

APPLICABLE FROM MAY 25, 2018	PERSONAL DATA PROTECTION NOTIFICATION ON THE PERSONAL DATA PROCESSING POLICY	v. 1.0
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CONTROLLER'S IDENTIFICATION DATA:

VERONIKI ECOGRUP S.R.L.

REGISTERED OFFICE: BUCHAREST, SECTOR 1, 2-4 MURUMURULUI ALLEY, GROUND FLOOR

NUMBER OF REGISTRATION WITH THE TRADE REGISTRY: J40/5534/2016

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VERONIKI ECOGRUP S.R.L. (hereinafter referred to as "VEG"), as a personal data controller, processes personal data in compliance with the provisions of Law no. 190 of July 18th 2018 and Regulation (EU) 2016/679 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 (hereinafter referred to as the "General Data Protection Regulation").

The purpose of this document is to inform you in a comprehensible, simple and concise manner about the purposes of the processing, the legal basis of the processing, the duration of the processing, the recipients of the collected personal data, the modalities of exercising the individual rights as well as information on the secondary purpose of the processing, if the data is also processed for other purpose than that for which it was originally collected by the controller.

As part of the data processing operation, VEG takes into account the legal regulations in the field of personal data protection, observes and applies the principles underlying the protection of personal data and ensures their confidentiality and security through appropriate organizational and technical measures, materialized in internal procedures, organizational measures and employee information and accountability measures as well as technical security measures.

Please read this personal data privacy notice ("Notification") carefully in order to understand our policies and practices regarding your personal data and the way we use it. This Notification applies to individuals who interact with VEG as potential or current suppliers or customers or other categories of business partners. This Notification explains how VEG collects, uses and discloses your personal data. It also explains how you can access and update your personal data, and make some choices about how they are used.

This Notification covers all our data collection activities, including personal data we collect through various channels, such as outlets (including activities outside the outlets) and events.

This Notification may be changed occasionally (see Section 12).

1 PRINCIPLES OF PERSONAL DATA PROCESSING

The collected personal data are:

- processed for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes should not be considered incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; we shall take every reasonable step to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which allows the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by law in order to safeguard the rights and freedoms of the data subject;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against loss or destruction, using appropriate technical or organisational measures.

2 SOURCES OF PERSONAL DATA

This Notification applies to personal data to be collected by VEG from you or with regard to your person through the methods listed below, from the following sources:

VEG website. The website <http://www.veroniekicogrup.ro>.

E-mail messages, text messages, and other electronic messages. Interactions through electronic communication between you and VEG.

Telephone conversations. Telephone communications with VEG representatives.

Registration forms. Written or digital form recordings, and various forms that VEG collects, for example in the case of promotional events.

Contracts. Data provided by you in connection with or in the contract concluded between the parties.

Data from other sources. VEG promotional partners, public sources, data received when buying other companies, etc.

3 PERSONAL DATA WE COLLECT FROM YOU AND THEIR MANNER OF COLLECTION

Depending on how you interact with VEG (online, offline, telephone, etc.) and your capacity in relation to VEG, we collect different kinds of information as described below:

Personal contact information. These include any information you provide to us (either personal or business information) that enables us to contact you, such as your name, postal address, e-mail address, telephone number, your position in the company you represent, as the case may be, etc.

Computer/mobile device-related information. Any information related to the computer system or other technological device you use to access the VEG website, such as the Internet Protocol (IP) address used to connect your computer or mobile device

to the internet, the type of operating system, and the type of web browser used. We expressly state that we do not use automated data collection techniques to collect certain information about your actions, such as the links you visit, the pages or content you view, and for how long, as well as other similar information and statistics.

Customer reviews. Any information you voluntarily make available to us about your experience with the use of our products and services.

Information on payments and financial information. Any information that we need to honour an order or that you use to buy VEG products. In all cases, both we and our provider(s) of payment information processing services manage payment and financial information in a manner consistent with the applicable security laws, regulations, and standards.

Special personal data. We do not seek to collect or otherwise process special personal data (e.g. racial or ethnic origin, political opinions, religion or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning the sex life or sexual orientation of the individual) during the normal course of our activity. Thus, your special personal data will only be processed in those cases where there is a legal obligation to do so, and if we receive unsolicited special data, they will be erased without delay.

4 PERSONAL DATA OF CHILDREN

We do not request and we do not knowingly collect personal data from children under the age of 16. If we find that personal data of a child under the age of 16 have been communicated to us, we will promptly delete the child's personal data from our records.

5 USE OF YOUR PERSONAL DATA

The following paragraphs show the different purposes for which we collect and use your personal data, as well as the different types of personal data that are collected for each purpose. Please be aware that not all of the uses listed below will be relevant to each person.

<u>For what purposes we use your personal data</u>	<u>Grounds of processing</u>	<u>Our legitimate interests</u>
<p><u>Services addressed to customers.</u> We use your personal data only for the specific purpose of VEG's activity, including for the purpose of responding to your requests. This normally requires the use of certain personal contact information and information on the reasons of your request (e.g. order status, technical issues, product-related questions/complaints, general questions, etc.)</p>	<ul style="list-style-type: none"> • <u>Fulfilment of contractual obligations</u> • <u>Legal obligations</u> • <u>Our legitimate interests</u> 	<ul style="list-style-type: none"> • Improvement and development of new products or services • Increase of efficiency
<p><u>Marketing and other promotions.</u> We may use your personal data, exceptionally and with your consent (where necessary), to provide you with information about goods and services (e.g. marketing communications or campaigns). This can be done by means such as emails, ads, SMS or mailed messages, to the extent</p>	<ul style="list-style-type: none"> • <u>With your consent (where this is necessary)</u> 	<ul style="list-style-type: none"> • In order to verify the proper conduct of the campaign and the fulfilment of the obligations of the third parties involved.

permitted by applicable law. This use of your personal data is voluntary, which means you may object or withdraw your consent to the processing of your personal data for these purposes at any time. For information on how to modify your preferences regarding marketing communications, see Sections 10 and 11 below. For more information on contests and other promotional campaigns conducted by VEG, please review the regulations or presentations published for each contest/campaign.

- Fulfilment of contractual obligations
- Our legitimate interests
- To understand which of the products and services offered by VEG you are interested in and to be able to provide you with additional information.

Performance of contracts. We use your personal data for the processing and delivery of your orders, for communications on the performance of contractual obligations, and for conducting identity verification and other fraud detection activities.

- Fulfilment of contractual obligations
- Legal obligations
- Our legitimate interests
- Improvement and development of new products or services
- Increase of efficiency
- Protection of our systems, networks and staff
- Observance of legal obligations

Disclosure of data following a legal obligation or in the context of a merger/acquisition. We will disclose your personal data to third parties (i) where this is required by applicable law; (ii) following requests from a court or competent authority; (iii) to protect the rights, privacy, security or property of VEG or third parties. Further, if VEG or VEG goods are acquired by another company, or in the event of a merger with another company, including as a result of bankruptcy, we will provide your personal data to any of our legal successors.

- Legal obligations
- Our legitimate interests
- Observance of legal obligations
- Protection of assets and rights of third parties

In addition to the above, when organizing or participating in a particular social, business or other event, such as fairs, conferences, trainings, etc. which are addressed to a wider audience, either VEG or our service providers defined in Section 7 below, or the organizers of such events can take pictures or recordings of yourself and other participants to such events. As far as possible, we will promote these events and our participation in these events so that the participants are properly informed about the place, time, purpose, activities and planned schedule. We may distribute these materials (before and/or after) to certain service providers to promote our events and names and brands as participants in these events; distribution and subsequent use of these materials may include professional editing. Furthermore, we can use these materials to promote our name and brands on our website and/or social platforms. We may also transmit these materials to other entities in the VEG group for internal purposes. When we implement the above, we rely on our legitimate interest in presenting and informing the public about the event (before and after), promoting both us and our brands, showing our involvement in various activities with social impact and our corporate responsibility. We will keep these materials as long as reasonably necessary to achieve the above purposes and provide them with an adequate level of attention and protection.

If you have any reason why you do not want to appear in such materials, please inform us in advance and we will take all reasonable steps to comply with the request.

6 DISCLOSURE OF YOUR PERSONAL DATA

VEG may grant access to your personal data to the following categories of third parties:

Service providers. External companies providing services to the benefit of VEG for the conduct of our business (e.g., honouring orders, processing payments, operating the website, supporting services, organizing promotional campaigns, etc.). Service providers and their selected staff are only allowed access to and use of your personal data in our name and on our behalf only in relation to specific contracted tasks based on our instructions, and are required to maintain the confidentiality and security of your personal data. To the extent necessary, you will be able to request and obtain a list of service providers who process your personal data.

Companies specializing in the recovery of debts. Debt recovery companies are external professionals that help us in collecting our outstanding receivables.

Third party recipients who use personal data based on legal grounds or in the context of a merger/acquisition.

We will disclose your personal data to third parties only on legal grounds or in the context of an acquisition or merger (see Section 5 for details).

7 RETENTION OF YOUR PERSONAL DATA

VEG takes all necessary steps to ensure that your personal data is processed only for the minimum period required for the purposes set forth in this Privacy Notice (Notification) and only on the basis of valid legal grounds plus the duration of:

- (i) any applicable limitation period (any period during which a person, tax authority, criminal investigation body or other public authority may bring legal proceedings against you or control the legal relationship between VEG and you); and
- (ii) an additional period of six (six) months from the end of the applicable limitation period (so as to make sure that no action against VEG has been initiated during the applicable limitation period); and
- (iii) If complaints or proceedings against VEG are filed, we may continue processing your personal data for the period necessary to defend VEG rights before the authority or, as the case may be, the court.

During limitation terms and subsequently until the deletion of personal data, processing will be restricted to data retention activity, subject to all security measures, unless the data needs to be reviewed in relation to any complain or any other obligation resulting from the applicable law.

Also, in the case of documents the keeping of which is regulated by certain normative acts (e.g. Order of the Minister of Public Finance no. 2634/2015 on financial and accounting documents), VEG will comply with such retention obligations.

After the end of the above-mentioned periods, each to the extent that it is applicable, we will erase or permanently destroy the relevant personal data.

8 DISCLOSURE, STORAGE AND/OR TRANSFER OF YOUR PERSONAL DATA

We use appropriate measures (listed below) to maintain privacy and security of your personal data. However, please be aware that these safeguards do not apply to the information you choose to distribute in the public domain.

People who can access your personal data. Your personal data will only be processed by employees and persons authorized by us, only to the extent that it is necessary to know them, depending on the specific purposes for which your personal data was collected (e.g. our employees responsible for invoicing or customer relationship, empowered persons collecting personal data during a promotional campaign, etc.).

Measures taken in operating environments. We store your personal data in operating environments that use reasonable security measures to prevent unauthorized access and we meet reasonable standards for protecting personal data. Unfortunately, the transmission of information via the Internet is not entirely secure, and even if VEG takes all due care to protect your personal data, data security cannot be guaranteed during transmission to VEG by email or through our website.

Measures we expect from you. It is also important for you to play an active role in maintaining the security and safety of your personal data. In this respect, you should use the privacy control settings and features of your web browser.

Transfer of personal data.

Your personal data will not be transferred to or processed in a third country. The retention and processing of your personal data as described above may impose their transmission and/or storage within the VEG group, outside your country of residence, in all cases within the European Economic Area ("EEA").

9 YOUR RIGHTS

Access to Personal Data. You have the right to access, analyse and request physical or electronic copies of the information held about you. You also have the right to request information about the source of your personal data.

Portability. You have the right to receive the personal data in a structured format and the right to transmit those data directly to another controller, if this is feasible from a technical point of view.

Right to object. You have the right to object to processing of personal data, unless the processing is necessary for the performance of a task which is in the public interest or when it concerns one of VEG's obligations.

Erasure. You have the right to request the erasure of personal data if it is no longer necessary for the purposes of processing or if the data has been processed illegally.

Restriction of processing. You have the right to obtain restriction of processing of your personal data. This restriction is temporary, suspending data processing. VEG has an obligation to meet this requirement only if the conditions set out in the Regulation are met.

Right not to be subject to an automatic decision. You have the right to object to data processing done by automatic means designed to evaluate aspects of your personality.

Right to lodge a complaint with a supervisory authority. You have the right to lodge a complaint with the National Supervisory Authority for Personal Data Processing in the case of violation of your rights.

Notification. You have the right to be informed of how VEG processes personal data, notification carried out through this policy on personal data processing.

These rights can be exercised by sending us an e-mail to dataprotection@veronikieogrup.ro or by writing to Veroniki Ecogrup S.R.L., with registered office in Bucharest, Sector 1, Intrarea Murmurului nr. 2-4, parter and enclosing a copy of your identity card or equivalent details. In all cases, VEG will be able to take further steps to identify you.

If the application is filed by another person without proof that the request is legitimately made on your behalf or if your identity cannot be verified, the application will be rejected. Please note that any identifying information provided to us will be processed only in accordance with and to the extent permitted by applicable law.

We hope that we can meet the requests you may have regarding the way we process your personal data. In all cases, if you have unresolved issues, you can exercise your right to lodge a complaint with the competent supervisory authority.

10 YOUR OPTIONS REGARDING THE MANNER IN WHICH WE USE YOUR PERSONAL DATA

We strive to provide you with options regarding the Personal Data you make available to us. The following mechanisms provide you with control over your personal data:

Cookies/Similar technologies. You can manage your consent through your browser to deny all or some of the cookies/similar technologies or to alert you when they are being used.

Advertising, marketing and promotions. You may consent to the use of your personal data by VEG to promote our products by giving your express consent. If you decide that you no longer wish to receive such communications, you may at any time withdraw your consent to receive marketing communications by communicating your option by any means. Please note that even if you opt out of receiving marketing communications, you will continue to receive administrative communications from VEG, such as confirmations of orders or other transactions as well as other important notifications not related to marketing.

11 CHANGES TO THIS NOTIFICATION

If we make changes to the way we manage your personal data, we will update this Notification.

We reserve the right to make changes to our practices and to this Notification at any time, mainly due to any legal obligations that will become applicable to the protection of personal data. Please check <http://veronikieogrup.ro/pdf/politica-prelucrare-date.pdf> to find out about any updates or changes to our personal data processing policy.

12 DATA CONTROLLER AND CONTACT DATA

In order to ask questions or submit comments on this Notification and our privacy practices, to exercise the rights set forth in Section 10 or to submit a complaint about the processing of personal data by VEG, please contact the Data Protection Officer at the email address dataprotection@veronikieogrup.ro, by post or courier at Bucharest, sector 1, Intrarea Murmurului nr. 2-4, parter or contact us by phone at the normal rate phone number +40 372 157 300.

We will confirm and investigate any complaint related to the way we process personal data.