

Privacy Notice concerning processing of personal data

(Version 1.1 July 2019)

As of May 25, 2018, Regulation 679/27-Apr-2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (General Data Protection Directive) (hereinafter referred to as GDPR) is applied in all the Member States of the European Union.

This Privacy Notice is intended to inform you about how we understand to apply the GDPR policy at our company level, and is an integral part of the iNES Framework Contract, the F series.

<p>Personal Data</p>	<p>We hereby inform you that the personal data we process are:</p> <p>identification and contact details: name and surname, address, place and date of birth, personal identification number, identification data in BI / CI or other identity documents, citizenship, e-mail, telephone / fax, bank account, bank, billing address.</p> <p>iNES product and service account data: Customer ID, username, passwords and authentication and access questions, payment and invoice data, subscription data, registered requests, complaints, details required to resolve them, date of interrogations, call duration, identified solutions, recordings of the conversations made;</p> <p>data on the goods and services you receive: phone numbers assigned and / or outgoing /incoming phone numbers, the type of products and services you request/benefit from; data on the voice communications needed to make the phone call and for billing it, duration and number of calls, the country, the traffic data needed for communication via the Internet and data on the quality of the connection to it, data volume, duration of the data session, details on access to our services and software, IP addresses, MAC addresses, accessed WI-FI networks, viewed TV programs, geolocation data, service installation and activation data, activation date and connection type, signature.</p> <p>subscriber directory data: your name, address, and phone number</p> <p>In most cases, these data represent a legal or contractual obligation that is necessary both for the conclusion and execution of the contract, and the failure to do so may affect the provision of the contracted goods or services or the observance of our legal obligations, including those concerning reporting and registration.</p>
<p>Scope of processing personal data concerned</p>	<p>Your personal data will be collected for specified, explicit and legitimate purposes and will be processed according to the principles of integrity and confidentiality in a way that ensures the adequate security of personal data, including protection against unauthorized or unlawful processing, and loss, destruction or accidental damage by taking appropriate technical or organizational measures.</p> <p>The processing of your personal data as a target person is accomplished without limitation for the following purposes:</p> <ul style="list-style-type: none"> • for the provision of goods and / or the provision of iNES services purchased or ordered from iNES; • to be contacted and to offer information about the iNES goods and / or services you use or expect to use;

	<ul style="list-style-type: none"> • For accounting, financial and invoicing purposes, drafting and submitting payment statements to central or local tax authorities; • to provide up-to-date information about iNES products and / or services, or information about changes to our terms and conditions or interruption / suspension of services; • to identify and solve fraudulent use of the iNES (and partner) network, technical issues, or other claimed issues; • to continuously optimize and develop the goods and / or services offered by iNES to analyze data on TV behavior and preferences and to produce combined and pseudonymized reports to be provided to other partner entities, as to be managed under appropriate conditions protection of the iNES network, audience reporting, marketing (including direct marketing) and advertising of its own products and / or services, fraud prevention and management, and security policy under the law. • to subscribing to the subscriber registry, a telephone directory service made available to authorized service providers for this purpose. • To serve any other purposes laid down in the contract or the legislation. <p>Personal data may target the following target persons: (i) actual or potential customers, agents, distributors, subcontractors, business partners (natural persons); (ii) Employees or contact persons of potential clients, clients, agents, distributors, sub-processors or empowered persons, business partners and sellers (who are natural persons); (iii) Employees, agents, counselors and independent persons of the Customer (who are natural persons) and / or (iv) Individuals authorized by the Customer to use the Service.</p> <p>The parties to the contract concluded with iNES have the obligation to comply with the EU legislation on personal data protection and to ensure that its staff / duly representatives and take reasonable commercial efforts to comply with EU data protection legislation. You, as the iNES Client, have sole responsibility for the accuracy, quality and legality of personal data communicated to us.</p>
Processing principles	We process your personal data under conditions of legality, fairness and transparency .
Legal basis for processing	<p>The legal basis for the collection and processing of personal data (anonymous data and aggregates are not considered personal data) for each of the purposes mentioned in this Information is any of the following:</p> <ul style="list-style-type: none"> • the consent of the person concerned; this consent will be given concomitantly with the execution of the contract, agreement or other documents explicitly mentioning this, signing any of this document representing the consent of the respective individual to the processing of his or her personal data. • purpose of processing compatible with the original purpose of processing personal data • performance of the contract to which the concerned individual is a party or the application submitted before signing the contract for the purpose of concluding the contract or performance of the same; • legal obligation: compliance with the applicable mandatory legal requirements; • the legitimate and legal interest of iNES to ensure the provision of its own products and services for processing with the intent of marketing, advertising, direct marketing materials, surveys and emails or other channels, to prevent and combat fraud

	<p>Personal data may also be collected upon purchase or use in any way of iNES products and services, when data are public or upon consent of the individual subject directly or indirectly, through the consent given to third parties, or of proxies, contractual partners or when the person concerned becomes an iNES customer or requests information about the goods and services offered.</p> <p>When the respective individual gives his / her consent, the data are processed further to recorded conversations with the iNES Support operators assigned to resolve notifications and / or requests for technical information.</p> <p>Personal data will also be collected if the individual is an IPTV subscriber in order to improve the service provided, to register content viewed, conversations made, the traffic and the connection made.</p>
INES obligations concerning processing of personal data	<ul style="list-style-type: none"> • to process the Personal Data only for the legal purpose of providing its own goods and services, complying with the written instructions received from the Customer or its legal representative specified in the Contract or the applicable legal provisions. • To implement appropriate technical and organizational measures to ensure the level of security required for the risks posed by the processing of personal data, in particular with regard to the protection against unauthorized destruction, loss, alteration, unauthorized disclosure or unauthorized access to personal data. • To take reasonable steps to ensure that only authorized personnel have access to such personal data and that any person they authorize to have access to their personal data is bound to respect the confidentiality of the processed data; • without undue delay, upon notice thereof, to notify the Customer of any breach of security that accidentally or unlawfully leads to the unauthorized destruction, loss, modification or disclosure of personal data transmitted, stored or processed otherwise, or unauthorized access to them by iNES, the persons empowered by it or any other identified or unidentified third party ("<i>Violation of personal data security</i>"); • Provide reasonable support to the Customer with regard to any breach of security and any reasonable information in the possession of iNES about such breach of security to the extent that it affects Customer.
Data transfer	<p>Currently we do not transfer data outside of the European Economic Area (EEA), our data being kept in locations in Romania. However, transfers of personal data to a third country or organization outside the European Economic Area will take place if the servers that store our data or our suppliers and providers are located outside the EEA or if you use the services and our products while visiting countries outside of this space. The transfer will take place under the conditions of adequate safeguards and security and on the basis of standard contractual clauses established by EU data protection law.</p>
Terms for retaining the data	<p>The expected deadlines for keeping and deleting the different categories of data will be those set by current legislation, including archiving, or the achievement of the purpose for which they were collected for as long as necessary to use them as established by current legislation (including tax) or competent authorities.</p>

	Unless otherwise provided by the law, personal data including payment obligations will be retained for the duration of a contract between iNES and the intended person plus a period of three years after termination in any manner whatsoever or the due date of the payment.
Subcontractors	In order to provide our service, to fulfill our contractual obligations, to carry out marketing and advertising (including direct marketing), for recovery / collection of recorded debts, and to perform any other actions related to the goods and services you receive, iNES employs authorized persons, third party operators, outsourced marketing operators, suppliers of goods and services, engineering and customer support as subcontractors. iNES will ensure that any subcontractor that it employs has signed a standard contract clause providing sufficient guarantees for the implementation of appropriate technical and organizational measures so that the processing complies with the requirements of the GDPR and ensures the protection of your rights . iNES will also ensure that subcontractors process data based on our documented instructions and that they will respect the confidentiality of processed personal data or have an appropriate statutory duty of confidentiality. According to this Information, your personal may be disclosed to our affiliates and group companies.
Your rights	As person concerned, you have the following rights: <ul style="list-style-type: none"> • Right to information and access to personal data The person concerned has the right to request a copy of the personal data owned by iNES. The request shall be made in writing at iNES headquarters or by email at dpo@ines.ro. • The right to rectify personal data The person concerned has the right to rectify the data if it is incorrect. Updating incorrect data will be made on the basis of a written request addressed to the iNES headquarters or by email at dpo@ines.ro. • The right to delete iNES will process and store the data only as long as it is necessary. Upon expiry of the mentioned retention periods, the data will be deleted and anonymized. Under certain circumstances, the concerned person has the right to request deletion of his or her personal data. For this purpose, the concerned person shall contact iNES to check the contract status. If it is no longer in force, iNES may still have legal grounds to process personal data that will be brought to the attention of the petitioner. • The right to restrict use of your personal data If the concerned person thinks that the data that iNES has about him/her is incorrect or should not be processed, he/she will contact INES headquarters for a discussion of his/her rights. Under certain circumstances, processing may be restricted. • The right to object to the use of personal data Under certain circumstances, the concerned person has the right to oppose to the processing of personal data by iNES, including data processing for direct marketing purposes. The request is made in writing at iNES headquarters or by email at dpo@ines.ro. The request of the concerned person will be examined and, unless there are legitimate and compelling reasons justifying the processing and which prevail over the interests, rights and freedoms of the concerned person, or if the purpose is to establish, exercise or defend a right in court, personal data will no longer be processed. Opposition to processing for direct marketing purposes will be dealt with as a priority, in the sense that regardless of the channel through which the personal data were transmitted, they will no longer be processed for this purpose. • The right to data portability

	<p>The person concerned has the right to carry with him / her personal information communicated under certain circumstances. (eg. downloading service bills). Access to these data will be allowed with a pre-login on the iNES site or using iNES applications in the formats agreed by INES.</p> <ul style="list-style-type: none"> • The right not to be the subject of a decision based solely on automatic processing <p>The concerned person has the right not to be the subject of a decision based solely on automatic processing, including profile creation, which produces legal effects that affect the concerned person or affects it to a significant extent and obtains human intervention from the operator, to express their point of view and to challenge the decision.</p> <ul style="list-style-type: none"> • Right to withdraw consent at any time <p>Withdrawal of consent may take place at any time and will only take effect in the future, the data processed before withdrawal still remaining in force.</p>
Requests. Complaints	<p>Any request concerning any of your rights or complaint about how iNES processes personal data will be submitted in writing to iNES headquarters at Str Virgil Madgearu no. 2-6, Sector 1, Bucharest or at the email address dpo@ines.ro. If you are not satisfied with the solution received, you may contact the National Supervisory Authority for Personal Data Processing - contact details can be found at www.dataprotection.ro</p>
Operator (which processes your data)	<p>INES GROUP S.R.L. Address: Str Virgil Madgearu nr. 2-6, Sector 1, Bucuresti Registration no. with the Trade Register: J40 /13209 /1993 Soce code of registration: 4021138 E-mail: dpo@ines.ro</p>
Updates.	<p>This Information may be subject to changes in contents over time. Any new version will be announced and displayed on the INES web site https://www.ines.ro</p>