

PRIVACY POLICY

June 1, 2020

ReadyTech Consulting SRL is a European company incorporated in Romania, headquartered in Cluj-Napoca, but serving companies from several EU countries. It is registered under the tax number of 39792399.

At **ReadyTech Consulting SRL** we respect your concerns about privacy and value the relationship that we have with you, therefore, we are keen on collecting and keeping as little data as possible and limit any data collection to absolute minimum. This includes this website, which has a purely informative role at this point.

Please take a moment to familiarize yourself with this privacy policy and let us know if you have any questions by contacting us. We are here to offer you any support you may need and answer any questions about what happens with your data.

We may update this Privacy Policy from time to time, depending on updates to our services or operations, mandatory law changes or in accordance with our corporate privacy strategy. For any changes, please review this Privacy Policy periodically.

Consent

By using our website, you hereby consent to our Privacy Policy and agree to its terms.

Data protection principles

We are committed to processing data in accordance with our responsibilities under the GDPR. To that end, Article 5 of the GDPR requires personal data to be:

- a) processed **lawfully, fairly** and in a **transparent** manner in relation to individuals;
- b) collected for **specified, explicit and legitimate purposes** and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) **adequate, relevant and limited** to what is necessary in relation to the purposes for which they are processed;
- d) **accurate** and, where necessary, **kept up to date**; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to

implementation of the appropriate technical and organizational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

f) processed in a manner that ensures **appropriate security** of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

We have taken all necessary measures to make sure all these principles are effectively implemented in our daily operations, including on this website, and are working continuously on keeping up to date with technology and legislative changes.

Rights of the data subject

In the following, we would like to make sure you are fully aware of all of your data protection rights as detailed by the General Data Protection Regulation.

- The right to access – You have the right to request copies of your personal data. We may charge you a small fee for this service.
- The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete any information you believe is incomplete.
- The right to erasure – You have the right to request that we erase your personal data, under certain conditions.
- The right to restrict processing – You have the right to request that we restrict the processing of your personal data, under certain conditions.
- The right to object to processing – You have the right to object to our processing of your personal data, under certain conditions.
- The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have **one month** to respond to you. Up to this point, we have introduced organizational and technical measures to ensure that all these rights can be fulfilled at the request of each data subject. If you would like to exercise any of these rights, please contact us.

Personal data collected on the website

Our website collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files.

We may collect the following metadata:

(1) the browser types and versions used

- (2) the operating system used by the accessing system
- (3) the website from which an accessing system reaches our website (so-called referrers)
- (4) the sub-websites
- (5) the date and time of access to the Internet site
- (6) an Internet protocol address (IP address)
- (7) the Internet service provider of the accessing system
- (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, we do not draw any conclusions about the data subject. Rather, this information is needed to:

- (1) deliver the content of our website correctly
- (2) optimize the content of our website as well as its advertisement
- (3) ensure the long-term viability of our information technology systems and website technology, and
- (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack.

The collection and processing of this data are carried out solely for the proper functioning of this website.

Besides this data and the data collected via the Contact form (detailed below), we do not collect any other type of potentially personal data. At this point, we do not use any third-party app, advertisement provider, nor have we enabled cookies collection via Google analytics or other tools.

Contact possibility via the website

Our website contains a form enabling a quick electronic contact to our enterprise. If you contact us by e-mail or via our contact form, the personal data which you transmit will be automatically stored. This data may include your name, surname, email address and Internet Protocol (IP) address. Such personal data transmitted on a voluntary basis to us are stored solely for the purpose of processing or contacting you later on.

There is no transfer of this personal data to third parties, and you can always request us to delete it from our records.

Legal basis for the processing

In the case of the data collected on our website or via our contact form, art. 6(1) lit. a GDPR (consent) serves as the legal basis for processing of such data.

If the processing of personal data is necessary for the performance of a contract to which you are party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on **Article 6(1) lit. b GDPR**. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services.

Period for which the personal data will be stored

The contact data entered on our website, via our contact form, is stored for 10 years, after which we delete it from our internal databases. This data can always be deleted at your personal request, by exercising your right to erasure.

Confidentiality and security of your personal data

We consider the confidentiality and security of your information to be of the utmost importance. We will use industry standard physical, technical and administrative security measures to keep your personal data confidential and secure and will not share it with third parties, except as otherwise provided in this Privacy Policy, or unless such disclosure is necessary in special cases, such as a physical threat to you or others, as permitted by applicable law.

However, because the Internet is not a 100% secure environment, we cannot effectively guarantee the absolute security of personal data, and there is some risk that an unauthorized third party may find a way to circumvent our security systems or that transmission of your information over the Internet will be intercepted. It is your responsibility to protect the security of your login information. Please note that e-mails communications are typically not encrypted and should not be considered secure.

Updates to this Privacy Policy

We are closely monitoring changes in privacy regulations across the European Union, as well as in any other market we interact with. Therefore, we are constantly reviewing and updating our privacy practices, in order to offer our customers and partners the best possible services.

Any change, update, or modification will be effective immediately upon posting on our website. We will notify you of any material change to this Privacy Policy by posting a notice on our website's homepage for a reasonable period of time following such update, and by changing the effective date (located at the top of this page). Be sure to return to this page periodically to ensure familiarity with the most current version of this Privacy Policy.

Contact details

If you have any questions or concerns, feel free to contact us at contact@readytechconsulting.com.