

CONFIDENTIALITY POLICY

According to the Regulation EU 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, FABRYO CORPORATION SRL (“FABRYO”) processes personal data subject to the principles to be further mentioned, for lawful purposes. The personal data processing is made by combined (manual and automated) means, in compliance with the legal requirements and under conditions that ensure the security, confidentiality and observance of the data subjects’ rights.

1. WHAT DOES PERSONAL DATA MEAN?

According to Article 4 GDPR, “**Personal Data**” means: “any information relating to an identified or identifiable natural person (‘data subject’) who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”

2. PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

- ✓ **Lawfulness:** When processing personal data, the personal data of the employees, customers, associates and suppliers are processed in good faith and in compliance with the legal provisions;
- ✓ **A well-established purpose:** Any personal data processing is made for well-established, explicit and lawful, appropriate, pertinent and non-abusive purposes by reference to the purpose for which it was collected and then processed;
- ✓ **Confidentiality:** The individuals who process personal data on behalf of **FABRYO** have a confidentiality clause in their employment agreement as well as their job description;
- ✓ **Consent of data subject:** Any personal data processing, except for the processing of the data of the categories stated in the Regulation EU 2016/679 and other data provided by regulatory acts, is subject to the consent of the data subject;
- ✓ **Information:** The individual is informed by the institution which processes the personal data of the data subject;
- ✓ **Storage:** Personal data will not be kept longer than necessary for the achievement of the purposes for which it was collected.
- ✓ **Protection of data subject:** Data subjects have the right to access the data were processed, to intervene with respect to it, to object and to not be subject to an individual decision as well as the right to refer to the National Authority for the Supervision of Personal Data Processing or to a court of law to defend any of their rights guaranteed under the law, which have been breached;
- ✓ **Security:** The technical and organizational measures for personal data security are established to protect personal data against accidental or illegal destruction, against loss, alteration, disclosure or unauthorized access. The possibility to alter the accessed data is protected through the firewall as well as antivirus solutions updated permanently.

3. DATA SUBJECTS RIGHTS

- Right to obtain from **FABRYO**, upon request, confirmation as to whether or not personal data concerning him or her are being processed by **FABRYO**;
- Right to obtain from **FABRYO**, upon request and free of charge, rectification or update, especially with respect to the incomplete or inaccurate data, based on supporting documents;
- Right to obtain from **FABRYO**, upon request and free of charge, a notice to the third parties to which the data of each of his/her operation was disclosed, unless this proves impossible or involves disproportionate effort by reference to the lawful interest that could be breached;
- The right to object at any time, for solid and lawful reasons, to the processing of the personal data concerning him/her, unless where there are legal provisions to the contrary; if the objection is reasonable, processing may no longer concern the data in question;
- Right to data portability
- Right to seek judicial protection for any rights guaranteed under this law that have been breached.
- Furthermore, to report any non-compliance with the rights guaranteed under the Regulation EU 2016/679 the data subject may refer to the National Authority for the Supervision of Personal Data Processing and/or the courts of law.

4. PERSONAL DATA SECURITY

In this Policy FABRYO certifies that it meets the personal data security requirements. **FABRYO** is using security methods and technologies as well as employee-related policies and working procedures, including procedures of control and audit to protect the personal data collected according to the legal provisions in force.

According to **Regulation EU 2016/679** on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, **FABRYO** must manage safely, and only for the purposes specified herein, the personal data you provide about yourselves, a family member or another person.

- Any person has the right to object, for lawful reasons, to the processing of the data concerning him/her. This right to object may be removed with respect to some processing operations provided under the law (e.g.. processing made by the financial and tax services, the police, the judiciary, the social security services). Therefore, this reference cannot exist if processing is mandatory;
- In addition, any person has the right to object, free of charge and without any justification, to the processing of his/her personal data for direct marketing purposes. The information registered are intended for the controller's use and will be communicated only to the **FABRYO** contractual partners, safely and subject to the consent of the data subject.
- According to the Regulation EU 2016/679 you have the right to access, to intervene with respect to the data, the right to not be subject to an individual decision and the right to seek justice.

- You also have the right to object to the processing of the personal data concerning you and to request the erasure of such data.
- If you sent your personal data to FABRYO you may exercise these rights very easily, by sending us a request to Șoseaua Olteniței 202B, Popești-Leordeni 077160, Ilfov county or by e-mail at: *protectiadatelor @fabryo.com* and we will use all reasonable and practical efforts to answer your request promptly, insofar as it is compliant with the applicable laws and professional standards.
- You also have the acknowledge right to seek justice.
- If any of the data concerning you are incorrect or incomplete, you must let us know as soon as possible.

5. MEASURES FOR ENSURING THE SECURITY OF THE PROCESSING

FABRYO invested in the adoption of technical and organizational measures for the data processing, which were updated according to the GDPR requirements, for the purpose of protecting your personal data against any unauthorized access to, improper use or any unauthorized disclosure, alteration, destruction or accidental loss. All **FABRYO** employees as well as any third parties acting in **FABRYO**'s name and on its behalf have committed themselves to confidentiality with respect to your information, according to the provisions of this Policy.

6. CONTROLLER

The controller is **FABRYO**, with its main office at Olteniței 202B, Popești-Leordeni 077160, Ilfov county.