

Privacy Policy

Last updated: June 2025

Introduction

For Comtim Romania, confidentiality of your data is very important, which is why we are committed to following it by taking all necessary measures. This policy describes what personal data we collect from you, for what purposes and on what legal basis, with whom it is shared, and your rights.

This policy can be changed at any time, without notice, by posting a new version here. Please check this policy every time you visit this site to identify and understand any changes that have occurred.

Operator's Identity and Contact Details

Name: Comtim Romania SRL

Trade Register No.: J2000000962351

Unique Registration Code: RO13427047

Headquarters: Timișoara, 4 Polona Street, Building GF+2F

What personal data do we collect and how do we use them?

Data provided voluntarily by visitors

The voluntary addition of the email address in the Contact section, alongside your last name, first name and phone number, gives us access to these data so that we can reply to your message. Data provided voluntarily are therefore processed based on consent. You can withdraw this consent at any time by emailing dpo@comtim.ro

Your personal data processed for the purpose of responding to your requests is stored for a period of 6 months, at the end of which the data is deleted from Comtim Romania's records.

Processing of personal data through video surveillance systems, in case of access of data subjects to Comtim Romania premises

Comtim Romania, through video surveillance systems, processes personal data, i.e. images, which allows identification of data subjects.

The purpose of processing personal data is for: monitoring/security of persons, premises and/or property, preventing and combating crimes, fulfilling legal obligations and achieving legitimate interests.

The registered information is intended for use by Comtim Romania and can only be communicated to the following recipients: authorized representatives or contractual partners of Comtim Romania, prosecution/criminal investigation bodies, courts, in accordance with the provisions of national and Community law applicable to the activity carried out by Comtim Romania.

The storage time of data obtained through the video surveillance system shall be 30 days, except in situations expressly regulated by law or duly justified. Upon expiry of the deadline, records shall be destroyed or deleted.

Automatic data collection

The IP address of your computer is collected automatically when you visit our website. The IP address is a number assigned to your computer when you access the Internet. These addresses are recorded for IT security reasons in the logs of the information systems that manage the website. We do not use your IP address to identify you or for purposes other than information, statistics or website protection.

Data of representatives and contacts of clients/suppliers

Comtim Romania collects and processes the personal data (Name, First Name, Function, e-mail and phone) of the customer/supplier's representatives and contacts, including collaborators, for the following purposes:

- (i) to send to the Company you work for, orders/offers/confirmations of offers/invoices/notifications regarding the performance of contracts concluded between Comtim Romania and the Company you represent or other documents and/or information relevant to existing or potential commercial relations between Comtim Romania and the Company you work for.
- (ii) Comtim Romania's compliance with the obligations imposed by law and the regulatory bodies to which Comtim Romania is subject, such as obligations to combat money laundering and counterterrorism, the obligation to report to the tax authorities.
- (iii) the exercise or defense of our legal rights or the observance of judicial orders.
- (iv) for the purpose of transferring certain personal data to other companies within the Comtim Romania group as part of business activities (reporting, administrative, operational etc.).

Legal basis used for processing personal data

The law in Europe allows us to process personal information, as long as we have a legal basis to do so. The legal bases used by Comtim Romania are as follows:

Legal obligation. This legal basis is used when we are required to process personal information in order to comply with a legal obligation, such as keeping personal data for tax purposes or providing information to a public authority;

Legitimate interest. We will process information about you for the purpose of carrying out the current activity of Comtim Romania, and only as long as it is not above your personal interests;

Your consent. In some cases, we will ask you for specific permission to process your personal data, and we will process this personal data only based on your consent. You can withdraw your consent at any time by contacting Comtim Romania at dpo@comtim.ro.

Examples of legitimate interests mentioned above are:

- To provide information and/or services to individuals who visit our website or provide information about employment opportunities.
- To prevent fraud or criminal activity and to protect our computer systems.
- To personalize people's online experience and improve the performance, usability and efficiency of Comtim Romania's online presence.
- To perform and analyze our marketing activities.

Children under the age of 16

Comtim Romania understands the importance of protecting children's privacy, especially in an online environment. Our website is not intentionally designed for or intended for children under the age of 16. It is our policy not to consciously collect or maintain information about any person under the age of 16, unless there is a commitment to provide professional services.

Who do we share your data with?

We will not disclose your information to third parties for use for their own marketing or commercial purposes without your consent.

Within the processing operations carried out, personal data may be transferred to entities within the Comtim Romania group as part of business activities (reporting, administrative, operational, etc.).

However, we may disclose your information to other companies that provide us with/provide services and act as an operator/processor, such as companies in charge of the maintenance of the website or sending communication emails on our behalf, as well as to our customers and suppliers.

These entities are selected with particular care to ensure that they meet the specific personal data protection requirements and do not have the ability to use your information for purposes other than in exceptional and expressly provided situations.

Retention period

Comtim Romania has implemented technical and organizational measures for the retention of personal data. Thus, we will retain personal data in accordance with the provisions of the data retention policy applicable at Comtim Romania level.

However, we will cease to process any of your personal data as long as it is not necessary for the purposes set, when you withdraw your consent or when the legal basis in which the personal data was processed is no longer valid.

Rights of the Data Subject

When Comtim Romania processes personal information about you, you have the following rights:



Information: You have the right to be informed of the processing of personal data carried out by Comtim Romania.

Access: You have the right to have access to that data and to obtain confirmation from Comtim Romania that personal data concerning you or not is being processed and, if so, access to that data.

Correction: If the information we hold about you is incorrect or incomplete, you have the right to ask us to correct our personal data.

Deletion: You have the right to request, without undue delay, the deletion of personal data in the following situations: personal data is no longer necessary to accomplish the purposes for which it was collected; the agreement under which the processing of personal data took place has been withdrawn and there is no other legal basis for processing; you oppose data processing and there are no legitimate reasons to prevail in data processing; personal data have been illegally processed; personal data must be deleted in order to fulfil a legal obligation.

Processing restriction: You have the right to limit the processing of personal data, if one of the following situations applies: the accuracy of your personal data is disputed by you, for a period that allows verification of the accuracy of personal data; the processing of personal data is illegal and you object to the deletion of personal data, requesting restriction of use; Comtim Romania no longer needs personal data for processing purposes, but you request it for the finding, exercise or defense of a right in court; you object to processing on the basis of legitimate interests, while verifying that the legitimate rights of Comtim Romania prevail.

Portability: You have the right to receive the personal data provided to Comtim Romania in a structured format that can be read automatically. Where the technical means permit such an operation Comtim Romania may transmit this data to another operator. You have such a right when the processing of personal data is based on your consent or on a contract with you and the processing is carried out by automatic means.

Objection: You have the right to object, for reasons related to your situation, to processing based on the legitimate interests of Comtim Romania. Comtim Romania will no longer process your personal data, unless it demonstrates compelling legitimate processing interests that take precedence over your interests, rights and freedoms or if the purpose of processing is to establish, exercise or defend a right in court.

Withdrawal of consent: If the processing of personal data is based on your consent, you have the right to withdraw it at any time, without the withdrawal of consent affecting the legality of the processing performed before it is withdrawn.

You have the right not to be subject to a decision based solely on automated processing, including profiling, which has legal effects on you, as well as the right to lodge a complaint with the competent authority responsible for the protection of personal data, the **National Authority for the Supervision of Personal Data Processing (ANSPDCP)**.

If the subject data, directly or by representatives, exercise the above-mentioned rights, without good reason, unjustified or excessively, especially due to their repetitive nature, Comtim Romania can:

- either exercise a reasonable fee, considering the administrative costs for supply of information or processing of measures requested;
- or refuses to act on the request.

How can you contact us?

For questions related to the terms of the Privacy Policy or for any queries regarding the exercise of your rights mentioned above, please contact us at dpo@comtim.ro or at our correspondence address in Timișoara, 4 Polona Street, Timis County.