



PERSONAL DATA PROTECTION POLICY

CONTENT

Introduction.....	1
Contact details of TTS (Transport Trade Services) S.A.	1
Definitions	2
Categories of personal data that we process and the purpose of this processing	2
Lawfulness of the personal data processing	5
Security of personal data processing.....	5
Information on the storage of the personal data	5
Rights of data subjects	6
Categories of beneficiaries of personal data.....	7
Automatic collection of non-personal data. Cookies.....	8
Other mentions	8



Introduction

TTS (Transport Trade Services) S.A., hereinafter named TTS, processes personal data in the context related to the provision of services regarding the river/ land freight transport and the performance of specific port operations (handling, storage, trans-shipment etc.), as well as on the basis of the existing employment contract with the personnel employed. Thus, the data subjects are, mainly, contact persons, representatives or other persons assigned from the part of the contractual/ group partners of TTS or the public authorities, in view of the fulfilment of some contractual or legal obligations, visitors of the website www.tts-group.ro, other natural persons who interact with the personnel of TTS, as well as own employees and shareholders.

TTS is aware of the importance of the personal data and it commits to protect its privacy and security, and it guarantees that the personal data will be processed in good faith, in accordance with the provisions provided for by the *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 (GDPR)*, as well as with the observance of the legal requirements provided for by the national legislation from the field of reference (*Law no. 190/2018 on the measures of enforcement of the GDPR*).

In order to be informed about the processing carried out by TTS on the personal data that concern you, please read this Information Note and, if you wish to find more information, please ask us any question using the contact details given below:



Contact details of TTS (Transport Trade Services) S.A.

Contact details of the controller	Responsible for data protection
Address: Bucharest, 27 Vaselor Street	Name: Mihaela Miron

Telephone number: +40 21 210 29 07

Email: office@tts-group.ro

Telephone number: +40 21 210 29 07

Email: dpo@tts-group.ro



Definitions

Personal data – means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person

Processing activities - means any operation or set of operations which is performed on personal data or on sets of personal data, whether by using or not any automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.



Categories of personal data that we process and the purpose of this processing

In the table below they are laid down the categories of personal data, processed by TTS:

Categories of data subjects/ personal data	Purpose of the processing	Lawfulness of data processing
Contact persons, representatives of the legal persons or other persons assigned by the contractual partners of TTS - Surname and name, signature, telephone number, email address, profession/ position, place of work, series and no. of the identity card (as the case may be)	The supply of TTS services to clients, potential clients and/ or contractual partners. Services of technical support. Contact/ communication with the clients.	Contract with the clients, suppliers, subcontractors. Legal obligation, such as the tax law Legitimate interest.
Natural persons who meet the personnel of TTS – identification data, position, place of work, positioning (as the case may be).	Services of technical support provided to the company clients. Evaluation and optimization of TTS services. Notification of the clients.	Legitimate interest. Consent.
Applicants for the vacant positions of TTS – Identification data, contact details, data from the C.V., other data related to the professional training, recommendations, certifications	The performance of the research, selection and assessment in view of the employment.	Pre-Contract between the employee and the employer. Consent. The existing legislation

etc.		applicable to the relation between the employee and the employer.
Visitors at the registered office of TTS: video image	Video surveillance of the TTS locations	Legal obligation Legitimate interest
Visitors of the site www.tts-group.ro Data regarding the connection to the TTS server, Cookies set for the language used (language) and the type of the equipment (is_mobile).	The supply of information to the site visitors regarding activity of TTS and to improve the site's efficiency	Legitimate interest
Personnel employed at TTS - data related to the conclusion, implementation or termination of an employment contract	Management of the relation between the employee and the employer	Legal obligation – The existing legislation applicable to the relation between the employee and the employer (Labour Code, Tax Code, etc.) Legitimate interest.
TTS Shareholders – identification data: last name, first name, personal identification number, identity card/passport series and number; contact details: home address, e-mail address, telephone number; video image; financial data	Participation to the TTS General Shareholders Meeting and voting in TTS General Shareholders Meeting; exercise of all shareholders rights under the existing legislation	Legal obligation – law no.31/1990 regarding the commercial companies and Law no. 24/2017 regarding issuers of financial instruments and open market operations.

The personal data processing at TTS level is carried out for the following purposes:

- 1) To provide the services of TTS to its clients, including the services of technical support and information – for the implementation of the contracts between TTS and its partners;
- 2) To keep the record of the TTS portfolio of clients and to attract new clients (including for marketing purposes);
- 3) To settle the requests and addresses received from public authorities, according to their legal competences, pursuant to article 6 paragraph 1) letter c) of GDPR (e.g. the requests addressed by the authorities that have legal duties with regard to the prevention, investigation, detection and criminal prosecution of the offences or with regard to the protection against the threats at the address of public safety and their prevention);
- 4) To improve the services offered to the clients, natural or legal persons;
- 5) To reply to the message sent by the data subjects to TTS;
- 6) For the financial-accounting management: to make payments, to issue invoices, financial reports, etc.;

- 7) To guard and protect the goods and the values, to protect people and to control the access to the headquarters of TTS;
- 8) To identify, select and assess the applicants for the vacant positions of TTS;
- 9) To make donations from TTS to natural persons (e.g. studies);
- 10) To defend a legal claim;
- 11) Participation to the TTS General Shareholders Meeting and voting in TTS General Shareholders Meeting, as well as exercise of all shareholders rights under the existing legislation (Law no.31/1990 regarding the commercial companies and Law no. 24/2017 regarding issuers of financial instruments and open market operations.

We inform you that TTS administers the personal data that you supply to us safely and only for the purposes indicated above.

Your personal data is collected as follows:

- 1) For contact persons, representatives or persons assigned from the part of a (potential) client/commercial partner of TTS, on the occasion of the performance of the pre-contractual activities or during the implementation of a contract concluded with it,
- 2) For the users of the Website www.tts-group.ro: when the website is accessed, when the data is necessary to monitor the efficiency of the use of the said website,
- 3) For TTS employees: on the occasion of the conclusion, implementation and termination of the employment contract with TTS or whenever they appear any changes in the acts that are included in the personnel file,
- 4) In view of identifying the applicants for the vacant positions of TTS: occasioned by the communication with them (email, telephone, etc.) or by using the information received from third parties: recruitment agents, specific websites (LinkedIn, eJobs, etc.), current or former contractual partners of TTS, etc.
- 5) For the visitors of the TTS headquarters, by means of the video surveillance system (for further information with regard to this processing, please solicit the Policy regarding the video surveillance at the TTS headquarters, by sending a request in this respect at the contact details given above),
- 6) For other natural persons: following their communication with the TTS personnel, such as the request for information or in case it is addressed a specific request for the exercise of the rights provided for by the GDPR,
- 7) For the shareholders when the Constitutive Act is elaborated, by sending a request to company Depozitarul Central, using the electronic platform E-vote.

If you apply for the existing vacant positions of TTS, we use the personal data from the CV that we receive to assess the qualifications/ abilities presented, in view of occupying the vacant position for which you have applied, having as legal ground the implicit consent (information sent voluntarily by the person concerned, necessary for the assessment of a potential candidate) or the existence of a pre-contract with regard to your employment. The collection of the personal data is limited to what is necessary to carry out the recruitment activities. If there will be no employment contract, the data collected during the recruitment process is kept for maximum 3 months from the date of the decision for rejection, for the legitimate interest of the controller, to occupy some vacant positions that can occur in this period or to reply to some complaints or requests related to the recruitment process.

Other considerations:

We inform you that the accuracy of the personal data that you supply to TTS fall under your responsibility. TTS does not verify the data sent through the webpage, by email or by telephone and it does

not intent to solicit other information to identify you. The data supplied by you to TTS is used as such for contact and communication purposes. If you are a minor, aged under 16 years old, and you wish to communicate with the personnel of TTS, please do that only if you are under the supervision of a parent or a holder of parental responsibility.

In certain situation, especially when there is a legal obligation of TTS or when they are solicited services related to a certain natural person, certain personal data must be validated in order to be able to offer the solicited services (e.g. in case it is sent a request for access to data, according to the provisions of art. 15 of GDPR). In this case, it might be solicited the submission of some documents that attest the identity of the person concerned or copies of these documents.

We mention that for the processing of the personal data specific to TTS, there is no automatic decision-making process, including the creation of profiles, as mentioned in article 22 paragraphs (1) and (4) of GDPR.



Lawfulness of the personal data processing

We inform you that your personal data is processed by *TTS* based on the following legal grounds:

- **Legal obligation**
- **The freely expressed consent**
- **Legitimate interest**
- **(Pre)Contract between the controller and the person concerned.**

For other information related to these aspects, please see the table from the section [Categories of personal data that we process.](#)



Security of personal data processing

We ensure you that, for the processing of your personal data, *TTS* has allotted all of the necessary and available resources in view of the implementation of some technical and organization measures that are appropriate to ensure the privacy, integrity and availability of this data, of which we recall:

- The data is processed by the *TTS* personnel who is subject to a privacy obligation pursuant to the right of the Union or the internal right, or pursuant to the rules established by the competent national bodies;
- The use of the equipment to secure the access to the network, as well as of some specific components of protection of antivirus type for the computerized records;
- The regular application of patches and upgrades for software/ hardware components involved in the processing of the personal data;
- The instruction of the persons who process personal data with regard to the responsibilities and obligation that they have in view of ensuring the adequate security of the personal data processing;
- The restricted access to the personal data;
- The periodical testing of the efficiency of the applied measures of security.



Information on the storage of the personal data

The duration of storage of the data is, as the case may be:

- For the personal data that concern you, in your capacity of contact person or representative of a TTS client, the duration necessary for the supply of the respective services and in accordance with the legal obligations provided for by the applicable legislation, including those related to the archiving of the documents (Law on national archives);
- The data related to the video surveillance for the security of the goods and persons, will be stored for a period of 30 days, respectively in accordance with the grounds provided for by the legislation in force;
- For the personal data sent by means of the contact details of TTS (telephone, fax, correspondence address or email), the storage duration is 3 years from the last correspondence exchanged with you, if there is no other legal ground that provided a different storage period, after which they will be deleted through specific procedures or until you exercise the right of deletion (the right to be forgotten) or the right of opposition;
- For the personal data processed by TTS following the recruitment process, the storage duration is 3 months;
- For the personal data that concerns you, used within the contracts that TTS has concluded with the contractual partners, the storage period is for the whole contractual period of time and additional for the necessary period until expiring of limitation period (3 years general prescription term or another special legal storage period, if case) and according legal obligations related to the archiving of documents;
- The data on the employee-employee relationship will be kept during Individual Employment Contract concluded with TTS and, after its termination, for the mandatory minimum period provided by legislation in force, depending on f the type of data concerned and according to the Labour Code;
- For the current shareholders, the existing personal data from TTS records, will be stored till the withdraw from shareholding and after that for the mandatory period provided by legislation in force or other internal regulations.

All of the personal information that we process at TTS level is stored on secured servers, located at the headquarters of TTS, and it can be accessed by our personnel assigned in this respect, only based on the work duties.

We mention that for the accounting books, the corresponding data will be stored according to the provisions of Annex no. 1 to the Order of the Ministry of Public Finances no. 2634/2015 on financial and accounting documents.

For a legitimate interest, we can store your data after the above-mentioned terms as well, in anonymised format (that no longer identifies you), for statistical or research purposes.



Rights of the data subjects

Through your request sent by email or postal services to TTS you can exercise, free of charge, the following rights:

The right to be informed. The present document informs you about the method in which we process your personal data, in accordance with the provisions of art. 13 and 14 of the GDPR. If you need further information related to personal data processing, in addition to those mentioned here, please send us a request in this respect.

The right to access your personal data, collected directly or indirectly from you. According to the provisions of art. 15 of the GDPR, you have the right to receive a confirmation with regard to the processing of the personal data and, as the case may be, to be informed about: the categories of processed data, the purpose

of the processing, the potential beneficiaries, the storage duration, as well as information related to your rights. Also, you can solicit a copy of the personal data that concern you.

The right to rectification of the data, in the situation in which you consider that it is incorrect or incomplete (in this case, it is possible to solicit some additional information).

The right of erasure (the right to be forgotten), assumes the deletion of the personal data that concerns you, without unjustified delays, with the exceptions provided for by law.

The right to restrict the processing for a limited period, meaning in which you must solicit us the period for which you wish to restrict the processing of your data and, as the case may be, the reason of this request.

The right to data portability, respectively the right to receive, in a structure format, used commonly and which can be read automatically, the personal data that concerns you and that you have supplied to TTS and the right to send this data to another controller. This right can be exercised if the legal ground of the processing is the consent of the person concerned or the existence of a contract concluded with the person concerned and if the processing is carried out by automatic means.

The right to object, respectively to right to oppose, at any moment, to the processing of the personal data that concerns you, with the exceptions provided for by law (for instance, you cannot oppose to the processing if it is a legal obligation of the controller or it is necessary for the defence of a legal claim).

The right to not be part of an automated individual decision-making process, including profiling. In this respect, we inform you that TTS does not perform any automatic decision-making processes that concern your personal details.

In the situation in which you consider that your previously mentioned legal rights have been violated, we inform you that you have the right to go to court or file a complaint with the Supervisory Authority for the Processing of Personal Data (in this respect, you can download a template form from the website www.dataprotection.ro).

Note. In situation that your requests are manifestly ungrounded or excessive, especially because of their repetitive nature, TTS may:

- either charge a reasonable fee taking into account the administrative costs for the supply of the information or the communication or for the adoption of the solicited measures;
- or refuse to give effect to the request

In these cases, the controllers have the responsibility to demonstrate the manifestly unfounded or excessive nature of the request.

Also, we inform you that, in certain situations (e.g. when they are enforced the provisions of art. 23 of the GDPR – *Restrictions*), certain rights cannot be exercised by the person concerned.

For any other information related to the exercise of these rights, please contact us.



Categories of beneficiaries of the personal data

We inform you that, according to the legal obligations that we have and when we are solicited, we can supply your data to public authorities vested with specific duties in the field of performance of the criminal investigations, the public safety and order, the national defence (such as the police, the legal courts and

other state competent bodies), based on and within the limits of the legal provisions and following some expressly filed requests.

The public authorities/ institutions to which it is supplied the personal data collected by TTS have the obligation to perform the processing of the personal data in compliance with the rules applicable in terms of personal data protection, in accordance with the purposes of the processing.

Even though we take the necessary measures to protect the person information that you supply to us, we mention that the transmission of information by means of the internet public network cannot be guaranteed as being safe (there are intermediary network connection that are not controlled by us, such as the local supplier of internet services).



The automated collection of non-personal data. Cookies

In the situation in which the website of TTS is accessed, it can be collected on the server certain information that can identify indirectly a person, such as: the type of the browser used, the IP of the work station, the date of access etc. We inform you that TTS does not process this information, it is transferred between the work station of the user and the server on which it is found the website www.tts-group.ro, following the interconnection of the two equipment on the Internet. In the situation in which it is accessed the website <https://ro-tts.weebly.com/> - the section in Romanian language of the TTS website – please access as well the privacy policy at the address <https://www.weebly.com/privacy>.

During the navigation on the TTS website it is stored certain information on the user station. This information will be in the form of some "Cookie"-type of files. For the TTS website, the "Cookies" files do not contain personal data (it is saved therein, temporarily, information related to the type of equipment used – *is_mobile* – or the language settings – *language*) and they help TTS to meet as much as possible the interests and preferences of the users. In most of the browsers (Chrome, Firefox, Internet Explorer etc.) "Cookies" files can be deleted or blocked, or a warning can be received before the reception of such a file. TTS recommends the users to consult the instructions of the browsers that are used to identify how the cookies can be used/ deleted. We recommend you, in this respect, to consult the website <http://www.youronlinechoices.com/ro/top-5-recomandari>, where you can find more information related to the management of the "Cookie" files.



Other mentions

Being given the continuous evolution of the technologies used in the IT&C field, the potential modification or completion of the legislative provisions from the field, as well as the diversification in time of the services offered by TTS, we reserve the right to adjust this *Information Note* whenever the case may be. In this respect, in order to be aware of all of the information related to the processing of your personal data, carried out by TTS, we recommend you to consult this document regularly.