

## **POLICY REGARDING THE PROCESSING OF PERSONAL DATA**

This Policy is intended to present the manner in which the personal data of data subjects are processed by **TODAY ADVERTISING SRL**

This Policy also informs data subjects about their rights in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter referred to as GDPR) and national legislation on the protection and security of personal data. , in force, hereinafter referred to as GDPR Legislation.

*Processing* shall mean any operation or set of operations performed on personal data or personal data sets, with or without the use of automated means, such as the collection, recording, organization, structuring, storage, adaptation or modification, extracting, consulting, using, disclosing by transmission, dissemination or making available in any other way, aligning or combining, restricting, deleting or destroying.

### **1. WHO ARE WE?**

**TODAY ADVERTISING SRL** is a **personal data operator**, headquartered in Romania Bucharest Calea Vitan nr. 108, bl. V35, Sc. 1, Ap. 33 unique registration code RO20362099 serial number at the Bucharest Trade Register J40/91/2007 telephone number 0723400136 e-mail address contact@scan-see.com. In this document, TODAY ADVERTISING SRL will be called "*SCAN&SEE*" or "*Operator*".

In accordance with the GDPR legislation in force, SCAN&SEE has the obligation to administer in safe conditions and only for the specified purposes, the personal data provided to it. SCAN&SEE processes personal data under conditions of legitimacy, implementing appropriate technical and organizational measures to ensure the integrity and confidentiality of data in accordance with the provisions of the GDPR Legislation.

For any questions, notifications or communications related to personal data, please contact us at the contact details specified above.

SCAN&SEE processes personal data through its website, [www.anyolijewelry.com](http://www.anyolijewelry.com) (hereinafter referred to as "the Site"), as well as the SCAN&SEE application (hereinafter referred to as "the Application") which can be downloaded from the dedicated platforms ( Android, Apple, Huawei etc.). When you access and browse the Site and when you download and use the Application and SCAN&SEE products, as a customer or recipient / beneficiary, you provide us with personal data, which we process in accordance with the Personal Data Processing Policy, to which we invite you. go through it carefully.

### **2. WHAT PERSONAL DATA DO WE PROCESS?**

In principle, any information that identifies or can identify, directly or indirectly, a person is *a personal data*.

SCAN&SEE processes the following categories of personal data:

a) *identification information*: name, surname;

b) *contact details*: telephone number, e-mail address;

c) *other information necessary for the provision of SCAN&SEE services / products / development of*

*the contractual/business relationship*: customer account and password (encrypted), data on invoicing, delivery and AWB, promotional codes, account creation and deactivation date, browsing history, products ordered, order ID, messages entered and uploaded files (eg images, video, audio, text - WORD, EXCEL, PDF), customer account and order activity history, connection source (eg site or Facebook), IBAN, amounts paid, bank card (truncated data), bank reference for payment, delivery address, data on the recipient of the SCAN&SEE product (eg name, surname, telephone, delivery address, e-mail);

d) *information necessary for the use of the Application and communication through it*: NFC chip ID embedded in the SCAN&SEE product, information about your device (make and model of the phone used, IP address, welcome message and subsequent messages (eg regarding the modification of the initial message transmitted by the client SCAN&SEE));

e) *data from communications, notifications, requests* made in writing or verbally by you or third parties, through the customer account, the chat implemented in the Site, the contact form implemented in the Site, SCAN&SEE social network accounts, telephone, e-mail: for example, name and surname, address, e-mail, telephone, other data and documents provided in communications / notifications / requests / discussions;

f) *social media profile*: we can access, respectively we can process, your profile data (eg username, profile picture, any other information provided to the social network) or your comments when you interact with SCAN&SEE through social networks media (eg when you like the SCAN&SEE page on Facebook or when you follow us or share content on Facebook, Instagram, Youtube, etc.);

g) *data on the device used to access the SCAN&SEE website*: the type and unique device identification number (IP), the operating system used, the preferred language of the device;

h) *data on the use and operation of the SCAN&SEE website*: for example, the date and duration of accessing / viewing, the type of browser used and its settings, the pages viewed, the web pages or the services of third parties previously used;

i) *cookies and similar technologies (eg pixels)*: details on these, how they work and inactivation can be found in the Cookies Policy.

SCAN&SEE reserves the right to request other data necessary for the performance of the duties of the relevant offices in its organizational structure, strictly in accordance with the applicable legal provisions.

### **3. WHO ARE THE TARGETED PERSONS?**

In the context of this Policy, the *term data subjects* refer to: a) visitors to the website [www.scan-see.com](http://www.scan-see.com) (including newsletter subscribers), users of the Application, of social network accounts whose user is SCAN&SEE (eg Facebook, Instagram, LinkedIn, Youtube etc.), b) SCAN&SEE customers, c) persons whose data are provided to SCAN&SEE by other persons. Data subjects may provide personal data both in their own name and as representatives of legal entities.

SCAN&SEE collects personal data either directly from the data subject or indirectly from third parties. For example, we collect personal data directly from you when: you contact us by e-mail or telephone, you provide us with the data for the creation of the customer account, via a business card or a social network (eg Facebook, LinkedIn, Instagram, Youtube etc.). We indirectly collect your personal data through other data subjects (eg if you are the recipient of a product with a message ordered by an SCAN&SEE customer), the legal entities for which you act as a representative / contact person / proxy, private operators or public authorities, including state authorities and courts, as well as from public sources / documents, as appropriate.

If SCAN&SEE receives the personal data of a data subject from another data subject or from a third party, he / she has the obligation to inform those data subjects about the processing of personal data.

Please note that the SCAN&SEE website contains links to social networks, but we do not use plug-ins to them. Thus, HTML links are incorporated in the SCAN&SEE website, which facilitate distribution on social networking platforms. Incorporating the link prevents a direct connection to various social network servers when you open a page on the SCAN&SEE site. When you click on the button related to a social network, a navigation window will open directing you to the site of the respective service provider, on which (after logging in) the "Like" or "Share" button can be used, for example.

OR

We also specify that the SCAN&SEE website contains plug-ins of social networks (eg Facebook, Instagram, LinkedIn, Youtube), and social network operators obtain by using social plug-ins the information that you accessed it on the SCAN&SEE website, IP address, browser information. If you interact with that plug-in (eg click on the "Like" button on Facebook), there is a transmission of that information to that social network. The information is transferred whether or not you have an account with a social network operator or if you are logged in to your account with that operator. SCAN&SEE does not have access to and does not store this data, its collection and disclosure being done automatically. These plug-ins are used in order to ensure the connection between this site and the official pages managed by SCAN&SEE within the relevant social network.

When the message attached to the SCAN&SEE product you purchased contains a link to another domain that does not belong to the Operator, when you access the link you will be redirected to that internet domain.

If you choose to communicate with us through social networks or use links to other Internet domains, please note that the data operators who manage these platforms / domains also process your personal data, including content. messages transmitted by these means and those registered in the related internet domains, according to our own personal / privacy data processing policies, which we invite you to read carefully.

#### **4. FOR WHAT PURPOSE DO WE PROCESS PERSONAL DATA AND WHAT ARE THE LEGAL BASIS OF PROCESSING?**

In order to be able to benefit from SCAN&SEE products / services as a customer or to have access to certain functionalities or services of the Site, it is necessary to provide certain personal data in order to be able to provide you with the service or to offer you access to that functionality. We inform you that if you decide not to provide us with the required information, your request may not be completed and you may not be able to benefit from certain SCAN&SEE services or features of the Site and / or Application.

In the case of commercial communications / marketing activities, we will process personal data only if you have expressed your express consent for this purpose. In addition, if SCAN&SEE wishes to process personal data for other purposes, in particular on the basis of Article 6 (1) (a) of the GDPR, or on the basis of your consent, a separate information notice will be sent to you. to allow you to express your consent freely.

Each legal basis on which we process personal data is established in accordance with the purpose for which this data is processed.

The purposes and legal bases of the processing of personal data are the following:

Nr. Crt	Purpose of processing	Legal basis	Additional details
1.	Creating and managing a customer account on the Site	Article 6 paragraph 1) letter b) of the GDPR	Personal data are processed to take steps at your request in order to create the customer account, according to the terms and conditions of SCAN&SEE.
2.	Conclusion and execution of the contract for the sale-purchase of SCAN&SEE products and services	Article 6 paragraph 1) letter b) of the GDPR	Personal data is processed, for example, to record, use, download and archive the message attached to the purchased SCAN&SEE product, to deliver your product, to pay for services, to notify SCAN&SEE customer and recipient of SCAN&SEE product, etc., according to the contract / terms and conditions of sale.
3.	Transmission of commercial communications / newsletters, marketing activities	Article 6 paragraph 1) letter a) of the GDPR	Personal data are processed only if you have expressed (online or by mail) your consent for this purpose.
4.	Îndeplinirea unei obligații legale care revine SCAN&SEE	Article 6 paragraph 1) letter b) of the GDPR	Personal data are processed for example for the preparation and keeping of accounting records, fulfillment of tax obligations, provision of data to competent authorities, etc., taking into account the applicable

			legislation (eg Law No. 82/1991 on Accounting, Tax Code, Code Civil / Criminal Procedure, etc.).
5.	Resolving requests, requests, complaints received by SCAN&SEE	Article 6 paragraph 1) letter b), c) or f), as the case may be, of the GDPR	Personal data are processed, for example, to deliver the product, to provide and benefit from the legal guarantee / offered by contract, to make possible returns, etc., according to the concluded contract, or to contact the data subject in order to obtain details of its application, as appropriate.
6.	Achieving the legitimate interests of SCAN&SEE	Article 6 paragraph 1) letter f) of the GDPR	The legitimate interests pursued by SCAN&SEE are: administration of the activity, internal records, archiving of documents.
7.	Analysis of the use of the Site in order to manage its functionality, improve our services and the experience of the person concerned on the SCAN&SEE Site	Article 6 paragraph 1) letter a) of the GDPR	Personal data is processed for example to understand how you navigate the Site and to optimize its use. Thus, we will keep and evaluate information about your recent visits to our Site, as well as how you move through the various sections of the Site for analysis purposes, to understand how people use the Site. , so we can make it more intuitive.

8.	For statistical purposes.	Article 89 paragraph 1) of the GDPR	The result of the processing for statistical purposes contains aggregated data that does not identify the data subject.
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**5. HOW LONG DO WE PROCESS PERSONAL DATA?**

Personal data are processed for a limited period of time, as necessary to carry out the activity of SCAN&SEE related to the purpose of processing and applicable legal provisions. For example, in order to fulfill the archiving obligations, we will process personal data for a maximum period of 10 (ten) years from the end of the financial year during to whom the supporting financial-accounting documents containing the respective personal data have been drawn up.

If the processing is performed for the purpose of commercial communications / marketing activities, personal data are stored during the validity of the marketing consent, to which is added a period of 3 (three) years - the general limitation period - from its withdrawal. In the event that you withdraw your consent, personal data will no longer be processed for this purpose from the moment of withdrawal of consent.

Subsequently, after the retention periods expire, we will proceed to delete the personal data. Since the messages are an integral part of SCAN&SEE custom products, being attached to the products at the exclusive initiative of the customer SCAN&SEE, these messages are kept in the customer account until the date when the customer SCAN&SEE deletes them from the account and SCAN&SEE permanently deletes them from the records its within 30 days. Also, if the SCAN&SEE customer enters the customer account and modifies a previous message, the latter is marked as deleted, to be deleted by the Operator from its systems in 30 days, the modified message remaining valid.

**6. TO WHOM DO WE TRANSMIT PERSONAL DATA?**

The personal data are intended for use by SCAN&SEE, as a data controller and are communicated to the following categories of recipients, if applicable:

- a) central and local institutions / authorities in order to fulfill the legal obligations of SCAN&SEE (eg ANAF, ANSPDCP, bailiffs, public registers, police, prosecutor's office, etc.);
- b) courts in order to formulate actions, defenses and representation in court;
- c) collaborators / service providers used by SCAN&SEE in its activity including, but not limited to areas such as: IT (eg server hosting, cloud, site and application maintenance and administration), accounting, audit, legal services, marketing / PR, sending newsletters / commercial communications, online payment services by card, courier, storage of files attached to SCAN&SEE products, chat implemented in the Site, etc.

Disclosure of data to third parties is made in accordance with the legal provisions for the categories of recipients specified above, who have taken appropriate protection measures, in accordance with the legal provisions, to ensure that they comply with their obligations regarding the protection of personal data.

SCAN&SEE may transfer personal data to countries outside the European Union or the European Economic Area (so-called third countries) recognized by the European Commission with an appropriate level of protection of personal data or, if not, only if a level of protection of personal data appropriate to that of the European Union, is contractually guaranteed by beneficiaries located in the third country (for example by signing the standard contractual clauses provided by the European Commission). Additional information can be requested in writing at the e-mail address [dpo@SCAN&SEE.com](mailto:dpo@SCAN&SEE.com).

**7. WHAT ARE THE RIGHTS OF THE PERSON CONCERNED AND HOW CAN THEY BE**

## **EXERCISED?**

According to the applicable legal provisions (articles 12-22 of the GDPR), the data subject has the following rights:

- a) *the right of access*, respectively the right to obtain confirmation that personal data are processed or not by SCAN&SEE, and if so, to obtain access to them, as well as certain information, including by providing a copy of the data processed personal;
- b) *the right to rectification*, respectively the right to obtain the rectification of inaccurate personal data and the completion of incomplete ones;
- c) *the right to erasure of data* (“the right to be forgotten”), which may be exercised in situations expressly regulated by law (for example, in case of withdrawal of consent or if it is found that the processing of personal data has not been legal);
- d) *the right to restrict the processing*, which may be exercised in situations expressly regulated by the GDPR (for example, if the accuracy of personal data is challenged for the period necessary to clarify the situation or if the processing is illegal, and not wishes to delete the data, but only to restrict their processing);
- e) *the right to data portability*, under which the data subject may receive his personal data which SCAN&SEE processes by automatic means, in the execution of a contract or on the basis of the data subject's consent, in a structured format, which can be read automatically, or may request that personal data be transmitted to another data controller;
- f) *the right to object*, under which the data subject may object at any time, for reasons related to his particular situation, to processing based on the legitimate interest of SCAN&SEE (including profiling) or carried out in the exercise of a public interest, or of an authorization with which the Operator is invested;
- g) *the right to request and obtain the withdrawal, cancellation or re-evaluation of any decision taken in respect of you which produces legal effects and which is based solely on automatic processing*; we specify that, at present, SCAN&SEE does not process data based on an automated individual decision-making process;
- h) *the right to withdraw your consent for the processing of personal data based on this legal basis*, at any time, without affecting the legality of the processing carried out on the basis of the consent before its withdrawal;
- i) *the right to address the National Authority for the Supervision of Personal Data Processing or a competent court*; If you consider that your rights as a data subject have been violated, you can contact the National Authority for the Supervision of Personal Data, based in Bucharest, at any time, with a complaint or a notification to this effect. B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, postal code 010336, Romania, [www.dataprotection.ro](http://www.dataprotection.ro). You can also bring an action before the competent courts. To exercise your rights, please contact us at the following contact details: [dpo@SCAN&SEE.com](mailto:dpo@SCAN&SEE.com). SCAN&SEE will respond to your request within one month of receiving the request, according to GDPR, a period that can be extended by two months when necessary, taking into account the complexity and number of requests being processed within SCAN&SEE. SCAN&SEE will send you information in this regard.