

Policy on the protection and processing of personal data

Address: 3, Occidentului Str., 3rd floor, zip code: 010981, 2nd district, Bucharest, Romania
(str. Occidentului nr.3, et. 3, cod poștal 010981, Sector 2, București, România)

Contact details : Phone: +40770250585

Processing principles

The processing of personal data we come into contact, hold and/or is entrusted to us is carried out according to the guidelines of the (EU) Regulation 2016/679, among which we mention:

- Principle of ensuring the confidentiality since the first interaction with the personal data;
- Principle of ensuring confidentiality in each phase/activity of personal data processing;
- Principle of transparency and fairness;
- Principle of holding control over own personal data;
- Principle of limiting the purpose as well as the principle of lawfulness of personal data processing;
- Principle of ensuring the security and integrity of processed data, either on digital or lettered (printed) format;

The protection of the information provided by you or for you or about you, is considered an important component for the activity we carry out and we wish to assure you that we enforce it with priority in all activities involving the processing of your personal data (*hereinafter referred to as PD*).

We furtherly present you a series of aspects we consider you should know about the information we collect, the legal framework we use, the collection purpose, how the information is used, who uses it and with whom we share it.

Legal framework

Observing the national and European legal provisions, meaning the **(EU) Regulation 2016/679**, on the protection of personal data and the free movement of such data, as well as its enforcement norms in the national legislation, **Law no. 190/2018**, your personal data are processed according to the Privacy Policy on the protection of personal data for the processing of personal data, internal working procedures and processes, approved by the decision factors within iSense Solutions International Research SRL (*hereinafter referred to as iSense*).

Observing the national and European legal provisions, as mentioned at the beginning, we would like to inform you that your personal data are processed in accordance with the legislation in force and with the Privacy Policy on the protection of personal data for the processing of personal data, internal working procedures and processes, approved by iSense or the agents of its legal representative.

We would like to inform you that such Privacy Policy might be amended in any moment, while the updates and amendments of the Privacy Policy are immediately available after notification and/or publication, which we shall display on www.SensePanels.com and, if necessary, through a notification sent on your email address, provided by you beforehand.

Contact details

Contact details of iSense

The contact details of iSense, as the organisation identified under the name iSense Training Center Association is hereinafter referred to and whose contact details are detailed subsequently, as well as on the website www.iSenseSolutions.ro, hereinafter considered as **data operator** according to the legal provisions in the field of personal data protection, who undertakes the responsibility of processing your personal data, when such data are collected directly from you or external sources (*additional*):

Address of the registered office: 3, Occidentului Str., 3rd floor, zip code: 010981, 2nd district, Bucharest, Romania (inside Ivy Office) (*str. Occidentului nr.3, et. 3, cod poștal 010981, Sector 2, București, România*)(*incinta Ivy Office*).

Contact details: contact@sensepanels.com

What are the identification details of the organisation processing your personal data?

The identification details are: iSense Solutions International Research SRL, with registered office in IVY Office Building, 3, Occidentului Str., 3rd floor, zip code: 010981, 2nd district, Bucharest, Romania (*clădirea de birouri IVY Office, str. Occidentului nr. 3, et. 3, cod poștal 010981, Sector 2, București, România*), registered at Trade Register under the no. J40/11410/17.09.2015, Unique Identification Code: RO35015004, legally represented by administrator.

Contact details of the DPO appointed by iSense

In case you will need additional information in this regard, please do not hesitate to contact us; we recommend using the contact details of the data protection officer (*abbreviated DPO*) appointed within iSense, who will answer you in the shortest possible time, up to 30 days. Contact details of the DPO are the following:

By email: dpo@sensepanels.com

Mail address: 3, Occidentului Str., 3rd floor, zip code: 010981, 2nd district, Bucharest, Romania (*str. Occidentului nr. 3, et. 3, cod poștal 010981, Sector 2, București, România*),

Type of collected data

We process different types of personal data provided by you or provided for you or about you- hereinafter referred to as „**Personal data**” (abbreviated PD):

- Surname, name, gender, birth year and zip code, email address, date of birth, age (*hereinafter referred to as „personal data”*)
- Additionally, in the case of the people who register and activate the account within the platform and answer several additional questions when completing the user profile, which helps us send the invitations to researches based on the user profile and type of respondents needed for a specific research (*which can be of various types, also referred to as survey in the hereby document*), we will be able to process also at education, occupation level, whether the person is a driver or not, the brand of the car he/she drives or owns, preferences (*for instance favourite foods, preferred fast-food, hobbies and interests, electronics/appliances, computer or video games, travels,*

whether he/she is a tobacco products consumer or smoker), information that include and can be considered personal data as defined in the Regulation and which we consider elements included in the „*Personal data*” category.

- IMPORTANT: during the process of completing the user profile, based on the answers to optional additional questions and in the case of participation to different researches, the following sensitive personal data may be collected: racial or ethnic origin, political opinions, religious belief or philosophical ideas, memberships in unions or data related to health or sexual life, information including or which may be considered personal data, as defined by the Regulation and which we consider elements included in the „*Personal data*” category, under special regime;
- Date and time of participation in the survey and/or date and time frame during which the survey took place, degree of completing the survey, percentage of inclusion in the user profile of a survey, theme of the survey (*hereinafter referred to as „Data related to the survey” and referring to the answers offered by you following the completion of the questionnaires accessed and completed within the research*).
- Additionally, in case of data taken from the answers to questionnaires within the researches in which the user participates and which are used for reporting the results of the surveys in anonymised form (*meaning that third parties are not allowed to identify the identity or the responding user/participant in a survey and/or market research*), the following types of information may be included: data regarding the customs and preference for consumption, as well as those related to the different types of goods- media, auto, consumption, food, holidays and leisure activities, medical products and services, possession and use of internet connection devices, information regarding the attitude towards certain brands or products, information we could consider components in the category entitled „*Data regarding the survey*”.
- IMPORTANT: in certain cases, regarding the answer to surveys conducted by certain market researches in which the user chooses to participate, certain sensitive personal data may be collected, such as racial or ethnic origin, political opinions, religious belief or philosophical ideas, memberships in unions or data related to health or sexual life, information including or which may be considered personal data, as defined by the Regulation and which we could consider components in the category entitled „*Data regarding the survey*”, under special regime;

Observation: the user is not obligated to answer to questions that could disclose or contain personal data information. This type of question shall always include the option „I prefer not to answer”. The answers to such questions will remain confidential, except for the cases in which the user expresses explicitly and freely the consent regarding the transmission of such answers, along with other personal data, as defined above, towards the customers in the research field, for close analysis.

- Identification data from the identity document, address for invoicing/drawing up a document necessary for reimbursement, financial information (*IBAN account, bank, holder of the account and/or user name, efinance platform, related email address*) (*hereinafter referred to as „Data regarding the payment”*).
- Contact/ communication preferences, email address, mobile phone number and/or landline, mail address (*including the district or zip code associated to such address*), content of the communicated/transmitted message and its subject, content of the

attached documents transmitted towards iSense (*hereinafter referred to as „Communication data”*)

- Information related to the quality of potential user and quality of user, details regarding the use of www.SensePannels.net portal by you (*for instance, date and time you accessed www.SensePortal.net*), including the public IP address you used, public ID device, as well as similar data about you (*for instance, different technical indicators, such as time spent on the website, area accessed in the portal*)(*hereinafter referred to as „Statistical Data”*).

Means of collection

Since the processing of your PD represents a legal obligation necessary for carrying out our activity of making available the products and/or services you wish to contract from us, and since such processing allows us to improve our products and services offered to you because it helps us process your requests quickly and to better manage the relationship with you, we wish to inform you on the means through which we collect such PD; in the subsequent list, we tried to explain a part of the means through which we collect the PD, but, in some special cases, we may use other means different from those subsequently mentioned:

- Directly from you (*by filling in the necessary registration in the online portals, in which and through which we manage to carry out the provision of contracted services, transmitted by email, transposed in a lettered format, SMS, social media or other agreed means of communication*);
- From the traffic reports registered on servers hosting the iSense website or servers and devices or software solutions composing the iSense information system;
- Using online platforms of social network (*for instance, Instagram, Twitter, Facebook*) as well as through cookies;
- From third-party partners, who communicate data for the provision of services at the quality level we wish (*for instance without limitation marketing services providers*), or for improving the products/services according to your requirements (*for instance, without limitation market research providers*); if we receive such information, we shall fulfil our legal obligation to inform you within 30 days from such endeavour;

Additionally, under the reserve of your prior consent (*which you may **WITHDRAW IN ANY MOMENT**, without additional costs, through a simple request addressed to iSense project team, particularly to the data protection officer appointed within iSense activity*), we could also process your PD for:

- Transmitting customised advertising announcements about our products or services or products or services of the partners/providers and/or collaborators, that we consider might interest you;
- Offering customised experiences;
- Performing market surveys (*for instance, without limitation, customers satisfaction degree*);
- Activating different facilities you wish in the activities carried out by iSense;

MANNERS of using the collected data

In the subsequent list, we detail several manners of using the information that could be considered PD:

- For selecting the respondents in the health surveys;
- For creating the user profile in the iSense portal;
- For remunerating the efforts/activities carried out in the iSense portal according to the Regulation in force;
- To allow iSense to comply with the legal provisions applicable to the activities carried out;
- In our attempt or the attempt of the partners or providers to ensure that we or they can contact you easily and professionally;
- To make available the information you requested;
- To offer you the products or services you requested;
- To send you relevant information on our products/services;
- To measure the performance of our advertising campaigns, either launched by us directly or through directly or indirectly delegated staff, through contracted partners/providers;
- To measure the performance of our sale and post-sale services;

Data RETENTION PERIOD

The subsequent table shows the maximum periods for retaining your personal data. This period may be extended if we are obligated by the legislation in force upon the collection time or through your consent.

After the expiry of such period, in case we do not have your consent regarding the extension of the period for retaining your personal data, such data will be transformed in statistical data through anonymization or, if applicable, will be safely deleted.

PD processing category	Retention period
Management of the relation with the users, transmission of relevant information about the processing of personal data, communication of necessary information following the participation in researches, measurement of the performance of promotional campaign, sales and post-sales services	5 years for registered users, 2 years for prospect users (<i>as the users who initiated the registration process on iSense portal and who did not complete the process are referred to</i>)
Surveys regarding the user’s satisfaction degree regarding the participation in iSense platform	2 years from the termination of the survey
Retention of financial-accounting documents and other documents necessary for the conformity with legal provisions in force.	10 years from the issuance of the documents in matter

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LAWFULNESS of the PD processing

The personal data legally processed by the iSense representatives and/or agents, for the provision of contracted products and/or services, as well as regarding the communication processes, including in the online environment or the answers offered after the request of an offer, the completion of online forms, improvement of services, subscription to Newsletter or provided by them in any other way through the use of the website or in the relation with iSense, may be processed directly and/or through delegates, based on the following grounds:

1. If you are an iSense website visitor, we can process your data in the subsequent way:

1. A. For more information regarding the use of cookies modules, access the Cookies policy available on iSense website.

Processing ground: legitimate interest, according to the provision of the Law 506/2004.

B. For the **purpose** of managing the applications sent through contact forms, request for additional information and/or claims on the iSense website:

Processing ground: legitimate interest

2. If you subscribed to business information we transmit through email (*activity hereinafter called „Newsletter”*), we could process your personal data for marketing purposes, for the transmission through remote communications means (*for instance, without limitation, email, phone, text message*), and other newsletter-type digital communication platforms or other business messages, regarding the iSense products and services, affiliates and other companies cooperating with us.

Processing ground: your consent;

IMPORTANT: your consent for direct marketing activities *may be withdrawn in any moment*, without additional costs for you. You must keep in mind that the withdrawal of your consent will produce effects in the future, without affecting the lawfulness of the processing prior to the withdrawal.

2. If you are a third party, without a role/quality of potential customer and/or customer, and regardless the method of contacting the iSense, we can process your personal data:

A. For observing the legal obligations in the following purposes:

- Settlement of claims regarding the exercise of the rights you benefit from in the context of personal data processing consented by the legislation in force;
- Management of the relations with public authorities or other public and/or private entities providing a public service;

Processing ground: legal obligation;

B. For the fulfilment of legitimate interests of iSense for the following purposes:

- Determining, exercise and defense of certain rights of iSense in courts, as well as any other legal procedures;
- For online access to announcements and related information;
- Transmission of answers following your requests;
- Insurance of IT infrastructure security, at the registered office and/or work facilities of iSense;
- Insurance of security and protection of the staff (team) of iSense;
- Management of any other application, suggestion, claim;

Processing ground: legitimate interest

3. AS USER of iSense platform (*former, current*), we can process your personal data in the following ways:

3.1. If you created the user account in iSense platform:

A. For observing the legal obligation for the following purposes:

- Fulfilment of financial-accounting obligations, including the preparation of accounting registries, keeping the supporting documents at the basis on accounting registrations;
- Settlement of complaints/ claims, related to the exercise of the rights you benefit from in the context of personal data processing;
- Archiving documents, according to legal provisions and observance of terms from iSense archive centraliser;
- Management of the relation with public authorities or other public/private entities, providing a public service;
- Keeping certain registries, forms according to the provisions provided by the special laws;

Processing ground: legal obligation

B. for the conclusion and execution of the agreement, for the following purposes:

- Taking and processing of contracting requirements, directly by you or indirectly, through an iSense employee or third party acting as intermediary contracted/ appointed by iSense for the management of the relation with iSense (*empowered by iSense*);
- Provision of specialty services offered by iSense, including in the context of completing the forms for the request of information for the execution of services requested by users;
- Provision of contracted products and/or services;
- Participation in researches (studies) involving the completion/ answering to questionnaires related to a general specific („*Data regarding the survey*”);
- Invoicing, reimbursement or sums, transfer of sums or return of sums;

Processing ground: execution of a contract between the parties/ observance of the contractual provisions;

- Management of answers and information generated following the participation in researches (studies) involving the completion/ offering of answers to related questionnaires with general specific („*Data regarding the survey*” *under special regime*);

Processing ground: your consent;

C. For executing the legitimate interests of iSense, we pursue the following purposes:

- Acknowledgment, exercise or defense of certain rights of iSense in Courts, as well as any other legal procedures;
- Online access to information and announcements of interest;
- Management of requests/ claims received in connection to the execution/ fulfilment of obligations (*of the contract*);
- Transmission of answers following your request;
- Insurance of IT infrastructure security, at the registered office and/or work facilities of iSense;
- Insurance of security and protection of the staff (team) of iSense;
- Management of any other application, suggestion, claim;

Processing ground: legitimate interest

4. AS PROSPECT of iSense (*future user of the iSense platform*), we shall process your personal data in the following ways:

4.1. In case you wish to register in iSense platform:

A. For the conclusion and execution of contracts for the following purposes:

- Taking and processing of the requirements for the creation of accounts, directly by you or indirectly, through an iSense employee or third party acting as an intermediary (*empowered by iSense*);
- Making available the researches (studies), iSense questionnaires, including those carried out in iSense portal, or transmitted by email;
- Management of the claims regarding the execution of the contract, the quality of the services provided through iSense portal;

Processing ground: fulfilment of pre-contractual formalities (*good execution of a contract*) observance of contractual provisions;

B. For executing the legitimate interests of iSense, we pursue the following purposes:

- Acknowledgment, exercise or defense of certain rights of iSense in Courts, as well as any other legal procedures;
- Data processing in phone appointments;
- Online access to information and announcements of interest;
- Transmission of answers following your request;
- Management of any other application, suggestion, claim;

Processing ground: legitimate interest

Concerning our PROVIDERS

We can allow the processing of your personal data to one of our partners (*affiliates, providers, collaborators*), for improving the services and products we offer. Before allowing them the access, we make sure they sign agreements, obligating them to implement adequate security measures regarding the protection of personal data entrusted to them or processed on your name or account.

For instance, we allow the access and /or we transfer the personal data to organisations we contract, who offer services on the name and account of iSense.

The following list includes the categories of these providers:

- Internet services (*for instance without limitation, web hosting, email hosting*);
- Marketing services;
- Sponsorships, competitions, promotions, awards, raffles;
- Data analyses services;
- Accounting services;
- IT security services;
- IT&C maintenance services;
- Customer services;
- Services regarding the surveys and/or market researches and/or customer satisfaction.
- Auditing services;

Concerning the enforcement of THE LAW, CONFORMITY and SECURITY

As part of our collaboration with other organisations in the iSense project, we can make available your personal data to their representatives. As part of our collaboration with each of these organisations, we make sure they implement a minimum set of security measures so that your personal data are permanently secured and, for instance, without limitation, in case of merge or reorganisation, we may transfer your personal data notifying you in a reasonable term.

Concerning the DATA TRANSFER

If we must allow the access or we must transfer your personal data towards public authorities or government, national or European authorities, due to national security reasons, conformity with legislation in force or due to public importance reasons, we will take all measures to notify you in advance, each time it shall be necessary, according to the law.

RIGHTS

<p>1. right to information and access to data</p>	<p>allows you to obtain the confirmation that your personal data are processed by us and, if the answer is affirmative, which are the relevant details of these processing activities;</p>
<p>2. right to data rectification</p>	<p>allows you to rectify your personal data, in case they are incorrect;</p>
<p>3. right to data erasure</p>	<p>allows you to obtain the erase of your personal data, for instance:</p> <ul style="list-style-type: none"> ○ If data are no longer necessary in connection to the purposes for which they have been collected; ○ If the processing was based on your consent, and if you withdrew the consent, case in which there is no other legal ground for processing your personal data; <p>in case it is demonstrated that your personal data have been processed illegally;</p>
<p>4. right to restrict processing</p>	<p>allows you to restrict the processing of your personal data in certain cases (for instance, when you appeal the accuracy of your personal data processing, on a period allowing us to verify such accuracy)</p>
<p>5. right to data portability</p>	<p>allows you to receive the personal data you provided, in a structured form, currently and legible, or to transmit such data towards another data operator;</p>
<p>6. right to oppose</p>	<p>allows you to oppose the subsequent processing of your personal data, within the conditions determined by the law;</p>
<p>7. right to file a claim to surveillance authority and/or legal court</p>	<p>allows you to contact ANSPDCP- National Authority for the Surveillance of Personal Data Operation or the Court regarding any breach of your rights connected to personal data processing and you may claim the inobservance of the rights guaranteed by law;</p>
<p>8. right not to be subject to a decision based solely on automated means</p>	<p>the right to request and obtain the withdrawal, cancellation or re-evaluation of any decision based exclusively on processing made through automatic means producing legal effects or affecting the interested parties in a similar way and in a significant measure.</p>

If, in good faith, we consider that the disclosure of your personal information is necessary for the protection of our rights, for the settlement of legal conflicts, for investigating a fraud, for

protecting our users, customers or employees or for observing the terms and conditions, we shall disclose them and take all possible measures to notify you within a reasonable term however, no longer than 30 days.

If we consider that the transfer of your personal data outside the European Economic Area (*hereinafter referred to as EEA*) shall be necessary, iSense and contracted providers shall pay special attention to how such data are processed, while the related transfer of PD will be made only towards the recipient(s) and companies who have taken additional security measures and present a sufficient set of warranties able to allow the development of the entire PD processing in optimal conditions.

To answer in the shortest possible time to you requests for the enforcement of rights offered by the legislation in force in the field of personal data protection, we recommend you to get in touch with iSense DPO, by email at the address: dpo@sensepanels.com, or in writing, at the following mail address: str. Occidentului nr. 3, et. 3, cod poștal 010981, Sector 2, București, România (*Ivy Office*).

Please keep in mind that the above-listed rights are not absolute, but we promise that each application received shall be analysed to make a decision related to its grounds. If your application is grounded, we shall assist you, regarding the exercise of the rights, while in case the application is NOT grounded, we reserve the right to reject it, however, we shall inform you on the rejection reasons and on your right to submit a claim at the Surveillance Authority or to address to Justice.

IMPORTANT: If, despite all efforts, we are unable to identify you, and you fail to provide us the additional information to complete the correct identification procedure, we reserve the right to act on such application.

The response term for each application you send us is 30 days; nevertheless, we would like to inform you that this term may be extended due to different reasons, such as the complexity of the application, increased number of applications or impossibility to identify you in due time.