

PRIVACY POLICY

REGARDING THE PROCESSING OF PERSONAL DATA

1. ABOUT THIS POLICY

This privacy policy is prepared in compliance with the provisions of the EU Regulation 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("**GDPR**"), guides and recommendations issued for the purpose of the GDPR by the European Data Protection Board ("**EDPB**") and other European and national legislation.

This version of the document may be subject to revisions in accordance with the future publication of national or European data protection laws, guides and recommendations, and changes in the Company's activity.

Through this privacy policy we will inform you about:

- The types of personal data we collect;
- The ways in which your personal data is collected;
- The purposes and legal grounds for processing your personal data;
- The use of cookies;
- The storage period of your personal data;
- To whom we will share your personal data;
- Your rights in relation with your personal data processing.

2. GENERAL INFORMATION

The controller is **Covrig Crocant SRL**, with its registered office at 133 Calea Serban Voda, Central Business Park, Building A, Ground Floor, Section A.2.64, District 4, Bucharest, Romania, registered with the Bucharest Trade Registry under no. J40/11145/2021, sole registration code 44505200 (hereinafter "**Covrig Crocant**" or "**we**").

3. TYPES OF PERSONAL DATA WE COLLECT

- (a) If you are interested to be our **customer** by accessing the "**Subscribe**" section available on the website, we shall process your personal data, such as e-mail address).
- (b) If you are interested about **career opportunities** within Covrig Crocant by accessing the "**Job offers**" section available on the website, we shall process your personal data you provide in this context, such as name, surname, e-mail address, phone number, experience and any other data included in the documents provided in this context.
- (c) If you are interested to cooperate with us as a **supplier** by accessing the "**Become partner/supplier**" section available on the website, we shall process your personal data you provide in this context, such as name, surname, e-mail address, phone number.

4. WAYS IN WHICH YOUR PERSONAL DATA IS COLLECTED

We may collect personal data about you when you provide us with information for establishing a relation with us such as by sending a request for subscribing to our newsletter, job application or details for your engagement with us as a possible supplier/partner. In some circumstances, we may

collect personal data about you from a third party source, such as from a publicly available record or from your organisation or other organisations with whom you have dealings.

5. PURPOSES AND LEGAL GROUNDS FOR PROCESSING YOUR PERSONAL DATA

- (a) If you are interested to be our **customer**, we may process your personal data for the purpose of transmitting commercial newsletters or alerts consisting on information on launching our services or product/service offers, having your consent as legal ground, if you choose to provide it. Providing your personal data for this purpose is voluntary.

This data processing shall be carried out based on the Article 6, paragraph 1, letter (a) of the GDPR.

- (b) If you are interested about **career opportunities**, we may process your personal data for the purpose of carrying out specific recruitment activities for certain vacancies within Covrig Crocant, having your consent as legal ground.

Providing your personal data for this purpose is voluntary.

This data processing shall be carried out based on the Article 6, paragraph 1, letter (a) of the GDPR.

If you are not selected for the position you applied for, we may continue to process your data in order to take you into account for other vacancies similar to the one for which you initially applied.

- (c) If you are interested to cooperate with us as a **supplier**, we may process your personal data for development of our contractual relationship, having our legitimate interest as legal ground.

This data processing shall be carried out based on the Article 6, paragraph 1, letter (f) of the GDPR.

6. BROWSING THE WEBSITE. USE OF COOKIES

When you visit our website, we may use cookies to collect technical information that may identify the user, such as IP address, type of internet browser used, your operating system, the domain name or domain host through which the user browses the website.

"Cookies" are small files, consisting of letters and numbers, which are stored on a user's computer, mobile terminal or other equipment through which the website is accessed.

The main purpose of using cookies is to help you have an improved browsing experience and also for advertising purposes, so that we can provide you with individualized content tailored to your interests and preferences. As a result, to the extent that you have agreed to the use of different categories of cookies, we will use them to provide you with a personalized and relevant browsing experience on our website and to understand how to interact with our advertising content.

Depending on the category of cookies, they have the following purposes:

- (a) **Technically necessary:** These are cookies without which you cannot use our services (e.g. for the correct display of our website/functions you want, to facilitate electronic communication, detection of connection errors, identification of connection points, site security web etc.)
- (b) **Preferences:** With these cookies may consider your real or assumed preferences for the optimal use of our webpage. For example, with your settings we can display our website in a language that is right for you.
- (c) **Statistics:** These cookies allow us to compile anonymous statistics on the use of our services for the purpose of organizing according to users needs. Thus, we can determine, for example, how we can better adapt our webpage to the habits of the user.
- (d) **Marketing:** With these cookies we can show you advertising content that is right for you, which is based on the analysis of your behaviour and/or the analysis of your interest in certain products.

Your behaviour and interest can be reconstructed through various websites, browsers or terminals, accessed by you, using a user ID.

7. STORAGE OF YOUR PERSONAL DATA

We will take appropriate technical and organisational measures to keep your personal data confidential and secure in accordance with our internal procedures covering the storage, disclosure of and access to personal data.

Your personal data will be deleted when it is no longer reasonably required for the permitted purposes as described above or you withdraw your consent (where applicable) and we are not legally required or otherwise permitted to continue storing such data. However, we will retain your personal data where required for us to assert or defend against legal claims until the end of the relevant retention period or until the claims in question have been settled.

- (a) If you are interested to be our **customer**, the processing will cease when you withdraw your consent, however without affecting the processing carried out by us on the basis of the consent provided by you before its withdrawal.
- (a) If you are interested about **career opportunities**, we may keep your personal data as long as necessary for the recruitment process. If you are not selected for the position you have applied, we may keep personal data of the rejected applicants (i) to document how recruitment process is conducted, the defence/exercise of our rights in court and (ii) for the use CVs/applications in other recruitment processes, but no more than 3 years from the date on which you provided the data.
- (b) If you are interested to cooperate with us as a **supplier**, we may process your personal data for the necessary period for the conclusion/execution of the contract and subsequently according to internal policies and legal obligations, including those regarding archiving.

8. SHARING YOUR PERSONAL DATA

We may share your personal information with certain trusted third parties in accordance with contractual arrangements in place with them, including telecommunication service providers we use to send SMS/e-mail messages, IT service providers, HR service providers (if applicable) or companies within Rohlik group, namely **ROHLIK GROUP A.S.**, a company organised and operating under the laws of Czech Republic, with its corporate seat at Sokolovská 100/94, Karlín, 186 00 Prague 8, Czech Republic, registered with the Commercial Register kept by the Municipal Court in Prague under file number B 26123, and having identification number 099 60 678 and **Rohlik skillz s.r.o.**, with its corporate seat at Sokolovská 100/94, Prague 8, 186 00, 099 90 739.

Where necessary, or for the reasons set out in this privacy policy, personal information may also be shared with regulatory authorities, courts, tribunals, government agencies and law enforcement agencies. While it is unlikely, we may be required to disclose your information to comply with legal or regulatory requirements. We will use reasonable endeavours to notify you before we do this, unless we are legally restricted from doing so.

Your personal data shall not be subject to automated-decision making or profiling, as defined by GDPR.

9. TRANSFER ABROAD OF YOUR PERSONAL DATA

We may transfer your personal data abroad if required for the permitted purposes as described above. We will ensure that any such international transfers are made subject to appropriate or suitable safeguards as required by the General Data Protection Regulation (EU) 2016/679 or other relevant laws.

We will also require our contractual partners, sub-contractors and others who are outside the European Economic Area and to whom we transfer your personal data to ensure a similar level of data protection.

10. DATA PROCESSING FOR INDIVIDUALS UNDER THE AGE OF 16

All personal data processing activities described in this policy exclusively refer to individuals who are at least 16 years of age. The use of the systems as well as the results of the processing is prohibited for persons who have not reached this age without the consent of their parents/legal representatives. If, despite our reasonable prevention efforts, such processing still takes place, we will stop it once we notice that the users have not reached the abovementioned age.

11. SECURITY OF DATA PROCESSING

We hereby inform you that we constantly evaluate and update the security measures implemented in order to ensure the processing of personal data in conditions of maximum security and safety. Only authorized personnel can access personal data while working.

12. YOUR RIGHTS

- (b) **Right of access.** The right of access allows you to obtain information as to whether your data is being processed by us. If your personal data are being processed, you have the right to access them and obtain a copy of them.
- (c) **Right to rectification.** You may exercise the right to rectification when you consider your personal data to be inaccurate or incomplete, in which case we will modify or update the data. In this regard, we will rectify/update the data with no undue delay, that is, as soon as possible.
- (d) **Right to erasure.** The right to erasure allows you to obtain from us the deletion of your personal data without undue delay in any of the following circumstances: (i) the personal data are no longer necessary for the purposes for which they were collected or processed; (ii) you withdraw the consent providing the basis for the processing, when you gave consent for the processing of your personal data for one or more specific purposes or when you gave express consent for the processing of personal data with one or more specified purposes, except when EU or Member State law holds that the prohibition of the processing of special categories of personal data cannot be removed by the data subject; (iii) you oppose the processing and no other legitimate reasons for processing prevail; (iv) the personal data have been unlawfully processed; (v) personal data must be deleted in order to comply with a legal obligation provided in EU or Member State Law applicable to us (vi) the personal data have been obtained in relation to an offer of information society services in which the data is processed of a child that is not at least 16 years of age.
- (e) **Right to restriction.** The right to restrict allows you to obtain from us the restriction of processing where one of the following applies: (i) the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data (ii) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead; (iii) we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims; (iv) you have objected to processing, pending the verification whether the legitimate grounds of us override those of your rights.
- (f) **Right to withdraw your consent.** You have the right to withdraw your consent when the processing is based on the consent, but without affecting the legality of the processing activities performed until that moment.

- (g) **Right to object.** You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, when the processing is based on our legitimate interests or personal data are processed for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing.
- (h) **Right not to be subject to individual automated decisions.** This is your right to not be subject to a decision of us taken based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects you.
- (i) **Right to data portability.** The right to data portability is your right to receive the personal data you have provided to us, and to transmit them to another data controller in a structured, commonly-used and machine-readable format, where: (i) the processing is based on your consent or for the performance of a contract and (ii) the processing is carried out by automated means.
- (j) **Right to lodge a complaint with the Data Protection Authority (ANSPDCP) or with competent courts.**

The abovementioned rights may be exercised at any time. In order to exercise the rights, you should submit a written request to the following address: 133 Calea Serban Voda, Central Business Park, Building A, Ground Floor, Section A.2.64, District 4, Bucharest, Romania or by e-mail at office@sezamo.ro. We will respond to your request within 30 days after the date of receiving the request.

13. CONTACT DETAILS

In person: at Company's headquarters: 133 Calea Serban Voda, Central Business Park, Building A, Ground Floor, Section A.2.64, District 4, Bucharest, Romania

Postal mail: 133 Calea Serban Voda, Central Business Park, Building A, Ground Floor, Section A.2.64, District 4, Bucharest, Romania

Email: office@sezamo.ro