PERSONAL DATA PROTECTION POLICY
QUADRANTE PROIECTARE ŞI CONSULTANŢĂ S.R.L

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C.U.I. RO 16310237

Article 1. QUADRANTE PROIECTARE ŞI CONSULTANŢĂ S.R.L. is committed to complying with the norms and obligations imposed by the current provisions regarding the protection of personal data. processed if they have been provided through concluded contracts, any kind of correspondence, or other legal means. This policy mainly refers to the principle of limiting the retention period of personal data.

Article 2. QUADRANTE PROIECTARE ŞI CONSULTANŢĂ S.R.L. must comply with the rules and obligations set by the current regulations regarding the protection of personal data, in particular *Regulation (EU) 2016/679* of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, as well as *Commission Implementing Decision (EU) 2021/914 of 4 June 2021 regarding the standard contractual clauses* for the transfer of personal data to third countries under Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter referred to as the "Regulation" or "GDPR").

Article 3. In this Policy, the terms used shall be interpreted in accordance with the GDPR, and where applicable, the terms used shall have the definitions provided in Art. 4 of the GDPR.

This policy applies to company employees, employees of contracted companies, collaborating third parties, legal entities as clients, and data collected directly or obtained through collaborations, partnerships, etc. The data is stored and processed if it was provided through concluded contracts, any kind of correspondence, or other legal means. This policy mainly refers to the principle of limiting the retention of personal data over time.

Article 4. QUADRANTE PROIECTARE ŞI CONSULTANŢĂ S.R.L. acknowledges that the European rules in EU Regulation 2016/679 apply to any data controller or processor located in the European Union and to anyone processing personal data of data subjects located in the European Union

or providing them with services.

Therefore, **QUADRANTE PROIECTARE ŞI CONSULTANŢĂ S.R.L** confirms full compliance with the following provisions, including but not limited to:

● Fulfilling all obligations regarding the necessary documentation to comply with Regulation 679/2016 and national legislation on the matter.

● The ability to respect the rights of the data subjects regarding deletion, correction, or transfer of personal information, the right to withdraw consent, the right to be informed about data processing, the right to access personal data, the right to rectify inaccurate or incomplete data, the right to object to data processing, the right to lodge a complaint with a Supervisory Authority, the right to be forgotten or the right to erasure, the right to data portability, and the right to object.

● notifying all relevant recipients in case of a data breach within a maximum of 72 hours, but no later than 24 hours from the moment such a data security breach comes to their attention;

● fulfilling all mandatory duties regarding documenting compliance with *Regulation 2016/679.*

● personal data will be processed in a way that ensures their proper security, including protection against unauthorized or illegal processing and against accidental loss, destruction, or damage, by taking appropriate technical and organizational measures.

Article 5. Personal data that may be collected and processed within the activity of **QUADRANTE PROIECTARE ŞI CONSULTANŢĂ S.R.L** are:

● Name, surname, email, phone number - if applicable - as well as any additional data; (position, professional qualification level (education), CV, personal identification number, ID copy, professional experience), results from financial and accounting records, internal communications, business correspondence, etc.;

● Data and information directly related to sent emails or subsequent actions, such as opened newsletter lists or accessed links (including the timestamp of these actions), email actions, IP address from which these actions originated, SMS/WHATSAPP/TELEGRAM messages, including content and sending time;

Article 6. The categories of people concerned are clients, employees, collaborators, subcontractors, suppliers, affiliates, potential clients, employees, etc.

Article 7. The parties may use the personal data of the signatories and other individuals only within the scope of the contract they have concluded, as this constitutes the legal and legitimate basis for processing. Any additional processing or processing for another purpose will be subject to a separate data processing agreement concluded between the Parties.

Also, the period for storing personal data processed under the contract is limited to the period

corresponding to the achievement of the main objective of the contracts concluded with third parties. Personal data will be processed throughout the duration of contractual relationships with third parties and thereafter in accordance with the legal obligations incumbent on the Parties they interact with.

Therefore, all technical measures, and especially organizational ones, will be taken regarding the obligations assumed under this clause:
Periodic staff training (internal security policy)
● Office access based on a key;
● coding at the source;
● Personal data is stored exclusively in the datacenter (nothing is stored in the office)
● Backend access is SSL secure using two-step authentication;
● unauthorized persons will not gain access to the data processing systems where personal data is processed or used;
● unauthorized use of data processing systems will be prevented;
● people who have the right to use a data processing system have access only to the data they are authorized to access, and personal data cannot be read, copied, modified, or deleted without authorization during processing, use, or after storage;
● they will ensure that personal data cannot be read, copied, modified, or deleted without authorization during electronic transmission, transfer, etc., and that it is possible to verify and determine which organizations the transfer of personal data is intended for via data transfer methods;
● they will ensure that they can check and determine if and by whom personal data has been entered, modified, or deleted in/from the data processing systems;
● they will ensure that, in the case of a personal data processing action, the data is processed strictly in accordance with this document or the contract concluded between the Parties;
● they will ensure that personal data is protected from accidental destruction or loss;
● they will prevent unauthorized persons from accessing the data collection systems that process or use personal data;
● will prevent unauthorized use of data processing systems;
● will ensure that people who are allowed to use a data processing system only have access to the data they are entitled to and that it cannot be read, copied, modified, or deleted without authorization during processing, use, or subsequent storage;
● will ensure that data collected for different purposes can be processed separately;
Article 8. Personal data may only be processed for another purpose:

(i) in cases where the prior consent of the data subject has been obtained;
(ii) in cases where this is necessary for the establishment, exercise, or defense of a right in court in the context of specific administrative, regulatory, or judicial procedures; or (iii) in cases where this is necessary to protect the vital interests of the data subject or another individual.

Article 9. Personal data exchanged between **QUADRANTE PROIECTARE ŞI CONSULTANŢĂ S.R.L.** and third parties cannot become accessible or be communicated to unauthorized third parties or made available for use in any other way.

Article10. QUADRANTE PROIECTARE ȘI CONSULTANȚA S.R.L. has the right to disclose certain personal data at the request of an authority, public institution, or court, or another authorized third party according to the law, due to a legal obligation or another condition provided by the law;

Article 11. Certain data will be kept long-term to protect the company's interests, to preserve evidence regarding their processing or deletion in accordance with the law and this personal data policy, if **QUADRANTE PROIECTARE ŞI CONSULTANŢĂ S.R.L.** considers it necessary;

Article 12. The purposes for long-term data storage are:

● complaints from third parties, public authorities, etc.
● disputes;
● workplace accidents;
● legal regulations;
● investigation regarding the occurrence of a security incident;

Art. 13. Retention periods:

● as long as necessary/valid for the purpose for which they were collected;
● for the duration of any kind of contracts, plus 2-5 years after the termination of legal relations, or according to the legal obligations for document retention;
● public procurement contracts, for the duration of their existence plus 2 years from the date of final acceptance;

Contracts, partnership agreements, rental contracts, correspondence, are kept for the duration of the contract and for 2 years afterward;

● financial-accounting records (invoices, payroll, account statements, expense reports, VAT records, tax documents, audit reports, payment card records), for the period required by law for their archiving;
● business emails, inboxes, folders, attachments, depending on automatic deletion settings approved by management systems;
● there may be exceptional situations, public interest, that require keeping data for longer or shorter periods (regarding employee pension rights, vacation/sick leave records, etc.);

● if the data was provided based on consent, until the date of the deletion request or until it is discovered that the data has become inactive;

● elimination by deleting information that is no longer current;

Article 13. The retention period may undergo changes, additions, and updates whenever legislation or the guidelines of the National Authority for the Supervision of Personal Data Processing require such changes;

Article 14. After the retention period expires, the company will actively destroy all data covered by this Policy or anonymize it;

● If an employee, a third party (collaborator, contractor, subcontractor, etc.) who has access to the processed data believes that certain data should not be destroyed, they will contact the Data Protection Officer or, if unavailable, the company's management, so that an exception can be made in this case.

● Destroying data that an employee/collaborator may consider harmful to the company or attempting to hide a violation of the law or the provisions of this Policy is prohibited;

Article15. The exchange of personal data between companies can be done either by returning the shared data to the supplying company or by deleting it.

In the case of a company takeover/merger, a procedure to follow will be agreed upon mutually.

Article16. The transfer of personal data to companies outside the European Union will take place on the condition that standard contractual clauses adopted or approved by the European Commission exist between **QUADRANTE PROIECTARE ŞI CONSULTANŢĂ S.R.L**. and the data importer, in accordance with Article 46 (2) (c) and (d) of the GDPR.

Article 17. Requests for the deletion of personal data can be made to the email address: ooprea@quadranteglobal.com, and should include:

● contact details;

● name;

● the processing activities through which the data was handled;

● the type of data collected;

● the total number of records that need to be deleted;

Article 18. Data destruction can be done physically or digitally, depending on the storage medium.