

Privacy policy regarding personal data

We, UNIVERSAL S.A., located in 2-4 Franceza st., 1st floor, zip code 030104, district 3, Bucharest, Romania, we are extremely concerned to guarantee the confidentiality and full protection of your personal data in accordance with the rules, principles and regulations in force in the European Union regarding this field, including with the REGULATION no. 679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and the free movement of such data.

Personal data means any information about an identified or identifiable individual, and an identifiable person is that identifiable person, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, localization, an online identifier, or one or more specific elements, of its physical, physiological, genetic, psychic, economic, cultural or social identities.

This Policy refers to the personal data of our customers, business partners, other people who come in contact with us or visit our locations, employees or people in the process of hiring, collaborators, and apply to personal data collected through: e- mail, directly to the secretariat, various forms, CV's, video recordings, web-sites, social media. For the purpose of carrying out the activity, UNIVERSAL S.A. may collect, process and store certain legally required personal data, for the conclusion of a contract or in the legitimate interest. These data may be, but are not limited to: name, surname, nationality, address, phone, e-mail address, moving images etc.

Privacy Policy describes:

- The purpose for which we collect and how we use your personal information;
- How we collect personal data;
- The basis of processing for the above purpose;
- The categories of personal data that we collect and process;
- The storage period for processing;
- Your rights and how you can exercise them;
- To whom can we pass this data.

We also want to let you know the steps we take to ensure the security of your personal data, as well as how you can contact us on issues related to privacy and protection of your personal data.

Who we are

UNIVERSAL S.A. is a Romanian legal entity, founded on January 4, 1991, registered with the Trade Register under no. J40/10/1991 and Unique Tax Registration Code no. 361390, RO attribute and an important owner of commercial street premises in Bucharest. The measures presented in this information apply to the activity of UNIVERSAL S.A.. For more details about our company, please visit www.universalsa.ro.

THE PURPOSE FOR WHICH WE COLLECT AND THE MODE IN WHICH YOU USE YOUR PERSONAL DATA

Our company collects data in the following cases:

1. If you are a shareholder, client or potential client of ours:

We have the obligation to safely manage the personal data you provide to us, about you and for the specified purposes only.

1.1. To offer you our services.

In this regard, we request your data for:

- be able to conclude a contract, based on the processing of the data of a contract;
- to submit personalized (optional) offers based on the legitimate interest of the company;
- to be able to verify the shareholder of UNIVERSAL S.A., based on the legitimate interest of the company, as well as a legal obligation;

1.2. To communicate with you.

It is important for us to be able to communicate with you for various purposes, such as finding out your opinion about our services, solving your various inquiries, or providing you our personalized services in a timely electronic manner.

1.3. Legal obligation.

In some situations, we may request some personal information under a legal obligation imposed by applicable law.

1.4. Sending information (commercial e-mail).

We request your data to send to you commercial information / e-mails in electronic format. For this, we will explicitly request your consent / accord, and e-mail address and we legitimately base on our legal interest.

You can withdraw your consent at any time by expressing the option of not receiving any commercial communications / emails in the future by sending to DPO@universalsa.ro an e-mail with the subject UNSUBSCRIBE in response to the e-mail received from us.

The data categories processed in the context of our relationship with you are your name, telephone, fax, address, e-mail address (optional) and other personal data you can provide directly to us.

2. IF YOU ARE EMPLOYED OR OTHER TYPE OF COLLABORATOR

2.1. To enter into contractual relations with us (CIM etc.).

We require data required by law to enter into employment contracts with us on the basis of a statutory obligation: name, first name, domicile, date and place of birth, identity card details, study papers, criminal record (where applicable).

2.2. To communicate with you.

In order to be able to communicate with you in a timely manner, we can request your phone number and e-mail address.

3. If you want to be employed at UNIVERSAL S.A.

We use the personal data contained in the CV's we receive to assess the qualifications of applicants for a position within UNIVERSAL S.A., including our "internship" programs. We base our processing on the interest in the potential conclusion and running of a labor contract. The categories of data processed in the context of our relationship with you are the name, e-mail

address, telephone, fax, address, personal details included in the CV's, details of education and training, professional qualifications, and other personal data you can supply directly.

4. If you are a business partner / supplier:

4.1. To keep in touch with you:

We use your personal data to maintain direct contact and maintain your contractual relationship with you. We collect these data on the basis of the conclusion of commercial contracts.

4.2. Communicating with you.

We use your contact information to communicate with you about any relevant issues related to our contractual relationship.

4.3. Legally Obligation.

In some situations, we may request some personal information under a legal obligation imposed by applicable law.

5. If you are a visitor to UNIVERSAL S.A. premises.

We use your personal data to ensure our security, property and staff. In this case, we rely on data processing in the legitimate interest of UNIVERSAL S.A., namely the protection of the company's premises, assets and personnel.

The categories of data processed in this context are your name as well as other personal data you can provide us directly to our request as well as the images recorded using the video surveillance system.

6. If you are a user of our website - www.universalsa.ro.

We use the personal data we collect from you when you visit our website in order to monitor the traffic and improve the content of the site. We perform this data processing activity in our legitimate interest in ensuring the proper functioning of our website and improving it.

The data categories processed in this context are the time and date of accessing the site, the IP address, and the ISP from which the site was accessed.

The basis for the processing of personal data may be: a legal obligation (if UNIVERSAL S.A. is legally obliged to disclose certain personal data to public authorities), the execution of a contract concluded by UNIVERSAL S.A. in the context of a particular transaction or legitimate interest of UNIVERSAL S.A. to perform a transaction in the most efficient way.

7. Provision of personal data.

When personal data is requested directly from you, UNIVERSAL S.A. asks you to provide all the categories of data we request for the above mentioned purposes, otherwise we will not be able to perform our specific activity.

If you provide UNIVERSAL S.A. personal data of other individuals, please tell them, prior to such data provision, how UNIVERSAL S.A. intends to process their personal data as described in this privacy policy.

8. Transmitting personal data to third parties.

Although, as a general rule, even if we do not disclose your personal data to third parties, it is possible:

- to disclose contact details to our marketing service providers (only with your consent);
- to disclose contact details to our legal service providers;
- to disclose contact details to our debt service providers;
- If there is a legal obligation to transmit relevant personal data to public authorities, in the context of providing us with the services you requested.

9. Processing time.

We intend to keep your personal data for a short period of time, as long as the minimum necessary for the proper conduct of our business - usually 60 (sixty) months.

However, there are situations where the legislation in force requires that certain sets of data be retained for longer periods of time.

10. Your rights.

As a personal data holder, GDPR gives you a number of rights, including:

- **the right of access** - allows you to obtain confirmation that your personal data is processed by us and, if so, what are the relevant details of these processing activities;
- **the right to rectify** - allows you to rectify your personal data if it is incorrect;
- **the right to delete** - allows you to erase your personal data in certain cases, such as:
 - if the data are no longer required for the purposes for which they were collected;
 - if your processing was based on your consent and you have withdrawn your consent, your consent has expired or if there is no longer a legal basis for processing your personal data;
 - a court or a regulatory authority has decided that your personal data in question must be deleted;
 - if it is proven that your personal data has been processed unlawfully;
- **the right to restrict** - allows you to obtain the restriction of processing your personal data in certain cases (for example when you contest the accuracy of your personal data for a period that allows us to verify this accuracy);
- **the right to object** - allows you to object to the further processing of your personal data under the conditions and limits set by law;
- **the right to data portability** - allows you to receive the personal data you have provided to us in a structured, commonly used and readable format, or to send these data to another data operator.

We are happy to ensure that these rights are respected, unless this proves impossible or involves a disproportionate effort. You may exercise the above rights and learn more about

such rights by submitting to us, as data operator, a written request to UNIVERSAL S.A. or by e-mail sent to DPO@universalsa.ro.

You also have the right to file a complaint with the data protection authority.

We are committed to always addressing your requests with the utmost care and to address any questions you may have to receive an answer as soon as possible.

11. VERSIONS OF THIS CONFIDENTIALITY POLICY

This Privacy Policy enters into force in May 2018. This Privacy Policy may be updated based on the legal changes that may occur. Any updates will apply within 15 days of site publishing.