



Notification on personal data processing

- AQUAVIA SRL**, with its registered office in Bucharest, 5-7 Dimitrie Pompeiu Blvd., Building A, Mezzanine, Sector 2, registered with the Trade Registry attached to Bucharest Court under no. J40/17546/2021, unique registration code 13467530, bank account no. RO27UGBI0000512010703RON, opened with Garanti Bank SA, duly represented by Kemal Bahadir Usta, as Executive Director ("AQUAVIA" or the "Controller"), in order to deliver insurance services, collects and processes personal data, in accordance with the legal provisions on personal data processing and free movement.

This notification **is meant** to inform you about the processing purposes, legal grounds, duration, the collected personal data recipients, about how to exercise individual rights, as well as to provide information regarding the secondary purpose of the processing, if the data are to be processed for a purpose other than the one for which they were collected.

Please read this notification carefully.

Categories of personal data that may be processed by AQUAVIA SRL:

(1) Personal identification data (last name, first name, address, telephone number, email). The data are necessary for carrying out the service supply relationship between you and AQUAVIA.

Purpose of using personal data

AQUAVIA SRL collects and processes your personal data for the following purposes:

- supply of tender services by the representatives of AQUAVIA SRL or third party companies, subcontracted by AQUAVIA SRL in order to carry out the activity of distributing its products;
- marketing, to inform about and give loyalty benefits and permanently improve the quality of the services and products provided (sending news, promotions, new products);
- internal reports or reports to other entities of the group of which AQUAVIA SRL is part, partners, and third party companies, respectively;
- statistical/actuarial analyses;
- handling customers' complaints and demands;
- resolution of potential disputes referred to (common law or arbitration) courts (inside the country or abroad);
- providing communications or reports to authorities, relevant public or governmental institutions or agencies;

The legal grounds based on which your data is processed for the abovementioned processes are:

- a legal obligation of AQUAVIA;
- the legitimate interest of AQUAVIA, for activities such as: conducting statistical/actuarial analyses and drafting internal reports or reports to other entities of the group of which AQUAVIA is part, checking the data subjects' integrity and compliance





c) your consent;

The categories of recipients to whom the collected personal data may be sent:

- a) public authorities (including tax authorities, consumers' protection authorities, relevant public bodies dealing with penal matters), as a result of a legal obligation of AQUAVIA;
- b) the suppliers directly/indirectly involved in the distribution process
- c) suppliers of marketing, market research, client satisfaction survey and other similar services;
- d) agents involved in the management of tenders
- e) other companies within GIVESCO A/S
- f) courts of law or arbitration courts, notaries public, lawyers, bailiffs, translation offices, other authorized services, expert valuers.

Personal data transfer to a country outside the European Economic Area

AQUAVIA SRL might transfer personal data to other companies outside or within GIVESCO A/S, which are located outside the European Economic Area. For such transfers, **AQUAVIA SRL** implemented several safeguards to ensure an adequate level of natural persons' protection, similar to the one provided by the EU legislation. Such safeguards include the conclusion of standard contractual clauses approved at European level.

Personal data storage

Personal data shall be processed for at least the period they are necessary in order to achieve the purposes for which they were collected or processed.

Personal data shall be stored for as long as necessary for the abovementioned purposes or for the time period set out by the general legal provisions.

If you agree to the processing for marketing purposes, the personal data collected shall be stored until you notify us that you are withdrawing the consent you gave for that purpose.

The rights you have with regard to your personal data

As regards personal data processing under the conditions set out in the EU Data Protection Regulation 679/2016, you may exercise any of the following rights:

(1) Right to be informed about and have access to your personal data

The right to be informed about personal data processing, to obtain from us a confirmation of whether or not **AQUAVIA SRL** is processing personal data concerning you and which types of data are being processed. If the personal data concerning you are not collected from you, we shall notify you about any available information regarding their source, in the cases when it is not prohibited by law that we disclose the source.

(2) Right to rectification

The right to request that the inaccurate or incomplete personal data concerning you are rectified or updated, or are completed, when such data are incomplete.





(3) Right to data erasure or “right to be forgotten”

The right to request the erasure of personal data concerning you, under certain circumstances, such as (i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, (ii) your data were illegally processed, (iii) data processing was carried out based on your consent, and such consent was withdrawn.

(4) Right to withdraw your consent

You may withdraw your consent at any time when the personal data concerning you were processed based on your consent.

(5) Right to restriction of processing

The right to request and obtain the restriction of the processing of the personal data concerning you, under certain circumstances, such as (i) you contest the accuracy of the data, for the period enabling us to verify the accuracy of such data, (ii) your data processing was unlawful, and you oppose the erasure of such data, requesting the restriction of their use.

(6) Right to data portability

Right to receive the personal data concerning you, which you provided to us, and to send them to another controller, if (i) the data processing was either based on consent, and the personal data processing was carried out by automated means. This right may only be exercised if the data provided were processed by automated means and where such data can be extracted in terms of the technical capabilities used by AQUAVIA SRL.

(7) Right to object

You have the right to object at any time, on grounds relating to your particular situation, to personal data processing, under certain circumstances, such as (i) the processing was carried out for our legitimate interest or (ii) the purpose of the processing is direct marketing, including profiling based on the respective provisions.

(8) The right not to be subject to a decision based solely on your data automated processing, including profiling, which produces legal effects or significantly affects you.

You have the right to request human intervention from AQUAVIA, to state your view and appeal the decision.

(9) The right to lodge a complaint with us and/or the relevant data protection authority





(10) The right to go to court

(11) The right to be notified by AQUAVIA SRL about any security breaches which have/might have an impact on your personal data.

To exercise your rights or for further information, you may contact the Data Protection Officer at AQUAVIA SRL., by:

- email to dpo@AQUAVIA.ro,

- post, to the following address: AQUAVIA SRL., Bd. Dimitrie Pompeiu, nr. 5-7, cladirea A1, Metrooffice, mezanin sector 2 Bucuresti or

-submitting in person a notification signed by hand, at AQUAVIA SRL office in Bucharest or other towns in the country. The contact details for lodging a complaint with the National Authority for the Supervision of Personal Data Processing are:

Web site : <http://www.dataprotection.ro/>

Email: anspdc@dataprotection.ro

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

Landline: +40.318.059.211,+40.318.059.212

President Cabinet +40.318.059.220; Fax+40.318.059.60

Updating this notification on personal data processing

This notification on personal data processing shall be subject to periodical reviews. To be up to date with any potential important changes that might impact the processing of your personal data, please regularly go to the company's web page www.AQUAVIA.ro –“**Protectia Datelor cu Caracter Personal**” (Personal Data Protection) **section**.

This notification on personal data processing was last updated on **June 2022**.

