



PRIVACY POLICY

www.confident.agency

1. Who are we?

CONFIDENT GROUP COMMUNICATION & COMMERCE S.R.L. (hereinafter referred to as "**Controller**"), attaches great importance to your personal data, constantly taking the necessary steps to ensure that the data processing carried out by it complies with the legal requirements in this area. To this end, we have developed this Privacy Policy, by which we undertake to respect the confidentiality of your personal data and by which we explain to you what categories of personal data **CONFIDENT GROUP COMMUNICATION & COMMERCE S.R.L.** processes, how that data is used, and for what purposes it is processed in the context of your visit to or interaction with the www.confident.agency website.

This Policy relates only to the personal data that we process through our website www.confident.agency (hereinafter referred to as the "Site" or "Platform"), in the context of your interaction with it. We want to assure you that we have taken all necessary measures to ensure the confidentiality of your data, which is processed only by the Controller's staff and collaborators who have been previously trained and authorized to process personal data and who respect firm confidentiality commitments.

To get to know us virtually, we provide you our identification data.

The Controller that process your personal data when you browse or interact with the online platform www.confident.agency is **CONFIDENT GROUP COMMUNICATION & COMMERCE S.R.L.**, with headquarters in Bucharest 3rd District, Calea Victoriei Street, No. 21-23, 6th Floor, Apartment ROOM 67+69, with UIC 33169295, registered in the National Trade Register Office under no. J40/5808/2014.

For any questions/ queries regarding the protection of personal data, you are invited to send a request either to the postal address indicated above or to the e-mail address bucharest@confident.agency or barcelona@confident.agency.

Individuals sending such requests to **CONFIDENT GROUP COMMUNICATION & COMMERCE S.R.L.** via e-mail/ mail are requested to mention in the subject line of the email/ mailing envelope information such as "*data protection*", "*GDPR*" or "*personal data*", in order to ensure that requests will be treated with priority.

As a data subject, you will receive a response within a maximum of 30 days from the communication of the document to **CONFIDENT GROUP COMMUNICATION & COMMERCE S.R.L.**. An extension of this deadline can only operate in exceptional situations. In these cases, we assure you that you will be duly informed of this deadline.

2. Definitions

- ❖ **„personal data”** means any information relating to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier or to one of more factors specific to the physical, physiological, mental, economic, cultural or social identity of that natural person.

! For the purposes of this policy, personal data that will be subject to processing may relate to: name, surname, telephone number, e-mail address, etc., as described below.

- ❖ **„processing”** means any operation or set of operations which is performed on personal data, whether or not by automated means, such as: collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

! For the purposes of this policy, data processing refers to those processing operations carried out at the time of your navigation on the website www.confident.agency or your interaction with it by subscribing to the Controller's newsletter or accepting cookies, other than those necessary (essential).

- ❖ **„controller”** means the person which, alone or jointly with others, determines the purposes and means of the processing of personal data.

! For clarity, for the purposes of this Privacy Policy, the Personal Data Controller is represented by CONFIDENT GROUP COMMUNICATION & COMMERCE S.R.L.

- ❖ **„data subject”** represents the person whose personal data is being processed.

! For the purposes of this Policy, the data subject is the Internet user who browses on or interacts with www.confident.agency.

- ❖ **„consent”** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

! The data processing carried out through the Platform and based on the legal basis of the consent is exclusively for the purpose of subscribing to the newsletter.



- ❖ **„third party”** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.
- ❖ **„processor”** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

3. What types of personal data do we process?

Your browsing and interaction with the Site involves the processing of two categories of personal data, namely:

- a. personal data that you disclose to the Controller on a voluntary basis (e.g. in the case of newsletter subscription or in the context of contacting the Controller, etc.), which are collected on an individual basis;
- b. data that you provide involuntarily, simply by browsing our website.

CONFIDENT GROUP COMMUNICATION & COMMERCE S.R.L. collects, on the basis of the voluntary provision of the data subject, the following personal data:

A. In order to obtain additional information *via* e-mail:

- **Name and surname;**
- **E-mail address;**
- **Other categories of personal data that you make available to us in the context of contacting the Controller by the above-mentioned mean.**

B. In the context of subscribing to the newsletter:

Subscribing to the newsletter is conditional on your consent to receive commercial and marketing messages. In this context, it will be processed as personal data:

- **E-mail address;**
- **Name and surname** (indirectly resulting from the e-mail address if it is name.surname@x.com).

C. In the context of submitting an application for employment with the controller:

- **Name and surname;**
- **Image (if included in your CV);**
- **Information on education and professional experience;**



- **Any other personal data included in the submitted CV or cover letter.**

D. In the context of completing the contact form:

- Name and surname;
- E-mail address;
- Any additional information or personal data transmitted by the data subject through the completion of the "Message" box.

The Controller also processes marketing and communication data only on the basis of prior consent of the users, as well as technical data and browsing actions by means of cookies and similar technologies. You can access our Cookie Policy.

The above-mentioned data is necessary for the effective provision of the services offered by CONFIDENT GROUP COMMUNICATION & COMMERCE S.R.L., to provide additional information regarding the Controller`s activity, to register applications for a job within the Controller`s team, to resolve any complaints, as well as for communication with the Controller or the transmission of marketing communications on its behalf, but with the prior consent of the user, as detailed in the Newsletter Subscription Policy.

In the event that you provide us with personal data that is not necessary for the purposes described below, detailed in section 4, we reserve the right to remove it immediately from our database.

The Controller may also unintentionally collect other personal data belonging to you, namely: **IP address, browser version, time and location settings, operating system, platforms on the devices used to access our site, etc.** This information will not be used to identify individuals and will not be made public other than as set out in this Privacy Policy, supplemented by the Cookie Policy.

The Controller reserves the right to request additional information from you, accompanied by supporting documents, by e-mail, in hard copy or in any other way deemed appropriate by the Controller, if necessary, for the purposes detailed below.

Your personal data may be disclosed by CONFIDENT GROUP COMMUNICATION & COMMERCE S.R.L. for processing or to designated data processors, including contractual partners, financial authorities and institutions, courts or competent bodies, at their request and for the purpose of providing the services offered by the Controller.

CONFIDENT GROUP COMMUNICATION & COMMERCE S.R.L. may store your personal data even after registering a request for deletion of such data, if the storage is for one of the following purposes, provided for in Article 17 of the GDPR, respectively:

- a. for the performance of a contract;



- b. for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject;
- c. for exercising the right of freedom of expression and information;
- d. for protecting the vital interests of the data subject;
- e. for the performance of a task carried out in the public interest;
- f. for archiving purposes in the public interest, scientific or historical research purposes;
- g. for the purposes of the legitimate interests pursued by the Controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child;
- h. for the establishment, exercise or defence of legal claims.

4. For what purpose and on what legal grounds do we process personal data?

CONFIDENT GROUP COMMUNICATION & COMMERCE S.R.L. processes your personal data for the following purposes and on the following legal grounds:

- a. **the data subject has given consent** to the processing of his or her personal data (art. 6, para. (1), let. a) of Regulation (EU) no. 679/ 2016 of the European Parliament and of the Council of 27 april 2016), in the case of the transmission of commercial and marketing communications or the acceptance of cookies other than necessary, if needed be;
- b. processing is necessary for the purposes of the **legitimate interests pursued by the controller** (art. 6 para. (1) let. f) of Regulation (EU) no. 679/ 2016 of the European Parliament and of the Council of 27 april 2016), to be able to provide accurate information and to solve problems of any nature related to the content of the website www.confident.agency or the services offered by the Controller, as well as for actions involving interaction with the online platform;
- c. processing is necessary **for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract** (art. 6 para. (1) let. B) of Regulation (EU) no. 679/ 2016 of the European Parliament and of the Council of 27 april 2016), in concrete with a view to the conclusion of an individual employment contract with the Controller by the applicant, as a data subject.

Your personal data will be processed so that the Controller can:

- a. improve the website and the services provided through it;
- b. determine the usefulness/popularity of the web content presented on the Site;
- c. send technical, support or administrative notifications;



- d. honor requests and resolve complaints received from users;
- e. facilitate user access to the services offered by CONFIDENT GROUP COMMUNICATION & COMMERCE S.R.L.;
- f. communicate information of interest to users of the site;
- g. protect the Controller's rights;
- h. evaluate and improve the quality of the Controller's services.

5. The duration of processing personal data

Personal data processed at the level of the Controller through the website www.confident.agency are retained for a reasonable period of time in relation to the purpose of data processing, in accordance with the legal provisions on data archiving. The Controller respects the data archiving deadlines required by law.

Data processed as a result of your subscription to the newsletter will be processed by the Controller only until you withdraw your consent for processing in accordance with the Newsletter Subscription Policy.

Data processed through cookies will be retained strictly for the lifetime of each cookie, as detailed in the Cookies policy for each type of cookie.

6. Special provisions relating to minors

The Controller pays particular attention to the data of minors that may be provided by them in the context of browsing the online platform www.confident.agency, in order to ensure that any processing of personal data of minors is carried out only in accordance with legal requirements and in strictly determined cases.

Thus, the Controller does not carry out direct marketing promotional activities towards minors. However, if a minor contacts the Controller through the related platform, the minor will be deemed to have done so with the consent of his/her legal representative.

Minors are not allowed to request services offered by the Controller, unless these operations are carried out on behalf of the minor by his/her legal representative or guardian, according to the law.

In this regard, any person who provides the Controller with personal data through the website or other applications or devices covered by this Policy guarantees that he/she is of legal age, i.e. that he/she has full legal capacity.

Any processing of personal data belonging to minors will be carried out only in accordance with the law and taking into account the above provisions.

7. Transfer of the personal data



Your data is processed on the territory of the European Union through secure internal servers. However, by means of plugins specific to social networks (e.g. Facebook, LinkedIn, Instagram, etc.), as third-party recipients of the data, it is possible that your data processed in this context may also be transferred outside the European Union/European Economic Area and stored on servers in third countries. In this regard, the Controller has implemented a number of necessary and appropriate measures to ensure that the data is processed accordingly.

The Controller undertakes that the data collected will only be processed in accordance with the stated purposes and will not make public, sell, rent, license, transfer, etc. unauthorized databases containing information on the data subjects to any third party not involved in the fulfilment of the stated purposes, unless the transfer/access/viewing etc. is requested by the competent authorities in cases provided for by the regulations in force at the time of the event.

It is possible that your data will be disclosed to other companies that provide services to us and act as our authorized persons, such as suppliers providing website maintenance, IT, legal etc. services.

These entities are selected with great care to ensure that they comply with specific personal data protection requirements. They have a limited ability to use your information for purposes other than providing services to us.

In addition to the disclosures described in this Privacy Policy, we may disclose information to third parties to whom you consent or request that we make such a disclosure.

8. Links, hyperlinks, third-party sites

The www.confident.agency website may contain links to third party sites that may collect your personal data, including through cookies or other technologies.

If you link to a third party website, this Privacy Policy will not apply to your use of that website.

9. What are your rights as a data subject?

Any natural person browsing our website, as a data subject, has the following rights in relation to CONFIDENT GROUP COMMUNICATION & COMMERCE S.R.L., as a Personal Data Controller:

- ❖ **Right of access** means the right of the data subject to obtain confirmation from the Controller as to whether or not the Controller is processing personal data relating to him or her and, where that is the case, access to the personal data and to information of how the data is processed.
- ❖ **Right to rectification** refers to the rectification, without undue delay, of inaccurate personal data processed or to their completion if they are incomplete. They can be amended by sending an e-mail to: bucharest@confident.agency or barcelona@confident.agency.

- ❖ **Right to erasure („right to be forgotten”)** means the right of the data subject to obtain from the controller the erasure of personal data concerning him or her, without undue delay, where one of the following grounds applies: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing, objects to the processing and there are no overriding legitimate legal grounds for the processing, the personal data have been unlawfully processed, the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject, the personal data have been collected in relation to the offer of information society services.
- ❖ **Right to restriction of processing** may be exercised if the data subject requests the restriction of the processing of his/her personal data, in which case they will be used strictly for the exercise of the data subject's other legal rights, including responding to any requests/complaints from the data subject.
- ❖ **Right to data portability** means the right to receive personal data in a structured, commonly used and machine-readable and the right to transmit those data to another, where the processing is based on consent or on a contract and is carried out by automated means, where technically feasible.
- ❖ **Right to object** concerns the right of the data subject to object to the processing of personal data where the processing is necessary for the performance of a task carried out in the public interest or in the legitimate interest of the Controller.
- ❖ **Right to not be subject to a decision based solely on automated processing, including profiling**, which produces legal effects concerning him or her or similarly significantly affects him or her. However, it will not be possible to exercise this right if the decision is necessary for the conclusion or performance of a contract between the data subject and the Controller, is authorised by the law applicable to the Controller, provided that the rights, freedoms and interests of the data subject are adequately protected or is based on the consent of the data subject obtained in compliance with applicable law.
- ❖ **Right to address the National Supervisory Authority for Personal Data Processing.**

If the data subject considers that the above-mentioned rights have been infringed, he/she has the possibility to address the ANSPDCP by lodging a complaint.

The contact details of the ANSPDCP are as follows:



Address: Bucharest, 1st District, G-ral. Gheorghe Magheru Blvd. no. 28-30;

Telephone: 0.318.059.211/0.318.059.212;

Fax: 0.318.059.602;

E-mail: anspdcp@dataprotection.ro;

Website: www.dataprotection.ro.

In order to exercise the rights set out above, the data subject shall contact CONFIDENT GROUP COMMUNICATION & COMMERCE S.R.L. by sending a request to the postal address/ e-mail address mentioned above in the first section of this Policy.

9. Final provisions

If CONFIDENT GROUP COMMUNICATION & COMMERCE S.R.L. deems it necessary to change the privacy rules, the Controller will publish those changes to inform data subjects about the information it collects and how it uses it.

The provisions of the Privacy Policy are complemented by the provisions of the Cookie Policy and the Newsletter Subscription Policy, respectively, present on the website www.confident.agency.

CONFIDENT GROUP COMMUNICATION & COMMERCE S.R.L.