

## Privacy policy

- (1) The company **PREMIER SOLUTIONS & TEAM S.R.L.**, Romanian legal entity, with headquarters in Bucharest, District 6, 4 Vasile Milea St., 2<sup>nd</sup> floor, Office no 3, registered with the Trade Register Office attached to Bucharest Tribunal under no. J40/6863/2007, fiscal registration code: RO 21507600 (hereinafter referred to as the "**Company**")
- (2) The contact details of the person responsible for personal data protection are: [office@afi-europe.ro](mailto:office@afi-europe.ro).

We ensure the protection and observance of the confidentiality of your personal data by implementing necessary measures provided by the data protection rules and regulations, including the General Data Protection Regulation (EU) 2016/679 (GDPR).

This document is intended to inform you of the personal data we collect from you or that you disclose to us through this web site, the way we process this data, and the rights that GDPR provides you.

- (3) Processing of personal data (meaning the information that identifies an individual or that makes it at least identifiable) is done for the following purposes:
  - Performing customer service;
  - Signing sale-purchase contracts;
  - Performing marketing activities for your own needs;
  - Making profiles as described in this document, including through "cookie" technology (for more details on using cookies, please click on (.....)).

**Legal grounds** for processing these personal data, conforming the GDPR, are as follows:

- **Site visitor's consent** (art 6 (1) of GDPR) for data used for direct marketing activities (e.g., subscription to newsletter, marketing cookies, etc.);
- **Performance of the contract** and the preliminary steps for this contract (article 6 (1) b of GDPR) - for the data collected by customer registration form or the data received as a result of the customer service;
- **legal obligations** (article 6 (1) c of GDPR) for data necessary for invoicing, archiving, as well as the other incumbent legal obligations;
- **fulfilling the legitimate interests of PREMIER SOLUTIONS & TEAM S.R.L.** to carry out their operations according to their object of activity (article 6 (1) f of GDPR for data used for marketing for current clients, to ensure [aficity.ro](http://aficity.ro) site security and the internal data used to optimize [aficity.ro](http://aficity.ro) site, as well as for the data collected through the registration form from the non-client targeted data or for the data received as a result of the non-client relations services with the data subjects.

(4) Depending on the interactions you have with our site, [aficity.ro](https://aficity.ro) collects personal data from its users in three ways

- directly from the user
- traffic data from the user's browser
- through cookies.

**a. Personal data collected directly.**

**a1. When you access [aficity.ro](https://aficity.ro) and fill out a registration form at your disposal, we can request:**

- surname, name: for identification;
- email address: for direct communications;
- phone number: for direct communications;
- details of your request: message with various information;
- other data required for contracting and delivery of all required information.

If you do not provide these data, we will be unable to honor your requests.

This data is stored for a period necessary to achieve the purposes of the processing. The storage of personal data may also be carried out subsequently in order to comply with the applicable legal obligations, including, but not limited to, the provisions on the archiving obligation and the financial-accounting obligations.

**a.2. When you access our support services,** we can ask for your name, e-mail address or phone number. We reserve the right to record any telephone or electronic communications made for [aficity.ro](https://aficity.ro) assistance services in order to improve our services. We will inform you before the communication begins that it may be recorded.

This data is stored for the period necessary to achieve the purposes of the processing. Storage of personal data will also be possible in order to comply with the applicable legal obligations, including, but not limited to, the provisions on the archiving obligation and the financial-accounting obligations.

**a.3. When you request a newsletter receipt or when processing data for other marketing purposes.** We may also use your contact information to provide you in electronic or paper form with offers, information, news about our products and services, but only if you have subscribed and you have given your express consent to such processing. We can also process your data for marketing and other purposes.

Your data will be processed for advertising and marketing purposes throughout your subscription to the newsletter, and in other processing cases, such as for sale-purchase purposes, for the duration of the

AFI City project. Storage of personal data may also be carried out subsequently in order to comply with the applicable legal obligations, including, but not limited to, the provisions on the archiving obligation and the financial-accounting obligations.

We may also request other data that may constitute personal data only to the extent that it is necessary for these purposes.

These data are used, for example, for the purpose of contacting you to resolve your claim / request.

You can at any time withdraw your consent by expressing the option not to receive this information in the future by clicking on "Unsubscribe" when you receive the e-mail or by sending an e-mail to [office@afi-europe.ro](mailto:office@afi-europe.ro).

#### **b. Traffic data**

When visiting a website, regardless of the device you use, you disclose certain information about yourself, such as your IP address, your visit time, where you visited our site, the pages you visited. [aficity.ro](http://aficity.ro), as well as other operators, registers this information for a specified period of time. [aficity.ro](http://aficity.ro) uses external traffic analysis services such as Google Analytics.

For more details on using cookies, please visit the Cookies Policy available here.

These data are used by [aficity.ro](http://aficity.ro) to improve our site and services, and to ensure the security of our site.

These data are kept for a period of time and for the purpose of the table below:

Domain	Cookies Name	Cookies	Purpose	Duration (days)
<a href="http://aficity.ro">.aficity.ro</a>	_ga	External	Google Analytics cookie Traffic monitoring	2 years
<a href="http://aficity.ro">.aficity.ro</a>	_gat	External	Google Analytics cookie Traffic monitoring	1 year
<a href="http://aficity.ro">.aficity.ro</a>	_gid	External	Google Analytics cookie Traffic monitoring	1 day

<a href="https://www.facebook.com">.facebook.com</a>	fr	External	Facebook cookie Traffic monitoring	3 lung
<a href="https://www.aficity.ro">aficity.ro</a>	_wpfuid	Internal	Website functioning	Expires in 2029

Certain sections of site content may be provided through third parties / third parties (for example, a video). Third parties may place these cookies on the site (referred to as "third party cookies" as they are not placed by the site owner). Users who do not want to use third-party cookies can use their favorite browser settings to delete or block them:

**From your browser settings**

Internet Explorer -<http://windows.microsoft.com/ro-ro/internet-explorer/delete-manage-cookies>

Mozilla Firefox -<http://support.mozilla.org/ro/kb/cookie-urile>

Google Chrome -<http://support.google.com/chrome/bin/answer.py?hl=ro&answer=95647>

Safari -[https://support.apple.com/kb/PH19214?viewlocale=ro\\_RO&locale=en\\_US](https://support.apple.com/kb/PH19214?viewlocale=ro_RO&locale=en_US)

or

**Browser plug-ins to block third-party cookies such as: UBlock, Ghostery, AdBlock, PrivacyBadger.**

**(5) Recipients of personal data**

Personal data are sent for the purposes stated by the website, in some cases, to the contractual partners of PREMIER SOLUTIONS & TEAM S.R.L., having as example the following destinations:

<b>Data Category</b>	<b>Recipient</b>	<b>Purpose</b>
Contract data (name, billing address, email, phone)	Accounting	Fiscal obligations
Contract data (name, email, phone)	Service Provider- AFI Gift Card	AFI Gift card release
Contract data (name, billing address, email, phone)	Platform hosting / technical support	Website security and technical support

In these cases, we ensure that our partners also meet the legal requirements on data protection.

Additionally, we may disclose your information, in whole or in part, under the terms of the law to the following entities:

**a) To companies in the same group as the Company**

**b) Company's contractual partners / service providers.** We may disclose your information to other companies that provide us with services and act as empowered persons, such as companies that help us with invoicing, web site maintenance companies, or emailing on our behalf.

These entities are carefully selected to ensure that they meet the specific privacy protection requirements. These entities can not use your information for purposes other than providing us with services.

**c) The public** - in this case, when it comes to announcing the winners of the contests (when or if it is the case).

**d)** Information provided by you that contain identification data may be forwarded to **public authorities** if there are any requests made within the competence of these authorities or a legal requirement to do so may be used for the purpose of drawing up employment documents and other documents that relate exclusively to labour relations or commercial communications or answers to your requests, and in case of legitimate requests, it will be forwarded to the state authorities: Territorial Labor Inspectorate, Employment Agency, Courts, other parties with your consent or at your request.

**e)** In addition to the disclosures described in this Privacy Policy, we may transmit the information to third parties that you consent to or request to make such disclosure.

**(6) Transferring personal data**

Most of the empowered entities we work with are in the European Union and the rest from the United States is enrolled in the US-EU Shield Privacy program.

**(7) We do not use automated or profiled legal processes with legal effects or that affect you similarly on the [aficity.ro](https://aficity.ro) site.**

We use profiling systems for visitors to the [aficity.ro](https://aficity.ro) website for customized business communications and offers via the site, push notifications, email or SMS, as appropriate.

**(8) Under GDPR provisions, you have the right to information, access, rectification or deletion of personal data, restriction of processing, portability of personal data, the right to oppose, the right not to be subject to an automatic individual decision, the right to address to the National Supervisory Authority for Personal Data Processing, and the right to withdraw consent when processing is based on that basis.**

- a) **Right to information** - the right to receive minimum information about the processing activities performed by the Company in accordance with legal requirements;
- b) **Right of access** - you can obtain from us, upon request and under the conditions established by the legislation, the confirmation that we process your personal data, as well as information on the specifics of the processing.
- c) **Right to rectify the data** - you can ask us to rectify your incorrect or inaccurate personal data or, if necessary, fill in the data that is incomplete, including by providing an additional statement.
- d) **Right to delete the data (the "right to be forgotten")** - you may request the deletion of your personal data, without undue delay, in the cases provided by the law.
- e) **Withdrawal of consent** - you can withdraw consent to data processing at any time. Withdrawal of consent does not affect the lawfulness of the processing under consent prior to its withdrawal.
- f) **Opposition Right** - you may at any time, for grounded and legitimate reasons relating to your particular situation, oppose that data is intended to be processed, except where there are legal provisions to the contrary. In the case of direct marketing, the data subjects have the right to oppose such processing at any time.
- g) **Restriction of processing** - under certain conditions, to the extent that the conditions provided by law are met, you may request that you restrict the processing of your personal data.
- h) **Right to Data Portability** - to the extent we process data by automated means, you may request, under the law, (i) to provide your data in a structured, currently used and readable form and (ii) transmit these data to another data controller to the extent that the conditions prescribed by law are met.
- i) **Right to file a complaint with the National Supervisory Authority for Personal Data Processing** (including the email address [plangere@dataprotection.ro](mailto:plangere@dataprotection.ro)) - you have the right to file a complaint with the National Supervisory Authority for Personal Data Processing for exercising and defending any rights guaranteed by applicable law, without prejudice to the possibility of appealing to the courts.

**Supervisory authority contact details are as follows:**

**National Supervisory Authority for Personal Data Processing** in Romania (Autoritatea Nationala pentru Supravegherea Datelor cu Caracter Personal din Romania)  
28-30 G-ral. Gheorghe Magheru Blvd., District 1, postal code 010336, Bucharest, Romania  
[anspdcp@dataprotection.ro](mailto:anspdcp@dataprotection.ro)

- j) **The right not to be subject to an automatic individual decision** - the right not to be the subject of a decision based solely on automatic processing, including the creation of profiles which produces legal effects that regard it or affect it similarly to a significant extent.

To exercise these rights, you can contact **PREMIER SOLUTIONS & TEAM S.R.L.** by accessing the contact form at [office@afi-europe.ro](mailto:office@afi-europe.ro).

### **(9) Security of personal data**

PREMIER SOLUTIONS & TEAM S.R.L. implements appropriate technical and organizational measures to ensure a level of security appropriate to the risks associated with the types of data processed and the processing operations.

DIRECT MARKETING ACTIVITIES / PROMOTION / RECEIVING NEWSLETTER