



PERSONAL DATA PROTECTION POLICY

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1. Introduction

SMART LEARNING SERVICES SRL, VAT code 48457440, Trade Registry No. J23/3940/2023, Headquarters Str. Gladiolelor nr 7 bl 1 ap. 10, sat Roșu, Ilfov county, Romania, zip code 077040 are personal data controllers.

(hereinafter referred to as "we" or "SMART") respects the confidentiality of your data and is committed to protecting the personal information we collect and process in accordance with EU Regulation 2016/679 on the protection of individuals with regard to the processing of personal data (GDPR).

In our activity, we collect, store and process personal information about customers, suppliers and other third parties and we recognize that the correct and lawful treatment of this data is the basis for trust in the company and will ensure the proper conduct of our activity, as follows

- We process your data exclusively for the delivery, improvement and guarantee of the services we offer
- Your data is stored safely in a secure environment
- Personal data is strictly confidential and will not be transmitted to third parties.

We use the data we collect for:

- Providing and administering the services, including to display personalized content and to facilitate communication with other users;
- Facilitating the technical operation of the services, including troubleshooting and resolving problems, ensuring services and preventing fraud and abuse;
- Processing registrations and orders for courses, products, services, etc. as well as communicating with you to answer your questions and requests.
- Sending administrative messages and information, including messages from trainers and facilitators, notifications about changes to our services and updates to our agreements;
- Sending information and messages about progress in courses, benefits, new services, new features, promotions, informative messages and other available courses (messages from which you can unsubscribe at any time);
- Solicit feedback and understand your needs with the help of analytics service providers;
- Identify unique users;
- Improve our services and develop new products, services and features;
- Analyze trends and traffic on the sites or promote our services on sites and applications.

This policy sets out the principles and procedures for collecting and processing your personal information.

Please read this text carefully so that you understand our practices regarding your personal information and how it is treated.

2. What data we collect and for what purpose

Personal data means any information about you that allows us to identify you, such as your name, contact details, order reference number, payment details and information about your access to our sites.

We may collect personal data from you when you book a place to attend events (directly or indirectly through our partners), when you create an account, when you use the websites and/or applications

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and other sites accessible through the website, when you participate in a survey or competition or when you contact us.

In the data processing process, we comply with good practice principles, which provide that your personal information must be:

- processed lawfully, fairly and in a transparent manner;
- processed for specified, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary;
- accurate and up-to-date;
- kept only for as long as necessary;
- processed in a manner that ensures appropriate security.

Personal data collected, used, stored and transferred includes, but is not limited to:

- Identity data (name, home address, email address, telephone number)
- Payment information
- Participation history, including information regarding your courses and services booked in connection with your courses;
- Information you provide about your participation preferences and those of your companions in SMART programs and courses;
- Information about your purchases of products and services;
- Information about your use of our websites and/or applications;
- Technical data, including IP addresses, your login details, browser type and version, time zone setting and location, plug-in types and versions, operating system and platform, and other technologies used on the devices you use to access our website;
- Data about how you use our website, products and services;
- Marketing data, such as your preferences for receiving information from us and third parties and your communication preferences.
- Communications you make with us or direct to us through letters, emails, chat services, calls and social networks.

We collect and process your personal data to provide services such as:

- online payment service providers
- analytics and advertising through Google Analytics

3. Sensitive Data

Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation, or certain types of genetic or biometric data is known as “sensitive data”.

In the course of our collaboration, we will not collect “sensitive data” about you.

4. What is the processing of personal data?

“**Processing**” means any operation or set of operations which is performed upon personal data or upon sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

5. Data Processing Principles

SMART undertakes to comply with the principles of personal data protection (hereinafter referred to as the “**Principles**”) set out in the GDPR, to ensure that all data are:

- Processed fairly, lawfully and transparently;
- Collected for specified, explicit and legitimate purposes;

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- Adequate, relevant and limited in relation to the purposes for which they are processed;
- Correct and up-to-date;
- Kept in a form which does not permit identification of data subjects for longer than is necessary in relation to the purpose of the processing;
- Processed in accordance with the rights of the data subject, in a manner that ensures adequate security of the processing, so that the data are intact, confidential and available.

6. How we collect data

We may obtain personal information by interacting with you, such as:

- by placing orders for services or products through our website;
- by subscribing to our publications or by delivering marketing materials;
- by corresponding with us by telephone, email, letters or in any other way;
- through automated technology when you interact with our website through the use of cookies and other similar technologies.

7. Purpose of using personal information

Your data may be used for the following purposes:

- We will only use your personal information where the law permits us to. Most commonly, we will use your personal information in the following situations:
 - you have given your consent;
 - we need to implement a contract that we are about to enter into with you or that is being performed;
 - for our legitimate interests or those of a third party, and your interests and rights do not override these interests;
 - to comply with a legal obligation (e.g. accounting requirements);

We will process your personal information only for the purpose(s) for which we collected it, unless we reasonably believe that we need to use it for another reason and that this reason is compatible with the original purpose. If we need to use your personal information for other purposes, we will notify you and explain the legal basis that allows us to do so. Please note that we may process your personal information without your knowledge or consent, in accordance with the rules above, when required or permitted by law.

We may also process your personal information in one or more of the following cases:

- To provide the products and services you request: we use the information you provide to perform the services you have requested in connection with your participation, including requested course changes;
- To contact you in the event of a schedule change or cancellation: we send you information about the services you have requested and any changes to these services. The information is not for commercial purposes and you cannot unsubscribe from it during the term of the contract;
- We use your payment information for accounting, billing and auditing purposes and to detect and/ or prevent any fraudulent activities;
- For administrative or legal purposes: we use your data for statistical and marketing analysis, systems testing, customer satisfaction studies, maintenance and development, or to resolve a dispute or claim.
- Security, health, administration, crime prevention/ detection: we may share your information with government authorities or law enforcement agencies to comply with legal requirements;

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- For Customer Service communications: we use your data to manage our relationship with you as a customer and to improve our services and your experience with us;
- To provide personalized services: we use your data to provide information that we believe is of interest to you before, during and after your participation and to personalize the services we offer you;
- Marketing: from time to time, we will contact you with information about promotional courses and ancillary products through online communications. You will have the option to unsubscribe from such communications by sending an email to office@smart-communication.ro.

We will not keep your data longer than is necessary to fulfil the purpose for which it is processed. To determine the appropriate retention period, we take into account the amount, nature and sensitivity of the personal data, the purposes for which we process them and whether we can achieve these purposes by other means.

How we process your personal data

- For the purpose of concluding and performing contracts – According to art. 6 para. 1 lit. b) of the GDPR, personal data may be processed for the purpose of concluding or performing the contract. In order to be able to offer you our products and services, we need to process your personal data.
- For the purpose of fulfilling legal obligations – According to art. 6 para. 1 lit. c) of the GDPR, personal data may be processed for the purpose of fulfilling legal obligations. We request a series of personal data, including, in certain situations, the personal identification number, in order to fulfil our obligations imposed by the tax authorities in relation to invoicing and reporting to the tax authorities.
- For marketing purposes – According to art. 6 para. 1 letter a) of the GDPR, personal data may be processed if the data subject has given consent to the processing of his or her personal data for one or more specific purposes. Thus, if you have subscribed to the Newsletter section, your personal data will be used for the purpose of sending you marketing messages, offers, news, future campaigns, invitations to various events. Your personal data will be deleted when you cancel your subscription to the Newsletter section. You can unsubscribe at any time via the link attached to the communications received or by a written request addressed to office@smart-communication.ro.

We must also take into account the periods for which it may be necessary to retain personal data in order to fulfill our legal obligations or to deal with complaints, inquiries and to protect our legal rights in the event of a claim.

When we no longer need your personal data, we will delete or destroy it securely. We will also consider whether and how we can minimize over time the amount of personal data we use and whether we can anonymize your personal data so that it is no longer associated with or identifies you, in which case we may use that information without further notice to you.

8. Your rights.

Under the GDPR, you have a number of rights in relation to the personal data that SMART processes:

- Right of free access to data processing – You have the right to access the personal data we hold about you, together with various information about why and how we use it, where we originally obtained the information and for how long we will use it;
- Right to rectification of data – You have the right to request that your Data be rectified if it is inaccurate or outdated and/or to complete it if it is incomplete.

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- Right to erasure of data (“right to be forgotten”) – In some cases, you have the right to obtain the erasure or destruction of your Data. This is not an absolute right, as sometimes we may be forced to retain your Data for legal or legitimate reasons.
- Right to restriction of processing – You have the right to request that the processing of your Data be restricted. This means that the processing of your Data is limited so that we can store the Data but not use or process it. This right applies in specific circumstances provided for by the General Data Protection Regulation, namely:
 - the information we hold about you is inaccurate;
 - the processing is unlawful and the data subject (i.e. you) opposes the erasure of the Data and requests the restriction of its use;
 - the controller (e.g. SMART) no longer needs the Data for the purposes of the processing, but it is required by the data subject (i.e. you) for the establishment, exercise or defence of legal claims;
 - a data subject (i.e. you) has objected to the processing based on legitimate grounds of the controller (in this case SMART), based on the verification whether the legitimate grounds of the controller (SMART) override those of the data subject (i.e. you).
- Right to data portability – You have the right to move, copy or transfer the data that interests you from our database to another. This only applies to data that you have provided, when the processing is based on your consent or on the basis of a contract and is implemented by automated means.
- Right to object – You can object at any time to the processing of your data when such processing is based on a legitimate interest.
- Right to withdraw consent at any time – You can withdraw your consent to the processing of your data when such processing is based on consent. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
- Right to lodge a complaint with the competent supervisory authority – You have the right to lodge a complaint with the data protection authority in your country of residence or domicile to challenge the data protection practices offered by SMART.
- Right to object to the processing of your data for direct marketing purposes – You can unsubscribe or opt out of our direct marketing communication at any time. You can do this by clicking on the “unsubscribe” link in any email or by sending an email to office@smart-communication.ro.
- Right to object to the processing of your data by us when we carry out actions in the public interest or in our own legitimate interests or those of a third party – You can object at any time to the processing of your data when such processing is based on a legitimate interest.
- Right to disable Cookies – you have the right to disable cookies. Internet browser settings are usually programmed by default to accept cookies, but you can easily adjust them by changing your browser settings.

You can exercise these rights, either individually or cumulatively, very easily, by simply sending a request to our headquarters in Roşu, str. Gladiolelor, no. 7, bl. 1, ap. 10, Ilfov county or by E-mail, to: alexandra@smart-communication.ro.

9. Data and processing security

SMART has adopted technical and organizational data processing measures, updated in accordance with the requirements of the GDPR, in order to protect your personal data against any unauthorized access, improper use or transmission, unauthorized modification, destruction or accidental loss.

We follow strict security procedures in the storage and disclosure of your personal data and to protect it against accidental loss, destruction or damage. The data you provide to us is protected using SSL

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(Secure Socket Layer) technology. SSL is the industry standard method of encrypting personal information and data, so that they are transferred securely over the internet.

All registration details are transmitted over an SSL connection and are stored in accordance with Data Security Standards.

We are continuously committed to implementing appropriate measures to protect your personal data against unauthorized access, loss or alteration.

All SMART employees and collaborators, as well as any third parties acting on behalf of SMART, are required to respect the confidentiality of your information and the requirements of the GDPR, in accordance with the provisions of this Policy.

10. What happens if you are unable or refuse to provide us with certain personal information

It is a contractual requirement that you provide us with certain information, namely your first and last name, personal identification number, address, telephone number and email address. During the ordering process, you will be asked to provide payment information to our chosen payment service provider. We do not retain any of your credit/payment card details. If you do not provide us with the information requested by us or the payment service provider, we may not be able to accept and process your request/order and/or we may cancel your order.

11. Cookies and Security

We use cookies to improve your experience on our website. By using our website, you agree to the use of these cookies in accordance with our cookie policy.

Cookies are small pieces of information sent from our website to the browser's "cookie" file on your computer's hard drive. Some files remain only for the duration of your visit (known as "session cookies"), while others remain after you have left the website to help us remember details about you, "persistent cookies"). Cookies are used for a number of reasons:

- to allow you to fill in information on our website pages without having to re-enter it manually.
- to monitor website traffic and analyse how our website is performing. This will allow us to make changes in the future and make it easier to use.
- to deliver relevant advertisements by displaying products and services that you may be interested in based on your most recent visit to our site.

We currently have an "implicit consent" policy. This means that by continuing to use our site, you agree to our use of the cookies listed above, unless you explicitly object. You have the option to accept or decline cookies by changing your browser settings. Most browsers allow the user to change the settings used for cookies. Also, some cookies that are not directly related to the site may actually be third-party cookies. As we cannot control these cookies, please check the third-party website for more information about their cookies. Additional information about changing your browser settings can also be found by visiting aboutcookies.org.

Disabling cookies will restrict your access to our site. If you have set your browser to disable all cookies, you will not be able to access many parts of the site. If your browser is set to ask when cookies are being used, you will need to answer "yes" when prompted. To opt out of being tracked by Google Analytics across all websites, visit tools.google.com/dlpage/gaoptout.

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Because we care about the security of your data, we have invested in a secure site, and for online payments, all details are encrypted using standard Internet encryption technology (TSL / SSL).

If a site is secure, when you are in the personal data/payment card entry area, a lock will appear in the lower right-hand corner of the screen. Occasionally, the lock will not be visible, but the page is still secure. If you do not see the lock, you can check by right-clicking anywhere on the page (except images) and selecting "Properties". If the URL starts with https://, the page is secure.

Third parties (including, for example, advertising networks and external service providers such as web traffic analysis services) may also use cookies, over which we have no control. These cookies may be analytics/ performance cookies or targeting cookies. You can block cookies by activating the setting in your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our website.

12. Processing of contact or registration forms

SMART will use the information you provide in the appropriate contact section on the site solely for the purpose of processing your request.

By providing any personal data through the SMART sites, you understand and agree that your data will be processed in accordance with the SMART policy.

Please note that in order to process your requests submitted in the registration section, we may, in certain circumstances, be obliged to transmit your data to partners with whom SMART collaborates and/ or other third-party service providers of SMART.

However, SMART has adopted appropriate technical and organizational measures to ensure the security of data transfer, as well as the processing in accordance with the GDPR requirements of your data by the aforementioned entities.

SMART undertakes not to process the personal data provided for any purpose other than that for which they were transmitted, except in situations where there is your express consent to use them for other purposes.

13. Disclosure of your data

We may share your personal data with third parties. For example, to confirm your orders, to resolve complaints, etc. In order to protect your privacy and to keep your personal data safe, we apply the following rules:

- we provide third parties only with the information they need to perform their specific services;
- we require all third parties to respect the security of your personal data, in accordance with the law;
- we do not allow our service providers to use your personal data for their own purposes, but to process it only for the purposes specified in the contracts concluded with them and in accordance with our instructions;
- we work closely with third parties to ensure that your privacy is respected and protected at all times;
- if we no longer use their services, any information about you obtained through us will be deleted or anonymized.

Examples of third parties we work with are:

- mailing services;
- behavioral analysis services (Google Analytics, etc.);

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- anti-fraud services;
- IT services;
- legal services;
- social media services;
- law enforcement – we may be required to disclose your personal data to the police or other enforcement, regulatory or governmental bodies, in your country of origin or elsewhere, at their request. These requests are assessed on a case-by-case basis and take into account the privacy of our customers.

14. Where we store your personal data

All information you provide to us is stored on our secure servers in Romania or the EU. We will take all steps reasonably necessary to ensure that your data is stored securely, including by taking the following measures:

- Network Security. We implement security and monitoring tools that restrict access and alert us to any unauthorized behavior on our network and systems;
- Data Transfers. All data transfers are performed using multi-layered security measures to ensure data integrity and confidentiality;
- Firewalls and Encryption. We apply standard firewall protection and use up-to-date encryption technology;
- Disposal Methods. Paper documents are disposed of in a manner that ensures confidentiality.
- Training. We ensure that our team is trained on the importance of data security.

15. How long will we keep your personal data

SMART may keep the processed data for different periods of time, deemed reasonable, in accordance with the purposes indicated above. We keep your data only for the period necessary to achieve the purpose for which we hold the data, to satisfy your needs or to fulfill our obligations imposed by law.

To know how long your data can be kept, we use the following criteria:

- When you purchase products and services, we keep your personal data for the duration of our contractual relationship;
- If you participate in a promotional offer, we keep your personal data for the duration of the promotional offer;
- If you contact us with a question, we keep your personal data for the period necessary to process your questions, but no longer than 5 years from the last correspondence sent;
- If you create an account, we retain your personal data until you request us to delete it or after a period of inactivity (without active interaction with us) defined in accordance with local regulations and guidelines. In this regard, we note that the data processed for this purpose will be deleted 5 years after the last interaction with the account user (such as logging into your account);
- If you have provided your consent for marketing, we retain your personal data until you unsubscribe or request us to delete it or after a period of inactivity (without active interaction), defined in accordance with local regulations and guidelines. In this regard, we note that the data stored in our databases for the purpose of direct marketing communications are deleted from the records of these databases 5 years after the last interaction with you;
- If cookies are stored on your computer, we keep them for as long as necessary to achieve their purposes (for example, for the duration of a session for shopping cart cookies or session ID cookies) and for a period defined in accordance with local regulations and guidelines. In this regard, we note that data processed through cookies used to provide online behavioral advertising, to personalize our services for



you and to enable the sharing of our content on social media sites (sharing buttons intended to display the site), will be kept for a maximum period of 5 years from their collection, based on your consent.

16. Opting out of marketing communications

You can ask us to stop sending you marketing communications by:

- using the unsubscribe link in our emails;
- sending an email to office@smart-communication.ro

17. Third-party links

Our site may include links to third-party websites, plug-ins, and applications. If you activate those links or enable these connections, it is possible that the third parties may allow the collection or sharing of data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our site, please read the privacy statement of each website you visit.

18. Privacy Policy Updates

We reserve the right to update this Privacy Policy periodically. Any changes will be posted on our website.

Please do not continue to use the SMART websites if you do not agree to such changes. We also recommend that you check this page for any updates.

If you have any questions or concerns regarding this Privacy Policy, we encourage you to contact us at alexandra@smart-communication.ro.

19. What data do we never store

The payment card data of the Customer/ User/ Buyer will not be accessible or stored by SMART, but only by the Transaction authorization institution or another entity authorized to provide card identification data storage services, about which entity the Customer/ User/ Buyer will be informed, prior to entering the data.

3D Secure means a new global approach to the authentication of buyers and sales in secure transactions on the Internet. This security measure involves redirecting the user at the time of payment to a secure page, where the registration of each cardholder is done by assigning an authorization code for each online transaction. The cards accepted for payment are those issued under the VISA (Classic and Electron) and MASTERCARD logos (including Maestro, if they have a CVV/CV2 code).

20. Updating data

If any of the information you have provided to us has changed, e.g. your email address, name or payment details, please let us know by sending an email to office@smart-communication.ro

21. Disclosure of Information

We comply with Romanian data protection laws. We take all necessary measures to prevent unauthorized access and use of your personal data. We are committed to keeping your data confidential and will only use it to provide you with products and services that are relevant to you. We would also like to send you information about special features of our website or any other services or products that we believe may be of interest to you. If you do not wish to receive emails, please send an email to office@smart-communication.ro with your email address and name.

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22. Your Agreement

By submitting your data, you consent to its use as set out in this policy. If we change our privacy policy, we will post the changes on this page so that you will be aware of the information we collect and how we use it at any time. Your continued use of the service will mean that you agree to any such changes. Due to the global nature of the internet infrastructure, the information you provide may be transferred to companies based in countries outside the European Economic Area who do not have similar protections for your information and its use as set out in this policy.

The advertisements on our site may be provided by another organisation. Our advertising partner will serve advertisements that it believes are most likely to be of interest to you, based on information about your visit to this site and other websites (this information is anonymous as it does not include your name, address, email address or telephone number). To do this, our advertising partner may need to place a cookie. For more information about this type of online behavioral advertising, about cookies, and how to disable this feature, please visit youronlinechoices.com

23. How can you contact us?

Questions, comments and requests regarding this policy are welcome and can be addressed to our team by writing to the address mentioned above or by sending an e-mail to office@smart-communication.ro.