

**Information notice given pursuant to section 13 of European Regulation 2016/679, concerning the protection of natural persons with regard to the processing of personal data (“GDPR”), should the data be collected directly from the data subject.**

Dear Customer,

for transparency and correctness, we provide you, pursuant to Sections 13, GDPR, the following information (hereinafter, the “Information Notice”), applicable to our company.

**(a) Data Controller**

SMART BSC S.R.L. (hereinafter “SMART”), having its seat in Str. Al. Lapusneanu, n. 18, Bl. C1/43, Galati, Romania, CIF 23011262, in person of its *pro tempore* legal representative, a company supplying administrative, tax, accounting and organisational services in favour of the national and foreign subjects, Controller of your personal data spontaneously communicated (verbally, by means of your visit card, e-mail, by means of website or social media platforms, etc.), (hereinafter, the “Controller”)

**(b) Contact details of the Data Protection Officer**

Office of the Data Protection Officer (“DPO”)

Str. Al. Lapusneanu, n. 18, Bl. C1/43, Galati

Email address : dpo@smart-project.ro

Tel. /Fax (+40) 236 435321

**(c) Purposes of the processing for which the personal data are intended and related legal basis**

Your personal data will be processed:

(i) without your consent (section 6, items b, c, f, GDPR), for the following purposes:

- performance of pre-contractual and contractual obligations deriving from the execution of a possible professional service contract;
- compliance with legal obligations, as provided for by a law (national or EU) or perform an order of any authority, as well of any other entity to which the Controller is subject;
- exercise the rights of the Controller, with particular reference to judicial defensive rights;

(ii) with your consent (section 7, GDPR), for the following purposes:

- organisation of events, conferences and workshops also for professional training;
- marketing and promotional activities of professional services, distribution of promotional materials, sending out of professional newsletters and publications;
- market surveys and questionnaires, also related to customers’ satisfaction.

For the purposes under par. (i) above, the collection of your personal data is necessary. In lack of the data or in case of any express refusal of consent to process such data may cause the impossibility to the Controller to perform the professional services contract or the possible violation of the competent Authorities requests.

For the purposes under par. (ii) above, the collection of your personal data is made on voluntary basis; consequently, you may decide not to provide us with any consent, or to waive it in any moment.

**(d) Processed Categories of Personal Data**

Within the purposes of processes mentioned under par. c) above, we shall exclusively process those personal data concerning, by way of example, your name and family name, tax code, VAT number, residence, domicile, work address, email, certified email address, phone and fax numbers, employer company, business role and / or position.

**(e) Categories of Personal Data Recipients**

The personal data you will submit us for the purposes mentioned under par. c), section (i) above, could be transferred to:

1. Employees and collaborators of the Controller, in their capacity of persons duly authorised to data processing;
2. Any third party subject, performing outsourced activities on behalf of the Controller, in their capacity of data processors;
3. Any judicial or controlling Authority, public entities (whether national or foreign ones);

Upon your express consent to processing the personal data for the purposes indicated under par. (c), section (ii) above, data may be transferred to those subjects indicated under items 1), 2) and 3).

**(f) Storage and Transfer of Personal Data to Third Countries**

Personal data are processed and stored “on cloud” and on servers located within EU, belonging to or in the possession of the Controller and/or third party processors, as duly appointed.

Your personal data will not be subject to dissemination.

**(g) Personal Data Storage Period**

Personal Data provided for the purposes indicated under par. (c), section (i) above are processed and stored for the entire duration of the executed professional services contract.

As of the termination of such contractual relationship, for whichever reason or cause, personal data will be stored for the duration of the prescription terms applicable by the current accounting, tax, civil and procedural law, normally 10 years.

Personal Data provided for the purposes indicated under par. (c), section (ii) above are processed and stored for the time necessary for the performance of the same purposes and, anyhow, not later than 2 years from the date in which we will receive your consent.

**(h) Exercisable Rights**

In compliance with the provisions of GDPR, you may exercise the rights therein indicated and in particular:

- **Right of Access** – Obtain confirmation whether your data are processed or not and, in such a case, obtain information related, in particular, to: the purposes of such processing, the categories of the processed personal data, the storage period, the recipients to whom such data can be transferred (Section 15, GDPR);
- **Right of Rectification** – Obtain, without undue delay, the rectification of inaccurate personal data and to have incomplete personal data completed (Section 16, GDPR);
- **Right of Erasure** – Obtain, without undue delay, the erasure of your personal data, in the cases provided for by the GDPR (Section 17, GDPR);
- **Right to Restriction** – Obtain from the Joint Controllers the limitation to processing, in the cases provided for by the GDPR (Section 18, GDPR);

- **Right to Data Portability** – Receive your personal data as communicated to the Controller in a structured, commonly used and machine-readable format and obtain the transmission of such data to another controller without any hindrance, in the cases provided for by the GDPR (Section 20, GDPR);
- **Right to object** – Object to the processing of your personal data, unless the Controller have compelling legitimate grounds for the continuation of the processing (Section 21, GDPR);
- **Right to Lodge a Complaint with the Supervisory Authority** – Lodge a complaint to National Supervisory Authority for Personal Data Processing, B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, cod postal 010336, Bucuresti, Romania, email address: [anspdc@dataprotection.ro](mailto:anspdc@dataprotection.ro)

You may exercise such rights by means of a request to be sent by email to the Data Privacy Officer certified email address above indicated.

**(i) Processing Operations**

Your personal data are processed through the operations indicated in section 4, n. 2), GDPR - whether or not performed by automated means – such as: collection, recording, organisation, structuring, update, storage, adaptation or alteration, retrieval and analysis, consultation, use, disclosure by transmission, alignment or combination, restriction, erasure or destruction.

Whichever the way, it will guaranteed their security, logical and physical, and overall their confidentiality, adopting all necessary technical and organisational measures appropriate to guarantee the data security.