

Privacy Policy

Last Updated: July 2018

I. General information

The confidentiality of your personal data is one of the main concerns of NORDIC IMPORT EXPORT CO SRL, based in Calea Vitan no. 240A, sector 3, Bucharest, as data operator. This document is intended to inform you about the processing of your personal data in the context of using our website <http://www.nordicgroup.ro/>.

Definitions:

- ANSPDCP is the National Supervisory Authority for the Processing of Personal Data;
- "personal data" means any information about an identified or identifiable individual ("the data subject"); an identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location, an online identifier, or one or more specific elements, of his physical, physiological, genetic, psychic, economic, cultural or social identity;
- "processing" means any operation or set of operations performed on personal data or personal data sets with or without the use of automated means such as collecting, recording, organizing, structuring, storing, adapting or modifying, extraction, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- "restriction of processing" means the marking of stored personal data in order to limit its future processing;
- "operator" means a natural or legal person, a public authority, an agency or other body which, alone or together with others, establishes the purposes and means of processing personal data; where the purposes and means of processing are determined by Union or national law, the operator or the specific criteria for designating it may be laid down in Union or national law;
- "person empowered by the operator" means the natural or legal person, public authority, agency or other body that processes personal data on behalf of the operator;
- "recipient" means the natural or legal person, public authority, agency or other body to which personal data is disclosed, whether or not a third party. However, public authorities to whom personal data may be communicated in a particular investigation under Union or national law shall not be considered as recipients; the processing of such

data by the respective public authorities respects the applicable data protection rules in accordance with the purposes of the processing;

- "consent" of the person concerned means any manifestation of the free, specific, informed and unambiguous will of the person concerned by which he or she accepts, through a declaration or by unequivocal action, that the personal data concerning him or her to be processed.

II. Categories of processed personal data

If you are a Visitor of <http://www.nordicgroup.ro/>, NORDIC IMPORT EXPORT CO SRL will process your personal data that you provide directly in the context of the use of the Website, such as the data you provide in the contact section, if you contact us in this way, as well as data on how you use the Website <http://www.nordicgroup.ro/>.

III. The purposes and bases of processing

If you are a Visitor of our Website, NORDIC IMPORT EXPORT CO SRL processes your personal data as follows:

- for commercial communications on the products and services offered by NORDIC IMPORT EXPORT CO SRL through the Website.

Basis: Processing your data for this purpose is based on the need to solve your requests.

Providing your data for this purpose is voluntary and only happens to the extent that you have launched a communication request.

- to monitor traffic and improve your experience on the Website.

Basis: Processing your data for this purpose is based on the legitimate interest of NORDIC IMPORT EXPORT CO SRL to ensure the correct functioning of the Website, as well as to permanently improve the visitor experience of the Website, including by solving various comments, questions or complaints.

Providing your data for this purpose is voluntary. You may request the non-use of your data for this purpose by email at DataProtection@nordicgroup.ro. Refusing to provide data for this purpose will not have negative consequences for you.

IV. The length of time we process the data

As a matter of principle, NORDIC IMPORT EXPORT CO SRL will process your personal data as necessary to achieve the above mentioned processing purposes.

In case you wish to delete your data please send us this request by email to DataProtection@nordicgroup.ro.

If you wish your personal data not to be processed further, or if you wish to delete the data, you can exercise the rights detailed in Section VII below.

V. Disclosure of personal data

For the purposes of processing, NORDIC IMPORT EXPORT CO SRL may disclose your data to partners, third parties or entities that support NORDIC IMPORT EXPORT CO SRL in carrying out its activity through the Website (IT Service Providers) or to the central public authorities / local, in the following cases listed:

- to administer the Website;
- to maintain, personalize and improve the Website and its services;
- to perform data analysis, testing and research, monitoring usage, activity trends and development of safety features;
- when the disclosure of personal data is provided by law, etc.

VI. Transferring personal data

Personal data provided to NORDIC IMPORT EXPORT CO SRL can be transferred outside of Romania, but only to countries in the European Union.

VII. The rights you benefit from

Under the conditions provided by the legislation on personal data processing, you are entitled to the following rights:

- the right to information, ie the right to receive details of the processing activities carried out by NORDIC IMPORT EXPORT CO SRL, as described in this document;
- the right of access to data, ie the right to obtain confirmation from NORDIC IMPORT EXPORT CO SRL regarding the processing of personal data, as well as details regarding the processing activities such as the way your data is processed, the purpose of the processing, recipients or data recipients categories, etc .;
- the right to rectification, ie the right to obtain the correction of your inaccurate /unjustified personal data without delays by NORDIC IMPORT EXPORT CO SRL, as well as the completion of incomplete data; Correction/completion shall be communicated to each recipient to whom the data was transmitted, unless this proves impossible or involves disproportionate efforts.
- the right to delete data without undue delays ("the right to be forgotten"), if one of the following reasons applies:

- they are no longer necessary for the purposes for which they were collected or processed;
- if consent is withdrawn and there is no other legal basis for processing;
- if the data subject opposes processing and there are no legitimate reasons to prevail;
- if personal data has been processed illegally;
- if personal data has to be deleted for compliance with a legal obligation;
- personal data has been collected in connection with the provision of information society services under EU or national law under which the operator is located.

It is possible that, following the request for data deletion, NORDIC IMPORT EXPORT CO SRL will anonymize this data (thus lacking its personal character) and continue processing for statistical purposes under these conditions;

- the right to restrict processing to the extent that:
 - the person challenges the accuracy of the data for a period that allows us to verify the correctness of the data;
 - processing is illegal and the data subject opposes the deletion of personal data, but instead calls for restrictions on their use;
 - the operator no longer requires personal data for processing, but the data subject requests them to establish, exercise or defend a right in court; or
 - the data subject opposed the processing, for the period of time to verify that the legitimate rights of the operator prevail over the data subject's.
- the right to data portability, respectively (i) the right to receive personal data in a structured, commonly used way and in a readable format, and (ii) the right to have such data transmitted by to NORDIC IMPORT EXPORT CO SRL to another data operator, to the extent that the conditions provided by the law are met;
- the right to opposition - in respect of the processing activities may be exercised by submitting a request as indicated below:
 - at any time, for reasons related to particular circumstances of the data subject, that the data that is intended to be processed under the legitimate interest of NORDIC IMPORT EXPORT CO SRL or for the public interest, except when NORDIC IMPORT EXPORT CO SRL can demonstrate that there are legitimate and compelling reasons justifying the

processing that prevail over the interests, rights and freedoms of the data subjects or that the purpose is to establish, exercise or defend a right in court;

- at any time, free of charge and without any justification, that the data that is intended to be processed for direct marketing purposes.

- the right not to be subject to an automatic individual decision, ie the right not to be the subject of a decision taken solely on the basis of automatic processing activities, including the creation of profiles, which produces legal effects concerning the data subject or affects it in a similar way to a significant extent;

- the right to address to the National Supervisory Authority for Personal Data or competent courts, to the extent that you consider it necessary.

For any additional questions about how personal data is processed and to exercise the above-mentioned rights, please email: DataProtection@nordicgroup.ro.

NORDIC IMPORT EXPORT CO SRL has the right to modify and complete the Privacy Policy at any time, by displaying the modified Privacy Policy at <http://www.nordicgroup.ro/>.

CONTACT INFORMATION FOR THE NATIONAL AUTHORITY FOR THE PERSONAL DATA PROCESSING SUPERVISION (ANSPDCP)

Address: G-ral Gheorghe Magheru Bd. 28-30, Sector 1, postal code 010336, Bucharest, Romania

Mail: anspdcp@dataprotection.ro

Phone: +0318.059.211; +0318.059.212