
**Eurocom policy
on the processing of personal data**

External policy

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Identity and contact data of the operator of your personal data

Eurocom S.A. (Eurocom) is a personal data operator.

Eurocom S.A. has the registered office in the municipality Galati, 4 Maior Iancu Fotea street, is registered with the Trade Register under no J17/1812/1991, CIF (tax code) RO 1643888

The contact data of Eurocom S.A. are the following:

Bucharest, District 1, 11 Ion Câmpineanu street

Phone: +4 021 3112970

Fax: +4 021 3127674

Email: contact@eurocom.ro

Contact data of the responsible with the protection with your personal data

Eurocom has designated a person responsible for the protection of personal data who can be contacted at the e-mail dpo@eurocom.ro.

If you do not want to contact the personal data protection responsible by e-mail, any other type of correspondence may be used using the Eurocom contact details mentioned in par. 1 precedent.

Categories of personal data we process

Depending on the category of people you are part of, and depending on how your personal data is in our possession, we can process - in whole or in part - the following categories of personal data:

1. identification data (e.g. first name, name, phone, email, etc.)
2. job/profession data (e.g. job, work place, etc.)
3. graphoscopic data (e.g. your signature on a contract entered with us, etc.)
4. financial data (e.g. bank account, bank where it is opened, payment date, payment justification, etc.)

Sources where we obtain your personal data

The sources where we obtain your personal data are varied, on a case-by-case basis, and may consist of:

1. you (e.g. you send us an e-mail or contact us by phone, send us a resume in order to be hired at our company,
2. the company/entity where you are hired (e.g. your company sends us your personal data to contact you to initiate and sustain a dialogue on a particular topic),
3. your company/entity with whom you are in a certain relationship (e.g. the company for which you provide certain goods and/or services without being its internal employee),
4. other people/entities that own your personal data (e.g. a friend, a company where you were hired, another client of us, etc.)
5. public sources (e.g. contact details from the trade registry, public procurement site, search results displayed by a search engine, etc.).

How we process your personal data

Eurocom may process your personal data in whole or in part in the following ways:

1. collection (e.g. reception of a contract signed by you)
2. storage (e.g. keeping an email received from you)
3. registration (e.g. your registration in our client base under a certain number)
4. visualization (e.g. viewing your contact data from our database),
5. modification (e.g. when you request us to modify your contact details),
6. encryption (e.g. when encrypting devices that will store your personal data)
7. transmission/disclosure (e.g. when we send your contact data to a courier),
8. destruction (e.g. when we delete you from active clients database),

Purposes for which your personal data are processed and the legal reasons of personal data processings

Eurocom processes a series of personal data based on one or more purposes, as well as one or more legal grounds, as outlined below.

In order to understand the legal purposes and grounds for which we will process your personal data, please access the category of persons you are part of.

Potential clients/Clients/Former Eurocom clients and other persons related to them

Eurocom processes the personal data of its potential clients/clients/former clients as well as other people in a particular relation/relationship with them such as:

1. individuals,
2. representatives of legal entities (e.g. administrator, general manager, economic director etc),
3. employees of partner legal entities (e.g. employees, civil servants, contract staff, etc.)
4. representatives of their suppliers/partners/subcontractors/consultants/etc. (e.g.: the manager of the accounting firm, the coordinating lawyer, etc.)
5. employees of an authority/public institution related to them (e.g. an inspector from the Environmental Authority etc)

Pre-contractual period

Purposes of processing

Eurocom aims to offer/provide its services and/or products and/or solutions to as many people/entities as possible.

In the pre-contractual period Eurocom will process your personal data for the following purposes:

1. in order to initiate and sustain a dialogue with you,
2. in order to present our products/services/solutions,
3. in order to obtain from you some information on the basis of which we can propose the products/services/solutions that best fit you,
4. in order to draft the documents related to the pre-contractual period (offer, contract model, etc.)
5. in order to understand the requirements and trends of the profile market (e.g. what products/services/solutions are being sought, by what categories of clients, at what prices, etc.)
6. in order to understand how we can improve our products/services/solutions (e.g. assessing internal staff, analyzing the opportunity to hire additional staff, etc.)
7. in order to understand how we have to organize our business from all points of view (commercial/marketing/HR/IT/financial, etc.) (e.g. one month sales valuation compared to sales that could have been made, how our internal employees perform their job duties, analyze how we present ourselves as a company, etc.)
8. in order to protect our rights and interests (e.g. if you consider yourself prejudiced in any way by how we presented our products).

Legal reasons of processing

Legal reasons for processing your data:

1. the need to take action at your request (e.g. we formulate a contract model, formulate an offer personalized to your needs, etc.)
2. our legitimate interests to achieve the goals outlined above.

In consideration of the above, it is possible that Eurocom will contact you either on its own initiative (e.g. sending you an e-mail) or at your own initiative (e.g. you contact us by phone, you visit our website, etc.) or at the initiative of another person/entity (e.g. both you and us receive an email from an intermediary).

Insofar as you become a Eurocom client, your data is processed as described in the chapter 4.1.2. following.

Period for data storing

Insofar as you do not become a Eurocom client, your data will be permanently removed within a maximum of 1 year from the moment when it becomes certain that you will not become our client (e.g. you send us an email by which you inform us, you discontinue the communication with us for a period of time that overpasses a reasonable period, we inform you that we can not provide the requested products/services, etc.).

Contractual/post – contractual period

Purposes of processing

Eurocom provides/supplies services and/or products and/or solutions to its clients, fulfills a number of legal/conventional obligations and adapts its business strategy according to the requirements of the profile market.

During the contractual/post-contractual period Eurocom will process your personal data for the following purposes:

1. in order to execute the contract concluded with you,
2. in order to initiate and sustain a dialogue with you,
3. in order to present our products/services/solutions other than those you have already contracted,
4. in order to obtain from you some information on which to offer you other products/services/solutions that may fit you, other than those already contracted,
5. for the purpose of drawing up the documents related to the contractual period (e.g. invoices, lists of prints, service reports, waste delivery - receipt reports, etc.)
6. in order to fulfill legal obligations (eg the obligation to draw up and maintain the primary accounting documents, the obligation to recycle a certain amount of waste, etc.)
7. in order to understand the requirements and trends of the profile market (e.g. what products/services/solutions are being sought, by what categories of clients, at what prices, etc.)

8. in order to understand how we can improve our products/services/solutions (e.g. assessing internal staff, analyzing the opportunity to hire additional staff, etc.)
9. in order to understand how we have to organize our business from all points of view (commercial/marketing/HR/IT/financial, etc.) (e.g. one month sales valuation compared to sales that could have been made, where our internal employees perform their job duties, analyze how we present ourselves as a company, etc.)
10. in order to protect our rights and interests (e.g. if you do not pay the value of the invoices issued and we have to initiate a civil proceeding).

Legal reasons for processing

Legal reasons for processing your data:

1. processing is required to execute the contract entered with you (e.g. you are a client of the Copy Center and want to store the materials you want to print on our computers, etc.),
2. processing is necessary to meet legal obligations (e.g. the obligation to prepare and keep primary accounting documents, such as the contract concluded with you, the invoices issued to you, the service reports from the moment of commissioning delivered products, the obligation to destroy toner cartridges consumed, etc.)
3. our legitimate interests (the interests to achieve the goals outlined above).

Period for data storage

Your data is to be stored by us for the entire contractual period as well as after the termination of contractual relationships for a period of time in accordance with the legislation in force (e.g.: the supporting documents underlying the records in the accounting - 10 years, etc.).

The reasons for which we store your data for the period outlined above are the following:

1. during the course of the contract, the data is necessary to know what parameters we have to comply with to you (e.g.: what we need to provide you, where, under what conditions, what costs, etc.),
2. during the course of the contract, and thereafter, the data is contained in a series of financial-accounting documents that the law obliges us to keep (e.g. the contract, the issued invoices, the payment orders, the bank records, the receipts, etc.)

3. during the course of the contract and afterwards the data is necessary to inform you about the opportunity to provide services/products/solutions that may be better suited to you than those originally contracted (e.g.: in so far as the level of printed documents is much higher than estimated and contracted initially, it is possible to offer you better and/or more cost-effective solutions for you, etc.)
4. during the course of the contract and afterwards, the data is necessary to be able to analyze the viability/technical efficiency/cost effectiveness/possible technical problems regarding the products/services/solutions offered so that we can understand as much as we can all the technical/economic aspects of the products/services/solutions offered (e.g. by analyzing how quickly a certain toner cartridge is consumed, we can choose another type of toner that better fits your needs, analyzing how many repairs require a particular piece of equipment, the type/cost repairs and at what time intervals we can recommend a more performing and more efficient technical/economic equipment etc.),
5. during the course of the contract and afterwards the data is necessary to understand the market trends, what type of products/services/solutions are being sought, what is available on the market, what are the costs that the clients are willing to allocate etc., the knowledge of these information to help us adapt our business strategy to remain on the market as competitive and as close to your real needs as possible,
6. during the course of the contract, and afterwards there is the possibility that there may be some misunderstandings/disputes between our company and you regarding the execution of the contract, in which case the data is necessary to protect our rights (e.g. in the case of a trial we can prove that we have fulfilled our obligations, in the case of non-payment in due time of an invoice, we can prove that we have provided the invoiced services etc.)
7. during the course of the contract, and afterwards, the data is necessary for us to analyze our own activity and the way we do it (internal analysis) so that we can adapt to the market in a most appropriate way (e.g. we analyze if new hiring is required, if it is, in which department, we analyze the efficiency of our employees, we analyze the knowledge and professionalism of our employees, etc.)
8. following the execution of the contract, there is the possibility that you or we may be subject to a control by the tax authorities/other public authorities/institutions in which case we must be able to fully prove the contractual relations between us and how they have been executed both by us and you.

Eurocom providers and other persons related to them

Eurocom processes the personal data of its potential suppliers/suppliers/former suppliers as well as other persons in a certain relation/relationship with them as they are nominated in the chapter 3.1..

Chapters 4.1.1. – 4.1.2. apply also to Eurocom suppliers appropriately.

Eurocom partners and other people related to them

Eurocom processes the personal data of his or her potential partners/partners/former partners, as well as other persons in a certain relationship/relationship with them as they are designated in the chapter 3.1..

Chapters 4.1.1. – 4.1.2. apply also to Eurocom partners appropriately.

Other persons

Eurocom processes the personal data of other persons than those presented in the chapters 3.1. - 3.3., such as:

1. representatives of public authorities/institutions (e.g. environmental inspectors, ANAF inspectors, etc.)
2. visitors to our offices and presentation/outlet/operation points (e.g. people entering the Copy Center just to get informed),
3. visitors to our sites,
4. other people we may contact, etc.

Purposes of processing

Eurocom aims to provide/supply its services and/or products and/or solutions to as many people/entities as possible, but also to fulfill its legal obligations and to maintain it in a most visible and performing way on the profile market.

Eurocom will process your personal data for the following purposes:

1. in order to initiate and sustain a dialogue with you,
2. in order to present our products/services/solutions,
3. in order to obtain from you some information based of which we can propose the products/services/solutions that best fit you,
4. in order to draft the documents related to the pre-contractual period (offer, contract model, etc)
5. in order to understand the requirements and trends of the profile market (e.g. what products/services/solutions are being sought, by what categories of clients, at what prices, etc.)
6. in order to understand how we can improve our products/services/solutions (e.g. assessing internal staff, analyzing the opportunity to hire additional staff, etc.)
7. in order to meet legal obligations (e.g. the obligation to provide the documents and information requested by an public authority/institution that initiates a control regarding us),
8. in order to understand how we have to organize our business from all points of view (commercial/marketing/HR/IT/financial etc) (e.g. one month sales valuation compared to sales that could have been made, how our internal employees perform their job duties, analyze how we present ourselves as a company, etc.)
9. in order to protect our rights and interests (e.g. if you do not pay the value of the invoices issued and we have to initiate a civil proceeding).

Legal reasons for processing

Legal reasons for processing your data:

1. processing is necessary in order to fulfill our legal obligations (e.g. if we are subject to fiscal control we provide the documents and information of the fiscal inspector whose data we hold in order to initiate and support the contact, etc.)
2. our legitimate interests (the interests to achieve the purposes outlined above).

Storage period

The storage period varies from case to case depending on the particulars of the data (e.g. the number of visitors to our site may be held for a period of 6 months required to carry out a particular survey or may be held for a period of 1 year for the analysis of a development, etc.).

However, we ensure you that we do not hold your data after the moment when the purpose for which we collected was made.

Recipients/categories of recipients of your personal data

Your personal data can be sent by us to:

1. people who act under our careful guidance (e.g. our employees),
2. our personal data co-operators (e.g. censors/audit committee, law firm etc.)
3. people who act under the close supervision of our personal data co-operators (e.g. our economists, our lawyers, etc.)
4. persons empowered to process personal data on our behalf (e.g. a courier company),
5. persons who act under close supervision of empowered persons to process personal data on our behalf (e.g. a driver employed by a courier company),
6. you, insofar as you understand to exercise one of the rights provided by law (e.g. right of access),
7. any other person/entity other than those listed in points 1-6, for example a distinct personal data carrier (e.g. ANAF, ITM, banks, etc.)

Transmission of personal data to the persons listed above will only be made and to the extent this transmission:

1. either it is imposed by the necessity of achieving the purposes for which we will process personal data,
2. or it is imposed by law.

Transfer of your personal data outside the European Union

As a general rule, Eurocom keeps your personal data, either in physical format or in digital format, or in both formats, on the territory of the European Union.

However, in certain situations, Eurocom will transmit your personal data outside the European Union (e.g. by storing them on a server outside the EU).

For example, as you use the PrintFleet application, your data contained in this application is on Amazon servers located in the United States of America.

In these latter cases, Eurocom will ensure that the transfer of data will be carried out only to the extent that the conditions imposed by the European legislation on personal data protection (e.g. a conformity decision issued by the European Commission, an agreement is concluded ensuring the necessary guarantees, etc.).

Your rights

In terms of your personal data, you have a series of rights:

1. the right of access to your data,
2. the right to rectify your data,
3. the right to obtain the erasure of your data,
4. the right to obtain restriction of processing your data,
5. the right to object to the processing of your data (except for situations imposed by law, e.g. transmission to ANAF of the diagnostic code provided for in medical leave, etc.),
6. the right to file a complaint before the competent authority in the field of personal data processing.

Eurocom shall facilitate the exercise of your rights, so do not hesitate to contact us at the address dpo@eurocom.ro.

Your obligation or its lack to provide your personal data

As a general rule, Eurocom will not oblige you to submit your personal data unless the law requires it.

However, in certain situations, if you do not submit your personal data, we cannot fulfill our stated goals.

For example, to the extent that you do not forward your contract bearing your signature, we cannot consider that a valid contract has been concluded between us.

Absence of an automated decision-making process

Eurocom does not own/use any automated decision-making process, including creating profiles, and all decisions/actions/inactions/measures taken/adopted/conducted by our company are based solely on the human factor.

In other words, although we use a number of IT equipment, the decisions we take for you are only adopted by the people in our team based on our own beliefs and appreciations and not automatically, based on the information provided by the equipment IT.

Modification of this policy

Eurocom informs you that this privacy policy of your personal data is a presentation of how we, today, when you read this material, process personal data.

There is a possibility that we may update this policy from time to time (e.g. due to legislative changes, because we want to process your data for other purposes and/or other legal grounds, etc.).

In these latter cases, the policy update will be achieved without affecting in any way the legitimate rights and interests of personal data protection.