

PRIVACY POLICY
www.telekomarena.ro
Central Ice Rink

The purpose of this Privacy Policy is to explain to you what data we collect data through the website, why we collect it and what we do with it. This information is important. We hope you will read it carefully.

CENTRAL ICE RINK S.R.L. headquartered in 24-26 Nordului Road, 1st floor, room 7, 1st District, Bucharest, **sole registration code** RO32773446, **registration certificate under no.** J40/1577/2014, in its capacity as author, owner and administrator of the website www.telekomarena.ro and in its capacity as „**controller**” within the meaning of the norms established by the national legislation and by the General Data Protection Regulation (*Regulation no. 679 drafted by the European Parliament and of the Council of the European Union on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC*) (GDPR), which comes into force from May 25, 2018.

respects the right to privacy of the individuals who access the website and ensures the correct protection of the processing of Personal Data (PD) for **visitors** and **users**.

Visitors – individuals who access the webpage www.telekomarena.ro, anonymously;

Users – individuals who use the site and fill in the contact forms in the website.

Although you can access the content of the website without providing any personal information, except for cookies and IP (in this regard please consult the Cookie Policy for further details), which could fall into the category of personal data (visitor), in case you fill in personal information online, our company can use it later for the purposes stated in this document.

Your personal data will be processed exclusively on the basis of the express and unequivocal consent granted for this processing. Therefore, making available the data/information requested through the website www.telekomarena.ro is considered as representing your express consent for your personal data to be used by Central Ice Rink SRL, in accordance with the purposes mentioned below.

We expressly warn visitors and users that all processing of personal data refers exclusively to persons who have reached the age of 16 years. Use of the website by children under the age of 16 year is prohibited. However, if such a situation occurs, resulting in the processing of personal data of children under 16 years old, we will stop the processing of such data as soon as we become aware of such a fact. The responsibility for the use of the website by children belongs exclusively to the parents.

The data protection officer (PDO) can be contacted at the address: ITH Management Office S.R.L., 24-26 Nordului Road, 1st district, Bucharest, telephone: 0214312149, e-mail: dataprotection@tiriacgroup.ro.

The personal data we request by filling in the communication forms from Central Ice Rink website is:

- surname and first name;
- e-mail address;
- telephone number.

If you do not agree with the processing of your personal data, please do not fill in the user forms on the website, instead you can send us your message by e-mail or telephone, using the contact data registered on the website.

For situations in which your personal data is filled in by a third party, we do not take responsibility for the author of the registrations.

The purpose for which we process the personal data you provide to us by filling in the user form in the respective section of the website is:

- **for your registration as beneficiary of on-line services;**
- **in order to receive further information by e-mail regarding our marketing campaigns, expressing your free consent by accessing the existing form;**
- **in order to be able to send us comments regarding our services and products;**

- to send you the newsletter - the periodic letter sent by e-mail whereby you will be informed of all the news, expressing your free consent by accessing the existing form;
- for further correspondence with you;
- for submitting the offers especially requested through the comments written on the website; processing the requests.
- in order to solve the different requests/questions/notifications/complaints addressed by the users;
- for the legitimate interest of the company; e.g.: for the purpose of ascertaining, exercising or defending a right in court, for internal administrative purposes, for billing the services provided and for making the related payments; in order to protect copyright and related rights.

The collection and processing of personal data is done in compliance with the norms established by the European Union and the national legislation, as follows:

- Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of natural persons with regard to the processing of personal data and the free movement of such data;
- **REGULATION (UE) 2016/679 OF 27 April 2016** on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General data protection regulation) (Text with relevance for the EEA), **provided that it enters into force from 25.05.2018.**
- The Constitution of Romania, republished (Art. 26);
- Law no. 31/1990 regarding commercial companies, republished, as further amended and supplemented;
- Law no. 287/2009 of 17 July 2009 regarding the Civil Code, republished, as further amended and supplemented;
- Law no. 134/2010 regarding the New Civil Procedure Code, republished;
- Law no. 677/2001, as further amended and supplemented, as well as its subsequent regulations (ANSPDCP Decisions).

In case of website visitors, Central Ice Rink SRL does not know any data about them, except for IP address and cookies (*for more details please see the privacy policy regarding cookie modules*), but it monitors the number of visitors and the sections in websites that are visited, for statistical purposes.

The company Central Ice Rink SRL pursues the legitimate interest of easy communication with its clients, attracting new clients and monitors the use of the website by the visitors, in order to carry out the current economic activity.

The personal data submitted by you on this website are also viewed by other legal persons, our joint controllers or processors, as follows:

- **Categories of processors:**
- IT programmers and developers who deal with the maintenance, modification of the application, updates actions performed by the selected provider in order to ensure the maintenance of the website.
- IT specialists dealing with the security of the infrastructure.
- security specialists dealing with the audit of the security tools used, performed only upon request and in order to prevent the occurrence of cyber vulnerabilities, done by the selected provider in this regard.
- consultants in marketing services - ITH Management Office SRL and contracted media agencies.

The personal data you have provided to us are stored physically at the e-mail address (Outlook) of the employee who provided you the answers on behalf of the respective joint controller,

at a single address of the service provider, and at a general level on a **web server** located within the EU territory, under the management of the website hosting service provider and with access allowed to the joint controllers, and that meets the highest accepted security standards at the current level of the IT industry.

Within these transfer processes on server, your data may be transferred strictly for the listed purposes and under the conditions set out in the company privacy policy.

The period for which we will keep user data on the website is determined according to the following criteria:

1. In case an offer is requested, the data shall be kept for a period necessary with that of the completion of the relationship between the offeror and the client;
2. In case of the clients who have completed the offering period with the signing of a contract - for a period equal to the contractual duration, plus the period required to comply with the legal provisions regarding the archiving and the protection of the company's interests;
3. For the other users, who do not fulfill the criteria of points 1 and point 2 above, the data will be processed by the company without limitation of the period, with the possibility of withdrawing your consent at any time, which in addition will be brought to your attention at a frequency of up to 5 (five) years.
4. In the case of occasional visitors, personal data are neither collected nor stored, except for the cookies and IP address, in which respect the Cookie Policy will be taken into consideration.

CENTRAL ICE RINK SRL will not disclose your personal data in order to be used by other third parties, except those mentioned. It is possible that the personal data collected to be used only partially (e.g.: e-mail - only the first and last name, the means of address Mr./Mrs. and the e-mail address are used).

The users of the website www.telekomarena.ro have the possibility to exercise the following rights in relation to **CENTRAL ICE RINK SRL**:

- 1. The right to access the personal data** - means the right to access the data in the filled-in form. If you believe this Privacy Policy is not sufficiently clarifying, you may have access to information by submitting a request to the address dataprotection@tiriacgroup.ro wherefrom you can find out:
 - what is the purpose of the processing of personal data?
 - what categories of personal data are involved?
 - who are the recipients to whom the personal data was provided?
 - what is the period for which the personal data will be stored?
- 2. The right to rectify the data** – if you notice that your personal data is inaccurate or incomplete, you have the right to request the rectification or completion thereof by sending a request to the address: dataprotection@tiriacgroup.ro.

In case your personal data is not entered by you, as a data subject, you have the right to request any available information regarding its origin, and this will be provided to you as far as it is available and only if the author who provided the data can be identified. For this, you will need to provide us with data about yourself in order to prove that the data was not provided through your direct action.

Separately, you can request to know if the data is being processed or not, and if affirmative, you can request access to the data, as well as certain information in connection thereof. Upon your request, you will also be able to receive a copy of the filled-in form.

You must be aware that any rectification can be done in a period of at least one month, but under special conditions we may extend this period to two months, in which case we will inform you about the extension.

Also, if we do not respond to your request for rectification or we will not answer to you, as well as in case we do not reach an agreement on the rectification period, you have the right

to file a complaint with the National Supervisory Authority for Personal Data Processing and to address the court of law.

3. The right to delete the data or “The right to be forgotten” – it is your right to obtain from our company the deletion of personal data from the website, without undue delay, and we, in our capacity as controllers, have the obligation to respond to the request for one of the following reasons:

- the data is no longer necessary for the purposes for which it was collected or processed;
- you withdraw your consent on the basis of which the processing takes place;
- when you oppose the processing of your data;
- when there are uncertainties regarding the legality of personal data processing;
- if there appears a legal obligation that we will comply with in our capacity as controller;
- if the personal data belongs to children under the age of 16 years old, and the parents or the persons who exercise parental control rights withdraw their given consent.

In our turn, depending on the technology available and the cost of implementation, we will take reasonable measures, including technical measures, in order to inform all processors who have had access to personal data that you have requested its deletion, including copies or links that make reference to the respective data.

The situations when we do NOT have to comply with your request to delete your personal data are:

- the exercise of the right to free expression and information;
- compliance with a legal obligation;
- reasons of public interest, in the field of public health;
- archiving purposes for public interest, scientific or historical research or for statistical purposes;
- ascertaining, exercising or defending a right in court.

4. The right to restrict access to personal data – means one of the following situations:

- Rectification of incorrect or inaccurate data, you can request to restrict access to the data during the period necessary for data verification and rectification;
- if you find out that the processing is illegal, however you do not want to have the personal data deleted, instead asking to restrict its use;
- if our company no longer needs the personal data or the storage deadline has been met, but you want to keep the data in order to use it for a law suit in front of the court;
- if you are against the processing, then you can still request that we restrict access to your personal data as long as necessary to verify whether our legitimate rights as controller prevail over your right to oppose the processing. Also, if there is a situation of lifting the restriction on processing, we will inform you in due time.

5. The right to withdraw your consent - for data processing, only in case your data is processed as a result of the expressed consent, you can send us an e-mail at dataprotection@tiriacgroup.ro at any time, whereby to notify us that you no longer agree with the processing of the personal data. The e-mail must include information about the personal data for which you want to withdraw your consent, the purpose for which it was provided and the communication channels for which you choose to withdraw your consent. The withdrawal of the agreement/consent to the processing of your personal data has the effect of ceasing the communications and the processing, as well as the cooperation. The withdrawal of the consent does not affect the legality of the processing carried out on the basis of the consent prior to its withdrawal.

6. The right to data portability – it is the possibility you have to receive the data provided in the format that we currently use, but that can be read automatically. You can also ask us to have this data submitted - to have it transferred - automatically to another controller (legal entity), as you will designate.

7. The right to oppose the processing – only applies to particular situations or cases in which you find yourself; it is your right to ask us not to process your data for the purpose of creating profiles. Exception from this rule is the situation when there are legitimate reasons prevailing over your

right to oppose, such as: ascertaining, exercising or defending a right in court, yours or that of another user.

All rights mentioned above are exercised by sending a written, dated and signed request to the headquarters of CENTRAL ICE RINK SRL in 24-26 Nordului Road, 1st district, Bucharest or to the e-mail address: dataprotection@tiriacgroup.ro with reference "**GDPR request**", except for the right to address the National Supervisory Authority For Personal Data Processing and to the courts of law (by exercising a single remedy), which shall be exercised by written request submitted to the competent authority.

Requests addressed at intervals greater than 60 days are free of charge.

Requests addressed within a range of 30 to 59 days from the previous request are charged with a reasonable fee representing the processing costs, based on the time allocated by the DPO to solve the request.

Requests addressed at intervals of less than 30 days may be rejected if they are not grounded or abusive, in particular because of their repeated nature.

In all situations, if we have doubts about the identity of the applicant, we can request additional information in order to confirm the identity.

USE OF THE WEBSITE

Implicitly, the website www.telekomarena.ro uses different types of functional **cookies** to improve your experience in using this website. For more information about our cookie policy or about the cookies used and the ways to activate/deactivate them, please consult the cookie policy available on our website.

Processing of messages via e-mail is done solely for the purpose of having correspondence with you. If the team responsible for managing the received messages cannot answer the question, it will send your e-mail to another internal or external service. You can be informed by e-mail about this service and the fact that your request will be taken over by that service. If you have any questions regarding the processing of your correspondence and of personal data, you can include them in the message you send to us.

We also use **social media channels** in order to present the activity, services and particular conditions we offer to our clients. The use of the specific social media channel is highlighted on this website with specific buttons for each channel.

You can follow the presentations we upload on our **YouTube** page or you can follow the links on our website or those associated with the **Facebook** account. Each social media channel has its own policy on how your personal data is being processed when you access their websites.

For example, if you choose to watch one of our videos on YouTube, you will be asked for explicit consent to accept YouTube cookies; if you look at our activities on Facebook, you will be asked for explicit consent for the acceptance of Facebook cookies; the same is valid for other services as well.

If you have any uncertainties or questions regarding the use of your personal data by those websites associated with the above mentioned media channels, you must carefully read the privacy policies provided by them, before use thereof.

For information on the purpose and volume of data collection and the subsequent processing and use of the data by Facebook, as well as on your rights in this regard and the possibilities of configuration in order to protect your private space, please consult the data protection information from Facebook: <http://www.facebook.com/>

If you do not want Facebook to associate the data collected when accessing our web page with your Facebook account, you must log out of Facebook when accessing our web page.

For information on the purpose and volume of data collection and subsequent processing and use of the data by YouTube, as well as your rights in this regard and the possibilities of configuration in order to protect your private space, please consult the data protection information from Google: <https://www.google.com/>

We will disclose your personal data to entities outside **Central Ice Rink SRL** if we believe, in good faith, that the access, use, retention or disclosure of such information is reasonably necessary or is required for:

- observing the law, following a legal or administrative procedure or upon the request of any entitled authority;
- preventing or combating of computer fraud, information security or technical problems;
- protecting our users against the violation of the rights, property or safety of **Central Ice Rink SRL**, as stipulated or allowed by the law.

Our privacy policy does not apply to services provided by other companies or individuals, including products or web pages that may be displayed in search results, web pages that may include **Central Ice Rink SRL** services or other connected internet pages within of our services. Our privacy policy does not include practices related to information of other companies and organizations that advertise our services and that may use cookies, pixel tags and other technologies to display and deliver relevant advertisings.

Our privacy policy may change from time to time. Your rights under this Privacy Policy may be diminished or extended under the new legislative regulations. Any changes brought to the Privacy Policy will be posted on the web page <http://www.telekomarena.ro/> and, in case the changes are important, we will provide an e-mail notification regarding the changes to the Privacy Policy.

Continuing to access the content of the website www.telekomarena.ro represents an acceptance of our privacy policy.

For any suggestions or complaints regarding the content of the privacy policy please contact us at the e-mail address dataprotection@tiriacgroup.ro

In the event that your personal data has undergone changes, and as a consequence it is necessary to have it updated, we ask you to inform us in this respect immediately, at the following address: 24-26 Nordului Road, 1st district, Bucharest, by clearly stating on the envelope "GDPR request" or by e-mail to the address: dataprotection@tiriacgroup.ro

The general term of storage is for the entire period of the cooperation, and subsequently, for a reasonable period, determined according to the specific criteria described above, after which the data will be deleted or made anonymous, as the case may be.

Useful links:

National Supervisory Authority for Personal Data Processing – click [HERE](#)