

RADCOM SA

Strada George Constantinescu Nr 2C, Cod 020339

Etaj 5 & 6, Sector 2, Bucuresti, Romania

Tel: 021 232 1039 Fax: 021 232 1068

Numar Inregistrare R.C. J40/10148/1993

C.U.I. RO 3939511

IBAN RO09INGB0001000119638916

Capital social: 205.000 RON



1. Purpose of the Privacy Policy

RADCOM S.A treated with utmost importance the relationship with customers, distributors, suppliers' employees, and with visitors and other parties concerned. The

Company shall propose to provide a level appropriate for protection of processing data of character personal to a- and maintain and improve the relations of business, trust and reputation.

Politics of Privacy observe the principles of Regulation General of the Union European concerning the protection of persons concerned with regard to the processing of data of character personnel and on the free movement of needles and tora 679 /2016 (referred to hereinafter "RGPD"). Regulation s hall propose to protect the rights and freedoms fundamental of those individuals in the EU in the context of globalization of economy and digitization of communications, in specific the right their to protect data of character personnel. RGPD put transparency and legal t ATEA processing as principles of reference pen tru to provide individuals informal laid and control that they need then when they are processed data of character personnel.

2. Scope of application of this policy

This policy applies to the processing of personal data by RADCOM. Personal data is any information relating to an identified or identifiable natural person, such as biographical information (names, birth dates, etc.), work data (addresses, position, telephone numbers and e - mail addresses). mail, etc.) online identifier (IP address) or to one or more specific elements of its own physical, physiological, genetic, psychological, economic, cultural or social identity.

This policy contains generally accepted principles of data protection, without replacing the existing legal framework. The policy is consistent with European law and national law regarding the processing of personal data and s is applied to transactions from card RADCOM S.A the company is committed to this policy to comply fully with national laws et Europeans applicability authorities on data protection personal and free movement

This policy does not apply to the identification data of legal persons, such as companies or other organizations with legal personality.

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This policy does not apply to anonymous data, such as statistical data. However, the mere absence of a name does not imply that the data are anonymous, so it would be impossible to directly or indirectly identify a data subject.

This policy can be modified under the coordination of the RADCOM data protection team. You can find the latest version of this policy and site www.radcom.ro

2. Definitions

Operator

The natural or legal person, the public authority, the agency or another body as a king, alone or together with others, establishes the purposes and the means of processing the personal data; If the purposes and means of such processing are established by Union law or national law , the operator or the specific criteria for its designation may be provided by the applicable law.

Health data

Personal data relating to the physical or mental health of a natural person, including the provision of health services, which discloses information about his / her health status.

The data subject

An identified or identifiable natural person whose personal data are processed. An identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identification element such as a name, identification number , location data , an online identifier or to one or more many specific elements specific to its physical, physiological, genetic, mental , economic , cultural or social identity .

Information personal

Any information regarding an identified or identifiable natural person ("the data subject").

Violation of the security of personal data

A breach of security leading to the destruction, loss, alteration, unauthorized disclosure or access unauthorized data it personal, transmitted, stored or otherwise processed.

Processing

Any operation or set of open reasons performed on data of their personal or the sets of their data personal, with or without the use of automatic means, such as collection, recording, organization,

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structuring, storage, adaptation or alteration, retrieval , consulting, using, disclosing the transmission, dissemination or otherwise making available, alignment or combination, restriction, deletion or destruction.

The person authorized by the operator

The natural or legal person, the public authority, the agency or other body that processes the personal data on behalf of the operator.

Pseudonymisation

The processing of personal data in such a way that personal data cannot be attributed to a particular data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures that to ensure the non-attribution of the respective data to an identified or identifiable natural person.

recipient

A natural or legal person, a public authority, agency or other body, to whom the personal data are disclosed, whether or not it is a third party. However, public authorities to whom personal data may be communicated in a particular investigation, in accordance with Union or national law, will not be considered as recipients; the processing of these data by the respective public authorities will comply with the applicable data protection rules in accordance with the purposes of the processing.

Restriction of processing

Marking of personal data stored in order to limit future processing.

3. Identification of the Operator

RADCOM S.A

Registered office: George Constantinescu Street, no. 2C, Floor 5 & 6, Code: 20339, Sector 2, Bucharest, Romania

Fiscal Code: RO 3939511

Register 's Trade: J40 / 10148/1993

Tel + 40-21-232.10.39 F a: 021.232.10.68

Website: RACOM.RO

4. Principles relating to the processing of data of character personnel

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4.1 Legality and fairness

Personal data must be processed legally and fairly in relation to the data subject. Any processing of personal data will be legal only insofar as the processing is based on a basis of processing provided by law. When special categories of personal data are processed, this will be done only when one of the derogation conditions specified by law is applied.

4.2 Transparency

The operator takes measures appropriate to provide the person concerned any informed them about the processing of data of character personal to her as concise, clear, understandable and easily accessible, used when a language clear and simple. The information is provided in writing or by other means, in clouding then when is its appropriate electronically.

4.3 Limitation of purpose

The purposes for which the personal data are processed must be explicit and legitimate and must be determined when collecting them. Personal data may not be processed in a manner incompatible with these purposes.

4.4 Data minimization

Data 's statement must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

4.5 Accuracy Data

Personal data must be accurate and, if necessary, updated. Reasonable measures must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are deleted or rectified without delay.

4.6 Limiting data storage

Personal data cannot be processed for a longer period than is strictly necessary for the respective processing. Since the personal data are no longer necessary for the purpose of processing, they must be anonymised or deleted.

Personal data may be stored for longer periods insofar as they will be processed exclusively for archival purposes in the public interest, for scientific or historical research purposes or for statistical purposes.

4.7 The integrity and privacy of your personal data

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Processing of splints personal must be it made it's into a mode which provides the crudity their elf including protection against unauthorized or illegal processing, Q against loss and, destruction or damage the country accidental. Confidentiality commitments are established with employees, consultants and other parties who have access to their personal data. In addition, a restriction system Driven access based on pa role to ensure that the people they can access only to those personal data that they need to exercise bad attributes DISCLOSURES their duties.

4.8 Data Responsibility

RADCOM be able to demonstrate compliance with the principles laid legality, equity them, tr transparency minimization, purpose limitation, limiting storage, integrity and confidentiality of processing personal data. Data protection policies, control elements, procedures, checklists and other measures that constitute the data protection framework are systematically documented.

4.9 protection of data

Elements of the control and the observance of the principles related to work-up data with personal data is developed in proactive phase of design and development of processing operations. The strictest privacy settings (in relation to the amount of data collected, the extent of the processing, the storage period and its accessibility) must be applied implicitly to any processing. Compliance with the data protection principle from the time of design and implicitly is a functional requirement throughout the life of RADCOM operations that involves the processing of personal data.

5. Information Persons Target with regard to the Processing Data Character Personal

RADCOM process data character personally in following their purposes:

Management process of recruiting staff (for employment or internship)

Purpose: The development work of recruitment and selection of staff.

Legality: requests made by the person concerned in order signing CIM or Agreement of Collaboration (Internship).

Persons concerned: candidates for po ziti declared available.

Personal data:

- Identification data: full name, date of birth, sex, domicile / residence, nationality;
- Contact details: phone number and email address;

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- Data on the studies followed and the qualifications obtained;
- Data on previous professional experience;
- Data required to confirm the legal obligation of employment in Romania (for persons who are not EU citizens);
- Information identifying the person who made recommendation (name, surname, place of work, function, phone, email)
- Additional data voluntarily provided by you in the CV or for the conclusion of the individual employment contract (egg photography, hobbies, data on holding a driving license, residence permit, residence registration certificate, marital status, etc.);
- Crazier judiciary, screening is carried out by integrity (portal Ministry of Justice).

Duration of treatment: during the process of recruitment and selection to which adds a year after completion thereof, for defending the company against any claims made by candidates - art. 20 in conjunction with art. 8 of order 37/2000 on the prevention and sanctioning of all forms of discrimination.

Management base their data talent (HR)

Purpose: Use information for further recruitment.

Legality: consent of the data subjects.

Persons concerned: candidates for po ziti available.

Personal data:

- Identification data: full name, date of birth, sex, domicile / residence, nationality;
- Contact details: phone number and email address;
- Data on the studies followed and the qualifications obtained;
- Data on previous professional experience;
- Data resulting from the process of selection;
- Additional data voluntarily provided by you in the CV or for the conclusion of the individual employment contract (photography, hobbies, data on holding a driver's license, residence permit, residence registration certificate, marital status, etc.).

Processing time: 5 years from the completion of the process of recruitment and selection.

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Management of the development of contracts for the sale / purchase of products and services

Purpose: Signing and carrying out contracts for the sale / purchase of products and services.

Legality: steps to sign contracts and scroll area contracts.

Persons concerned: representatives of parties contracting authorized to engage and to carry out contracts of sale / purchase of goods and services, other people specific object contracts.

Personal data:

- Data identification: name completely, depending, instead of working, signature;
- Contact: phone number and address e-mail address for correspondence;
- Other personal data derived from the specific subject of the contract s.

Duration of treatment: during the progress of contracts plus a period of 10 years archiving.

Management of the audit activity of quality management, financial and operational

Purpose: To carry out the audit activity of quality management, financial and operational.

Legality: the legitimate interest of the operator for the compliance and efficiency of the financial and operational activity

Persons covered: All persons have a role in the activity audited, and people who are mentioned in documents audited.

Personal data:

Data of character personnel included in the activities audited.

Processing time: 10 years.

Management of events organizing activities

Purpose: To promote company and the image it, develop the spirit of the team.

Legality: The legitimate interest of the company

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Data subjects: Personnel employed, personnel beneficiaries (potential beneficiaries) or other suppliers invited to events.

Personal data:

- Identification data: full name, date of birth, sex, domicile / residence, place of work.
- Contact details: phone number and email address;
- Other personal data specific to an event type (mentioned in the event specific consent).

Processing time: the duration of the event to which a storage period of 10 years is added.

Management of complaints and disputes

Purpose: To carry out the specific activity for solving complaints and disputes.

Legality: the legitimate interest pursued by the operator to protect the interests of the organization.

Data subjects: all persons involved in the settlement of complaints and disputes.

Personal data:

- Data identification: name and surname, job, position, phone, e-mail;
- Other data relevant for carrying resolve complaints and disputes.

Duration of treatment: the function of the present case, according to the legislation in force, and after a period of two years to resolve the complaint or dispute.

Management activities and the monitoring and recording video / audio

Purpose: Protection of private property and prevention of crime.

Legality: The legitimate interest of the company for the protection of private property and the prevention of crime.

Persons concerned: staff employee, visitors.

Personal data:

- Video image / audio recording
- Location in time

Duration of treatment: 30 days

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Recipients

Management and Top Management of the company

Providers of medical services

Suppliers of services of security and health in work SSM and PSI

Suppliers of services and banking, services financial AND and the insurance

Suppliers of services safeguarding

Suppliers of services IT and communications

Suppliers of services related to payroll

Providers of legal services

Suppliers of services support

State authorities (ANAF, ITM, other legally authorized institutions);

Other companies in the group RADCOM

6. Rights of Persons Target

Rights that we have in which that the data you with character personal:

In accordance with Regulation (EU) 679/2016, you can exercise any of the following rights:

the right of access to data of character personnel you look;

the right to request rectification or updating data of character personal then when they are inaccurate or incomplete;

the right to request the deletion of data of character personnel if, for example, the data are no longer needed for processing or data subject objects with regard to the processing of data and the processing of personal data was done illegally;

the right to portability of data, its not meaning transferul data your personal by a different carrier statement its NTR -a format structured that can be read automatically;

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right to restrict the processing of personal data in cases where, for example, the legality of the processing or the accuracy of the data is challenged. A once restricted operator can only store personal data, you can use further and can lift the restriction only after informing the data subject about this intention i.e. Each recipient to whom the personal data were communicated must be informed of any rectification, deletion or restriction that has been made to comply with this request;

the right to be opposed to the processing of their data if it's not that it is carried out in order to protect the country of interest our legitimate if the situation your particle Miss you give reasons based;

the right to not make the object of a decision based solely on processing automatically, including the creation of profiles, which produces effects legal that you watch or you affect in her measure significant;

the right to lodge a complaint in November and / or the authority responsible on the protection of data;

right to you withdraw consent, it's not any time for work its data personal, to which you consent it previously;

To exercise in these rights , as and for all their question its plimentare with respect to this notification or its in connection with the use of the RADCOM of data personal , we pray to our contact by choosing any of the ways authorities of communication described in May down (paragraph 10) , stating , also , name your , address postal or email (in Running i.e. by way of by which you want to communicate) , the number you the phone and and order demand you .

7. Security and confidentiality

RADCOM and employees thereof have implemented measures their technical and organizational order to protect data of character personnel against destruction accidental or unauthorized, the loss accidental, to change or access unauthorized at. These measures are developed taking

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into account the results of the risk analysis of the processing carried out and are evaluated and tested at regular intervals. Security and privacy require measures to increase the level of awareness, training and communication of the issues related to the protection of data of character personnel in the organization (training for all employees who have access to the data of character personnel, allocation of responsibilities, etc.). Be taken into account techniques as would be minimizing data, limiting the period of storage of informal get, Pseudonymisation, encryption, contracts of confidentiality, integrity physical of media data and logging conform rights of access in function of the role had its n processing data the character personally.

8. The person authorized by the operator

RADCOM forced people their supplier operator, or any subcontractor that carries data processing cater I personally behalf of RADCOM, and single implement technical security measures and organizational measures. When taking into account these measures should be considered properly stage of progress information systems , the nature, scope , context and goals and the risks regarding the infringement of rights and freedoms ACROSS 'retail e. RADCOM to its ended a processing agreement is with each of the persons empowered in accordance with the requirements of the GDPR .

9. Data transfer

Data transfer personal information is guaranteed in terms of security in the countries of the European Union / European Economic Area and in other countries considered by the European Commission ensure when an adequate level of protection is to them. When personal data is exported by RADCOM acting as an operator in the European Union to recipients in countries that do not provide an adequate level of protection, RADCOM has ensured that adequate protection measures are implemented, standard contractual clauses regarding protection personal data or stolen certification mechanisms.

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10. The person responsible for the protection takes data personal

Top management shall ensure that the person responsible for the protection of data first important

health resources adequate, training and guarantees the independence necessary for a- et and mana ge efficiently the tasks.

The person responsible for the protection takes data has the following tasks:

- Informing and advising employees and persons authorized by RADCOM that handles the processing of data of character personnel about the obligations they return their n t Emei regulation 679/2016 and other provisions ii of the rights t the Union European S and the right ui internal on the protection takes data.
- Monitoring compliance REGULATION 679/2016, the other provisions of law of the Union European or by dre for domestic related to protection and the data of character personnel et and the policy RADCOM or the person authorized by RADCOM in terms that the protection takes data with character personnel including allocation of responsibilities and actions of sensitization s and the ins truire of staff involved in operational actions of processing and can perform checks periodically , reviews and audits of the documents , procedures and operations .
- ants ization of counseling to request in terms that regards you eva making impact on the protection of data and monitoring officials this t in accordance with the provisions of Article 35 of Regulation 679/2016.
- Cooperation with the authority of supervision (Supervisory Authority).
- Assuming the role of point of contact for ANSPDCP on issues related processing including consultation prior mentioned it to Article 36 of RGPD like and if it is the case consult with respect to any other matter.
- C coordinates the processing of the requests of the data subjects.

Contacts

The person responsible for the protection of data of character personnel:

- E-mail: dpo@radcom.ro
- correspondence address: George Constantinescu Street, no. 2C, Floor 5 & 6, Cod: 20339, Sector 2, Bucharest, Romania