

PRIVACT POLICY

I. SCOPE AND DEFINITIONS

1.1. Application domain:

The present Privacy Policy ("Policy") is intended to describe how SANEX S.A. (hereinafter referred to as "SANEX") processes, uses and manages personal data. SANEX is committed to protecting and respecting the confidentiality of personal data, in compliance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, regarding the protection of natural persons with regard to the processing of personal data and regarding free circulation of these data and repealing Directive 95/46 / EC (General Regulation on data protection - GDPR), with Law no. 190/2018 regarding measures for the implementation of the GDPR and / or with any other decisions that the National Authority for Supervision of Personal Data Protection (ANSPDCP) can issue, as a supervisory authority regarding the protection of personal data (hereinafter referred to as "Applicable legislation regarding the processing of personal data"). By consulting this Policy you will understand the purpose of the processing of personal data and the way of processing personal data.

Regarding the personal data processed, SANEX is a "data operator", that is the entity that sets the purposes for which and the means by which the personal data are processed.

To obtain additional information regarding the personal data processed or regarding this Policy, please use the following contact details:

Company name: SANEX S.A.
Address: Cluj-Napoca, str. Beiusului no.1, Cluj county, Romania
Phone: 0372.640.800
Email: office@sanex.ro

1.2. Relevant definitions in accordance with the applicable Legislation regarding the processing of personal data:

- (1) "personal data" means any information regarding an identified or identifiable natural person ("data subject"); an identifiable natural person is a person who can be identified, directly or indirectly, especially by reference to an identification element, such as a name, identification number, location data, an online identifier, or to one or more many specific elements, their own physical, physiological, genetic, psychological, economic, cultural or social identity;
- (2) "processing" means any operation or set of operations performed on personal data or on personal data sets, with or without the use of automated means, such as collecting, recording, organizing, structuring, storing, adapting or modifying, extracting, consulting, using, disclosing by transmission, dissemination or making available in any other way, aligning or combining, restricting, deleting or destroying;
- (3) "restriction of processing" means the marking of personal data stored in order to limit their future processing;
- (4) "pseudonymization" means the processing of personal data in such a way that they can no longer be assigned to a particular data subject without using additional information, provided that such additional information is stored separately and made the object of measures of a technical and organizational nature that will ensure the non-attribution of the respective personal data to an identified or identifiable natural person;
- (5) "anonymisation" means the irreversible elimination of the identification of personal data, so that the person cannot be identified by using a reasonable period of time, costs and technology, either by the Operator or by any other person, for to identify that natural person. The principles of the processing of personal data do not apply to anonymized data, as they are no longer personal data.
- (6) "profiling" means any form of automatic processing of personal data consisting of their use to evaluate certain personal issues relating to a natural person, in particular to analyze or foresee performance aspects at the place of work, economic situation, health, personal preferences, interests, reliability, behavior, the place where the natural person is or their displacement.
- (7) "operator" means the legal person, who establishes the purposes and the means of processing personal data;
- (8) "person empowered by the operator", means the legal person, who processes personal data on behalf of the operator;

(9) "recipient" means a natural or legal person, public authority, agency or other body to whom (to whom) personal data are disclosed, whether or not it is a third party. However, public authorities to whom personal data may be communicated in a particular investigation in accordance with Union law or national law are not considered as recipients; the processing of these data by the respective public authorities complies with the applicable data protection rules, in accordance with the purposes of the processing;

(10) "third party" means a natural or legal person, public authority, agency or body other than the data subject, the operator, the person empowered by the operator and the persons who, under the direct authority of the operator or the person empowered by the operator, are authorized to process personal data;

(11) "representative" means a natural or legal person established in the Union, designated in writing by the operator or the person empowered by the operator pursuant to Article 27, who represents the operator or the person empowered in respect of their respective obligations incumbent upon them on the basis of this Regulation;

(12) "data record system" means any structured set of personal data accessible according to specific criteria, whether they are centralized, decentralized or distributed according to functional or geographical criteria;

(13) "responsible for data protection", means a natural / legal person designated by the Company on the basis of professional qualities and specialized knowledge, in order to fulfill the tasks provided by art. 39 of the GDPR

(14) "supervisory authority" means an independent public authority established by a Member State pursuant to Article 51;

(15) "supervised authority concerned" means a supervisory authority which is concerned with the process of processing personal data because:

- the operator or the person empowered by the operator is established on the territory of the Member State of the respective supervisory authority
- the data subjects who reside in the Member State where the respective supervisory authority is located are significantly affected or are likely to be significantly affected by processing; or
- a complaint was filed with the respective supervisory authority.

II. PURPOSE AND THEME OF PERSONAL DATA PROCESSING

SANEX processes personal data in the following situations, which include, but is not limited to: conducting business / business activities (eg, entering into commercial contracts and, as the case may be, amicably resolving claims), in order to fulfill the legal obligations arising from conducting business / business activities, for using our website, for marketing activities (when there is the express consent by which you subscribe to the newsletter), for awarding prizes in case of promotions / contests, as well as in the case of a legitimate interest and / or in other expressly regulated situations. For the purposes of the foregoing, by the present privacy policy, as well as other documents made available to the data subject, the processing of personal data is done at the same time with the appropriate information, regarding the following: (i) identity and data operator contact (ii) the types of personal data collected; (iii) the purposes of the processing as well as the legal basis of the processing; (iv) the legitimate interests pursued by SANEX as an Operator; (v) the recipients or categories of recipients of the personal data; (vi) the rights of the Data Subjects regarding their personal data; (vii) the period of data storage or, if this is not possible, the criteria used to establish this period; (viii) the eventual international transfers of data to a third country or an international organization having adequate protection measures taken by SANEX to protect personal data, with a reference to the means of obtaining information about it; (ix) the existence of the rights of the data subject, respectively the right of the data subject to withdraw his consent at any time; the right to lodge a complaint with the competent supervisory authority; as the case may be, the existence of an automated decision-making process including profiling.

III. CATEGORIES OF PERSONAL DATA PROCESSED

The categories of personal data collected by SANEX are the necessary data, which have been previously provided by the data subject, in order to fulfill the following purposes, grounds or legitimate interests:

3.1. In order to carry out commercial / business activities (for example, the conclusion of commercial contracts and, as the case may be, the amicable settlement of complaints), as well as to fulfill the legal obligations arising

from the commercial / business activities, SANEX collects the following personal data: name , first name, email address, mobile phone number, address / delivery address, and if applicable, other identification and / or correspondence data.

3.2. The website www.sanex.ro uses cookies. When you visit our website, our server will temporarily store each access in a log file. The following data are collected and stored for the period necessary to fulfill the purposes for which they are processed, after which the automatic deletion operates: the IP address of the requesting computer, the date and time of the access, the name and the URL of the extracted data, the amount of data transmitted, the message if it has been found. has been realized, the browser detection data and the operating system used, the website from which the access was initiated, the name of the Internet service provider. The purpose of this data processing is to allow the use of the website (the connection location), the security system, the technical administration of the network infrastructure and the optimization of the Internet services. In case of attacks on the SANEX network infrastructure, we will evaluate the IP addresses.

Cookies are small text files stored on your computer and browser. By setting cookies, our web server can recognize your browser, your individual settings on our web pages, and if necessary, parts of the registration data in encrypted form, thus facilitating the use of our pages and enabling automatic connection.

You have the possibility to allow or not to use cookies, with the mention that the refusal to allow their launch can be made only on the basis of related settings. The types of cookies used cannot be used to run programs or to transmit computer viruses to your devices. Some of the cookies are strictly necessary for the proper functioning of the website and cannot be deactivated. Cookies such as measuring and promotion, can be disabled by you, in the section dedicated to this type of operation.

Thus, for the use of cookies in the following two categories, you need your consent:

- analysis and performance cookies - helps to improve the website, so that the information can be found faster and easier;
- promotion cookies - if you do not agree with the use of these types of cookies, you will continue to display advertising on the Internet, with the mention that this may not be relevant to you.

Our web server uses session and permanent cookies, as well as own or third party cookies, for the following purposes:

- Cookies strictly necessary - for the functioning of the website and cannot be disabled in our systems. These are only established in response to the actions performed by the visitors of this website. Depending on the browser used, visitors (users) may set a block or receive a warning regarding these cookies, but in this case, certain parts of the site may not work. These types of cookies will not store information that can identify you personally and are exempt from the rule of obtaining consent for their placement.
- Measurement cookies - are used strictly for statistical purposes and allow the drawing up of an evidence regarding the number of users who visit the site or how accessed is a certain category on the website page. These cookies do not collect personal data and expire at the end of each session.
- Performance cookies and analysis - allow the counting of website visits and traffic sources, so that it is possible to measure and improve its performance. The information collected by these cookies are collective and anonymous. If these types of cookies are not accepted, monitoring site visits and improving the performance of applications used by different areas of the site will not be possible.
- Promotion cookies - are set on the website based on agreements concluded with advertising partners (eg Social Media pages, Google, etc.). The use of these types of cookies allows the advertising partners to observe and analyze the types of products on the website for which they have expressed an interest. These types of cookies do not store direct information about you, but are based on the unique identification of the browser and the device from which the web page was accessed. If these types of cookies are not accepted, fewer personalized ads will be displayed.

Our website uses several codes to track the behavior of visitors to the site. These codes do not individually identify the users of the site, and are not related to personal data. Also, in an attempt to improve the online experience of our website visitors, we use the services below:

- Google Analytics - a traffic analysis service owned by Google, Inc., and by default cookies. Categories of cookies used: site performance, visitor analysis, retargeting and advertising. These cookies do not collect personal data and do not personally identify site visitors, but are used to provide you with content tailored to your preferences while browsing the Internet. To view Google Analytics Terms of Service, please visit <http://www.google.com/analytics/tos.html>.
- Facebook Pixel - a code by which the user can be targeted through advertising services, on Facebook advertising platforms, once he has visited our site. Details about Facebook's privacy policy can be found here: <https://www.facebook.com/about/privacy>. In order to avoid computer attacks based on cookies, we recommend that you make sure that the version of the browser you use is always updated.

For more information on the types of cookies used by our website, please consult the Cookies Policy on the website www.sanex.ro.

3.3. When you request to be logged into the "Investors section" of our website, we will be able to request certain personal data in order to ensure access to you. In this case, you will be informed about the purpose of the processing of the personal data and the rights related to this processing. The data collected for this purpose will most often be stored until their completion, except where, in accordance with the legal provisions, it will be necessary to keep them for a longer period of time.

3.4. Marketing activities involve the transmission of information about the products and services offered by SANEX. Sending the marketing materials will only be possible if this option is expressly requested. Regardless of whether the consent for the receipt of the marketing messages has been expressed, the consent can be easily withdrawn, and the messages will no longer be sent after the withdrawal of the consent.

If you do not want to be contacted for marketing purposes, you can unsubscribe from our newsletter at any time. You can send us an email or cancel it via a link at the bottom of the newsletter.

We do not use your personal data for marketing purposes only with the express consent of the data subject. If you want information about the products, services offers and promotions offered by SANEX, you can obtain them by subscribing to the newsletter.

In order to register for SANEX newsletter services, we need at least the email address to which the newsletter should be sent. SANEX may request additional information. These are voluntary and will only be used based on your consent, for example, to personally address you and to clarify any issues with your email address. For mail deliveries, we need your address data. In case of press releases, information about the press organization you work with is required, otherwise we will be sure to provide it to a press office.

In general, we use the double registration procedure. This means that we will not send you newsletters unless you have confirmed the registration by completing the registration form. Login and confirmation will be recorded. We use this method to ensure that only you can register as a user of the email address specified in the newsletter service. Your consent must be sent immediately, otherwise your registration and e-mail address from our database will be deleted. Until we receive your consent, the newsletter service will not accept subsequent registrations with this e-mail address.

You can unsubscribe from our newsletter at any time. You can send us an email or cancel it by a link at the bottom of the newsletter.

3.5. In the case of SANEX organizing promotions / competitions, and awarding prizes, we will be able to request certain personal data of the participants to such events, in order to effectively carry them out and in order to fulfill the legal obligations, for example the legal obligations for granting of awards.

In this case, you will be informed about the purpose of the processing of the personal data and the rights related to this processing. The data collected for the needs of these events will most often be stored until their completion, unless, in accordance with the legal provisions, it will be necessary to keep them for a longer period of time (for example, in the case of some legal obligations regarding the provision of information regarding the prizes awarded).

3.6. In other cases where there is the express consent of the data subject regarding the processing of personal data. The collected data will most often be stored until it is finalized or until the consent is withdrawn, except in cases where, according to the legal provisions, it will be necessary to keep them for a longer period of time.

IV. PLACE AND METHOD OF STORING PERSONAL DATA

SANEX keeps personal data that it collects in secure environments. Personal information is protected from unauthorized access, disclosure, use, modification or destruction by any organization or individuals.

SANEX takes appropriate technical and organizational measures to ensure the security of personal data, such as access controls, data encryption, transfer with strict observance of confidentiality requirements, etc., in accordance with SANEX security policies.

In order to demonstrate compliance with the data protection principles, SANEX has the obligation to implement data protection in its own commercial activities, from the moment of collecting the personal data and until their destruction / deletion from the data systems kept and organized by the Company.

Currently, personal data is stored at the SANEX headquarters. Personal data will be transmitted to affiliated persons, third parties or state institutions only in certain circumstances, respectively for the purpose, basis or legitimate interest of fulfilling commercial (business) relationships, or for fulfilling legal obligations. Personal data will not be transmitted to a third country or international organization outside the European Economic Area (EEA) in respect of which the European Commission has not issued a decision to ensure an adequate level of personal data collection, with unless the transmission is necessary for the fulfillment of a legal obligation and only in certain circumstances such as the application of appropriate protective measures and as the case may be, on the basis of a prior notification and / or based on the related consent. In case the application of adequate protection measures is not possible, the transfer of data will be done only with the authorization from the competent supervisory authority and with respecting the legal requirements regarding the protection of personal data.

V. STORAGE PERIOD OF PERSONAL DATA

The personal data stored by SANEX will not be stored for a longer period than is necessary for the fulfillment of the specific purpose of use, the basis, the legitimate interest and / or the legal obligation. By way of exception, personal data may be stored for one for a longer period of time (determined period), in the situation where there is the express consent of the data subject regarding the storage of personal data for another period. For example, in the case of personal data processed for the purpose of fulfilling the commercial / business relationships, the financial-accounting supporting documents containing personal data, according to the storage term provided by law, can be stored for 10 years from the date of conclusion for the financial year during which they were drawn up.

Personal data must be adequate, relevant and strictly limited to what is necessary in relation to the purposes, grounds and / or legitimate interests for which they are processed. In exceptional situations, when required, SANEX may establish appropriate measures for anonymizing and / or pseudonymizing personal data, where possible, to reduce risks.

VI. The rights of the persons whose personal data are collected and processed by SANEX

6.1. Right of access

Based on a prior request, you have the right to obtain from SANEX a confirmation regarding the processing or not of personal data. If yes, you have the right of access to the respective data and the following information: the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients to whom the personal data were or are to be disclosed, the period for which will be stored personal data.

6.2. The right of rectification Based on a prior request, you have the right to obtain from SANEX, without undue delay, the correction of incorrect or inaccurate personal data. At the same time, you have the right to obtain the incomplete personal data.

6.3. The right to delete ("the right to be forgotten") Based on a prior request, if the personal data are no longer necessary for the fulfillment of the purposes for which they were collected or processed, there is no other purpose, theme or legitimate interest, or a legal obligation for the processing of personal data by SANEX, you have the right to obtain the deletion of personal data, without undue delay.

6.4. The right to portability On the basis of a prior request, you have the right to receive the personal data provided, in a structured, commonly used and automatically readable format, as well as the right to transmit the personal data to another operator. .

6.5. Right of opposition On the basis of a prior request, you have the right to oppose the processing by SANEX of personal data in certain circumstances, ie if personal data are no longer required to meet the purposes for which they were collected or processed, there is no other purpose, basis or legitimate interest, or a legal obligation to process such data.

6.6. Right to restriction of processing Based on a prior request, you have the right to obtain from SANEX the restriction of processing in case you dispute the accuracy of the data; consider processing to be illegal and oppose deletion of data as you have opted for restricting data processing; consider that SANEX no longer needs personal data for the purpose of processing, ie if personal data is no longer necessary for the purposes for which they were collected or processed, there is no other purpose, theme or legitimate interest, or a legal obligation for the processing of this data; You have opposed the processing of data during the period in which checks are carried out regarding the situation in which the purpose, the basis or the legitimate interest, or the legal obligation, prevails over the rights exercised by you.

6.7. The right to file a complaint with the supervisory authority Without prejudice to any other administrative or judicial remedies, you have the right to file a complaint with the ANSPDCP (National Supervisory Authority for Personal Data Processing, based in Bucharest, B). - Mr. Gheorghe Magheru nr. 28- 30, Sector 1, postal code 010336, tel. +40.318.059.211, +40.318.059.212, fax: +40.318.059.602), if you consider that data processing with personal character violates the legal provisions.

VII. ENTRY INTO FORCE AND CHANGES TO THE CONFIDENTIALITY POLICY

The privacy policy is currently valid and dated from 25.05.2018. Due to the development of our website or the implementation of new technologies, it may be necessary to modify this privacy policy. SANEX reserves the right to change the privacy policy at any time with effect for the future. We recommend that you periodically consult the current privacy policy.