

# speePrivacy Policy

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## I. General information

The privacy of your personal data is one of the main concerns of Speedwell and members of Speedwell Group (“**Speedwell**”), in its capacity of data controller. Contact details of Speedwell and members of Speedwell Group are available [here](#).

This document is intended to inform you with respect to the processing of your personal data, in the context of the activities provided by Speedwell.

## II. The categories of personal data processed

**II.1.** If you are a **natural person client or potential client** of Speedwell, it will process your personal data, such as your last name and first name, telephone number, e-mail address, invoicing data, bank account, personal identification number, identity document details (e.g., ID / passport series and number), as well as any other categories of data you provide directly in order to conclude a contract with Speedwell.

**II.2.** If you are a **natural person representative of a legal person client / potential client** of Speedwell, it will process your personal data, such as your last name and first name, telephone number, e-mail address, workplace, position / title.

**II.3.** If you are a **natural person representative of a contractual partner** of Speedwell, it will process the following categories of personal data: your last name and first name, telephone number, e-mail address, workplace, position / title.

**II.4.** If you are a **visitor** of [queensdistrict.ro](#) (hereinafter referred to as the „**Website**”), Speedwell will process the personal data you provide directly in the context of using the Website, such as the data you provide in the Contact Form (e.g., last name and first name, e-mail address, telephone number), as well as data concerning your activity on the Website. For further information with respect to the type of cookies used on the Website, we kindly ask you to access the following [link](#).

**II.5.** If you are an **employee** of the Speedwell, it will process your personal data necessary for the performance of the work relation, such as your last name and first name, address, telephone number, e-mail address, bank details, workplace, position / title, as well as any other personal data resulting from the performance of the work relation.

**II.6.** If you apply for a **job** in Speedwell’s as *candidate*, Speedwell will process your personal data provided in this context, such as your last name, first name, e-mail address, telephone number, work experience as well as other data included in the documents you choose to present in this capacity.

## III. Purposes and grounds for processing the personal data

**III.1.** If you are a ***natural person client or potential client*** of Speedwell, it will process your personal data as follows:

- in order to carry out the contractual relation between you and Speedwell, respectively to conclude and perform the contract between you and Speedwell, including in order to inform you with respect to the assets of the contract, the delivery – receipt of the subject matter of the contract, to execute the subject matter of the contract, etc., to resolve the requests and complaints in connection with the assets of the contract or other aspects related to the agreement concluded with Speedwell;

**Grounds:** The processing of your personal data for this purpose is performed pursuant to the agreement concluded between you and Speedwell. The provision of your data is necessary. The refusal to provide to us your personal data may have as consequence the impossibility to carry out the contractual relation between you and Speedwell.

- in order to fulfill the legal obligations incumbent upon Speedwell in the context of the conclusion and performance of the agreement, including the fulfillment of fiscal, archiving, personal data protection obligations, including in order to manage the relation with the public authorities or other entities providing a public service, in cases where data is requested by an official letter.

**Grounds:** The processing of your personal data for this purpose is necessary pursuant to certain legal obligations. The provision of your data is necessary. The refusal to provide to us your personal data may have as consequence the impossibility of Speedwell to comply with the legal obligations incumbent upon it.

- for marketing activities, in order to communicate certain commercial materials, newsletters and /or alerts, consisting in information with regard to the products / services offers sent by e-mail (e.g., e-mail, text message, fax) and / or human operator telephone call.

**Grounds:** The processing of data for the purposes indicated above is performed pursuant to your consent, if you choose to give such consent.

You may give your consent for the processing of your data for this purpose by ticking the corresponding box, when Speedwell provides this option. If you wish to unsubscribe from receiving this type of commercial communications you may use the option available at the end of each e-mail or text message containing commercial communications. Furthermore, you may unsubscribe by accessing the section *Contact Form* available on the Website.

The provision of your data for this purpose will be at your sole discretion. The refusal to give your consent with respect to the processing of your data for this purpose will not have negative consequences for you.

- in order to resolve the requests and notifications that are not sent for the purposes presented in the preceding items (i.e., pursuant to the agreement or a legal obligation), and in order to ensure the recognition, exercise or defense of certain rights of Speedwell in court, as well as in other judicial proceedings.

Grounds: The processing of your personal data for this purpose is performed pursuant to Speedwell's legitimate interest related to resolving various requests and defending Speedwell's rights and interests.

The provision of your data for this purpose will be at your sole discretion. In principle, the refusal to provide your data for this purpose will not have negative consequences for you, but there are cases where the refusal to provide the data may lead to the impossibility to fulfill the purposes indicated above, including the impossibility to manage the requests you send to us or the exercise of legitimate rights and interests of the parties.

**III.2.** If you are *a natural person representative of a legal person client / potential client*, Speedwell will process your personal data as follows:

- in order to initiate or carry out the contractual relation between Speedwell and the legal person client

Grounds: The processing of your personal data for this purpose is performed pursuant to Speedwell's legitimate interest in initiating and carrying out the contractual relations with the legal persons clients / potential clients. Your refusal to provide the data for this purpose may have as consequence Speedwell's impossibility to carry out his activity.

- for marketing activities, in order to communicate certain commercial materials, newsletters and /or alerts, consisting in information with respect to the products / services offers sent by electronic mail (e.g., e-mail, text message, fax) and / or telephone automated telephone call (e.g., e-mail, text message, fax) and / or automated telephone call.

Grounds: The processing of data for the purposes indicated above is performed pursuant to your consent, if you choose to give such consent.

You may give your consent for the processing of your data for this purpose by checking the corresponding box, when Speedwell provides this option. If you wish to unsubscribe from receiving this type of commercial communications you may use the option available at the end of each e-mail or text message containing commercial communications. Furthermore, you may unsubscribe by accessing the section *Contact Form* available on the Website.

The provision of your data for this purpose will be at your sole discretion. The refusal to give your consent for the processing of your personal data for this purpose will not have negative consequences for you.

- in order to resolve any grievances, complaints, respectively to ensure the recognition, exercise or defense of certain rights of Speedwell in court, as well as in other judicial proceedings.

Grounds: The processing of your personal data for this purpose is performed pursuant to Speedwell's legitimate interest related to resolving various requests and defending Speedwell's rights and interests.

The provision of your data for this purpose will be at your sole discretion. The refusal to provide your data for this purpose will not have negative consequences for you.

**III.3.** If you are **a natural person representative of a contractual partner** of Speedwell, this will process your data as indicated under item III.2 above.

**III.4.** If you are a **visitor** of the Website, Speedwell will process your personal data as follows:

- to respond to your requests made by completing the Contact Form on the Website, in order to solve the requests and notifications transmitted, respectively in order to ensure the recognition, exercise or defense of certain rights of Speedwell in court, as well as in other judicial proceedings.

**Grounds:** The processing of your personal data for this purpose is performed pursuant to Speedwell's legitimate interest related to resolving and responding to various requests transmitted by you, as well as for defending Speedwell's rights and interests.

The provision of your data for this purpose will be at your sole discretion. The refusal to provide your data for this purpose will not have negative consequences for you, but there are cases where the refusal to provide the data may lead to the impossibility to fulfill the purposes indicated above, including the impossibility to manage the requests you send to us or the exercise of legitimate rights and interests of the parties.

Please consult the section concerning the use of cookies available [here](#).

**II.5.** If you are **an employee** of Speedwell, it will process your personal data as follows:

- in order to carry out the work relation, *e.g.*, in order to perform employees' assessment.

**Grounds:** The processing of data for this purpose will be performed pursuant to the employment agreement concluded between you and Speedwell. The provision of your personal data is necessary. The refusal to provide your personal data may have as consequence the impossibility to carry out the contractual relation between you and Speedwell.

- in order to meet the legal obligations incumbent upon Speedwell in the context of the conclusion and performance of the employment agreement, including of the fiscal, archiving, personal data protection obligations, and in order to manage the relation with the public authorities or other entities providing a public service, in cases where data is requested pursuant to an official letter.

**Grounds:** The processing of your personal data for this purpose is necessary pursuant to certain legal obligations. The provision of your data for this purpose is necessary. The refusal to provide to your personal data may have as consequence the impossibility to comply with the legal obligations incumbent on it.

- in order to resolve the requests and notifications that are not sent for the purposes indicated above (*i.e.* pursuant to the agreement or a legal obligation), respectively in order to ensure the recognition, exercise or defense of certain rights of Speedwell in court, as well as in other judicial proceedings.

Grounds: The processing of your personal data for this purpose is performed pursuant to Speedwell's legitimate interest in resolving different requests and defending Speedwell's rights and interests.

The provision of your data for this purpose will be at your sole discretion. In principle, the refusal to provide your data for this purpose will not have negative consequences for you; however, there are cases where this refusal may lead to the impossibility to fulfill the purposes indicated above, including resolving the requests you address to us or exercising the legitimate rights and interest of the parties.

**II.6.** If you apply for a job in Speedwell as *candidate*, Speedwell will process your personal data:

- in order to carry out specific recruiting activities in connection with certain vacancies in Speedwell's company.

Grounds: The processing of your personal data for this purpose is performed pursuant to actions taken to respond to your request in order to sign an agreement. The provision of your data for this purpose will be at your sole discretion. The refusal to provide the data may have as consequence the impossibility of Speedwell to consider your application in the recruiting process carried out in connection with different positions.

- in order to resolve any grievances, complaints, and to ensure the recognition, exercise or defense of certain rights of Speedwell in court, as well as in other judicial proceedings.

Grounds: The processing of your personal data for this purpose is performed pursuant to Speedwell's legitimate interest related to resolving various requests and defending Speedwell's rights and interests.

#### **IV. The provision of the personal data**

The provision of your personal data may be either necessary for carrying out the contractual relation between you and Speedwell, for ensuring compliance with Speedwell's legal obligations, for resolving your requests or defending Speedwell's interests, either at your sole discretion, as indicated above.

#### **V. The provision of third parties' data to Speedwell**

Normally, Speedwell will not request that you provide third parties' data and, in any case, will not ask you to provide sensitive data with respect to them. We kindly ask you not to provide this type of data.

If in the context of your interaction with Speedwell you disclose personal data belonging to third parties (e.g., in the context of purchasing a product /service of Speedwell), you undertake to inform accordingly and in full these persons with respect to the disclosure (including with respect to the categories of data disclosed) and the manner in which their personal data will be processed by Speedwell, by communicating to them this Privacy Policy.

The third party data you choose to provide will be processed by Speedwell pursuant to our legitimate interest in carrying out the activity, namely in view of carrying out the contractual relation with you (e.g., when a fiscal invoice is issued) or in order to meet our legal obligations, such as the fiscal, archiving or data protection obligations. The categories of data that may be processed are the following: the last name, the first name, and the contact data.

The provisions that will be presented in detail further on with respect to the period during which the data will be processed, the categories of recipients, the transfers, the automated decision making processes, and the rights with regard to the personal data processing will apply accordingly.

## **VI. Duration for which we process your data**

In principle, Speedwell will process your personal data if this is necessary for the processing purposes indicated above.

If you are a *client*, we will process your personal data throughout the contractual relation and subsequently, during the period necessary for complying with the legal obligations resting with Speedwell, including, without limitation, the legal fiscal obligations (e.g., in case of financial – accounting explanatory documents for which the retention term set forth by the law is of 10 years from the end date of the financial exercise during which they were drafted), the archiving and personal data protection obligations.

If you are a *potential client* of Speedwell, i.e., you concluded a pre-agreement with Speedwell, but a final form agreement has not been signed yet, Speedwell will delete your identity card data and process only the data necessary for marketing activities, if you gave your consent in this respect.

If you withdraw your consent for the processing of the data for marketing purposes, Speedwell will terminate the processing of your personal data for this purpose, but without affecting the processing activity carried out by such pursuant to the consent expressed by you before the withdrawal thereof.

If you choose to apply for a job in Speedwell, as a *candidate*, Speedwell will retain your personal data as long as this is necessary for the recruiting process. If you are not selected for the position for which you applied, Speedwell will process the data you provided in order to consider your application for other recruiting processes, but not longer than 3 years from the date on which the data was provided.

If you are a natural person *representative of a legal person client /potential or of a contractual partner*, your personal data will be processed during the period necessary for the conclusion/ performance of the agreement and subsequently, in accordance with the internal policies and legal obligations, including those related to archiving.

## **VII. Disclosure of the personal data**

In order to fulfill the processing purposes, Speedwell may disclose your data to:

- public central / local authorities,

- contractual partners, third parties or entities ensuring support for Speedwell in offering products / services;
- other contractual partners, including to external consultants from different areas such as the accounting, legal, fiscal areas;
- third parties, in connection with or during the negotiations having as subject matter a merger, sale of Speedwell's assets, the consolidation or restructuring, financing or acquisition of Speedwell or of a part thereof by other entities;
- Speedwell's affiliates, more specifically companies from Speedwell's group;

The data is disclosed in the following cases listed below by way of example:

- when the disclosure of personal data is set forth by the law;
- for Website administration purposes;
- in order to maintain, personalize and optimize the Website;
- in order to send commercial marketing communications, in accordance with the conditions and within the limits set forth by the law.

## **VIII. Transfer of the personal data**

The personal data provided by Speedwell may be transferred outside Romania, but only to countries from the European Economic Area ("EEA").

If Speedwell intends to transfer personal data outside the EEA, the data subjects whose personal data is subject matter of the transfer may request from the Speedwell information concerning the updated list of the countries where the data is transferred and of the transfer guarantees adopted, using the contact data indicated at the end of this document.

## **IX. Your rights**

Pursuant to the legislation regarding personal data processing of personal, in your capacity of data subject, you will have the following rights:

- **the right to be informed**, respectively the right to receive details regarding the processing activities, as described in this document;
- **The right of access to the data**, respectively the right to obtain confirmation that your personal data is processed, as well as details concerning the processing activities, including the right to obtain a copy of the personal data;
- **The right to rectification**, respectively the right to obtain the rectification of your personal data, as well as the supplementation of incomplete data;
- **The right to erasure**, if the conditions provided by the law are met.

**Note:** It is possible that some of your personal data cannot be erased, given the legal obligations or legitimate interest in continuing to process it. Further details on this subject will be provided to you upon request.

- **The right to restriction**, if the conditions provided by the law are met;
- **The right to portability**, respectively (i) the right to receive the personal data in a structured, commonly used and machine-readable format, as well as (ii) the right to

have this data transmitted to another data controller, if the conditions provided by the law are met;

**Note:** The law requires that we fulfill the request only for the data previously processed based on your consent or for the performance of the contract concluded with us, and only if the data is processed by automatic means.

- **The right to object**, respectively the right to oppose to the data processing activities conducted on the basis of our legitimate right, if the conditions provided by the law are met;

**Note:** The law requires that we fulfill the request only for the processing activities conducted for direct marketing purposes. In the other cases, we will put our interests and your specific situation in balance in order to make a final decision. This is why we kindly ask you to also explain us why you oppose the processing when submitting your request.

- **The right not to be subject to an individual automated decision making process.** As a rule, you have the right not to be subject to a decision adopted exclusively based on an automated processing activity, if this generates legal effects or significantly affects you in a similar way.

**Note:** In certain cases, the law permits us to take such decisions, when we have obtained your consent or if the decision is made in virtue of the performance of the contract we have concluded with you. In these situations, you will have the right to challenge the decision, to express your opinion and to obtain a human review of the decision. Moreover, there can be situations where the law requires us to implement such automated decision making processes.

- **The right to withdraw consent**, if we process the data based on your consent, you may withdraw such consent at any time;

**Note:** The withdrawal of your consent will only produce effects for the future. The processing carried out for a different purpose, such as the performance of the contract, will not be affected by the relevant withdrawal.

- **The right to file a complaint with the National Supervisory Authority for Personal Data Processing or the courts of jurisdiction**, if you deem necessary.

For any further questions with respect to the method in which personal data is processed, as well as with regard to the rights from which you benefit in this context, please contact us by sending a request to the address [info@speedwell.be](mailto:info@speedwell.be) .

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