



Ordinary Member



Individual Member



## SECURITY POLICY FOR PROCESSING PERSONAL DATA

**SC 2B OPEN LOGISTICS SRL**, headquartered in Bucharest, 10 Montreal Square, World Trade Center, 1<sup>st</sup> floor, district 1, registered with the Trade Register under no. J40/7060/2014, Unique Identification Code RO33276976, operating as a limited liability company, in order to provide services for the organizing of freight forwarding in domestic and international traffic, collects and processes personal data in accordance with the legal provisions regarding the processing of personal data and the free movement of such data.

### **THE PRINCIPLES RELATING TO THE PROCESSING OF PERSONAL DATA**

The processing of personal data is subject to the following principles:

- ✓ *Lawfulness, fairness and transparency* - personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject;
- ✓ *Purpose limitation* - personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- ✓ *Data minimization* - personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- ✓ *Accuracy* - personal data shall be accurate and, where necessary, kept up to date; all necessary measures must be taken to ensure that personal data which are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- ✓ *Storage limitation* - personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- ✓ *Integrity and confidentiality* - personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures;
- ✓ *Responsibility* - personal data shall be processed accordance with the above principles and 2B OPEN LOGISTICS will be responsible for demonstrating this observance.

### **GENERAL RULES FOR THE PROCESSING OF PERSONAL DATA**

2B OPEN LOGISTICS aims to perform data processing in compliance with the following legality requirements:

- ✓ *Consent* - the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- ✓ *Execution / Conclusion of a contract* - processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- ✓ *Legal obligation* - processing is necessary for compliance with a legal obligation to which 2B OPEN LOGISTICS is subject;
- ✓ *Legitimate interests* - processing is necessary for the purposes of the legitimate interests pursued by 2B OPEN LOGISTICS or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

### **STORING PERSONAL DATA**

Personal data will be processed at least for the duration of the contract for the organization of railway transport services, as well as for the duration of the contractual obligations by either party.

## **INTERNATIONAL TRANSFER OF DATA**

2B OPEN LOGISTICS has business relationships with international suppliers and customers. The only international data transfers that are made with them are strictly of a commercial nature and with the consent of the parties (contact details of people signing or tying certain business documents such as contracts, service offers, invoices). In addition, data transfers of this type are punctual and involve a small number of people.

## **RIGHTS OF DATA SUBJECTS**

Data subjects whose personal data are processed by 2B OPEN LOGISTICS may exercise the following rights set out in Regulation:

*The right to be informed* about personal data processed by 2B OPEN LOGISTICS.

### *Right of access of the data subject*

Every data subject has the right to obtain from 2B OPEN LOGISTICS the confirmation that the data concerning it are processed or not, and if so, information will be provided regarding:

- ✓ the purposes of the processing;
- ✓ the categories of personal data concerned;
- ✓ the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- ✓ where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- ✓ the existence of the right to request rectification or erasure of personal data or restriction of processing by 2B OPEN LOGISTICS or to object to such processing;
- ✓ the right to lodge a complaint with a supervisory authority;
- ✓ where the personal data are not collected from the data subject, any available information as to their source;
- ✓ the existence of automated decision-making as well as meaningful information about the logic involved, the significance and the envisaged consequences of such processing for the data subject.

### *Right to rectification*

Data subject has the right to obtain from 2B OPEN LOGISTICS as a data operator, without undue delay the rectification of inaccurate personal data concerning it.

Taking into account the purposes of the processing, data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### *Right to erasure ('right to be forgotten')*

The data subject has the right to obtain the erasure of the personal data concerning it, without undue delay and 2B OPEN LOGISTICS will have the obligation to erase personal data without undue delay where one of the following grounds applies:

- ✓ the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- ✓ the data subject withdraws consent on which the processing was based;
- ✓ the data subject objects to the processing pursuant to GDPR;
- ✓ the personal data have been unlawfully processed;
- ✓ the personal data have to be erased for compliance with a legal obligation to which the controller is subject;
- ✓ the personal data have been collected in relation to the offer of information society services referred to minors;
- ✓ in accordance with the General Data Protection Regulation.

2B OPEN LOGISTICS, as data operator, may refuse the request for data deletion under the following conditions:

- ✓ processing is necessary for exercising the right of freedom of expression and information;
- ✓ processing is necessary for compliance with a legal obligation applicable to the operator;

- ✓ processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with GDPR, to the extent that the exercise of the right may make it impossible or seriously affect the achievement of the objectives of that processing;
- ✓ processing is necessary for the establishment, exercise or defence of legal claims.

#### *Right to restriction of processing*

The data subject has the right to obtain from 2B OPEN LOGISTICS, as a data operator the restriction of processing of personal data in the following cases:

- ✓ the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- ✓ the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- ✓ 2B OPEN LOGISTICS no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- ✓ the data subject has objected to processing, pending the verification whether the legitimate grounds of the controller override those of the data subject.

#### *Right to data portability*

The data subject has the right to:

- ✓ receive the personal data that they view and which 2B OPEN LOGISTICS has provided in a structured, commonly used and machine-readable format and to transmit those data to another controller without hindrance from 2B OPEN LOGISTICS to which the personal data has been provided if: (a) the processing is based on consent or on a contract and (b) the processing is carried out by automated means.

In exercising its right to data portability, the data subject is entitled to transmit his data directly from one operator to another where this is technically feasible.

#### *Right to object*

The data subject has the right to:

- ✓ to oppose at any time, for legitimate reasons relating to its particular situation, that the data subject to it are processed, except where there are legal provisions to the contrary. In the case of justified opposition, the processing may no longer relate to the data in question unless there are legitimate and compelling reasons justifying the processing which rely on the rights of the data subject or if the purpose is to establish, exercise or defend a right in court;
- ✓ to oppose at any time that the data that is intended to be processed for direct marketing purposes, including the creation of profiles for that purpose.

#### *Automated individual decision-making, including profiling*

The possibility for the data subject to request 2B OPEN LOGISTICS not to be the subject of a decision based solely on automatic processing, including the creation of profiles and producing legal effects that affect the data subject or significantly affect it.

With regard to the adoption of a decision based solely on automatic processing, the data subject has the opportunity to express his point of view, to request the intervention of a human operator and the possibility of challenging such a decision.

In addition to the above rights, the data subject also has *the right to address the law and the National Supervisory Authority for Personal Data Processing (ANSPDCP)*.

### **SECURITY OF PERSONAL DATA PROCESSING ACTIVITIES**

2B OPEN LOGISTICS applies appropriate technical and organizational measures to protect data against accidental or unlawful destruction, loss, modification, disclosure or unauthorized access. These measures shall ensure an adequate level of security with regard to the risks posed by the processing and the nature of the data to be protected.