



APPROVED

GENERAL MANAGER

DORU VIJIANU

PRIVACY POLICY

THIS POLICY IS THE PROPERTY OF ZIPPER SERVICES

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Edition history			
Edition	Date and description of the change	Done	Approved
1	09.02.2022 – First edition	Mirela Ojog	Judit Fekete
2	05.06.2023 – Update	Mirela Ojog	Judit Fekete



1. General

This privacy statement explains all aspects regarding the processing of personal data and ensures compliance with all principles regarding processing, established by the legislation in force, as well as by Regulation (EU) 679/2016 (GDPR), performed by Zipper Services as a Trust Service Provider according to Regulation no. 910/2014 on the electronic identification of and trust services for electronic transactions on the domestic market (hereinafter referred to as the "**Company**"), headquartered in Cluj Napoca, str. Fabricii, nr. 93-103, jud. Cluj. registered with the Trade Registry under no. J12/ 3166 / 2004, having CUI 16723187.

For us, ZIPPER SERVICES SRL, the protection of personal data is very important. In this regard, we undertake to pay increased attention to how we process personal data (hereinafter referred to as "data"). This Policy provides full details on how data is processed following the completion of the application and consent for the provision of time stamping services.

This confidentiality agreement explains all aspects regarding the processing of personal data and ensures compliance with all principles regarding processing, established by the legislation in force, in particular by Regulation (EU) 679/2016 (GDPR), activities performed by the company as **Processor** (during the execution of contracts with its clients), **respectively Controller** (quality that the Company has for the period of 10 years in which data are kept in order to comply with the applicable legislation in force, Regulation (EU) no. 910/2014 eIDAS.)

In any processing carried out totally or partially by automated means, as well as in the processing by any means other than automated of personal data that are part of or intended to be part of a data filing system, we assure you that your data are:

- Processed lawfully, fairly and transparently;
- Collected for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered incompatible with the original purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Accurate and, where necessary, updated, we will take all necessary measures to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Kept in a form that allows your identification for a period that does not exceed the period necessary to fulfill the purposes for which the data are processed; personal data will be stored for longer periods to the extent that they will be processed exclusively for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;
- Processed in a manner that ensures adequate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Our services are dynamic and we frequently introduce new functionalities, which may require the collection of new information. If there are changes in data processing, we will update this Privacy Policy accordingly.

2. For what purpose do we process personal data?

The main purpose for which we process your personal data is to provide you with **access to temporary trademark services in accordance with agreed contractual requirements.**

If we intend to further process your personal data for a purpose other than that for which they were collected, we will provide you, prior to this further processing, with information on the purpose of the processing and any relevant additional information requested by you that includes:

- The period for which personal data will be stored according to the criteria used to determine this period;



- The existence of the right to request from us regarding your personal data, access to them, their rectification or erasure or restriction of processing or the right to oppose processing, as well as the right to data portability;
- When processing is based on your consent to the processing of personal data for one or more specific purposes, the existence of the right to withdraw your consent at any time, without affecting the lawfulness of the processing carried out on the basis of consent before its withdrawal;
- The right to lodge a complaint with a supervisory authority;
- If the provision of personal data is a legal or contractual obligation or an obligation necessary for the conclusion of a contract, as well as if you are obliged to provide such personal data and what are the possible consequences of non-compliance with this obligation;
- The existence of an automated decision-making process including profiling, pertinent information on the logic used and on the importance and envisaged consequences of such processing for your person.

3. What legal basis do we use to process your personal data?

Your personal data is used to **provide time stamping services** to users/subscribers, in **accordance with the contracts concluded in this regard**.

We also have a **legal obligation to keep data for 10 years** from the expiry date of the qualified digital certificate, according to the applicable legislation in force, Regulation (EU) no. 910/2014 (eIDAS). After the expiry of the archiving term, the data will be irreversibly deleted. Applications for obtaining /renewing uncompleted certificates shall be prepared for the entire period of time mentioned above.

4. What types of data do we collect?

We collect data to operate efficiently and provide you with the best experiences related to our products/solutions/services.

In order to fulfill the purpose defined above, we need certain personal data from you, as follows: **name and surname, email address, telephone number**, contained in the Application and agreement for the provision of time stamping services.

Failure to submit this information will make it impossible to register the request;

5. How long do we store personal data?

We store your personal data for as long as necessary to provide the products/services/information you have requested or we store your personal data. personal information for other essential purposes, such as complying with legal obligations, resolving disputes and enforcing our agreements.

In order to achieve the above-mentioned purposes, personal data will be processed by Zipper Services throughout the contractual relationship and after its completion in order to comply with the applicable legal obligations in the field, including, but not a limitation to archive provisions.

We have a legal obligation to preserve data for 10 years from the expiry date of the qualified digital certificate, according to the applicable legislation in force, Regulation (EU) no. 910/2014 (eIDAS). After the expiry of the archiving term, the data will be irreversibly deleted. Applications for obtaining /renewing uncompleted certificates shall be prepared for the entire period of time mentioned above.



6. Where do we transmit personal data?

Confidentiality is very important for Zipper Services, in this regard we do not disclose personal data belonging to a subject, except for situations:

- audit service providers;
- certification service providers;
- the supervisory body according to the applicable legislation;
- public authorities and institutions on the basis of public law obligations;
- lawyers to represent us in case of litigation or for your advice, bailiffs to judge for contractual communication or enforcement of possible thieves, judges, debt recovery firms;
- contractual partners of Zipper Services (courier companies, etc.),
- and in any other situations justified with your prior knowledge, but only in order to fulfill the purpose mentioned above and to protect with priority the rights of the data subject.

Personal data are not transferred to other companies / entities in other countries outside the EU / EEA, if this situation occurs you will be informed in this regard.

7. How do I choose to be informed?

Our company and brands want to communicate with you only if you want to.

Communication between us and you can be achieved through:

- Phone including SMS
- Electronic mail (e-mail);

8. How do we protect children's data?

We are concerned about children's privacy and safety when using the Internet. We will never knowingly ask for personally identifiable information from individuals under the age of 16 without verifiable parental consent. Our websites and services are intended for an audience over the age of 16 and are not intended for children.

9. What security measures have we adopted?

We guarantee that the processing of your data is carried out in conditions of legitimacy, while implementing appropriate technical and organizational measures to ensure the integrity and confidentiality of data according to Regulation (EU) 679/2016 (GDPR).

The company has implemented a personal data security policy, which is confidential for security reasons. We assure you that the processing of your data is carried out by personnel trained in this regard, at the highest standards of confidentiality.

We do our best to provide you with a safe and convenient experience when accessing the company's websites. We have physical, electronic, contractual and managerial safeguards in place to help protect the security and confidentiality of your personal data.



10. What are your rights?

According to the legislation on personal data protection, you benefit from the following rights:

- **Right to information**

Data subjects have the right to be informed about how organizations process their data;

- **Right of access to data**

The data subject has the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are processed and, if so, access to those data;

- **Right to rectification**

If personal data are inaccurate, the data subject has the right to request the correction and completion of incomplete personal data on the basis of the information he provides;

- **Right to erasure ("right to be forgotten")**

The data subject has the right to obtain from the controller the erasure of data if one of the following reasons applies:

- The data are no longer necessary for the purposes for which they were collected or processed;
- It was withdrawn;
- The person concerned opposes the processing (Right of objection);
- The data has been processed illegally;
- The data must be deleted in order to comply with a legal obligation of the Controller;
- Grants were collected in connection with the provision of information society services to a child;

With the specification that data will not be deleted if:

- the data are necessary for the fulfilment of a legal obligation;
- for archiving purposes and in the public interest;
- for establishing, exercising or defending a right in court.

- **The right to restrict processing;**

The data subject has the right to obtain from the controller the restriction of processing where one of the following applies:

- The data subject has contested the accuracy of the data, for a period that allows the controller to verify the accuracy of the data;
- The processing is unlawful and the data subject opposes the deletion of personal data, requesting in return the restriction of their use;
- The Controller no longer needs the personal data for processing, but the data subject requests them for the establishment, exercise or defense of a right in court;
- The data subject has opposed the processing in accordance with his right to object for the period of time in which it is verified whether the legitimate rights of the Controller prevail over those of the data subject;

- **The right to data portability;**

The data subject shall have the right to receive personal data concerning him or her which he or she has provided to the controller in a structured, commonly used and machine-readable format and shall have the right to transmit such data to another controller without hindrance from the controller, if:

- The processing is based on consent or is necessary for the performance of a contract
- It is carried out by automatic means.



- **Right to object;**
At any time, the data subject shall have the right to object, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her, including profiling on the basis of those provisions.
- as well as **the right not to be subject to an automatic individual decision, including profiling.**
The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning the data subject or similarly affects him or her.

For further details regarding the processing activities carried out by the company, as well as regarding the rights you benefit from in this context, please send a request in electronic format, by e-mail to dpo@ezipper.ro or on paper at the address in Bucharest, B-dul. 1 Decembrie 1918, nr. 1G, sector 3.

Your request will be reviewed and answered within 30 days of receiving your request. In the case of complex or very numerous applications, this period may be extended by two months.

Equally, you have the right to address to the supervisory authority for Personal Data Processing (ANSPDCP), based in B-dul G-ral. Gheorghe Magheru 28-30, sector 1, postal code 010336, Bucharest, in accordance with the ANSPDCP procedure for solving complaints available on the Authority's website (www.dataprotection.ro). You are also granted the right to go to court to defend any rights guaranteed by applicable legislation in the field of personal data protection, which have been violated.

CONTACT DETAILS OF THE DATA PROTECTION OFFICER

You can contact the Data Protection Officer appointed by the company, DPO: tel: +40 747 055 703 / +40 213 404 638, E-mail: dpo@ezipper.ro.