

TURIST ȘUIOR

Personal Data Protection Policy

This policy defines the way that we, Turist Suior S.R.L., Baia Sprie, collect, store and utilize your personal data when you access or you interact with our web page www.suior.ro, with our front desk or our employees.

The operator that collects your personal data is S.C. Turist Suior SRL, with the headquarters in Baia Sprie, 121 George Cosbuc Street, Maramures, registered at the National Trade Register Office with the number J24/714/1999, VAT number CUI RO12510917, tel. +40262262080.

Considering the EU General Data Protection Regulation (GDPR) 2016/679 and the Council's provisions from 27th of April 2016, regarding the personal data protection, we hereby inform you that:

Data operator: Turist Șuior SRL

1. We comply with the legal provisions regarding the protection of personal data and implement technical and organizational measures to protect all operations that concern directly or indirectly personal data that prevent unauthorized or unlawful processing and accidental or illegal loss and destruction.
2. **What information we collect, purpose and the grounds of personal data processing**
 - a) When you access our website, www.suior.ro, some data is collected through cookies. Cookies are small files that the browser places on the user's hard disk. We use cookies to understand better how you use the site to personalize this experience and make your next visit more enjoyable. You can refuse the use of cookies by selecting the appropriate settings on your browser, please note that if you do so, you may not be able to use the full functionality of this site.
 - Our web server automatically registers your IP address, as well as information about your visit, such as the pages you accessed, the information requested, the date and time of the request, the source of the access to our website (for example website or URL), your browser and operating system.
 - Legal grounds for processing: Compliance according to the legal regulations (Article 6, paragraph (1) (c) of the General Data Protection Regulation).
 - Legal Obligation: Registering the access to our website using server log files is a technical measure to ensure an adequate level of security to protect the information gathered from our website in accordance with the Article 32 (1) of the General Data Protection Regulation.

- b) Data analysis of the information gathered from our server log to determine how our website users interact with our website and its features. For instance, we analyze the number of visits and unique visitors we receive, the date and time of the visit, location, operating system and used browser.
- We use the information gathered to improve our website. For instance, we use the information gathered to modify the content and the structure of our website and individual pages, depending on visitors' needs and the amount of time spent on certain pages of our website.
- The legal basis of data processing: legitimate interests (Article 6, paragraph (1) (f) of the General Data Protection Regulation).
- Legitimate interest: Improving of our site for the users and knowing the preferences of our website users so that our website can respond better to their needs.

c) Communication through email or through the contact form on www.suior.ro

- When you send a message to the e-mail address displayed on our website, or e-mail us through the contact page on our website, we collect your e-mail address, name, location, phone number and any other information you provide in that e-mail.
- The legal basis for processing: our legitimate interests (Article 6, paragraph (1) (f) of the General Data Protection Regulation);
- Legitimate interest: to be able to answer the questions and messages we receive and to keep the record of correspondence, to conclude a collaboration contract or to start the employment process in a contract upon your request (Article 6, paragraph 1 (b) of the General Data Protection Regulation).

d) Direct collection of information by contracting our services at the front desk or at the cashier desks in the Turist Suior Complex, when we collect your data from the ID: name, surname, Personal Identification Number, address.

- The legal basis for processing: executing a contract or taking steps at the request of the data subject prior to the conclusion of a contract (Article 6, paragraph (1) (b) of the General Data Protection Regulation).

e) Collecting video images within the Turist Suior Complex, on the ski slopes, through the video surveillance system.

- The legal basis for processing: our legitimate interests (Article 6, paragraph (1) (f) of the General Data Protection Regulation).
- Legitimate interest: in order to ensure **the security** of the individuals and the assets, **safety and protection within the complex and on the ski slopes.**

3. The time frame for retaining personal data

Turist Suior SRL has implemented technical measures for the organization of the process and specific criteria for keeping your personal data (including our archiving procedures).

We will cease processing your personal data when it is no longer necessary for the allowed purposes, according to our legal obligations (eg. to maintain accounting records) or any other legal basis for the use of information (eg. consent, contractual obligations, legitimate interests), or when you withdraw your consent (if applicable):

- (i) There are no longer any legitimate and compelling reasons justifying further personal data processing by Turist Suior SRL (including legal obligation) and prevailing over your interests, rights and freedom.
- (ii) They are no longer necessary to establish, exercise and defend a legal right in court.

4. Personal data recipients

For the above mentioned purposes, Turist Suior SRL uses the services of several contractual partners. We can share your personal data with contractual partners and service providers. Some of them are third parties who do not have the role of processing personal data, but can access them in order to fulfill their obligations or during their collaboration with Turist Suior SRL, such as technical maintenance companies, financial auditors or legal services providers. We put our best effort to ensure that all entities with which we work keep your personal data safe and secure.

Personal data can be shared with third parties under the following circumstances:

- (iii) Public authorities, auditors or institutions with controlling powers over the Company's activities or assets, that require the Company to provide information on the basis of its legal obligations. These can be the National Agency for Fiscal Administration, the Ministry of Finance, the National Anticorruption Directorate, units of the Ministry of Internal Affairs.
- (iv) For complying with a legal obligation or for protecting the rights and assets of our Company or of another legal entity, such as a Court.
- (v) Third parties (potential acquirers) in a situation in which part, or the entire, activity would be acquired by an external company and the personal data would be part of the transferred/acquired assets.
- (vi) WWW.SUIOR.RO and third parties (including Google and Facebook) post ads on the website pages. Third party suppliers, including Google, use cookies to show ads based on previous visits of the individual on www.suio.ro.

5. How is the personal data secured

By using technical and organizational solutions such as: storing information on secure servers, encrypting data transfers to and from our servers using SSL technology, allowing access to your personal data only when necessary and only by authorized persons, we take responsibility for ensuring the confidentiality, integrity and availability of personal data.

We constantly evaluate and improve our implemented security measures in order to ensure the personal data processing is being carried out in excellent safety and

security conditions.

6. Personal data transfer outside the European Economic Area

We will transfer your personal data outside of the European Economic Area only if we are obliged to do so by law or under special and particular circumstances. When doing so, we will ensure that adequate safety measures are in place and that third parties transferring your personal data outside of the European Economic Area have self-certified as complying with the EU-US Privacy Shield.

7. Automatic decision making processes and profiling

Your personal data is not being used in automatic decision making processes or profiling.

Our company uses Google Analytics which is based on data collected by Google on our website. Google uses this information, including IP addresses and cookies information, for various purposes such as improving Google Analytics. Information is shared with Google on aggregate and anonymous basis. To learn more about what information Google collects, how it uses this information and how to control information sent to Google please follow the next link: <https://www.google.com/policies/privacy/partners/>

Legal grounds for processing: our legitimate interests (art. 6, paragraph (1) (f) from the General Data Protection Regulation);

Legitimate interest: complying with the Google's contract provisions: <https://www.google.com/analytics/terms/us.html>

You can cancel Google Analytics by installing the available plug in for your browser: <https://tools.google.com/dlpage/gaoptout>

8. Individual's rights in terms of personal data processing

You have the following rights in terms of personal data processing:

a) **The right to access your personal data that is being processed:** you have the right to obtain a confirmation whether your personal data is being processed or not. If so, you can access the type of personal data and the processing conditions by filing a request to the data operator;

b) **The right to request the rectification or deletion of personal data:** You can request, by submitting a request in this respect to the operator, the rectification of inaccurate personal data, the update of personal data when they are incomplete or the deletion of your personal data when (i) personal data is no longer required for its original purpose (and there is no new legal purpose for processing), (ii) the legal grounds for processing is the consent of the individual and the individual withdraws its consent and there is no other legal ground for the data processing;

c) **The right to request restriction of processing:** You have the right to restrict data processing in situations where: (i) you consider inaccurate personal data to be processed, for a period of time that allows the operator to verify the accuracy of your personal data; (ii) the processing is illegal, but you do not want to delete your personal data, requiring only the restriction of its use; (iii) if the operator no longer needs your personal data to process it for the purposes mentioned above, but you request the data

for the establishment, exercise or defense of a right in court, or (iv) you have opposed to the processing, for the period of time during which it is checked whether the legitimate grounds of the operator prevail over the rights of the individual;

d) **The right to withdraw your consent for processing**, when processing is based on your consent, without affecting the lawfulness of the processing carried out until the date of the consent withdrawal;

e) **The right to object to the processing of personal data** for reasons related to your particular situation, when the data processing is based on a legitimate interest, and to oppose at any time to the personal data processing for direct marketing purposes, including profiling;

f) **The right not to be the subject of a decision exclusively based on automated processing, including profiling**, which has legal consequences on the individual or affects him/her to a significant extent;

g) **Data portability right** –the right to receive your personal data that you have provided to the operator in a structured, commonly used and readable form and the right to transmit this data to another operator if the processing is made on the basis of your consent or the execution of a contract and is done by automatic means;

h) **The right to file a complaint** at The National Supervisory Authority for Personal Data Processing (NSAPDP) and the right to address yourselves to the competent authorities.

9. You can exercise your above mentioned rights at any given moment. In order to exercise your rights we recommend you to contact us using the contact details below.

Contact details:

The personal data operator is SC Turist Suior SRL, J24/714/1999, from Baia Sprie, 121 George Cosbuc Street, email: office@suior.ro, contact@suior.ro.

The Data Protection Officer for the data operator (for Turist Suior SRL) is Adina Coza. You can contact our Officer by post at 121 George Cosbuc Street, Baia Sprie or e-mail: cozaadina@gmail.com.