



Transilvania Investments

POLICY REGARDING THE PERSONAL DATA PROCESSING ACCORDING TO THE REGULATION (EU) 2016/679

Transilvania Investments Alliance carries out the processing of personal data in compliance with the legal provisions and under conditions that ensure the security, confidentiality and integrity, as well as the observance of the rights of data subjects.

Until May 24, 2018, the processing of personal data was carried out in accordance with the provisions of Law no. 677/2001, and starting on May 25, 2018, the applicable legal framework is represented by the provisions of Regulation (EU) 2016/679 *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* (General Data Protection Regulation - GDPR) and applicable national legislation, including Law no. 190/2018 on measures to implement Regulation (EU) 2016/679.

Transilvania Investments Alliance, in capacity as a personal data controller, is responsible these data to be:

- a) Processed legally, fairly and transparently to the data subject;
- b) Collected for specified, explicit and legitimate purposes and not subsequently processed in a way incompatible with these purposes;
- c) Appropriate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) Accurate and, where necessary, updated; all necessary measures must be taken to ensure that personal data which are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) Stored in a form that allows the identification of data subjects for a period not exceeding the period necessary to fulfil the purposes for which data is processed; personal data may be stored for longer periods as long as they are processed solely for purposes of archiving in the public interest, for scientific or historical research purposes or for statistical purposes, subject to the application of the appropriate technical and organizational measures provided for in this Regulation in order to guarantee the rights and freedoms of the data subject;
- f) Processed in a way that ensures the adequate security of personal data, including protection against unauthorized or unlawful processing and against loss, destruction or accidental damage by taking appropriate technical or organizational measures.

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R.C. J08/3306/1992

Autorizată A.F.I.A.:
Autorizație ASF nr. 40/15.02.2018

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Cod LEI (Legal Entity Identifier):
254900E2IL36VM93H128

Capital social:
216 244 379,70 lei

Nr. Registru ASF:
PJR071AFIAA/080005

Nr. Registru ASF:
PJR09FAIR/080006

IBAN B.C.R. Braşov:
RO08 RNCB 0053 0085 8144 0001

Societate administrată în sistem dualist

Transilvania Investments Alliance processes personal data for the fulfilment of legal and contractual obligations and only as an exception in cases where the consent of the data subjects is required, in which cases the company acts in accordance with the GDPR provisions.

Transilvania Investments Alliance does not process special categories of personal data as defined by the Regulation (EU) 2016/679.

Within the company, there are not automated decision-making processes, including profile creation, in relation to the data subjects.

Transilvania Investments Alliance ensures the information and access to personal data both when the data is collected from the data subject and when obtained from other operators.

The data subjects may exercise all their rights in relation to the company provided by the GDPR, namely rectification or deletion of personal data (except for the cases provided by law), restriction of processing or the right to object to processing, right to data portability, the right to withdraw the consent, as well as the right to file a notification with the national supervisory authority.

Transilvania Investments Alliance keeps a record of the personal data processing activities carried out under its responsibility and ensures the processing security by implementing appropriate technical and organizational measures such as:

- Pseudonymization and encryption of personal data;
- Ensuring the confidentiality, integrity, availability and continued resilience of processing systems and services;
- Ability to restore the availability of personal data and timely access to personal data in case a physical or technical incident occurs;
- A process for testing, evaluating and periodically assessing the effectiveness of technical and organizational measures to ensure the processing security.

In the event of a data security breach, Transilvania Investments Alliance notifies the National Supervisory Authority for Personal Data Processing without undue delay and, if possible, in maximum 72 hours from the date on which the company became aware of it, unless the notification is likely to generate a risk to the rights and freedoms of natural persons.

The Company keeps records of all data security breaches, consisting in a description of the factual situation in which the data security breach occurred, its effects and the remedial actions taken.

Should the data security breach be likely to generate a high risk to the rights and freedoms of natural persons, the Company informs the data subject about such breach without undue delay, with the observance of the legal provisions.

Transilvania Investments Alliance designates a Data Protection Officer (DPO), publishes his contact details on the Company's website and communicates such information to the supervisory authority. The data subjects may contact the Data Protection Officer for all matters relating to the processing of their personal data and the exercise of their rights.

Transilvania Investments Alliance uses an Integrated Information System that supports the optimal carrying out of all processes in the organization, ensuring the security, confidentiality and integrity of information, as well as the business continuity, in compliance with the legal provisions in force, as well as the specific working procedures.

Transilvania Investments Alliance implemented and certified the requirements of the Information Security Management System, in accordance with the requirements of ISO/IEC 27001 Standard.

Transilvania Investments Alliance has implemented and certified, starting with 2012, the Information Security Management System, in March 2021 the Company being audited in view of re-certification in accordance with ISO/IEC 27001:2017 Standard.

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