



Personal Data Processing Policy

In accordance with the changes and amendments introduced by Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data ("**GDPR**"), we hereby inform you, through this Personal Data Processing Policy ("**Data Processing Policy**" or "**Policy**"), regarding:

- **Who we are**
- **What is personal data?**
- **What data do we process about you?**
- **How do we collect and process your data?**
- **How long do we retain your data?**
- **With whom do we share your data?**
- **When do we transfer your data outside the European Union or the EEA?**
- **What security measures do we ensure for the protection of your data?**
- **What are your rights and choices regarding the data we process?**

The same approach shall apply each time you visit or place an order on the website <https://farmaciacrisia.ro>.

This Data Processing Policy may be amended or updated at any time by Perla Warehouse S.R.L. (Crisia), whenever we consider that changes occur in the activities through which we process your data. Any such amendments will be published on our website, <https://farmaciacrisia.ro>.

WHO WE ARE?

Perla Warehouse SRL, persoană juridică de naționalitate română, înmatriculată la Registrul Comerțului sub nr. J40/13133/2015, având cod unic de înregistrare fiscală RO35168903 („Crisia” sau „Operator” sau „Noi”), este operatorul datelor tale și entitatea care îți furnizează, prin intermediul site-ului nostru sau direct din locațiile noastre fizice, produse farmaceutice.

You may contact us at any time at:

Address:

Calea Dorobanti, No. 111-131, Ground Floor, Sector 1, Bucharest, Romania

Sos. Mihai Bravu nr. 251 - 253, Sector 3, Bucharest

Phone number: +40 723 159 560

E-mail: contact@dposafety.ro

Crisia has appointed a Data Protection Officer. For any questions or concerns regarding this Policy, the manner in which Crisia processes your data, or your rights, you may contact us at the dedicated e-mail address contact@dposafety.ro or by post at the following address: Calea Dorobanti, No. 111-131, Ground Floor, Sector 1, Bucharest, Romania.

WHAT PERSONAL DATA DO WE PROCESS?

What constitutes personal data?

Personal data means any data or information that enables us to identify you either directly (for example, your first and last name) or indirectly (for example, based on the profile we create in order to send you personalized offers). Certain information may be less obvious (such as your shopping preferences and habits, or your computer's IP address), but when associated with you, it allows us to identify you and therefore falls within the notion of "personal data."

Crisia’s policy is to collect and process only the data necessary in order to provide you with the most pleasant experience when browsing or shopping on our website. In general, we process the following categories of data about you:

- 1. Account authentication and registration: username, e-mail address, password.
- 2. Careers section: first name, last name, e-mail, phone number, age, CV.
- 3. Ordering products available on the website: first name, last name, company name, country, address, city, county, postal code, phone number, e-mail, username, delivery address, bank account.
- 4. Ordering products based on magistral prescription: first name, last name, age, e-mail, phone number, possible personal data included in comments, physician's name, physician's specialty, place of prescription issuance, prescription, medical report, bank account; first name and last name of the animal owner, e-mail, phone number, observations, physician's name, physician's specialty, prescription, place of prescription issuance, medical report.
- 5. Product delivery through service providers required by law to ensure transport compliance (controlled temperature): first name, last name, delivery address, phone number, and e-mail.
- 6. Call center assistance: first name, last name, phone number, status/role of the person transmitting the message, personal data included in the subject and message, voice, and personal data provided through video recording.
- 7. Cookies: functional cookies, analytics cookies, and advertising cookies.

More specifically, the table below sets out the personal data (“Data” or “Personal Data”) that we collect directly from you, that result from your interaction with us, and that we or our partners process in order to provide the ordered products or to offer you various personalized offers when you browse or shop on our website, or when you use different devices (computer, tablet, or mobile phone).

Minors’ Data

Crisia processes minors' personal data only with the consent of the legal representative, when the medical prescription is issued for a minor.

MANNER OF PROCESSING YOUR PERSONAL DATA

Crisia collects and processes your data for the purpose of fulfilling the orders you place and delivering the products you request, improving your experience on our website, providing assistance and support when you use our website or customer account, or creating a customer profile in order to send you personalized offers (direct marketing).

The table below details the manner in which we process your data, the purposes, and the legal basis of the processing activities.

Purposes for which we collect and process your personal data	Personal data we collect and the manner in which we process it	Legal basis for the processing of personal data
Creation of your customer account	<p>We can create a customer account for you on our website only if you provide us with the following mandatory personal data, either (a) during the process of requesting the opening of a new customer account, or (b) when placing an order for the first time on our website (in which case we activate a customer account in order to fulfill your order):</p> <ul style="list-style-type: none">• username, e-mail address, and password.	<p>Consent</p> <p>For the purpose of identifying you as a customer.</p>
Purchasing on our website	<p>You may make purchases only if you have an active customer account, place certain products in the shopping cart, and subsequently submit an order.</p> <p>Each time you place an order, we will collect and process the following data:</p> <ul style="list-style-type: none">• first name, last name, company name, country, address, city, county, postal code, phone number, e-mail, username, delivery address.	<p>Performance of the contract</p> <p>In order to fulfill your orders, deliver the products to the indicated address / hand them over at the designated pick-up points, perform our warranty obligations associated with the products, or, as the case</p>

	<p>When we confirm your order or notify you that the products have arrived at the designated pick-up points, we will process:</p> <ul style="list-style-type: none">• your phone number and, where applicable, your e-mail address, in order to inform you about the status of your order / delivery. <p>If you expressly request this, we may deliver the ordered products and process and transfer your data to transport intermediation service providers (mandatez.ro) for the purpose of delivering the ordered products:</p> <ul style="list-style-type: none">• first name, last name, phone number, e-mail address, and delivery address.	<p>may be, process product returns.</p>
<p>Placing an order based on a magistral prescription</p>	<p>You may place an order for a medicinal product based on a magistral prescription by providing the following data:</p> <ul style="list-style-type: none">• first name, last name, e-mail address, phone number, order comments, physician's name, physician's specialty, place of prescription issuance, prescription and medical report (which may include data relating to minors, processed on the basis of the legal representative's consent), delivery address.• first name, last name of the animal owner, e-mail address, phone number, animal's name, animal breed, order notes, physician's name, physician's specialty, prescription, place of prescription issuance, medical report. <p>In the event that the order cannot be finalized or its cost is not accepted, the data will remain in an offer status and will subsequently be deleted.</p>	<p>Performance of the contract</p> <p>In order to fulfill your orders, deliver the products to the indicated address / hand them over at the designated pick-up points, perform our warranty obligations associated with the products, or, as the case may be, process product returns.</p>
<p>Payment of purchases / refund of payment in case of product return</p>	<p>Payment for purchases shall be made exclusively in cash.</p> <p>In the case of order returns, we collect and process:</p> <ul style="list-style-type: none">• the IBAN and the bank where you hold your account, in order to refund the payments made for the returned products.	<p>Performance of the contract</p> <p>To ensure that each customer has the possibility to return the purchased product, insofar as this is possible, and to obtain a refund of the payment made.</p>
<p>Delivery of products to you</p>	<p>We deliver the products to the address indicated, through transport intermediation service providers (mandatez.ro), with whom we share strictly the data necessary for the delivery of the products:</p> <ul style="list-style-type: none">• We will also process the same data for the purpose of handling your complaints.	<p>Performance of the contract</p> <p>Fulfillment of our obligations related to the management and delivery of the products to the customer, under the agreed conditions and timelines.</p>

	<p>If you collect the product from our pick-up points, in order to identify you we will compare the data from your identity document with those in the order (without retaining a copy of the identity document), namely:</p> <ul style="list-style-type: none"> • first name, last name, and date of birth. 	
Customer assistance and support	<p>In order to provide you with support regarding your customer account and the orders you place on our website, we will identify you by confirming:</p> <ul style="list-style-type: none"> • your first and last name, your e-mail address and phone number, and the order ID. • With your prior consent, we may process your voice from the recordings of telephone conversations with you in order to respond to your assistance requests. • We will also process the same data for the purpose of handling your complaints. 	<p>Performance of the contract</p> <p>Fulfillment of our responsibilities / activities during the performance of the contract</p>
Promotional campaigns, contests, promotions, or raffles	<p>For the contests organized on the website https://farmaciacrisia.ro/ or directly in our pharmacies, we collect:</p> <ul style="list-style-type: none"> • first name and last name, home address, phone number, e-mail address, and the fiscal receipt number. <p>We also organize contests on our official Facebook / Instagram pages, where, depending on the campaign, we collect the following data necessary for your participation in the contest and for the validation of winners through random.org:</p> <ul style="list-style-type: none"> • first name, last name and your e-mail address, or phone number. 	<p>Consent</p> <p>For the purpose of your participation in the contests organized by Crisia and the granting of the respective prizes.</p>
Newsletter subscription	<p>For the purpose of promoting Crisia's products and promotions, we may process the e-mail address directly from the data subject.</p>	<p>Consent</p> <p>For sending personalized offers or for promoting Crisia's products.</p>
Creation of customer profiles for direct marketing purposes	<p>Depending on your interactions and behavior on our website, we collect and process your data through our partners in order to create your customer profile, for the subsequent transmission of personalized offers ("personalized offers") via the communication channels chosen by you.</p> <p>For profiling purposes, we process the following data:</p> <ul style="list-style-type: none"> • first name, last name, e-mail address and / or correspondence address, and mobile phone number; • the online identifiers obtained from the device you use when browsing our website; 	<p>Consent</p> <p>For profiling and sending personalized offers through the communication channels to which you consent (SMS, e-mail, push notifications).</p> <p>More details on how we carry out profiling for direct marketing purposes can be found below in the "Profiling" section. You have the right to object to profiling at any time.</p>

	<p>When you visit our website, you may log into your customer account or not. We also collect, through cookies and with the help of your computer, phone, tablet, or other device (“the device”), information that allows us to identify you online (“online identifiers”), which we use for profiling for direct marketing purposes:</p> <ul style="list-style-type: none">• IP address; the internet browser you use and the version of your device's operating system; HTTP / HTTPS protocol data; the duration of your visit / activity on our website; the general location of the device (if geo-location is enabled) from which you connect. [Please note that most devices provide you with the option to disable geo-location services directly from the device settings]. <p>[“Cookies” – files that a server sends to your device, placed on our website or through the download / use of the mobile application. The purpose and manner in which we process cookies are detailed in the Cookie Policy available on the website.]</p>	
Online behavioral advertising	<p>Based on your browsing history and behavior on our website, monitored through cookies, we will provide you with online advertisements for some of our products that may be of interest to you. Based on information about your navigation on our website, we will place you into an interest group together with other customers with similar browsing behavior and will deliver advertisements (banners) to you based on those interests.</p>	<p>Cookie consent</p> <p>For the cookies that monitor your behavior on our website.</p> <p>If you do not wish to participate in cookie-based monitoring for the purpose of receiving online advertisements (banners) based on your interests, you may refuse the setting of such cookies by configuring your browser to generally disable the automatic setting of cookies. You may also disable cookies for the advertising services of a browser provider (e.g., Google) by setting your browser to block cookies from the respective domain.</p> <p>The option to opt out of online behavioral advertising will not stop the display of general advertisements that are not tailored to your interests.</p>
Offers based on custom audiences (customer lists)	<p>With your consent, we will use your e-mail address and mobile phone number to create encrypted customer lists (“hashed data”), and then use the encrypted data</p>	<p>Consent</p> <p>For sending personalized offers on Facebook (through the use of the</p>

	<p>from this list to match your data (together with that of other customers in an interest group) with the data of individuals on Facebook, in order to deliver personalized offers through targeted advertisements to your account on the platform where the respective campaign is carried out.</p> <p>Facebook and other promotional channels encrypt the hashed data, upload it to the social platform, and thus create an audience for us, using this hashed data exclusively for matching with the data from your social media account, without disclosing it to third parties (or other commercial advertisers), and it will be automatically deleted by Facebook immediately after the matching process.</p> <p>When you create a lookalike audience, you select a source audience (a custom audience created using a data partner, your pixel data, or the fans of the Crisia page), and Facebook or other social media channels identify the common characteristics of the individuals in that audience (for example, demographic information or interests). The platform then finds individuals who have similar (or "lookalike") characteristics.</p> <p>In addition, on our website we also use the services of social media channels for custom audiences created with the help of your pixel data. Through this service offered by Facebook, Instagram, TikTok, LinkedIn, and Google, we can identify that you clicked on our advertisement in the respective channel and were redirected to the Crisia website. The data collected through these channels are used exclusively for compiling statistics regarding the success and usage of our social media advertising campaigns.</p>	<p>custom audiences service based on customer lists).</p> <p>For more details regarding the purposes, methods of collection, and processing of personal data by Facebook, as well as for privacy protection settings on Facebook, you may consult Facebook's Privacy Policy and the Help Center for advertisers.</p>
Staff recruitment	<p>When you apply for a job opening at Crisia Pharmacy through our website, we will process:</p> <ul style="list-style-type: none">• first name, last name, e-mail address, phone number, age, and the data you provide in your CV.	
Maintenance and security of the website	<p>We use the following online identifiers for the maintenance and security of the Crisia website:</p>	<p>Legitimate interest</p> <p>Implementation, configuration, and</p>

	<ul style="list-style-type: none">• IP address; the internet browser you use and the version of the operating system of the device you connect from; HTTP/HTTPS protocol data; the location of the device (if geo-location is enabled) from which you connect to the Crisia website. <p>More specifically, we process your data for the following purposes:</p> <p>To ensure the proper functioning of the website, namely:</p> <ul style="list-style-type: none">• the correct display of the content of the Crisia website;• the retention of your authentication data (when you request it);• the improvement of the website;• the configuration of the device from which you connect/log in to meet the requirements of the Crisia website. <p>To ensure the security of the website and to make sure that we protect you against fraud or any IT security breaches concerning Crisia.</p> <p>The identification and remediation of malfunctions that prevent the use of our website or your customer account.</p>	<p>maintenance of the security measures of the Crisia website.</p>
Audit and reporting	<p>We process your data for the purpose of annual financial auditing, as well as for filing tax and accounting returns with the tax authorities.</p>	<p>Legal requirements</p> <p>For compliance with the legal obligations imposed by the applicable fiscal and accounting provisions.</p>
Video data processing within the perimeter, building access areas, and storage areas	<p>We process your data – video information – in the areas covering the perimeter defined by the company's property boundaries, public access areas, and storage areas, in the event that you enter our pharmacies to purchase products or collect ordered products, when you come to us for an active recruitment process, or for...</p>	<p>Legal requirements</p> <p>The processing is necessary for the fulfillment of a legal obligation pursuant to Law 333/2003, in conjunction with the Risk Assessment and Physical Security Risk Treatment Report.</p>
Defense of rights in court	<p>When defending our rights in court for the recovery of amounts due, or when protecting our interests against unfounded claims/complaints, we will process the data necessary for drafting statements of defense, written submissions, applications, and specific documents.</p>	<p>Legitimate interest</p> <p>The exercise of any defenses/rights before the courts of law, or before public authorities or supervisory/control institutions.</p>
Procedures, investigations, and those of the authorities and/or judicial bodies	<p>As an exception and in accordance with the law, we will provide the competent authorities, within the framework of formal procedures/investigations or other actions provided by law, and in compliance with the legal procedure, the following data: first name, last name, address, e-mail, phone number. Crisia will document any such actions.</p>	<p>Legal requirements</p> <p>For compliance with the specific legal obligations imposed by the applicable legal provisions regarding protection against fraud, money laundering, and terrorism.</p>

PROFILING FOR DIRECT MARKETING PURPOSES

When we send you personalized offers through direct marketing channels (SMS, e-mail, push notifications), we may use certain "profiling techniques," namely, a form of automated processing of your data consisting mainly of the analysis and interpretation of your personal data necessary to evaluate or predict certain aspects related to your shopping preferences and interests. For profiling purposes, the Company does not process sensitive data concerning sexual orientation, religious beliefs, or political affiliations.

Your shopping behavior and personal preferences result from your visit and/or purchase history, from your financial situation as reflected by the purchases you make, and from other personal interests you have provided to us, which may be common with those of other customers.

Specifically, the Company creates your customer profile as follows:

- based on your browsing behavior on the website;
- based on demographic data: age, gender, city;
- based on purchase history and monetary value.

We collect your data for profiling from sources such as our website and the advertising service providers with whom we collaborate.

We use profiling to communicate and present personalized promotional offers to you in a relevant and useful manner.

You will be able to modify your direct marketing preferences in your customer account on our website at any time after your registration as a customer, by indicating this option in your customer account.

You may object to profiling for direct marketing purposes on any of the communication channels to which you have previously consented, by withdrawing your consent through unsubscribing from the specific communication channel you had previously opted for. For more details, please see the section below entitled **"Your Rights and Options."**

HOW LONG DO WE RETAIN YOUR DATA?

Our Company processes your data for the period necessary to fulfill the purposes for which it was collected and in accordance with our personal data retention policy. In certain cases, some legal provisions may require or allow us to retain the data for a longer period.

The data retention period depends mainly on the following:

- the period for which we need your data in order to provide you with the requested products and to fulfill our obligations towards you, as well as for the purposes mentioned above in this Policy;
- if you have provided us with your data but the order has not been finalized for various reasons (e.g., we did not receive your approval for the proposed price, or the requested product was not in stock), we will delete your data after 30 days;
- if the order was successfully finalized, we will retain such data for a period of 10 years in accordance with Annex no. 1, Article (A), point 38 of Order 2635/2015 regarding financial-accounting documents;
- if you have an active customer account on the website, we will retain your data for as long as this customer account remains active, but no longer than 5 (five) years from the date of your last login to the account or your last order (without logging into the account); we will notify you before closing your customer account and deleting all data associated with it;
- if you have given your consent for data processing for a longer period, we will retain the data for the entire consented period, unless you withdraw your consent earlier;
- if legal or contractual obligations require us to retain your data for a specific period of time (for example, statutory limitation periods for the defense of our rights in court);
- data processed as a result of your job application at Crisia are kept for a maximum period of 1 year from the conclusion of the recruitment process, in order to demonstrate compliance with our legal obligations;
- video images processed through our CCTV system are retained for a maximum period of 30 days;
- data processed as a result of handling complaints and disputes are retained for a period of 5 years after the conclusion of the dispute;
- data processed as a result of performing an audit are retained for the duration of the audit, plus an additional period of 2 years, after which they are archived for a period of 10 years.

We will retain your data only for as long as you maintain a customer account and/or continue to make purchases on our website. If you deactivate your customer account and expressly request full deletion, the data associated with your customer account will be deleted or anonymized so that you can no longer be identified in our data records, except where we are required to retain your data for a longer period under the law or based on our legitimate interest.

In this way, we will ensure that you have full control over your personal data. We will collect and process your data again only if you provide it to us once more.

For the purposes for which you have given us your consent to process your data, as outlined in the table above, we will process your data for that specific purpose until you withdraw your consent regarding such processing, unless we are required to retain this data for a longer period under the law, for reporting to public authorities, or for defending our rights in court.

We inform you that we rely on your consent when processing your data in order to send you:

- personalized offers based on online behavioral advertising;
- personalized offers based on the profiling we carry out for direct marketing purposes, through communication channels such as SMS, e-mail, and push notifications.

*Consent – means your freely given, specific, and informed agreement by which you unequivocally accept that your data will be processed by Us for the purpose for which you have given your agreement.

WHO DO WE SHARE YOUR DATA WITH?

Your personal data may be transmitted to and processed by our trusted partners in order to provide you with products.

In order to provide you with the products ordered on the website, we will share your data with our trusted partners. We carefully select the partners and providers who, on our behalf, perform the operations supporting our activity. We only share with them the personal data necessary to carry out the specific activities entrusted to them.

When we outsource certain activities to our trusted partners, we make all reasonable efforts to verify in advance that they ensure the protection of your data through strict data security measures, and we will conclude data processing agreements with each of them.

More specifically, we transmit certain data to third parties (our suppliers and partners) for the performance of functions and services necessary for processing orders, such as:

- the provider that ensures our data storage services on external servers located in Romania;
- the Outlook e-mail provider;
- the provider of telephone exchange services;
- our administrative services provider;
- the provider of the application for managing warehouse operations and product pick-up points, or that helps us print and deliver invoices for products delivered in locations across Romania;
- the external accounting provider;
- our marketing services provider;
- our transport intermediation services provider (mandatez.ro);
- the mobile telephony services provider that helps us keep in touch with you, located in Romania;
- the provider of the platform for managing prescriptions submitted for compounding;
- our IT services provider – maintenance and support;
- third-party couriers authorized by us to deliver the products you purchased (Fan Courier, Cargus, DPD, TCE);
- the provider of collaborative tools for access to documents and information (Google Workspace);
- our marketing services provider.

We also share your data with our partners for marketing purposes.

In order to provide you with products tailored to your interests and preferences, we process certain data with some of our partners who help us deliver personalized offers, such as: (i) processing data through the Facebook platform to send you personalized offers via targeted advertising using the custom audiences function based on customer lists, or (ii) processing data to send you personalized offers based on online behavioral advertising carried out through Google AdWords. The manner in which Facebook or Google process your data is presented in the table within this Data Processing Policy.

Transfer of data to public authorities, institutions, or judicial bodies

We may transmit some of your personal data to the competent public authorities or institutions when required by law (e.g., fraud investigations, prevention of money laundering, filing of tax returns or financial statements with the tax authorities, etc.), or we may transmit such data to the courts when defending ourselves in legal proceedings, or before other public authorities.

WHEN DO WE TRANSFER YOUR DATA OUTSIDE THE EUROPEAN UNION OR THE EEA?

As a rule, your data is not stored in a country outside the European Union or the European Economic Area ("EEA").

However, some data may be transferred to our partners who help us operate the website and who may be located outside the European Union. With each of these partners, we have made reasonable efforts to ensure that adequate data protection measures are in place.

For example, if one of our service providers is located in the United States (outside the EU), we would work with them only after verifying whether they hold the EU–U.S. Privacy Shield certification (non-HR section), thereby ensuring an adequate level of data security as recognized by the European Commission.

If we transfer your data to other partners/providers located in countries that do not ensure an adequate level of protection for the transmitted data, we undertake to take all necessary measures to ensure that such partners/providers comply with the terms and conditions set forth in this Policy. These measures may further include the implementation of data protection standards (e.g., ISO 27001), standard contractual clauses adopted by the European Commission, as well as direct control systems over such mechanisms.

HOW DO WE ENSURE THE SECURITY OF YOUR DATA?

Our Company ensures the necessary technical and organizational measures for the secure collection, processing, and storage of data, including against unauthorized access, unauthorized use of data, or the destruction, loss, or alteration of data. We are committed to keeping your personal data safe and take all reasonable protective measures to achieve this.

We implement systematic training processes for the persons responsible for IT security, as well as monitoring and auditing of IT systems and infrastructure security, in accordance with our Company's internal policies.

In addition, we make all reasonable efforts to ensure (including through the contracts concluded with them) that our trusted partners also implement appropriate technical and organizational measures for the processing of the data we share with them.

WHAT RIGHTS AND OPTIONS DO YOU HAVE REGARDING YOUR DATA?

We want to ensure that you have full control over your data at all times and that you can effectively exercise the rights and options you have under the GDPR.

To ensure that you have effective control over your data, we inform you that you have the following options based on the technologies available to you:

- you will be able to delete cookies or your browsing history from the settings of the Crisia website; in addition, you may choose to adjust the settings of the browser you use in order to restrict the tracking of your behavior on our website through cookies (however, such restrictions may affect your browsing experience);
- social media platforms and search engines (e.g., Google or Facebook) give you the possibility to manage various options regarding how you choose your data to be processed.

In addition to these options, the GDPR grants you, as a data subject, the rights described below. Before complying with any request regarding your rights, we will ensure that you are the holder of the data for which you choose to exercise these rights, and for this purpose we may request certain information/data to verify your identity, or we may ask for further details about your request. The correspondence we exchange with you may be retained to ensure that we keep records of the requests and responses regarding your rights.

Right to be informed. You have the right to receive clear, transparent, easily understandable, and easily accessible information regarding how we process your data, including details about your rights as a data subject. This information about the data, the purpose, and the manner in which we process your data is also included in this Policy.

Right of access to data. You have the right to access the data we process about you, without any charge for the first provision of such data. If you require additional copies of the data already provided, we may charge a reasonable fee taking into account the administrative costs of providing the data. We reserve the right to refuse excessive, repeated, or unjustified requests. To exercise your right of access, you may send your request to us at: E-mail: contact@dposafety.ro

Right to rectification. If you identify that the data we process about you is incorrect, incomplete, or inaccurate, **you may send a rectification request to the following e-mail address:** contact@dposafety.ro

Right to object to direct marketing. You may object to and unsubscribe from our direct marketing communications at any time. You can easily do this by clicking on the "unsubscribe" link in any e-mail we send you, or by sending an e-mail to: contact@dposafety.ro

Withdrawal of consent (through unsubscribe or written request) does not affect the lawfulness of processing based on consent prior to its withdrawal.

Right to object to processing based on legitimate interest. You may object at any time to any data processing where we rely on our legitimate interest. Please refer to the section "What is the legal basis for data processing?" in the table above to identify the situations where our processing is based on legitimate interest. You may exercise this right in writing by sending a written request to the following e-mail address: contact@dposafety.ro

Right to erasure (right to be forgotten). You have the right to request the deletion of your data in any of the following situations:

a) the personal data are no longer necessary for the purposes for which we previously processed them;

b) you withdraw the consent on which we processed your data and there is no other legal basis on which we can rely for future processing;

c) you object to the processing of your data when we process data for direct marketing purposes;

d) you object to the processing of data based on our legitimate interest and we are unable to demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms;

e) the personal data are processed unlawfully;

f) the personal data must be erased in order for us to comply with our legal obligations. This is not an absolute right. We may refuse your request for erasure if: (i) we are required to comply with legal obligations to retain the data; or (ii) the data are necessary for the establishment, exercise, or defense of our legal claims. You may exercise this right in writing by sending a written request to the following e-mail address: contact@dposafety.ro

Right to restriction of processing. You have the right to obtain from us the restriction of processing of your data in any of the situations described below.

(a) the accuracy of the data is contested by you (the data subject), for a period enabling us to verify the accuracy of the data;

(b) the processing of the data is unlawful and you (the data subject) oppose the erasure of the data and request the restriction of their processing instead;

(c) we no longer need your data, but they are requested by you (the data subject) for the establishment, exercise, or defense of legal claims;

(d) you (the data subject) have objected to the processing of data based on our legitimate interests, pending the verification of whether our legitimate grounds override those of the data subject (i.e., yours).

You may exercise this right in writing by sending a written request to the following e-mail address: contact@dposafety.ro

Right to data portability. When we process your data based on consent or the performance of a contract, and in an automated manner, you have the right to request the transfer of your data: (i) to yourself, or (ii) to another controller indicated by you. The second situation means that you have the option to request us to transmit the data associated with your customer account to another data controller (e.g., to a controller operating another website that sells pharmaceutical products). More specifically, you may request only the portability of personal data that you have actively and directly provided to us (excluding any data derived or created/developed by Crisia, such as, for example, a customer profile). **You may exercise this right in writing by sending a written request to the following e-mail address: contact@dposafety.ro. We will transmit your requested data as specified here** in a structured format that allows data re-use (e.g., in XML, JSON, CSV format).

Right to lodge complaints with the supervisory authority. You have the right to lodge any complaints with the National Supervisory Authority for Personal Data Processing ("A.N.S.P.D.C.P.") regarding the manner in which we process your personal data. However, we hope that you will decide to discuss with us first, before lodging any complaints with the A.N.S.P.D.C.P. The protection of your data is very important to us, and we will take all necessary measures to resolve any issues regarding the control and security of your data. You may also contact the A.N.S.P.D.C.P., the data protection supervisory authority in Romania, with any questions. You can find certain guidelines and information regarding your rights on the authority's website: <http://www.dataprotection.ro/>.

QUESTIONS AND REQUESTS REGARDING DATA PROTECTION

Our Company is at your disposal for any questions, clarifications, or details you may need regarding this Data Processing Policy.

You may also contact us for any suggestions or comments regarding this Policy or the way we collect and use your data, using the DPO contact details provided below.

Our Company has appointed a Data Protection Officer (DPO), whom you may contact regarding any matter related to the processing of personal data, at the following contact details:

Data Protection Officer (DPO)

Address: Str. Pastorului 48-50, Sector 2, Bucharest

E-mail: contact@dposafety.ro

WHEN IS THIS POLICY UPDATED

This Data Processing Policy is subject to changes and is supplemented by Crisia's other specific policies, namely: (a) the Data Processing Policy through CCTV systems and (b) the Cookie Policy, both available on our website.