

POLICY/REGULATION
concerning the Processing of Personal Data
SOCIETATEA ROMANA DE CHIRURGIE METABOLICA

The document you are reading presents you the policy of ASOCIATIA SOCIETATEA ROMANA DE CHIRURGIE METABOLICA (referred to in this Regulation as "SRCM") concerning the collection and management of personal data, as these procedures are regulated by the Regulation (EU) 2016/679 applicable since 25 May 2018, regarding the protection of persons regarding the processing of personal data and regarding the free movement of such data.

For any questions or concerns regarding the terms used below or any other issues related to how we understand the confidentiality of your data, please contact us at the following address office@rsms.ro

Through the online platform and the provided services, "SRCM" processes personal data for the sole purpose of performing the services undertaken in accordance with its object of activity with each contractual partner. In this regard and pursuant to the provisions of the Regulation (EU) 2016/679 concerning the protection of individuals with regard to the processing of personal data and the free movement of such data, "SRCM" has the duty to comply with all its obligations under the applicable legislation concerning the protection of persons with regard to the processing of personal data and the free movement of such data and any other regulations of Romanian or European law regarding the protection of personal data.

For this purpose "SRCM" adopts this Policy concerning the Processing of Personal Data, through which it informs the data subjects that it undertakes to maintain strictly confidential all the collected Personal Information and will not disclose the personal information, except to its employees and contractors who work at its headquarters, who need this information to facilitate the access of data subjects to the requested services or to perform the services contracted with its beneficiaries. The employees and contractors of "SRCM" have been trained and guided to maintain the confidentiality of this data.

At the same time, "SRCM" will not disclose, transmit or make available to third parties personal information unless such disclosures, transmissions or making available to third parties have been approved through the consent of the persons whose data is processed.

Through implementing necessary measures from an operational, technical and organizational point of view that are required for the protection of personal information against accidental or illegal destruction, modifications and disclosures or unauthorized access to personal data, "SRCM" guarantees the security of this data and eliminates any risks resulting from the disclosure of personal information.

"SRCM" regularly monitors the efficiency of personal data protection and security standards, constantly evaluating and adapting to possible risks that could alter the integrity, security or confidentiality of personal information. Also, "SRCM" ensures the observance of data security programs and procedures by its employees and contractors.

Main rules concerning the processing of personal data

Data collection

For the purpose of collecting personal data, "SRCM" designates authorized users for the operations of collecting, entering and storing personal data in an informational or physical system, on paper.

Any modification of personal data is made only by authorized users designated by "SRCM".

"SRCM" applies measures for the information system to record who performed the modification, the date and time of modification.

Data storage

"SRCM" will store the personal data only for the period of achieving the purpose of the processing and only for their use for the purpose for which they were collected.

Upon the expiry of the term for storing the data for processing purposes, personal data will be deleted, destroyed or may be transformed into anonymous data when they can be used for statistical or scientific purposes.

Access to personal data

The access to personal data stored in the information system will be restricted and allowed only to those persons who hold an access password or who have been designated as authorized persons of the operator. For the access on the physically archived personal data, in the form of printed documents, "SRCM" allowed access to these data only to the persons specially empowered in this respect.

The access will be allowed only for the purpose of fulfilling the service tasks that are related to the need to use the personal data.

"SRCM" secures the access to operating systems and applications, as well as prohibiting remote access to and from its systems by disabling remote communication at the operating system level if there is no need for an operation by rigorous access control through approvals, regular inspections of logs and performed operations.

Execution of backups

"SRCM" performs backups of personal databases, as well as of programs used for automated/electronic processing. Users who perform these backups are called "SRCM" in a limited number.

Backups are stored in different places than those where personal data used in the current activity is stored.

The access to backups is monitored.

Training of personnel

During the meetings for user training, "SRCM" informs users about the provisions of Regulation (EU) 2016/679 for the protection of individuals with regard to the processing of personal data and the free movement of such data, the minimum security requirements of processing of personal data, as well as concerning the risks involved in the processing of personal data, depending on the specifics of user's activity.

Users from "SRCM" who have access to personal data are instructed concerning the confidentiality of such data and are obliged to respect the secrecy of such data.

Pursuant to the provisions of Regulation (EU) 2016/679 concerning the protection of individuals with regard to the processing of personal data and concerning the free movement of such data, the data subjects benefit from: the right of access and intervention (rectification) on the data, the right of opposition to data processing, the right to request the transfer of data to other organizations, the right to request the deletion of collected data.

"SRCM" maintains continuously informed concerning the legal requirements for the processing of personal information, and the processing process used by the operator is in accordance with the laws and regulations in force regarding confidentiality and security.

Protection of data

The confidentiality and protection of personal data or information collected from applicants/partners/users/members are of great importance to us, and in this regard "SRCM" does not provide this collected data to third parties without the express and prior consent of each applicant.

Thus, "SRCM" will not disclose any personally identifiable information about natural persons/applicants/partners/users/members to third parties without first receiving the express consent of users in this regard.

At the same time, however, "SRCM" may disclose personally identifiable information when expressly provided by law or when necessary to protect the rights and interests of "SRCM".

Right of persons

"SRCM" guarantees that it respects the rights regarding the protection of personal data.

The applicants/partners/users/natural persons members of "SRCM" will always have the **right of access** to the collected data. If "SRCM" is requested to confirm whether or not we process a person's personal data, we will be obliged to confirm that we process personal data or do not process that applicant's personal data. "SRCM" will allow the access to the personal data of the applicant if we are asked to confirm the processing of personal data. In this situation, it will be possible to provide a copy of the processed personal data.

The applicants/partners/users/natural persons members of "SRCM" will have the **right to rectify** their personal data. The right to obtain the rectification of personal data that are inaccurate includes only personal data concerning that applicant. "SRCM" will rectify the personal data if it processes the personal data of the applicant and the personal data are inaccurate.

The applicants/partners/users/natural persons members of "SRCM" will have the **right to delete** personal data. "SRCM" will delete personal data without undue delay, if it is requested to delete the personal data of an applicant and those data are processed by "SRCM".

The applicants/partners/users/natural persons members of "SRCM" will have the **right to obtain the restriction** of the processing of their personal data. The right to obtain restrictions concerning the processing of personal data does not include anonymous data and includes only the personal data concerning that applicant or which may be clearly linked to that person. "SRCM" will restrict the processing of personal data if it has been requested to restrict the processing of personal data.

Transfer of personal data outside the EU or EEA

"SRCM" does not transfer personal data to countries outside the EU or EEA or to international organizations.

How can you contact us

In order to contact "SRCM" or to communicate with us about the exercise of personal rights regarding the protection of personal data we accept only written requests because we cannot deal with verbal requests immediately, without first analyzing the content of the request and without first identifying the applicant. The applicant's application must contain a detailed and precise description of the right he/she wishes to exercise as well as his/her identification data. The use of the information in the applicant's application is limited to the activity of confirming the identity of the applicant and will not generate a storage of personal data more than it is necessary for this purpose.

Applicants will be able to send any request regarding the protection of their personal data to office@rsms.ro. If "SRCM" receives a request regarding the exercise of the rights regarding the protection of personal data of a data subject, the Company will reply to this request within 30 days under the conditions provided by EU Regulation no. 679/2016.

The applicant will receive the reply to the request aimed at protecting his/her personal data at the email address mentioned in the request. "SRCM" has designated a person responsible for processing requests regarding the protection of personal data. At the same time, "SRCM" has implemented policies to ensure the fact that a request for the protection of personal data is recognized and resolved within the time limits provided by law. "SRCM" will inform the applicant about the way in which it manages his/her request (through which the rights are exercised) regarding the protection of his/her personal data.

Personal data registered through the website rsms.ro

What kind of information do we collect from applicants?

rsms.ro collects information from its users in the following ways: directly from the user, from the traffic reports registered by the servers that host the **rsms.ro** websites, as well as through cookies.

Information provided directly by the user:

When our applicants use a service provided by **rsms.ro**, they may be asked their name, their e-mail address and they may be asked for other personal information.

Information from the server's traffic report:

When an applicant visits a website, he/she reveals certain information about him/her, such as the IP address, the time of the visit, the place from which he/she accessed our websites. **rsms.ro**, like other operators, records this information for a certain period of time.

Cookies:

In order to offer a customized service to our users, **rsms.ro** may use cookies to facilitate the storage and tracking of the preferences of its applicants. For example, we may use cookies in order to identify its applicants and to provide information and services based on the preferences that each applicant has expressed in his/her previous visits. Also, third-party online advertising networks may use cookies in order to adapt the advertising messages according to the preferences of each applicant. Cookies are ".txt" files, provided to your browser by a web server and then stored on the hard disk of each applicant's computer. The use of cookies is a current standard on many of the important websites that applicants can visit. Most browsers are set to accept cookies. If applicants prefer this, then they will be able to reset the browser either to notify them whenever they receive a cookie, or even to refuse to accept cookies. However, you should be aware that some sections of our website will not be able to be viewed normally if the applicant sets the browser or rejects cookies.

It should also be noted that whenever personal information is voluntarily disclosed in the online communication environment, online forums, e-mail program, FTP program, discussion groups, chat services, the disclosed information may be easily collected and used by unauthorized persons. Although **rsms.ro** makes every effort to protect the personal information of each applicant, **rsms.ro** will not be able to ensure or guarantee the security of any type of information that applicants transmit, so that the transmission of information in an inappropriate environment is at the applicant's own risk. Also, the applicant must understand that he/she is solely responsible for maintaining the secrecy of information (passwords, usernames, etc.) related to the accounts he/she has acquired as a result of using the services offered by us.

How and when is the information used?

rsms.ro uses the information collected from applicants in several ways, depending on the type of information that is collected:

Information provided directly by the user: this information is used only for the purpose of customizing the provided services and verifying the identity of the applicant in order to facilitate the relationship between the applicant and "SRCM" following the use by the applicant of online services developed by us.

Information collected from the traffic report of the **rsms.ro** server: this type of information helps us to identify which sections of our websites are sections of interest to users. **rsms.ro** also collects the IP addresses of its users in order to securely manage our computer system, in order to avoid criminal activities and, last but not least, in order to communicate the anonymous typed templates of users to our advertising clients;

Information collected through cookies: **rsms.ro** uses cookies to allow applicants the most useful use of our services and in order to obtain statistical information that allows us to improve our services. Cookies (as defined above) will allow us to save access passwords and preferences of applicants so that they do not have to enter them again the next time they visit our websites.

How do we protect the information collected from applicants?

The confidentiality and protection of the information collected from applicants are of great importance to us. **rsms.ro** does not offer the collected information to third parties without the express and prior consent of each applicant. Any traffic statistics of our users, which we will provide to third party advertising networks or partner websites, is provided only as a set of data and does not include any personally identifiable information about any individual user.

Applicants' access to certain services and information within the website is password protected. It is recommended that applicants do not disclose this password to anyone. **rsms.ro** will never ask you for the

password of the applicants' accounts in unsolicited messages or telephone calls. So, applicants will be advised not to disclose this password to persons who request it. Applicants are also advised to close the browser window in which they worked at the end of their browsing on the websites or services provided by **rsms.ro**. These tips are intended to remove unauthorized persons' access to applicants' personal information or correspondence when working on a computer network in a public place (in Internet cafes, for example). Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. Consequently, despite our efforts to protect personal information, **rsms.ro** cannot ensure or guarantee the security of the information transmitted by each applicant to us, to and from our online services or our products. For this, our applicants are warned that any information sent to us will be at their own risk. However, we guarantee that we will make every effort to ensure their security in our systems, according to the security standards imposed by the Romanian legislation in force.

Who has access to the information collected from applicants?

As an exception to the cases set forth above, **rsms.ro** will not disclose any personally identifiable information about its users to third parties without first receiving the express consent of users in this regard.

At the same time, however, **rsms.ro** may disclose personally identifiable information when the law expressly provides so or when this is necessary to protect the rights and interests of **rsms.ro**.

As a conclusion, when our applicants access the **rsms.ro** websites and are asked to disclose information about them, this information will be disclosed only through the **rsms.ro** websites, unless that service or information is provided in partnership with another website or service.

However, each time such a service is provided in partnership with another website, applicants will be informed about this. In order to provide services to the highest possible standards, it is necessary to share personal information with the copartner website or service. If the applicants do not want this data to be shared with them, they will be able to proceed accordingly by not allowing the transfer of data, by not using that specific service.

In turn, if applicants choose to accept data sharing, they must be informed that the partners of the partnership service may have separate practices of confidentiality and data collection and **rsms.ro** has no control and cannot guarantee all legal aspects that the use of these independent privacy practices involves.

How can we correct errors in the data collected from our applicants?

If applicants create an account with one of our services, they may be sent a confirmation email with the details of their new account. The confirmation message will be sent to the provided email address and will describe the ways in which the applicant can modify or delete the account data he/she has just created. Applicants are advised to keep this confirmation email, especially as it also contains information that may be useful when problems arise in accessing our services.

Sharing information to third parties

The **rsms.ro** websites can use the services of some advertising companies to establish advertising targets and support advertising campaigns and other messages specific to the marketing activity. For this, the respective companies may collect anonymous data through cookies. To the extent that this happens, **rsms.ro** will include in its confidentiality agreement links to the confidentiality agreements of the partner advertising networks.

Contact data

The website **rsms.ro** is managed by ASOCIATIA SOCIETATEA ROMANA DE CHIRURGIE METABOLICA that may be contacted at the address:

85A Nicolae Caramfil str., ground floor, room 27
Bucharest – District 1