

PRIVACY POLICY AND PERSONAL DATA PROTECTION (GDPR)

TOMIS TRADING SERVICES S.R.L.

Version: 1.0

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1. INTRO

This privacy policy describes how **TOMIS TRADING SERVICES S.R.L.** (hereinafter referred to as the "Company", "we" or "the Operator") collects, uses, stores and protects your personal data, in accordance with Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR) and applicable Romanian legislation.

2. IDENTITY AND CONTACT DETAILS OF THE CONTROLLER

Name of the Controller: TOMIS TRADING SERVICES S.R.L.

Registered office: Str. Hortensiei, No. 1, Ground Floor, Apartment 1, Valu lui Traian, Constanța County, Romania

Unique Registration Code (CUI): 42535948

Registration Number: J2020001115130

Website: <https://tomis-trading.ro>

Email for data protection: trading@tomis-trading.ro

Telephone: + 40 737 696 210

3. DEFINITIONS

For the purposes of this policy:

- **Personal data** means any information relating to an identified or identifiable natural person ("data subject").
- **Processing** means any operation or set of operations performed on personal data.
- **Controller** means TOMIS TRADING SERVICES S.R.L., which determines the purposes and means of processing personal data.
- **Processor** means any entity that processes personal data on behalf of the Controller.
- **Data subject** means any natural person whose personal data is processed.

- **Consent** means the free, specific, informed and unambiguous expression of the data subject's will.
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4. DATA PROCESSING PRINCIPLES

The Company processes personal data in accordance with the following principles:

1. **Lawfulness, fairness and transparency** – data is processed lawfully, fairly and transparently.
 2. **Purpose limitation** – data is collected for specific, explicit and legitimate purposes.
 3. **Data minimisation** – data collected is adequate, relevant and limited to what is necessary.
 4. **Accuracy** – data is accurate and, where necessary, kept up to date.
 5. **Storage limitation** – data is kept only for as long as necessary for the purposes of processing.
 6. **Integrity and confidentiality** – data is processed in a manner that ensures appropriate security.
 7. **Accountability** – the controller is accountable and can demonstrate compliance with these principles.
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5. CATEGORIES OF PERSONAL DATA PROCESSED

Depending on the nature of our relationship with you, we may collect and process the following categories of data:

5.1. Identification data

- First and last name
- Personal Identification Number (PIN)
- Series and number of identity document
- Date and place of birth
- Citizenship

5.2. Contact details

- Home or mailing address
- Telephone number (landline and/or mobile)
- Email

5.3. Professional details

- Name of employer
- Job title/position
- Professional contact details

5.4. Financial and billing details

- Bank details (for payments)
- Billing information
- Transaction history

5.5. Automatically collected data (for the website)

- IP address
- Browser and device type
- Browsing data (cookies)
- Date and time of access

6. PURPOSES AND LEGAL BASIS OF PROCESSING

We process your personal data for the following purposes and on the following legal grounds:

Purpose	Legal basis (Art. 6 GDPR)
Performance of commercial brokerage contracts	Performance of a contract [Art. 6(1)(b)]
Issuing invoices and managing payments	Legal obligation [Art. 6(1)(c)]
Fulfilling tax and accounting obligations	Legal obligation [Art. 6(1)(c)]
Commercial communications and marketing (with consent)	Consent [Art. 6(1)(a)]
Responses to requests and inquiries	Legitimate interests [Art. 6(1)(f)]
Improvement of services and website	Legitimate interests [Art. 6(1)(f)]
Prevention of fraud and ensuring security	Legitimate interests [Art. 6(1)(f)]
Resolving disputes and defending in court	Legitimate interests [Art. 6(1)(f)]

7. RECIPIENTS OF PERSONAL DATA

Your personal data may be communicated to the following categories of recipients:

- **Public authorities** – ANAF, judicial institutions, control bodies, based on legal obligations.
- **Contractual partners** – service providers (accounting, IT, legal, courier) acting as authorised persons.
- **Financial institutions** – banks, for payment processing.
- **Consultants and auditors** – to the extent necessary for the company's activity.

We do not sell, rent or transfer your personal data to third parties for marketing purposes without your explicit consent.

8. TRANSFER OF DATA OUTSIDE THE EU/EEA

In principle, your personal data is processed in Romania and the European Union.

If it is necessary to transfer data to countries outside the European Economic Area, we will ensure that: - The destination country offers an adequate level of protection recognised by the European Commission; or - Appropriate safeguards are in place (standard contractual clauses, binding corporate rules); or - One of the derogations provided for in the GDPR applies.

You will be informed in advance of any such transfer and the safeguards implemented.

9. DATA RETENTION PERIOD

Personal data is only kept for as long as necessary to fulfil the purposes for which it was collected:

Data category	Retention period
Contractual data	Contract duration + 3 years (statute of limitations)
Billing and financial data	10 years (in accordance with tax legislation)
Business correspondence	3 years from the last communication
Marketing data	Until consent is withdrawn
Browsing data (cookies)	In accordance with the cookie policy
Data for disputes	Until final resolution

After the retention period expires, the data will be securely deleted or anonymised.

10. RIGHTS OF DATA SUBJECTS

In accordance with the GDPR, you have the following rights:

10.1. Right of access (Art. 15 GDPR)

You have the right to obtain confirmation that your data is being processed and to access this data, as well as information about the processing.

10.2. Right to rectification (Art. 16 GDPR)

You have the right to obtain the rectification of inaccurate data and the completion of incomplete data.

10.3. Right to erasure ("right to be forgotten") (Art. 17 GDPR)

You have the right to request the erasure of data under certain conditions (e.g. the data is no longer necessary, you withdraw your consent, the processing is unlawful).

10.4. Right to restriction of processing (Art. 18 GDPR)

You have the right to obtain restriction of processing under certain conditions (e.g., you contest the accuracy of the data, the processing is unlawful).

10.5. Right to data portability (Art. 20 GDPR)

You have the right to receive the data in a structured, commonly used and machine-readable format and to transmit it to another controller.

10.6. Right to object (Art. 21 GDPR)

You have the right to object to the processing of data for direct marketing purposes or processing based on legitimate interests.

10.7. Right not to be subject to an automated decision (Art. 22 GDPR)

You have the right not to be subject to a decision based solely on automated processing, including profiling.

10.8. Right to withdraw consent

When processing is based on consent, you have the right to withdraw it at any time, without affecting the lawfulness of previous processing.

10.9. Right to lodge a complaint

You have the right to lodge a complaint with **the National Supervisory Authority for Personal Data Processing (ANSPDCP)**: - Address: B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, Bucharest, postal code 010336 - Website: www.dataprotection.ro - E-mail: anspdcpc@dataprotection.ro

11. EXERCISING YOUR RIGHTS

To exercise any of the above rights, please contact us:

- **Email:** trading@tomis-trading.ro
- **Address:** TOMIS TRADING SERVICES S.R.L., Str. Hortensiei, No. 1, Ground Floor, Ap. 1, Valu lui Traian, Constanța County
- **Telephone:** + 40 737 696 210
- We will respond to your request within **30 days** of receipt. In complex cases or in the event of a large number of requests, the deadline may be extended by **an additional 60 days**, in which case you will be informed in advance.

Exercising your rights is **free of charge**. However, in the case of manifestly unfounded or excessive requests (e.g. repetitive), we reserve the right to charge a reasonable fee or refuse the request.

12. DATA SECURITY

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, destruction or disclosure:

- Strict control of access to data (based on the "need-to-know" principle)
- Encryption of sensitive data
- Regular and secure backups
- Staff training on data protection
- Internal security policies and procedures
- Periodic risk and vulnerability assessments
- Confidentiality agreements with employees and partners

In the event of a data breach that may pose a high risk to your rights and freedoms, we will notify you without undue delay.

13. USE OF COOKIES

Our website (<https://tomis-trading.ro>) may use cookies and similar technologies. Cookies are small text files stored on your device that allow us to improve your browsing experience.

Types of cookies used:

Type	Purpose	Duration
Essential cookies	Basic functioning of the website	Session
Performance cookies	Traffic analysis and website improvement	[3] months
Functional cookies	Preference storage	[3] months
Marketing cookies	Advertisement personalisation (if applicable)	[3] months

You can manage or disable cookies through your browser settings. Please note that disabling certain cookies may affect the functionality of the website.

For more details, please refer **to the Cookie Policy** available on our website.

14. CHANGES TO THE PRIVACY POLICY

We reserve the right to update this policy periodically to reflect changes in legislation or our processing practices.

Significant changes will be communicated: - By publishing the updated version on the website - By direct notification (e-mail), if applicable

The date of the last update is indicated at the beginning of the document. We encourage you to review this policy periodically.

15. CONTACT

If you have any questions, requests or clarifications regarding the processing of your personal data or this policy, please contact us:

TOMIS TRADING SERVICES S.R.L.

1 Hortensiei Street, Ground Floor, Apartment 1
Valu lui Traian, Constanța County, Romania

Email: trading@tomis-trading.ro

Telephone: + 40 737 696 210

Website: <https://tomis-trading.ro>

This policy has been developed in accordance with Regulation (EU) 2016/679 (GDPR) and Law No. 190/2018 on measures for the implementation of the Regulation.

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