# Privacy Policy

The information on this Website is held in property by ARQ Legal – SCA Cioroabă și Ungureanu.

This Privacy Policy explains how We collect, use and otherwise process your personal data when you use our services and the Website.

#### 1. What data do we collect?

- 1.1. We collect the following personal data about you:
  - a. surname;
  - b. first name;
  - c. email address;
  - d. any personal data included in documents made available to us (including: surname, first name, other identification data, as serial number, identifity card).
     You declare that you have obtained the neccessary consent for this transfer of personal data.
- 1.2. In relation to all Visitors and Users (as defined below):
  - a. IP Addresses and Usage Data

We collect for IT security purposes and system diagnostics, your IP Addresses and Usage Data. Both IP Addresses and Usage Data are collected from Users (individuals that log in to this Website or which request an offer or additional information via the contact page) as well as Visitors (individuals that visit the Website without registering and/or giving any of their personal data).

These types of data will also be used to analyze trends and the performance of the Website.

For the purpose of this Privacy Policy the personal data listed under points 1.1 and 1.2 above are hereinafter referred to as the Data.

#### 2. Legal basis for processing

We collect only necessary data: This Website collects only the personal data required to meet your request. You will be notified of this at the moment of data collection.

**General applicable rule**: The law allows Us to process personal data as long as We have a legal basis for doing so. The law also requires Us to inform you of the purposes of the processing.

**Our grounds of processing**: As a result, when we process your personal data, we will rely on one of the following legal grounds for processing, for the purposes indicated:

- Legitimate interest, in answering a
  request/application we will process information about
  you which you submit when you fill in the forms
  available on this Website, or the data you choose to
  send to us at your discretion directly to the contact
  addresses indicated on this Website.
- Your consent, in some cases, we will ask you for specific permission to process some of your personal data, and We will process your personal data in this way, only if you agree to do so; for example, when you exercise your option to receive information from us.

Your consent may be withdrawn at any time following the steps available in the indicated section of this Privacy Policy. If at any point you opt-in for particular services or communications, such as newsletters, participation in our events etc., you will be able to unsubscribe at any time by following the instructions included in each communication.

In any case, We will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of the Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

#### Mode of processing the Data

We take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated.

#### 4. Place and usage of the Data

**Place**: The Data is processed at Our operating offices. Depending on your location, data transfers may involve transferring your Data to a country other than your own. To find out more about the place of processing of such transferred Data, you can check the section containing details about the processing of Data. Moreover, our mailing list is administered through Google.

We will transmit your data to relevant authorities when we have a legal obligation to do so; we can transmit your data to our partners that offer us services such as legal, billing, accounting, security, marketing, user interactions, hosting.

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**Usage**: We collect your Data so that we can: (a) Present you this Website and improve it; (b) Email you with news and updates on our services; (c) Respond your email if you contact us via email; and (d) Manage your participation in our events.

#### 5. Further relevant information for you

#### A. Retention time

Unless specified otherwise in this document, the Data shall be processed and stored for as long as required by the purpose it has been collected for and may be retained for longer due to applicable legal obligation or based on your consent.

#### Therefore:

- Data collected for purposes related to the performance of a contract between Us and you shall be retained until such contract has been fully performed.
- Data collected for the purposes of Our legitimate interests shall be retained as long as needed to fulfill such purposes. You may find specific information regarding the legitimate interests pursued by Us within the relevant sections of this document or by contacting Us.

We may be allowed to retain Data for a longer period whenever you have given consent to such processing, as long as such consent is not withdrawn. Furthermore, We may be obliged to retain Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, the Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

## B. Your rights based on the General Data Protection Regulation (GDPR)

You have the right to do the following, to the extent permitted by law:

- Withdraw your consent at any time. You have the right to withdraw consent where you have previously given your consent to the processing of your Data.
- Object to processing of your Data. You have the right to object to the processing of their Data if the processing is carried out on a legal basis other than your consent.
- Access your Data. You have the right to learn if your Data is being processed by Us and to obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. You have the right to verify the accuracy of your Data and ask for the Data to be updated or corrected.

- Restrict the processing of your Data. You have the right to restrict the processing of your Data. In this case, We will not process your Data for any purpose other than storing it.
- Have your Data deleted or otherwise removed. You
  have the right to obtain the erasure of your Data.
- Receive your Data and have it transferred to another controller. You have the right to receive your Data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- Lodge a complaint. You have the right to bring a claim before your competent data protection authority.

#### C. Exercise of your rights

Any requests to exercise your rights can be directed to Us through the contact details provided in this document, i.e. email address: office@arq-legal.com.

Such requests are free of charge and will be answered by Us as early as possible and always within one month, providing you with the information required by law.

Any rectification or erasure of Data or restriction of processing will be communicated by Us to each recipient, if any, to whom the Data has been disclosed unless this proves impossible or involves disproportionate effort. At your request, We will inform you about those recipients.

#### 6. Information not contained in this Privacy Policy

More details concerning the collection or processing of Data may be requested from Us at any time, at email address: office@arq-legal.com.

#### 7. Marketing

Bright Spaces would like to send you information about products and services that we think you might like, as well as those of our partner companies. If you have agreed to receive marketing, you may always opt out at a later date. You have the right at any time to stop Bright Spaces from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please send an email to <a href="mailto:office@arq-legal.com">office@arq-legal.com</a>.

#### 8. Cookies

**Purpose**: In this section, you can find information about what Cookies are, how they are used and what the implications are for you, as a result of accepting the Cookies used on this Website.

**Definition**: Cookies are small amounts of data, generally made up of a string of characters or parts of a file, which when accessing a website are saved in the browser used by the computer, phone, tablet or any other device through which the respective website is accessed online. At each subsequent access to the website, the browser used sends this file to the server of the respective site, in order to allow the identification of a visitor who has returned to the site.

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Purpose of the cookies: This Website uses cookies for the following reasons: (i) to ensure the proper functioning of the website; (ii) to grant us with the possibility of analyzing the traffic and performance of the website accessed by visitors so that we understand the needs and requirements of website visitors and can take measures to improve/optimize their browsing experience on the website; (iii) to ensure the best and personalized use of the services offered through the website; (iv) to improve, including making the marketing actions more efficient, (v) to record temporarily the content previously viewed by the visitor, for the proper display of content and further navigation. We never sell your information; we use cookies data to enhance your experience with our website.

#### What are your available selections regarding cookies?

- If you would like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.
- Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

#### Where can you find more information regarding cookies?

Additional information regarding cookies can be found on publicly available databases (third party websites for which we incur no liability) regarding cookies, as per example:

- http://www.allaboutcookies.org/
- http://www.aboutcookies.org/

#### 9. Changes to this Privacy Policy

We reserve the right to make changes to this Privacy Policy at any time by notifying you on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the beginning of the document.

Should the changes affect processing activities performed on the basis of your consent, We shall collect a new consent from you, where required.

#### 10. Definitions used in this Privacy Policy

- Data Subject: The natural person to whom the Data refers.
- IP Address: An IP address is a number assigned to your computer every time you access the Internet. It enables computers and servers to recognize and communicate with each other.
- Personal Data or Data: Any information that directly, indirectly, or in connection with other information including a personal identification number allows for the identification or identifiability of a natural person.
- Service: The service provided by this Website as described in the relative terms (if available) and on this Website.
- Usage Data: Information collected through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the visitors who use this website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the visitor, the various time details per visit (e.g., the time spent on each page within the website) and the details about the path followed within the website with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the visitor's IT environment.
- **User:** The individual using this Website who, unless otherwise specified, coincides with the Data Subject, and which registers under the Website.
- Visitor: The individual using this Website who does not perform any registration of this Web site or who does not provide any Data.
- Website: The means by which the Data of the User or the Visitor is collected and processed.

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## Let's talk!

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