

PRIVACY POLICY

I. APPLICATION DOMAIN AND DEFINITIONS

1.1 Application domain:

The present Privacy Policy ("Policy") is intended to describe how LASSELSBERGER S.A. and SANEX S.A. processes personal data as joint controllers. As joint controllers, both are committed to protecting and respecting the confidentiality of personal data, in compliance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, regarding the protection of natural persons with regard to the processing of personal data and regarding free circulation of these data and repealing Directive 95/46 / EC (General Regulation on data protection - GDPR), with Law no. 190/2018 regarding measures for the implementation of the GDPR and / or with any other decisions that the National Authority for Supervision of Personal Data Protection (ANSPDCP) can issue, as a supervisory authority regarding the protection of personal data (hereinafter referred to as "Applicable legislation regarding the processing of personal data"). By consulting this Policy, you will understand the purpose of the processing of personal data and the way of processing personal data.

Regarding the personal data processed, joint controllers are "data controllers", namely entities that sets the purposes for which and how the personal data are processed.

You can obtain additional information regarding the personal data processed or regarding this Policy, by addressing written requests in this regard to the following email addresses: office@ro.lasselsberger.com or office@sanex.ro.

1.2 Relevant definitions in accordance with the applicable Legislation regarding the processing of personal data:

- (1) "**personal data**", means any information regarding an identified or identifiable natural person ("**data subject**"); an identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, identification number, location data, an online identifier, or to one or more many specific elements, their own physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- (2) "**processing**", means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- (3) "**restriction of processing**", means the marking of stored personal data with the aim of limiting their processing in the future;

- (4) "**pseudonymization**", means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
- (5) "**profiling**", means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movement;
- (6) "**controller**", means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;
- (7) "**processor**", means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- (8) "**recipient**", means a natural or legal person, public authority, agency or other body to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the 4.5.2016 EN Official Journal of the European Union L 119/33 framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- (9) "**third party**", means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- (10) "**representative**", means a natural or legal person established in the Union who, designated by the controller or processor in writing pursuant to Article 27, represents the controller or processor with regard to their respective obligations under this Regulation;
- (11) "**filing system**", means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;
- (12) "**data protection officer**", means a natural / legal person designated by the controller on the basis of professional qualities and specialized knowledge, in order to fulfill the tasks provided by art. 39 of the GDPR;
- (13) "**supervisory authority**", means an independent public authority which is established by a Member State pursuant to Article 51;
- (14) "**supervised authority concerned**", means a supervisory authority which is concerned by the processing of personal data because:

- the controller or processor is established on the territory of the Member State of that supervisory authority;
- data subjects residing in the Member State of that supervisory authority are substantially affected or likely to be substantially affected by the processing; or
- a complaint has been lodged with that supervisory authority.

II. PURPOSE AND LEGAL GROUNDS (LEGAL OBLIGATIONS) OF PERSONAL DATA PROCESSING

Depending on the purpose and legal grounds of the personal data processing, as we will explain in the lines below, the personal data we process, will generally be the following:

- identification data (for example: name, surname, email address, mobile phone number, domicile / residence, etc.);
- data regarding the connection, geolocation and navigation (for example: location data, device identification number, etc.);
- commercial information (for example: email address in case of newsletter subscription and email address and mobile phone number if at registration moment/after in the professional club "pro club", you express your consent to receive information regarding CESAROM® offers);
- economic information (for example: bank account, but only on the basis of prior consent and only in case of organizing promotions / contests, preceded by awarding cash prizes).

In some cases, by using tracking tools, such as cookies in the browser, we can passively process personal data. More information on this method of processing and on cookie modules can be found in point 2.4. of this privacy policy.

Depending on the services, products or functionalities offered, as well as depending on the interaction with our Platform, personal data will be performed for the following purposes and legal grounds:

2.1 In order to carry out commercial / business activities. This purpose includes the processing of personal data, mainly (i) for the development, fulfillment and execution of the sale-purchase contract concluded in order to purchase products; (ii) for the amicable settlement of claims concerning the products purchased; (iii) for drawing up invoices and payment documents related to purchases products; (iv) to ensure the purchased products delivery; (v) for the elaboration of the transport documents related to the purchased products delivery; (vi) for organizing promotions / contests, and for awarding prizes.

Also, the processing of personal data for carrying out commercial / business activities is based on the fulfillment of legal obligations. Thus, we process personal data for the preparation of invoices and payment documents related to product purchases, for the preparation of transport

documents related to the purchased products delivery, for awarding prizes in case of promotions / contests, and for amicable settlement of complaints regarding the purchased products.

At the same time, in addition to the purpose and legal obligation mentioned above, in case of organizing promotions / contests and for awarding prizes, we process personal data based on the prior consent given by you.

Also, when the processing of personal data is performed in order to answer the requests or questions addressed through the contact data displayed on our Platform, the processing is performed based on the legitimate interest.

2.2 Marketing purposes.

As far as you subscribe to the Newsletter, and /or register in the professional club "pro club", and/or you express your consent to receive information regarding CESAROM® offers, we will process personal data to manage your subscription to these services. Thus, (i) in the case of subscribing to the Newsletter, we will process personal data, including to send personalized information about our products or services, (ii) in case of registration in the professional club, we will process personal data, including for awarding prizes, dedicated gifts, free access to events, recommendations in CESAROM projects, automatic registration in promotional campaigns, and (iii) if at registration moment/after in the professional club "pro club", you express your consent to receive information regarding CESAROM® offers, we will process personal data, including to send personalized information about our products or services, about newly launched promotions and/or actions specific to the professional club "pro club". Please note that, if you express your consent to receive information regarding CESAROM® offers, personalized information about our products or services, about newly launched promotions and/or actions specific to the professional club "pro club", the information will be sent both by email and text message (sms) on the mobile phone.

In order to subscribe to the Newsletter and register in the professional club "pro club", including in the case of consent expressing to receive information regarding CESAROM® offers, we use the double registration procedure. In this regard, we will be able to send you Newsletters, grant you the "pro club" benefits and we will be able to send you information regarding CESAROM® offers, only after you have confirmed your registration by completing the registration form and you have expressed your consent to receive information on CESAROM® offers by selecting the relevant box. Login and confirmation will be recorded. We use this method to ensure that only you can register as a user of the email address specified in the newsletter and "pro club" services. Your consent must be sent immediately, otherwise your registration and email address from our database will be deleted. Until we receive your consent, the newsletter and "pro club" services, will not accept subsequent registrations with this email address.

Please note that you can unsubscribe from our newsletter and from professional club "pro club" and you will also be able to withdraw your consent for receiving information regarding CESAROM® offers, at any time and free of charge. In this regard, you can send us an email in order to unsubscribing from the Newsletter and/or from professional club "pro club", and/or in order to withdraw the consent for receiving information regarding CESAROM® offers by text messages (sms) on the mobile phone and/or by email. Also, you can unsubscribe from the Newsletter through a link at the bottom of the Newsletter or from the professional club "pro club" by selecting the "delete account" option.

From a legal point of view, the processing of personal data is done based on your consent.

2.3 In order to respond to your requests made through the contact data displayed on our Platform.

We process only the personal data that is necessary for the purpose of managing or resolving requests made through the telephone numbers or email addresses displayed on our Platform.

Also, in addition to the above mentioned purpose, we consider that we have a legitimate interest when we process personal data in order to answer your requests addressed through the contact data displayed on our Platform. We understand that this data processing is also in your advantage, as it allows us to help you properly.

2.4 The usage and quality analysis in order to improve our services.

Our platform uses cookies for analytical and statistical purposes. When you visit our website, our server will temporarily store each access in a log file.

You have the possibility to allow or not to use cookies, with the mention that the refusal to allow their launch can be made only on the basis of related settings. The types of cookies used cannot be used to run programs or to transmit computer viruses to your devices. Some of the cookies are strictly necessary for the proper functioning of the website and cannot be deactivated. Cookies such as measuring and promotion, can be disabled by you, in the section dedicated to this type of operation.

Thus, for the use of cookies in the following two categories, you need your consent:

- analysis and performance cookies - helps to improve the website, so that the information can be found faster and easier;
- promotion cookies - if you do not agree with the use of these types of cookies, you will continue to display advertising on the Internet, with the mention that this may not be relevant to you.

Our web server uses session and permanent cookies, as well as own or third party cookies, for the following purposes:

- Strictly necessary cookies - for the functioning of the website and cannot be disabled in our systems. These are only established in response to the actions performed by the visitors of this website. Depending on the browser used, visitors (users) may set a block or receive a warning regarding these cookies, but in this case, certain parts of the site may not work. These types of cookies will not store information that can identify you personally and are exempt from the rule of obtaining consent for their placement.
- Measurement cookies - are used strictly for statistical purposes and allow the drawing up of an evidence regarding the number of users who visit the site or how accessed is a certain category on the website page. These cookies do not collect personal data and expire at the end of each session.
- Performance and analysis cookies - allow the counting of website visits and traffic sources, so that it is possible to measure and improve its performance. The information collected by these cookies are collective and anonymous. If these types of cookies are not accepted, monitoring site visits and improving the performance of applications used by different areas of the site will not be possible.
- Promotion cookies - are set on the website based on agreements concluded with advertising partners (eg Social Media pages, Google, etc.). The use of these types of cookies allows the advertising partners to observe and analyze the types of products on the website for which they have expressed an interest. These types of cookies do not store direct information about you but are based on the unique identification of the browser and the device from which the web page was accessed. If these types of cookies are not accepted, fewer personalized ads will be displayed.

Our website uses several codes to track the behavior of visitors to the site. These codes do not individually identify the users of the site and are not related to personal data. Also, in an attempt to improve the online experience of our website visitors, we use the services below:

- Google Analytics - a traffic analysis service owned by Google, Inc., and by default cookies. Categories of cookies used: site performance, visitor analysis, retargeting and advertising. These cookies do not collect personal data and do not personally identify site visitors, but are used to provide you with content tailored to your preferences while browsing the Internet. To view Google Analytics Terms of Service, please visit <http://www.google.com/analytics/tos.html>.
- Facebook Pixel - a code by which the user can be targeted through advertising services, on Facebook advertising platforms, once he has visited our site. Details about Facebook's privacy policy can be found here: <https://www.facebook.com/about/privacy>. In order to avoid computer attacks based on cookies, we recommend that you make sure that the version of the browser you use is always updated.

We consider that we have a legitimate interest in analyzing the usability of the platform, because we understand that the processing of this data is also to the advantage of the website user, given the purpose used in processing this data, respectively to improve the experience and provide a high quality service.

For more information on the types of cookies used by our platform, please consult the Cookies Policy on displayed on our website.

III. STORAGE PERIOD OF PERSONAL DATA

The personal data we process, will not be stored for a longer period than is necessary for the fulfillment of the specific purpose of use or for fulfilling a legal obligation. By way of exception, personal data may be stored for one for a longer period of time (determined period), in the situation where there is the express consent of the data subject regarding the storage of personal data for another period, but not later than the withdrawal of consent. For example, in the case of personal data processed for the purpose of fulfilling the commercial / business relationships, the financial accounting supporting documents containing personal data, according to the storage term provided by law, can be stored for 10 years from the date of conclusion for the financial year during which they were drawn up, according to the retention period provided by law.

Personal data must be adequate, relevant and strictly limited to what is necessary in relation to the purposes for which it is processed, and once the possible actions are prescribed in each case, we will proceed to delete personal data. Also, when required, we can determine appropriate measures for anonymizing and / or pseudonymizing personal data, where possible, to reduce risks.

IV. PLACE AND METHOD OF STORING PERSONAL DATA

We keep personal data that it collects in secure environments. Personal information is protected from unauthorized access, disclosure, use, modification or destruction by any organization or individuals.

We are taking appropriate technical and organizational measures to ensure the security of personal data, such as access controls, data encryption, transfer with strict observance of confidentiality requirements, etc., in accordance with our security policies.

In order to demonstrate compliance with the data protection principles we have the obligation to implement data protection in our own commercial activities, from the moment of collecting the personal data and until their destruction / deletion from from our data systems.

Currently, personal data is stored at our headquarter. Personal data will be transmitted to affiliated persons, third parties that offer us support in the services we offer or state institutions

in certain circumstances, respectively for the purposes mentioned in this policy, or for fulfilling legal obligations. Personal data will not be transmitted to a third country or international organization outside the European Economic Area (EEA) in respect of which the European Commission has not issued a decision to ensure an adequate level of personal data collection, with unless the transmission is necessary for the fulfillment of a legal obligation and only in certain circumstances such as the application of appropriate protective measures and as the case may be, on the basis of a prior notification and / or based on the related consent. In case the application of adequate protection measures is not possible, the data transfer will be done only with the authorization from the competent supervisory authority and with respecting the legal requirements regarding the protection of personal data.

V. The rights of data subject whose personal data we process

5.1 Right of access by the data subject

Based on a prior request, you have the right to obtain a confirmation regarding the processing or not of personal data. If yes, you have the right of access to the respective data and the following information: the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients to whom the personal data were or are to be disclosed, the period for which will be stored personal data.

5.2 The right to rectification

Based on a prior request, you have the right to obtain without undue delay, the correction of incorrect or inaccurate personal data. At the same time, you have the right to obtain the incomplete personal data.

5.3 The right to erasure ('right to be forgotten')

Based on a prior request, if the personal data are no longer necessary for the fulfillment of the purposes for which they were collected or processed, there is no other purpose, or a legal obligation for the processing of personal data, you have the right to obtain the deletion of personal data, without undue delay.

5.4 The right to restriction of processing

Upon prior request, you have the right to obtain a processing restriction in the following cases: (i) if you consider that the personal data processed are inaccurate, for a period that allows us to verify the accuracy of the personal data; (ii) if the processing is illegal, but you do not want us to delete your personal data, but to restrict the use of such data; (iii) if is no longer needs your personal data for the above mentioned purposes, but you need data to establish, exercise or

defend a right in front of the court; or (iv) you have objected to the processing, for the time period in which it is necessary to verify that our legal grounds prevail over your right.

5.5 The right to data portability

On the basis of a prior request, you have the right to receive the personal data provided, in a structured, commonly used and automatically readable format, as well as the right to transmit the personal data to another controller, if the processing is based on your consent or the performance of a contract and is carried out by automatic means.

5.6 The right to object

Upon prior request, you have the right to object to the processing for reasons related to your particular situation, when the processing is based on a legitimate interest, and to oppose, at any time, to the processing of data for the purpose of direct marketing, including profiling.

5.7 The right not to be subject to a decision based solely on automated processing, including profiling, that produce legal effects concerning or affect the data subject in a similar way in a significant manner. The personal data we process are not subject to automated decision-making, including profiling.

5.8 The right to an effective judicial remedy or the right to submit a complaint with the national supervisory authority for the processing of personal data

Without prejudice to any other administrative or judicial remedies, you have the right to submit a complaint with the ANSPDCP (National Authority for the Supervision of Personal Data Processing, with the headquarter in Bucharest, G-ral. Gheorghe Magheru Boulevard, no. 28- 30, Sector 1, postal code 010336, phone +40.318.059.211, +40.318.059.212, fax: +40.318.059.602), if you consider that the personal data we process violates the personal data protection Regulation.

VI. ENTRY INTO FORCE AND CHANGES TO THE PRIVACY POLICY

The privacy policy is currently valid and dated from 25.05.2018.

Due to the development of our website or the implementation of new technologies, it may be necessary to modify this policy. We reserve the right to change this policy at any time with effect for the future. We recommend that you periodically consult the current policy.