

Privacy policy for personal data protection and processing

Starting May 25, 2018, EU regulation 2016/679 comes into force, known as the General Data Protection Regulation (GDPR) or the General Regulation on Personal Data Protection, its provisions being applicable in all Member States of the European Union.

Combridge SRL will continue to process the personal data of its customers and registered users on the website www.cloude.ro only for well-defined purposes.

This privacy policy for personal data protection and processing policy includes information on the grounds, purposes, and manner of processing, including the collection, use, exchange and protection of your personal data, when you purchase Combridge Services, and when you use the Site, www.cloude.ro

Combridge SRL is a personal data controller registered with the National Authority for Personal Data Processing Supervision ("NAPDPS") based on Notification no. 2583. The full details of our company are displayed on the homepage of www.cloude.ro.

Personal data security and compliance with the legislation on their protection and privacy are a priority for Combridge, so in order to comply with the new provisions and to mediate communication on this issue, Combridge has appointed a Data Protection Officer - Data Protection Officer (DPO), respectively Cristina Cinca, a lawyer at the Bucharest Bar that can be contacted at the contact details specified below.

CONTACT DETAILS

We have tried to ensure that this information is complete and clear, but we encourage you to contact us if you have any questions or want further details regarding the processing of your personal data. You can do this either by email at asistentadcp@combridge.ro or by post to Calea Victoriei no. 155, bl.D1, section 6, et.1, sector 1, Bucharest.

Starting May 25, 2018 there are available at www.cloude.ro within the PERSONAL PROTECTION SECTION also specific forms that will help you in contacting us and exercising your rights.

Combridge will take all reasonable steps to protect the information gathered against loss, misuse, and unauthorized access, disclosure, alteration or destruction of information.

When using passwords, identification numbers, or other special access features on the website www.cloude.ro, it is your responsibility to keep them safe.

If this Privacy Policy for Personal Data Protection and Processing will undergo changes, the revised policy will be posted on the website www.cloude.ro at the Protection of Personal Rights section, accessible at any time by Users / Customers. Please check periodically, and especially before providing any personal identification information.

Explanations of terms

Personal data is any information relating to an identified or identifiable individual. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or one or more factors specific to his or her physical, physiological, psychological, economic, cultural or social identity

Personal data are information about a person, regardless of whether it relates to his or her private, professional or public life (e.g. name, photograph, email, bank information, social media posts, medical information, address IP of the computer.)

Personal data processing means any data operation with or without the use of automated means such as collecting, registering, organizing, structuring, storing, adapting or modifying, extracting, consulting, using, disclosing, disseminating or making available in any other way, alignment or combination, restraint, erasure or destruction;

The operator, in this case Combridge, is the one who establishes the purposes and means of processing personal data

Operator-mandated person means a natural or legal person, public authority, agency or other body that processes personal data on behalf of the operator

The person concerned is the person whose personal data are processed, that is, the user of the website www.cloude.ro and the Customers who purchase the Services through the site.

By choosing to register on the website www.cloude.ro and by checking the option "I agree with the Privacy Policy for personal data protection and processing, the User / Customer declares expressly and unequivocally that he agrees to the provision of his personal data and processing by the Provider or the following personal data: name and surname, home / address, email address, telephone number.

Use of this site implies acceptance of the terms of use established by Combridge, conditions that you can consult in the Policy section of the Site and Services, and if you do not agree to these proposed conditions, please do not use Site and Services.

The provision of certain personal data required in the procedure for registering and acquiring the Services is necessary, the refusal to provide the service leading, as the case may be, to the impossibility of creating a user account or to the impossibility of finalizing the online order, the failure to conclude the contract at a distance and implicitly the impossibility of delivering the ordered service.

By accessing your account and using your personal password, you are responsible for all actions resulting from its use. Combridge cannot be held responsible for errors / incidents resulting from user / customer negligence regarding the security and confidentiality of their account and password.

Any attempt to access another person's personal data, modify or affect the content of the website www.cloude.ro will be considered an attempt to fraud and will lead to the initiation of criminal proceedings and the bearing of all consequences by the person who committed such facts.

THEMES OF PROCESSING

Combridge will process your personal data on the basis of the following legal grounds:

- in order to conclude or execute the contract with you and to meet your requests (for example, in order to create a user account on our website to issue invoices or to perform credit checks)
- based on your consent, as a person whose data is processed; REMEMBER that this consent may be withdrawn at any time by accessing the

<https://pipedrivewebforms.com/form/57a56e0f86e3b0ee95cea549529242c21195837> link, that you can also find in the Personal Data Protection Section - Forms or you may contact us at the contact details mentioned above in the Contact Data Section

- to protect legitimate interests, for example, to prevent fraud, to maintain the security of our network and services. However, any processing of personal data will prevail over your legitimate interests as outlined in this information.
- in order to comply with our legal requirements (for example, existing accounting and tax requirements requiring some Customer's personal data to be specified in the invoice and certain documents to be retained for a certain amount of time)
- to protect the vital interests of the data subject or of another individual
- to fulfill an obligation that serves a public interest

THE PURPOSES OF PROCESSING

We will process your data in order to register your user account and to provide the services you have purchased from us and for the following:

- in order to create a user account - we will use your personal data for identity verification to ensure access to your account and generally for account management.
- to record your orders and to keep you up to date with their progress
- to provide your ordered services, including related services, if applicable
- to contact you with our contract performance reports, including customer service messages, to provide you with information about our services, for example, about changing our terms and conditions, or interrupting services.
- for billing and payment management, or to withdraw the appropriate credit amount and to contact you if the billing information you provide us is inappropriate / out of date or we can not collect the payment;
- in order to improve the services we offer, we collect and analyze anonymous data without identifying elements so that we can develop more interesting products and services
- for marketing purposes - depending on the products and services you have purchased from us, if you have given your consent, we will keep you informed about these products and services and generally about our offer, we will send you newsletters, we will inform you about promotions, competitions, events organized by Combridge or by third parties and others; you may control your permission regarding the data we use for marketing purposes by withdrawing your consent at any time by accessing the by accessing the

<https://pipedrivewebforms.com/form/57a56e0f86e3b0ee95cea549529242c21195837> link, that you can also find in the Personal Data Protection Section - Forms or you may contact us at the contact details mentioned above in the Contact Data Section

- to answer any questions you may have about our products or services.
- to recover debts or to detect those who did not pay for the services used.
- In order to execute the contract, we may call upon third parties to provide services or provide a service on our behalf, and they may have access to your personal data, but we authorize them to use or disclose your data strictly personal in connection with the provision of their services

CATEGORIES OF PERSONALLY COVERED DATA

Combridge can collect and process any of the following data, whether volunteered by you or automatically collected, depending on the services and products you choose to use:

- name, address, fixed and / or mobile phone number, e-mail address
- automatically collected data, such as IP address or other identifying addresses, dates and times of use / access to our services, these data being part of providing services to you - for example - the amount of resources used
- your location data - when you turn on location-based services or features, or when, for example, a location is derived from your IP address or data such as the zip code or city name;
- emails, notes, letters, notifications, communications with Combridge representatives or any other evidence of your contact with us
- Your account information, such as the dates and amounts of payments due or received, and the subscriptions you use
- Access legitimacy information - We will collect passwords, clues and similar security information used for authentication and access to accounts and services;
- information about the services provided to you- such as network or service issues and other events that may affect our network services or other services;
- Combridge can legitimately collect data about the customer and from external sources when consulting public databases (Trade Register, Ministry of Finance) or other public sources, as well as from Combridge partners, if the customer agrees that his or her personal data or communicated to Combridge
- Details of transactions (purchased products, prices, payment methods)

Card payments are made through online payment solutions provided by authorized third parties, guaranteeing the legality and security of IT systems, so that third

parties do not own your data and are abusively used. Bank card data (type and card number, expiration date, etc.) will not be transferred or stored on Combridge servers or authorized third-party servers. Your card information or other bank information - we do not process this information

- Combridge can automatically collect your visit data on the website www.cloude.com using cookies or other technologies. This information may include the IP address, operating system, browser, browsing activity, and other information about how you interact with the site.

In order to be able to provide the best products and services, Combridge can sometimes request information about customer experience during the use of products and services, in the form of questionnaires, comments, suggestions, recommendations for improvement.

IMPORTANT NOTE ABOUT SENSITIVE DATA

The website www.cloude.ro is not intended for minors under the age of 18. We will not knowingly collect information from visitors in this age group. We encourage parents to talk to their children about the use of the Internet and the information they disclose on the Internet.

If you are not specifically requested to do so, please do not disclose sensitive personal information (e.g. information about racial or ethnic origin, political opinions, religion or other beliefs, health, criminal history or trade union membership) through this site or other means of communication.

DESTINATION OF PERSONAL DATA

Combridge may provide your personal information to other companies with whom it is in partnership, but only on the basis of a confidentiality commitment from them to ensure that such data is kept secure and that the provision of such personal information is made legislation in force.

If we have a contract with a service provider or contractor to provide us services or provide a service on our behalf, and they may have access to your personal data, we do not authorize them to use or disclose your personal data but just in relation to the provision of their services.

These entities acting as empowered persons are selected with special care to ensure that they meet the specific privacy protection requirements.

Your personal data may be communicated to Combridge affiliated companies for the purpose of conducting current and business activities or external consultants providing assistance to the company (lawyers, debt recovery companies)

We will not disclose your information to third parties for use for their own marketing or commercial purposes without your consent.

Your personal information may also be provided to the Prosecutor's Office, the Police, the Courts and other competent bodies of the State, on the basis and within the limits of the legal provisions and as a result of expressly formulated requests.

DURATION OF STORAGE OF PERSONAL DATA

We will store your data for as long as it will be necessary to execute your requests (e.g., the registration of an account), our contract for the supply of the products / services requested by you or as required by law. If there is no legal requirement, we will store them only for as long as is necessary and reasonable.

Therefore, Combridge will retain your personal data for a reasonable amount of time, but no more than 6 months after the last user / client authentication on cloude.ro platform (provided there are no active services). Exceptions are those data that must be kept under a legal obligation.

When the customer's personal data are no longer required for the purpose for which they were collected or which were agreed and there is no legal obligation to store, Combridge will destroy or delete them in a safe way.

With our specialized security policies, we are constantly aiming for the necessary measures to protect your personal data from unauthorized access, accidental loss, disclosure or destruction.

However, we are not responsible for any unauthorized access or loss of personal data that does not belong to our control.

TRANSFER OF PERSONAL DATA

The platform manager (application) based on which the cloude.ro site through which we provide the services is an entity in Turkey. This administrator does not store our database of VPS users / clients and does not process your personal data, but as a full-time administrator can view certain data. In order to provide appropriate safeguards to our users / clients, we have concluded with this partner a convention with special clauses designed to ensure at least the same level of protection of personal data as that provided in the European Union.

The database of our users / clients, including personal data, is stored within the European Union, ensuring a level of security according to the legislation in force. We do not currently transfer your data to other countries outside of the European Union.

If we change the policy, we will inform you accordingly, we will provide you with the related warranties and we will ask for your consent.

THE RIGHTS OF TARGETED PERSONS, USERS AND CLIENTS - For the exercise of these rights you may contact us using the contact details specified in this document under the Contact Details section

1. The right of access to personal data

You have the right to obtain from us a confirmation that your personal data is processed or not and if so you have the right to access that data

You have the right to request a copy of the personal data that Combridge owns about you.

By choosing to register and purchase Services through the website www.cloude.ro, you are obliged to provide us with the correct name, address and other information necessary for the operation of the placed orders.

2. The right to rectify personal data

You have the right to rectify the data held in connection with you, if they are incorrect and the right to obtain the completion of personal data that is incomplete, including by providing a supplementary statement. If the data we hold about you must be updated or if you believe that they may be incorrect, please contact us.

Certain data may be rectified directly by the Client in his / her personal account - profile section, respectively - telephone number, country, city, county address, postal code

3. The right of deletion of personal data

Under certain circumstances, you have the right to ask us to delete your personal data that we own. If the contract with us has ceased, we may still have legal grounds for processing your personal data.

If (1) the data are no longer necessary for the fulfillment of the purposes, (2) the consent has been withdrawn and there is no other legal basis for the processing, (3) opposes the processing and there are no legitimate reasons for the processing, (4) personal data has been processed unlawfully, you have the right to obtain the deletion of the data concerning you without undue delay.

4. The right to restrict the processing of your personal data

If you believe that the data we hold about you is incorrect or you think we should not process your data, please contact our Customer Relations team for a discussion of the rights that you have. Under certain circumstances, you will have the right to ask us to restrict the processing.

You have the right to obtain from us restricting processing if one of the following applies:

- (a) you contest the accuracy of the data for a period that allows us to verify the accuracy of the data;
- (b) processing is illegal, and you oppose the deletion of your personal data, but instead request restricting their use;
- (c) we no longer need personal data for processing, but you ask us to find, exercise or defend a right in court;
- (d) you have opposed to conforming for the length of time that it is ascertained whether our legitimate rights outweigh your rights.

In the case of the rights set forth in paragraphs 2, 3 and 4 above, Combridge will notify you of the exercise of these rights by you, to every recipient whose personal data has been disclosed to you, except when the action proves impossible or requires disproportionate efforts for Combridge. Upon your request, Combridge will inform you of these recipients.

If personal data is not collected directly from the data subject, Combridge will provide it with any available information regarding the source of such data.

5. The right to data portability

You have the right to be able to take with you the personal data you have communicated to us. To the extent technically feasible, your data may be transmitted directly to another operator upon your request. This does not mean that

data portability automatically triggers the deletion of Combridge data and does not affect the initial storage of data that has been transmitted.

Combridge will not be responsible for the processing of another person receiving the personal data

6. The right to oppose the processing

You have the right to oppose the processing of personal data made on our legitimate interests. In the exercise of this right, we will no longer process this personal data unless we have legitimate and compelling reasons that justify processing and prevail over your interests, rights and freedoms.

7. The right to lodge a complaint with a supervisor

If you would like to complain about the way we use your personal data, please contact us with the contact details specified in this information. We will do our best to help you, but if you continue to be dissatisfied, you can contact the National Supervisory Authority for Personal Data Processing - contact details can be found at www.dataprotection.ro

8. The right to oppose profiling

You have the right not to be the subject of a profiling decision when it is based on automatic processing. This right wants to protect people from certain negative decisions that can be taken without human intervention. Profile creation is defined as any automated form of processing for the purpose of evaluating certain personal aspects of the individual, such as performance at work, health, personal preferences, economic situation, location, and others