

## Information note on personal data processed by Lean Vector SRL through the website [www.santinela.com](http://www.santinela.com)

We, Lean Vector SRL ("Lean Vector" or "Operator" or "We" or "Us"), appreciate your decision to become a visitor to our website and recognize that your personal data is important to us. To this end, we want you to know what personal data we collect, how, on what occasions, and for what purposes we collect and use this data, and to whom we may disclose it.

This notice ("Notice") describes the occasions, purposes, and ways in which We process certain categories of your personal data through the website [www.santinela.com](http://www.santinela.com) operated by Us ("Website").

Please take the time to read carefully and understand the contents of this Information Note. Please note that if you intend to provide us with the personal data of another natural person, you have the right to provide us with such data only at a later date and to the extent that, you have obtained his / her consent for this purpose and only after informing the person concerned about the processing of his / her personal data for this purpose and the other purposes mentioned in this Information Notice (we assume that you have done so, and do not assume liability otherwise).

- **Who are we?**

Lean Vector S.R.L., with registered office in Pantelimon, 20, St. Gheorghe Street, Ilfov County, 077145, registered with the Trade Registry Office of the Ilfov Court under no. J23 / 495 / 2014, CUI 33527369, which manages the website [www.santinela.com](http://www.santinela.com), is the controller of your personal data and the entity providing you with software consulting / development services ("Services").

You can always contact us at:

Address: 20 St. Gheorghe Street, Pantelimon, Ilfov County, 077145

Email: [sorin.petcu@santinela.com](mailto:sorin.petcu@santinela.com)

Phone: +40 729 11 29 45

- **Who are our services for?**

The Services offered by Us through the Website are services dedicated to legal persons. The Services are not addressed to persons under 18 years of age, and therefore we do not collect / solicit personal data on persons under 18 years of age.

If we discover / are informed that we have collected personal data on persons of this age without the consent of their legal representatives, we will either (i) duly verify and, where required by law, (ii) duly obtain the express consent of the legal representatives to process this data, and, if such consent cannot be obtained, (ii) we will delete this information from our records and ensure its deletion from the records of our processors / our associated operators.

- **What Personal Data do we process about you?**

Our policy is to collect only your Personal Data of you as a natural person which is strictly necessary for us to provide you with the best experience regarding the services offered by Us (according to the principle of minimizing the processing of personal data). As a rule, we collect the following Personal Data about you in accordance with the applicable legal provisions:

- Name and surname
- Company or entity you represent
- Email address
- Phone number
- Information (e.g., specific requirements) you provide about the Services requested.
- Your activities when browsing the Website.

- **For what purposes and how do we process your Personal Data?**

We process your personal data for the purpose of being able to send you information about the services you registered for (for example: event invitations), as well as other offers concerning our services.

In certain cases, we will ask you to provide us with your personal data directly, in other cases we will have access to this data indirectly. In certain cases, if you do not consent to their processing, there is a risk that we will not be able to provide you with the requested offer because it will be impossible for us to fulfill our legal and / or contractual obligations. Thus, your Personal Data processed for the purposes set out in letters A)-C) and E) of the table below is necessary for us to either offer / provide services to you or to comply with a legal obligation incumbent on us, so that your refusal to allow us to process these data may make it impossible for us to offer the requested services or, as the case may be, to enter into a contractual relationship for the Services offered by us and / or to comply with legal obligations incumbent on us.

Except for Personal Data processed pursuant to this Information Notice, We will not ask you to, and recommend that you do not, on the occasion of and / or in connection with the submission of a request for an offer for the Services provided by Us, otherwise transmit / disclose to Us unsolicited any other Personal Data, in particular those considered sensitive by law (e.g., without limitation, health card number, personal numerical code, data relating to ethnic or racial origin, racial or ethnic origin, political opinions, religious denomination / philosophical beliefs, trade union membership, genetic data, biometric data for the unique identification of an individual, health data / data on sex life or sexual orientation, information on administrative or criminal sanctions or pending criminal investigations concerning you and / or other individuals). Should this happen (including accidentally) we will take appropriate steps to delete / destroy the Personal Data concerned from our records.

No.	For what purpose do we process Your data?	What Personal Data do we process, in what cases, modalities and purposes?	What is the legal basis of Data Processing?
<i>Your data that you provide us directly</i>			
A.	Request or quotation for Services provided by Santinela or invitation/information on PR/Marketing Activities	<p>We collect your personal data personally when you contact us via email address or phone number on the Website. In this way, we can honor your request only if you provide us with the following Personal Data:</p> <ul style="list-style-type: none"> <li>Your first and last name</li> <li>Email address</li> <li>Phone number</li> </ul> <p>We also collect any other information on that you provide when you contact us either by phone or email to request a Offers by Services (for example, the name company for a bid as well as the function on that you hold within it, details with on the Services requested).</p> <p>The provision of this Data is necessary to stay connected with you for the submission of the quotation requested or to inform you / invite you to our PR/Marketing events.</p>	To take steps before the conclusion of a contract (pre-contractual phase) Art. 6 para. (1) lit. (b) of the General Data Protection Regulation) Interestour Legitimate Interest your legitimate interest (Article 6(1)(b))- (f) of the General Data Protection Regulation), i.e., to communicate to you offers of Services tailored to your needs.
B.	Conclusion of a Contract Provision of Services	<p>If the entity you represent decides to accept the offer of Services transmitted by Us, We will process the following data for the purpose of concluding and executing the contract for the provision of the Services: Name of the company you work for and its invoicing data. Your contact details: name / first name, email address, phone number, and position within the entity you represent.</p>	To act before the conclusion of a contract (pre-contractual phase) as well as for the execution of the contract Article 6(1)-point (b) of the General Data Protection Regulation).
C.	Handling of requests, questions, and / or complaints	<p>When we receive requests, questions, or complaints from you by phone or email, we will collect and process the following Data as appropriate:</p> <ul style="list-style-type: none"> <li>first and last name</li> <li>email address</li> <li>phone number</li> </ul> <p>any other information you provide when you contact Us</p> <p>Note: The processing of these Data is necessary for us to keep track of these requests, questions, and complaints, to prove them, to keep the complainants informed of the status of their resolution, and to send them our response to them.</p>	Our legitimate interest, (Article 6(1) point (f) of General Data Protection Regulation) In order to improve the quality of the data of our products, so that we can provide you with the best possible best quality, adapted to your requirements. Performance of the contract (Article 6(1)-point (b) of General Data Protection Regulation) Fulfillment of our obligations during the execution of the contract concluded with yours
D.	Formulation of actions / exercise of legal remedies	To protect our legal rights and legitimate interests, we may process your personal data necessary to bring legal actions / exercise legal remedies (including the preparation of related documentation and the completion of related legal procedures / formalities) in relation to courts / authorities / institutions / other third parties.	Legitimate interest (to ensure respect of our rights and legitimate interests) (Article 6(1) point (f) of General Data Protection Regulation)
E.	Provision of information and documents in proceedings / investigations in report with competent authorities / institutions / other entities	In the case of: (i) specific requests from authorities / institutions / other legally competent entities in the framework of formal proceedings / investigations; or (ii) the need to fulfill legal obligations to inform / report to authorities / institutions / other legally competent entities that are incumbent on us- we will exceptionally and by law only provide your Personal Data that are expressly requested by these authorities or institutions or that need to be provided to us by you be provided to these authorities / institutions / entities according to law and we will document these probationary approaches.	Fulfillment of a legal obligation (for compliance obligations imposed by legal provisions relating to, e.g., unlimited, prevention and protection against fraud, money laundering, terrorism, etc.) (Article 6(1) point (f) of General Data Protection Regulation)
F.	Recruitment	As a rule, We do not conduct recruitment campaigns through the Website managed by Us. However, to the extent that you send us your CV to our email address, we will process the following Data for the purpose of initiating / finalizing the recruitment process and, if applicable, for the purpose of hiring you: personal data contained in your CV (name / first name, telephone, email address, education, work experience and skills, and any other data normally contained in a CV)	Our legitimate interest (completion of the recruitment process, i.e., to identify the best candidate for the vacant position) as well as the interest of your legitimate job search for a job that matches your experience (Article 6(1) point (f) of General Data Protection Regulation)
<i>Data we collect automatically</i>			
G.	Maintenance and security Website	<p>For the maintenance and security of our website, we may process Visitor Data consisting of the following online identifiers:</p> <ul style="list-style-type: none"> <li>IP address or MAC address;</li> <li>The Internet browser used when visiting the Website; o the operating system version of the device used by the Website visitor to connect to the Internet when visiting the website;</li> <li>IT protocol data (e.g., HTTP / HTTPS);</li> </ul> <p>Specifically, we process your data more above to:</p> <ul style="list-style-type: none"> <li>ensure the proper functioning of the website;</li> <li>correctly display content on the website;</li> <li>improve the website;</li> <li>to ensure the security of the Website and to protect you against fraud / IT security incidents in relation to the website;</li> <li>identify and remedy any faults that prevent the use of the Website.</li> </ul>	Our legitimate interest (Article 6(1) point (f) of General Data Protection Regulation). For the purposes of implementing and maintaining the security measures of the Website and the Website)

If we decide to process your Data in ways and for purposes other than those mentioned above in this Notice, we will inform you in a lawful manner to enable you to exercise your legal rights.

- **How long do we retain your personal data?**

We store your Personal Data strictly for the periods necessary to fulfill each of the purposes for which such data is collected under this Notice, in accordance with our Personal Data retention policy and applicable laws (e.g., special, and general archiving laws).

Thus, for example, your data required for the submission of a bid for Services will be processed by Us for a period of 60 days from the date on which you submit such data to Us (which period We consider necessary for Your analysis of the bid submitted by Us), while the data necessary for the performance of the Services will be processed by Us for the duration of the contract as well as for a period of 36 months after termination of the contract (unless a legal provision obliges Us to process the data for a longer period).

In determining the appropriate period for storing the Personal Data that we process, we take into account the amount, nature, and sensitivity of the Personal Data, the potential risk of harm resulting from unauthorized processing and disclosure, the purposes for which we process such data and whether we can achieve these purposes by other less intrusive means, applicable legal requirements that require us to store it for certain periods of time, and any agreed industry practices regarding the length of time we retain the information, and how we can ensure that the data we process is accurate and up-to-date.

At the end of the applicable retention periods, if and to the extent that we no longer have legal grounds, legitimate interests, or your consent to process your Personal Data (in applicable cases), such Data will be deleted from our records in accordance with our internal procedures and applicable laws (in ways that may include archiving, anonymization and / or destruction of such data, on a case-by-case basis).

- **Automatic decision-making, Creating profiles automatically.**

The personal data referred to in this Information Notice are not subject to any automated processing or automated decision-making, including profiling.

- **Who has access to your personal data?**

Our aim is to provide our customers with the best possible service and, in order to do so, where appropriate, we disclose your Data to our employees who are authorized to have access to your Data and to our partners whom we have carefully selected and to whom we will only disclose the Data necessary for the specific activities we entrust to them strictly in the context of providing our services. In addition, your personal data may be transferred to various public authorities and institutions, investigative, prosecutorial, and judicial bodies, or consultants, strictly for the purpose of fulfilling legal obligations.

Specifically, we disclose certain Data to third parties (our suppliers and partners) to perform certain functions and services necessary for browsing the Website and for the conduct of our business:

- the provider who maintains our website,
- the provider who provides us with data storage services (in the cloud).

- **If and when We transfer your Personal Data outside of the European Union or SEE?**

As a rule, your Personal Data will not be stored or transferred to a country outside the European Union or the European Economic Area ("EEA"). However, some of your Personal Data may be transferred to our partners who help us provide you with the best Services and are located outside the European Union. However, with each of these partners, we have made reasonable efforts to ensure that appropriate measures are in place to protect your data. Specifically, these partners are: cloud providers and PR/Marketing partners to be able to contact you for diverse necessary activities.

If we transfer your Personal Data to other partners / suppliers located in countries that do not provide an adequate level of protection, we undertake to take all necessary and reasonable steps to ensure that those partners / suppliers comply with the terms and conditions set out in this Notice. We will ensure that such transfers comply with the provisions of European Union law on the protection of personal data either by implementing Standard Contractual Clauses approved by the European Commission which ensure adequate protection, either by implementing a transfer to a Privacy Shield-certified entity (EU-US Privacy Shield) in the case of a transfer to the US, or by other means provided for by applicable legal provisions.

- **What security measures do we provide to protect your data?**

We have implemented the necessary technical and organizational measures to ensure an adequate level of security for the collection, further processing, and safekeeping of your personal data, including against unauthorized access, unauthorized use, destruction, loss, or alteration. These measures include but are not limited to, granting restricted access rights to our physical and IT systems, imposing privacy obligations on our employees and business partners, using HTTPS protocol to provide encrypted and secure server identification.

In addition, we make all reasonable efforts to ensure (including through contracts with them) that our business partners who may have access to your Data in the context of the services we provide manage appropriate technical and organizational measures for processing.

In the event of a security incident involving your Data, we will make all necessary notifications and take all necessary steps as required by applicable law.

- **Forwarding information to us**

The transmission of information over the Internet is not entirely secure and when you send information / Personal Data to us in this way (e.g., by email, through our website, or by any other means), you assume risks.

We cannot be held liable for any expenses, loss of profits, damage to reputation, damages, liabilities, or any other form of loss or damage suffered by you as a result of your decision to transmit information to us over the Internet or by any means, other than our mandatory legal obligations (including in the field of personal data protection) and those undertaken in our contracts with you.

- **What are your rights regarding the Personal Data we process? In the context of processing your Personal Data, you have the following rights:**

- a) Right of access to processed Personal Data: you have the right to obtain confirmation as to whether or not your Personal Data are being processed and, if so, to have access to the type of Personal Data and the conditions under which they are processed, by making a request to us as a data controller;
- b) Right to request rectification or erasure of Personal Data (right to be forgotten): You have the possibility to request, by submitting a request to us as data controller, the rectification of inaccurate personal data, the completion of incomplete data or the deletion of your personal data if (i) the data is no longer necessary for the original purpose (and there is no new lawful purpose), (ii) the legal basis for the processing is the data subject's consent and the data subject withdraws his / her consent and there is no other lawful basis, (iii) the data subject exercises the right to object and the controller has no overriding legitimate grounds for continuing the processing, (iv) the data have been unlawfully processed, (v) the removal is necessary for compliance with EU or Romanian law, or (vi) the data have been collected in connection with information society services offered to children (if applicable), where specific consent requirements apply. This is not an absolute right. We may refuse your request to delete data if: (i) we are required to comply with legal obligations to retain the data; or (ii) the data is necessary for us to establish, exercise or defend our rights and / or legitimate interests in legal proceedings.
- c) Right to request restriction of processing: you have the right to obtain restriction of processing in cases where: (i) you believe that the personal data being processed is inaccurate, for a period of time that allows us as the controller to verify the accuracy of the personal data again; (ii) the processing is unlawful, but you do not want us to delete your personal data, but to restrict the use of this data; (iii) if we as the data controller no longer need your personal data for the purposes mentioned above, but you need the data to establish, exercise or enforce a right in court; or (iv) you have objected to the processing, for the period within which to verify whether our legitimate grounds as data controller outweigh the rights of the data subject.
- d) The right to withdraw your consent to the processing, where the processing is based on consent, without affecting the lawfulness of the processing conducted up to that point.
- e) The right to object to the processing of data on grounds relating to your situation, where the processing is based on legitimate interest, and to object at any time to the processing of data for direct marketing purposes, including profiling.
- f) The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning the data subject or similarly affects the data subject in a substantial way.
- g) The right to data portability, meaning the right to receive personal data that you have provided to us as a data controller in a structured, commonly used, and machine-readable form, and the right to transfer that data to another controller, where the processing is based on your consent or the performance of a contract and is carried out by automated means;
- h) The right to lodge a complaint with the Data Protection Authority (ANSPDCP) located at General Gheorghe Magheru 28-30, Sector 1, postal code 010336, Bucharest, Romania, telephone +40.318.059.211 / +40.318.059.212, email [anspdcp@dataprotection.ro](mailto:anspdcp@dataprotection.ro) and the right to apply to the courts competent.

The above rights can be exercised at any time. To this end, you may send written requests, dated, and signed, to our registered office at 20, St. Gheorghe Street, Pantelimon, Ilfov County, or by email to [sorin.petcu@santinela.com](mailto:sorin.petcu@santinela.com).

We will respond to each of your requests within one (1) month of receipt of the request, unless we need to extend this period by a maximum of two (2) months from receipt of the initial request, considering the complexity and number of requests received. We will inform you of any such extension within one month of receipt of the initial request, together with the reasons for the delay.

We also point out that the exercise of your rights by the above-mentioned data subject is free of charge. In the case of requests that are manifestly unfounded or excessive, in particular, due to their repetitive nature, we may: (a) charge a reasonable fee taking into account the administrative costs of providing the communication information or carrying out the requested action; or (b) refuse to comply with the request, with a reasoned response. If you request additional copies of your Data undergoing processing, we may charge you a reasonable fee based on the administrative costs of providing such copies.

If you are not satisfied with our response, you can complain to the ANSPDCP. More information about the complaints procedure is available on the ANSPDCP website at the following link: [https://www.dataprotection.ro/?page=procedura\\_plangerilor](https://www.dataprotection.ro/?page=procedura_plangerilor)

- **QUESTIONS AND REQUESTS ON DATA PROTECTION and UPDATE OF THE INFORMATION NOTE**

If you have any queries, clarifications, or any details you need regarding this Information Notice you can contact us at contact at [sorin.petcu@santinela.com](mailto:sorin.petcu@santinela.com) or at our head office address.

This Information Notice is subject to change from time to time (e.g., because of changes in law or practice, or changes in our business, etc.), and the latest version of the Information Notice is posted on our website. If you would like to receive an earlier version of the Information Notice, you can send us a request to the following email address: [sorin.petcu@santinela.com](mailto:sorin.petcu@santinela.com).

Whenever required by law, we will obtain your express, specific, informed, and prior written consent to process your Personal Data for purposes and in ways other than those for which we have obtained your prior consent.