grounds**

a. Organization of business events. Processing is based on your consent.

We will not publish the last name, first name, photograph or other personal data of the participants in the business events without the subject’s consent.

#### **2.5. Direct marketing communications**

We may process personal data to inform you about products and services, promotional offers or newsletter subscriptions. As a general rule, these personal data shall be processed for direct marketing

purposes only with your consent and by using the communication channels (email, SMS, etc.) indicated when giving consent.

For each commercial message we send, we will provide you with the option to object to the use of your email address (option to unsubscribe).

**Purpose. Categories of data processed. Legal grounds**

Direct marketing communication. Data you provided when giving consent, e.g. first and last name, email address, telephone number, company, position, consent

**2.6. Polls, customer satisfaction surveys and feedback from customers**

We will process your personal data when you decide to participate in polls or our market research studies, customer satisfaction surveys or when you provide feedback on our products and services. These personal data shall be processed for the aforementioned purpose only with your consent, taking also into account our legitimate interest to understand the needs and expectations of the customers regarding our products and services. Your participation in these studies is voluntarily. Subsequently, you decide whether or not to provide personal data (first and last name, information about shopping preferences and customs or other personal data you may provide) by filling in the participation forms on our website or similar forms made available for the respective surveys or research.

**Purpose. Legal grounds**

Polls or market studies, customer satisfaction surveys or feedback regarding our products and services: consent, legitimate interest

**3. Conclusion and deployment of contracts**

The Company is processing your personal data provided to conclude and deploy your contract or with the company whose representative/contact person you are. Moreover, throughout the contractual relationship, we will be communicating with you to ensure a proper development of the business relation.

**Purpose. Legal grounds**

Conclusion and deployment of contracts

Deployment of your contract (natural person) and measures taken upon your request to end the contract, legitimate interest to conduct our business in relation to the conclusion and deployment of contracts and communication with the contractual partner for this purpose, when the contractual relation is established with the company whose representative/contact person you are

**4. Automated decision making and profiling**

The personal data referred here shall not be subject to automated decision-making processes, including profiling.

**5. Who do we communicate your personal data to?**

To achieve the aforementioned purposes, the Company uses the services of several contractors.

Some are individual data controllers, such as Google or YouTube. Other contractors operate as our agents for the processing of personal data.

Another category of contractors are third parties who do not process the data, but may have access to them in the fulfillment of their own duties or in the relationships with the Company, such as providers of maintenance, financial or logistic services.

The aforementioned personal data may also be provided to third parties in the following situations: (i) public authorities, auditors or competent institutions with expertise in conducting inspections on the company's activity or assets, that require the company to provide information based on legal obligations.

Such public authorities or institutions may be; (ii) to fulfill a legal requirement or to protect the rights and assets of our company or of other entities or individuals, such as courts of law; (iii) to third-party purchasers, to the extent in which the company's activity is to be (fully or partially) transferred, and the subject's data are part of the assets representing the subject matter of the transaction. For the

aforementioned purposes, we may also communicate your personal data to companies in the OMV Group that includes OMV Petrom, that will be subject to the rules provided by the company with regard to the processing of personal data.

The persons and entities whom we may communicate personal data are the following:

a) For the purpose of navigating the website and using cookies, we may submit personal data to analysts and providers of search engines, to allow them to provide website maintenance services;

- b) To create and maintain your user account, we may submit your personal data to our agents, service providers;
- c) To respond to your questions, requests or claims, we may submit your personal data to agents, our service providers (including call centers);
- d) To organize and manage the business events, we may submit your personal data to agents, advertising and marketing agencies and digital or social media agencies or other agents;
- e) For direct marketing communications, we may submit your personal data to agents, advertising and marketing agencies or other agents who deliver the communications on our behalf;
- f) To conduct polls, market research studies, customer satisfaction surveys or to obtain feedback from the customers on our products or services, we may communicate personal data to agents, providers of surveys or market research / customer support services.
- g) To conclude and deploy contracts, we may communicate your personal data to agents that act as service providers.

The aforementioned data may be provided to third parties, public authorities, as the case may be, and in other specific cases, to group companies.

#### **6. Transfer of personal data abroad**

In the context of the operations described above, your personal data may be transferred abroad, in European Union ("EU") state.

We inform you that any transfer made by the company in a European Union state will comply with the GDPR requirements.

If the personal data are to be transferred in states that do not provide sufficient protection for the personal data, agreements will be concluded to guarantee the compliance with the legal provisions and we will update this policy.

#### **7. Period of time when personal data are stored**

We will store your personal data only for the period of time necessary for the above processing purposes and in compliance with the legal provisions in force. If the Company considers it has a legitimate interest or a legal obligation to process your personal data for other purposes, you shall be informed about this. We believe that the above processing activities will require the storage of personal data for the following periods:

##### **Purpose Timeframe**

1. Website navigation and use of cookies in agreement with the Cookies Policy  
Creation and maintenance of your account on the website. Until you withdraw your consent by deleting the account
2. Responding to questions, requests or claims throughout the duration necessary to manage the claim and, subsequently, according to archiving rules and for the protection of legitimate interests
3. Organization and management of business events throughout the duration required to manage the event and, subsequently, according to archiving rules and for the protection of legitimate interests or until you withdraw your consent for the participation in the event
4. Direct marketing communications until you withdraw consent/unsubscribe
5. Conducting polls or market research studies, customer satisfaction surveys or obtaining feedback for our products and services during the period of time necessary to achieve the survey purpose, that is to be established based on the survey project
6. Conclusion and deployment of contracts during the deployment of the contract and, subsequently, according to archiving rules and throughout the duration of the prescription term for the right to action

#### **8. Processing of data belonging to children younger than 18**

All processing of personal data presented in this document refer only to individuals older than 18. The use of the systems and the results of the processing for minors between 14 and 18 shall be conditioned by the consent of the parents/legal guardians and banned for children younger than 14, except for the situations where the parents/legal guardians have themselves given their consent for such processing. If such processing occurs despite our reasonable efforts to prevent them, they shall cease when we are notified that the users are younger than the age specified above.

#### **9. Data processing security**

The Company informs that it shall constantly assess and update the security measures implemented to ensure safe and secure processing of personal data.

#### **10. Subjects' rights**

In the context of the processing of your personal data, you shall have the following rights:

- a. The right to access the personal data processed: you have the right to obtain confirmation of whether your personal data are processed and, if the answer is affirmative, to receive access to the type of personal data and the processing conditions, by sending a request for this purpose to the data controller;
  - b. Right to have personal data rectified or deleted: you have the possibility to request, by notifying the data controller in this regard, to have inaccurate data rectified, completed if they are incomplete or erased in the following situations: (i) the data are no longer necessary for the original purpose (there are no other legal grounds), (ii) the legal grounds of processing are the subject's consent, the subject may withdraw his/her consent and there are no other legal grounds, (iii) the subject exercises his/her right to object and the controller has no other reasons to continue the processing, (iv) the data has been unlawfully processed, (v) the data have to be erased for compliance with the EU or Romanian legislation, or (vi) the data was collected in relation to information society services provided to children (as the case may be), that are subject to specific requirements concerning the giving of consent;
  - c. The right to request restriction of processing: you have the right to obtain restriction of processing if: (i) you consider that the personal data processed is inaccurate, for a period enabling the controller to verify the accuracy of the personal data; (ii) the processing is unlawful, but you do not want to have your data deleted, but only to restrict their use; (iii) if the controller no longer needs your data for the above purposes, but you need them for the establishment, exercise or defense of legal claims, or (iv) you objected the processing pending the verification whether the legitimate grounds of the controller override those of the data subject;
  - d. Right to withdraw your consent for processing when processing is based on consent, without affecting the legality of the processing conducted thus far;
  - e. The right to object the processing of data on grounds related to your particular situation, when processing is based on legitimate interest, and to object at any time to processing of data for direct marketing purposes, including profiling;
  - f. Right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning the data subject or similarly significantly affects him/her;
  - g. Right to data portability, meaning the right to receive the personal data you provided to the controller in a structured, commonly used and machine-readable format, and the right to transmit those data to another controller, if processing is based on your consent or on a contract and is carried out by automated means;
  - h. Right to submit complaints to the data protection authority and right to refer to a competent court of law.
- The above rights may be exercised at any time. To exercise your rights, we recommend to use the form provided [here](#). If you want to withdraw consent given for direct marketing purposes, you may use the "unsubscribe" option available in the marketing messages.

#### **11. Changes to this privacy policy**

This privacy policy may be changed and updated periodically by the company when necessary. The Company shall inform you about all significant changes brought to this policy in a way that allows you to confirm reception, for instance by using the e-mail address you communicated or by any other proper communication means.

#### **12. Contact**

Any question on these topics may be addressed to the data controller at the following address:

**Energy Policy Group (EPG) Association** (hereinafter referred to as "Beneficiary"), a Romanian legal entity of private law, based in 13 Barbu Şt. Delavrancea St., Bucharest, District 1, Phone: **+4 031 860 1041**; Email: **office@enpg.ro**