

APPROVED by,  
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## **SECURITY POLICY ON NATURAL PERSON PROTECTION REGARDING PROCESSING OF PERSONAL DATA**

### **1. INTRODUCTION**

Starting with May 25, 2018, the provisions of Regulation (EU) No. 679/2016, the European Parliament and of the Council on the protection of individuals that-what the data processing with personal data and on the free movement of these data and of repeal of Directive 95/46 / EC (General Data Protection Regulation) are implemented.

### **2. WHO ARE WE?**

CONPET SA Society, headquarters in Ploiesti, Anul 1848 str, no. 1-3 Tax ID Code RO 1350020, email conpet@conpet.ro, Prahova County, is firmly committed to protecting personal data of the subjects and comply with the legal and applicable regulations in protecting them.

CONPET SA Society is committed and is permanently concerned in providing and maintaining a consistently high protection level of personal data, by adopting technical and organizational measures suitable with personal processing, meant to guarantee and protect the rights and freedoms of individuals, especially the right to intimate, family and private life regarding ongoing compliance with the Regulation no. 679 of April 27, 2016, on the protection of natural persons into personal data processing and free movement of these data.

### **3. THE GOAL FOR PROCESSING PERSONAL DATA**

CONPET S.A. society collects, processes, uses and supplies personal data only for accomplishing the purposes that have formerly collected for, as they were declared into the Personal data processing register.

#### **4. CONPET S.A. COMPANY POLICY INTO THE FIELD OF PROTECTING NATURAL PEOPLE REGARDING PERSONAL DATA PROCESSING**

The company management adopts, implements and develops the best practices and appropriate technical and organizational actions and measures to safeguard security of personal data processing in a legal manner, fair and transparent from the relative subject with data processing purposes and means, having as a primary objective respecting the rights and fundamental freedoms of natural persons, especially the right to an intimate, family and private life, as well as taking an appropriate level of quality and regularity of the duties and company attributions and activities provided, according to the company's goal and purposes, and fully respect of all provisions and declared values.

#### **5. PRINCIPLES, ASSUMPTIONS AND RIGHTS**

The principles and premises that the society's Administration is committed to meet and stay at the base on policy implementation of security of natural persons regarding personal data processing in agreement with Regulation no. 679 / April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of these, are:

- a) Personal data processed legally, fair and transparent to the subject (*"legal, fairness and transparency"*);
- b) Personal data collected for specified, explicit and legitimate purposes and not further processed in an incompatible mode with these purposes (*"limits tied to purposes"*);
- c) Personal data, which is adequate, relevant and limited to what it is necessary with respect to the purposes for which they are processed (*"minimalization of data"*)
- d) personal data are exact and where It is needed to be updated. Must take all necessary measures of it to ensure that inaccurate personal data, having to the purposes for which they are processed, are erased or corrected without delay (*"accuracy"*);
- e) personal data kept in a form which permits the identification of data subjects on a period not exceeding the term needed to achieve goals into which is processed (*"limitations in connection to storage"*);
- f) personal data processed in a manner which ensures adequate security of personal data, including protection against unauthorized or illegal processing and against the loss, destruction or of accidental damage by taking technical measures or organizational measures (*"the integrity and confidentiality"*)
- g) identification and adoption at the level of the society of the suitable action to ensure protection and security of processing personal data to which can limit access to personal databases of unauthorized persons' data, guaranteeing respect of the rights and fundamental freedoms of the natural persons, especially of the right to intimate, family and private life.

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### **6. THE RIGHTS OF PERSONS WHOSE PERSONAL DATA ARE COLLECTED AND / OR PROCESSED**

The rights of the subject regarding the processing of personal data, which the administration is engaged to respect:

#### 6.1. The right to being informed

- 1) in case personal data are obtained directly from the subject, CONPETS.A. society is bound to provide the subject the following information unless this one person already possesses the subject's information:
  - a) the goal for which data processing is performed;
  - b) additional information regarding the recipients or categories of recipients with personal data;
  - c) the existence of the subject's existence under Regulation 679/2016,
  - d) any other information whose supply is imposed by the availability of the Authority of Surveillance, considering the specifics of the processing procedure;
- 2) On the webpage of CONPET S.A. Company ([conpet@conpet.ro](mailto:conpet@conpet.ro)), the Policy of Security will be posted regarding the protection of individuals with personal data processing;
- 3) The company's locations that have video surveillance will have an entrance, displayed in a visible place, information on this aspect.

#### 6.2. The right to access data

Any subject has the right to obtain from CONPET SA (acting as an operator) on request and free, confirmation that the data in question are or are not processed by it.

CONPET SA, in the case of personal data which concern the petitioner, is bound to communicate together with the confirmation, at least the following:

- a) information on processing purposes, categories of data taken into consideration and recipients or categories of recipients whose data are disclosed;
- b) communication in an intelligible form of data undergoing processing and any available information regarding the source of the data;

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- c) information on functioning principles of the mechanism through that it performs any automatic processing of data which aims the subject;
- d) information concerning the entitlement to modify the data and the right of opposition, as well as the conditions that may be exercised;
- e) information regarding the right to submit a complaint to the Authority of Surveillance and to address to court for appeals against the decisions of the operator into compliance with provisions of the law.

### 6.3. The right to modify data

Any subject shall have the right to obtain from CONPET SA (acting as an operator), to request and free of charge:

- a) Where is necessary, correction, updating, blocking or erasing data are not processed, consistent with the legislation in force, especially of incomplete or inaccurate data;
- b) Where is necessary, turn into anonymous data whose processing is not in accordance with the law.

### 6.4. The right of opposition

The subject has the right to oppose at any time, from legitimate reasons related to its particular situation, that the data intended to be processed, excepting the cases where there are contrary legal dispositions. In case of justified opposition, the processing may no longer involve those data.

### 6.5. The right to address the court

- 1) Without bringing the possibility to address with a complaint to the Supervisory Authority, the subjects have the right to go to court to defend the rights guaranteed by law which were violated;
- 2) Anyone who has suffered damage as a result of processing personal data, inconsistently performed with legal regulations, may address the competent court for repair.

## **7. TIME OF KEEP / STORAGE PERSONAL DATA**

CONPET S.A. will keep the subjects' personal data as long as it is necessary to achieve the goals for which it has been collected, including to meet any legal requirements, accounting or reporting and, there where it is necessary for the company to initiate any legal proceedings or defend against legal claims until the end of withholding relevant period or until resolving the claims in question.

In order to determine the period of proper storage of personal data, consider the value, nature and the sensitivity of personal data, the potential risk of damage caused by unauthorized use or disclosure of your personal data, the purposes for which we process personal data and we can achieve these goals by other means and applicable legal requirements.

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When keeping time expires, we safely destroy your personal data in accordance with the laws and regulations in force.

## **8. THE GENERAL OBJECTIVE`**

The overall objective on which CONPET SA is engaged to realize is that to ensure the security and confidentiality of processing personal data through the implementation, monitoring and harmonization of the most appropriate and suitable requirements and technical, organizational and logistic measures, including the security information system as a technical base technique to process personal data in order to ensure permanent compliance the applicable law and with the intended purposes.