

Personal data protection policy

1. Introduction

Data protection is very important for us. We respect your privacy and your personal life. Consequently, we shall inform you below on personal data processing when you express your consent for personal data processing by Initiative Media S.A., hereafter referred to as the "Agency". Initiative Media S.A. is responsible for the observance of the provisions of the General regulation on data protection (with abbreviation in English, GDPR).

This personal data protection policy describes our practices regarding the collection, use (processing) and transfer of the data communicated directly to our company, as well as the use of personal data collected by Initiative Media S.A. from public sources for the purpose of supplying our specific advertising, marketing, public relations, communication services performed by the Agency, for the purpose of promoting trade names, brands and/or other elements developed for the purpose of recognizing the identity of the Clients of Initiative Media S.A. or their products.

Our practices regarding data protection are compliant with the applicable legislation on data protection, but if, for any reason, the terms established within this Policy are not acceptable for you, you have the possibility to inform us on your objection at address anca.pauna@ro.initiative.com or office@ro.initiative.com.

2. Definitions

Personal data – any information regarding an identified or identifiable natural person ("concerned person"); an identifiable natural person is a person that can be identified, directly or indirectly, particularly by reference to an identification element, such as a name, an identification number, localization data, an online identifier, or one or several specific elements, belonging to its physical, physiological, genetic, psychical, economic, cultural or social identity.

Data protection laws refer to EU data protection laws and as far as applicable, the laws for the protection of the data and of the personal data from any other country;

Data protection EU laws refer to Directive UE 95/46/CE, as transposed in the national legislation of each member State and according to the subsequent amendments and supplements, including GDPR and the laws that implement or supplement GDPR;

GDPR means the Regulation (EU) 2016/679 of the European Parliament and Council of the 27th of April 2016 on the protection of natural persons regarding the processing of personal data and the free circulation of these data and abrogation of Directive 95/46/CE (General Data Protection Regulation).

Processing – collection, registration, organization, structuring, storage, adaption, extraction, consulting, utilization, disclosure by transmission, dissemination or making available in any other manner, lining up or combination, restriction, erasure or destruction thereof.

Restriction of processing – making of the stored personal data with the purpose of limiting the future processing thereof;

Pseudonymization – personal data processing so that they can no longer be assigned to a certain concerned person without using additional information, provided that such information should be separately stored and make the object of some technical and organizational measures that provide the non-assignment of the concerned personal data to an identified or identifiable natural person;

Data record system means any structured set of personal data accessible according to some specific criteria, either centralized, decentralized or assigned after functional or geographical criteria;

Operator means a natural or legal person, public authority, agency or another body that, alone or together with others, establishes the purposes and means of processing of the personal data; when the purposes and means of processing are established by the law of the Union or by domestic law, the operator or the specific criteria for the designation thereof can be envisaged in the law of the Union or in the domestic law;

Person authorized by the operator means a natural or legal person, public authority, agency or another body that processes personal data on behalf of the operator;

Addressee means a natural or legal person, public authority, agency or another body to whom personal data are disclosed, whether it is third party or not. Yet, public authorities to whom personal data can be disclosed within a certain investigation in accordance with the law of Union or domestic law are not considered addressees; the processing of these data by the concerned public authorities observes the applicable norms in terms of data protection, in accordance with the purposes of the processing;

Third party means a natural or legal person, public authority, agency or body other than the concerned person, operator, person authorized by the operator and the persons who, under direct authority of the operator or of the person authorized by the operator, are authorized to process personal data;

Consent of the concerned person means any expression of free will, specific, informed and devoid of ambiguity of the concerned person by which he /she accepts, by a declaration or by an action without equivoque, that the personal data regarding him/her can be processed; The Consent should be granted by a non-equivocal action that represents an expression of free will, specific, informed

and clear of the agreement of the concerned person for the processing of his/her personal data processing, like for example a declaration made in writing, including in electronic format or orally. This could include the ticking of a box when the person visiting a site, the selection of the technical parameters for the services of the informational society or any other declaration or action that clearly indicates, in this context, the acceptance by the concerned person of the processing of his/her personal data.

The absence of an answer, the boxes ticked beforehand or the absence of an action should not represent a consent.

Data operator – the person that establishes the purposes and means of personal data processing means a natural or legal person, public authority, agency or another body that, alone or together with others, establishes the purposes and means of personal data processing;

Person authorized by the operator – (processor) means a natural or legal person, public authority, agency or another body that processes personal data on behalf of the operator.

Applicable laws refer to the laws of the European Union or of the Member States that govern the Personal data of the Company for which any Company from the Group makes the object of the data protection laws; and (b) any other applicable law that governs the Personal data of the Company for which any Company from the Group makes the object of the data protection laws;

Authorized Sub-operator means any entity or third party appointed by the Operator and expressly approved by the Company; Sub-Operator is the contractual partner of the Operator, that processes the personal data of the Company and/or its final Clients. Any third party natural or legal person appointed by the Performer or that acts on behalf of the Performer for processing the Client's Personal data.

Affiliate of the Company shall mean any entity controlled by the Company, that controls the Company or that is controlled by the same entities as the Company;

Company from the Group means the Company or any Affiliate of the Company, as defined by the Tax Code.

Affiliate of the Operator shall mean and entity controlled by the Operator, that controls the Operator or that is controlled by the same entities as the Operator;

Services mean the services and other activities that are performed or are to be performed or carried out by or on behalf of the Operator for the Company, Companies from the Group or final Clients of the Company, according to the Framework Agreement.

Information means all the information regarding the activities of the Operator, including but without limitation to any lists of clients or details, ideas, methods of business, finance, prices,

computer systems and software, products and services that are disclosed that can include or not Personal data. This information can be expressed orally or by any other intangible or tangible form, including, but without limitation to written or printed form, disk, CD, electronic media of storage or by telephone or that can be disclosed;

Breach of the personal data means a breach of the security that leads to the destruction, loss, change, of unauthorized disclosure or unauthorized access to personal data them transmitted, stored or processed in another manner;

Data Transfer means a transfer of Personal data of the Client or its Final Clients from the Performer to a Sub-contracted Attorney in fact, or between two entities of a Sub-contracted Attorney in fact, in each case, if the concerned transfer was banned or restricted by the Legislation on Personal data Protection (or by the terms of the personal data transfer contracts), in the absence of some Standard Contractual Clauses or of other mechanisms that provide appropriate guarantees according to Art. 46 of GDPR.

Standard Contractual Clauses mean standard clauses of data protection adopted by the European Union Commission in accordance with the examination procedure mentioned in Art. 93par. (2) of GDPR or standard clauses of data protection adopted by a Surveillance Authority and approved by the European Union Commission in accordance with the examination procedure mentioned in Art. 93 par. (2) of GDPR.

Breach of the personal data security means a breach of the security that accidentally or illegally leads to the destruction, loss, change of unauthorized disclosure of the personal data transmitted, stored or processed in another manner or to the unauthorized access to them;

Genetic data mean personal data regarding the genetic inherited or acquired characteristics of a natural person, that offer unique information regarding the physiology or health of the concerned person and which result particularly following the analysis of a sample of biological material taken from the concerned person;

Biometric data mean personal data that derive following some specific processing techniques concerning the physical, physiological or behavioral characteristics of a natural person that allow or confirm the unique identification of the concerned person, such as the face images or dactyloscopic data;

Data on health refer to personal data related to the physical and mental health of a natural person, including the performance of medical care services, that disclose information on the status of health thereof;

Group of enterprises refers to one enterprise that exercises control and enterprises controlled by it;

Mandatory corporate rules refer to the policies in terms of personal data protection that must be observed by an operator or by a person authorized by the operator established on the territory of a member state, in what regards the transfers or the sets of transfers of personal data to an operator or to a person authorized by the operator in one or several third countries within a group of enterprises or of a group of enterprises involved in a joint economic activity;

3. Rights of the concerned persons (defined according to GDPR):

- Information and data access
- Rectification or erasure of data
- Restriction of processing
- Oppose to processing
- Data portability
- Not to be submitted to individual decision
- opposition

4. Purposes of collected personal data

Initiative Media S.A. processes personal data for the purpose of carrying out media services (Services), for the purpose of promoting the image, products and/or services of the Clients of the Agency, promotion that is to be performed in the entire conventional media, respectively TV, press, radio, outdoor and indoor display, cinema, on-line display, online performance and other non-conventional media channels and associated projects agreed by the parties, as these services are mentioned below:

- a) Strategy services for the media budget allotted by the Clients, planning, implementation, purchase of advertising space in any type of media and media research, permanent monitoring and post action evaluation of all the advertising actions carried out by the Agency, proposition of steps to follow for improving the future advertising actions, designed in accordance with the communication and media objectives of the Clients (including regarding the special offers of the media suppliers for the allotted budget).
- b) Services for the monitoring of the companies of the Clients' competitors in the agreed reporting formats, as well as the supply of spots and/or advertising patterns for the new campaigns of the competition.
- c) Services for the monitoring and analysis of the media and advertising market in general.
- d) Any other media services and specialized services necessary for reaching the communication and media objectives of the Agency's Clients

5. Personal data processing in the context of expression of personal data processing consent

In the context of offering the consent of personal data processing to INITIATIVE MEDIA S.A., the Agency undertakes to use the data only for the specified purposes, namely:

- transmission of materials online and print regarding the media market, for direct marketing purposes, carried out by INITIATIVE MEDIA S.A.;

For this purpose, for the performance of our basic services, the following personal data will be processed:

- Full name
- company
- position
- email address

The date and time for filling in shall be stored for purposes related to proving the valid consent in case of a security incident, but without being used for other purposes than this.

You have the option to request the change, partial or total erasure from our data base of the following personal data that are processed and collected/stored, by sending an email at the addresses : office@ro.initiative.com and anca.pauna@ro.initiative.com:

- email address
- full name

Initiative Media S.A. does not request and does not process personal data from the special categories, but only non-sensitive data necessary and relevant for the performance of the above defined advertising services, except when it is legally necessary to do this in a subsequent phase. The data considered to be sensitive /special might be, without limitation to, information regarding race or ethnic group, political opinions, religion, capacity of member of the trade unions, health, sexual preferences or judicial record.

Initiative Media S.A. does not allow the utilization of the personal data of the persons under 18 years, but with the prior written consent of the parent, in which the purpose, used personal data and the term of minors' data utilization are specified.

The collected information about you is not transferred to our partners or attorneys in fact.

6. Personal data processing for market research

In case the processing of your personal data is necessary for the purpose of market research and opinion polls, your data shall be anonymized, exclusively used by us for statistical purposes and no correlations can be made with you in any circumstance. You can revoke this data processing at any moment, and this will apply for the future, without exposing the reasons. For this purpose, you can choose from the modes specified in the declaration of confidentiality (below).

We observe the protection of our clients and collaborators by the fact that we make the market research with anonymized data.

7. Data storage term

The personal data collected and processed by Initiative Media S.A. shall be kept for a period of 5

years. Yet, your basic data can be preserved throughout the carrying out of the contract if a collaboration applies.

8. Data security

In order to prevent unauthorized access, in order to maintain the accuracy of the data and provide the right utilization of the data, we implement reasonable and appropriate physical security, IT and organizational measures so as to protect the personal data that we collect/store/process.

We take technical and organizational security measures in order to protect your data from unwanted access in a manner as complex as possible. Besides the securing of the operating environment, in certain areas we use the encryption procedure. The information that you supply shall be subsequently submitted, in encrypted form, by using SSL protocol (Secure Socket Layer) in order to prevent the inappropriate use of the data by third parties. You can identify this aspect by the fact that in the status bar of your browser the symbol of a closed lock appears, and the address bar starts with „https“. The security of the data shall be adjusted according to the current stage of technique.

9. Your rights.

9.1 The right to information

You have the right to request information anytime from us about the data stored about you, as well as about their origin, addressees or categories of addressees to whom these data are sent and about the purpose of storage. For all the other copies except for the first copy, reasonable administrative costs can be invoiced. This does not apply for the communication of the information by electronic means.

9.2 The right of withdrawal

If you have given your consent regarding the utilization of the data, you can withdraw it at any moment and this will apply for the future (once the contracted services have been completed), without exposing your reasons. For this it is enough to send an email at office@ro.initiative.com.

9.3 The right of rectification

In case the data collected by our organization is inaccurate, you can request the correction thereof at any moment by contacting any employee of Initiative Media S.A. or by email at office@ro.initiative.com.

9.4 The right of erasure

You have the right to request the erasure of your data. The erasure of your personal data can be made at any moment, by means of the request by the already enumerated methods or by using our contact data. Usually, your data is immediately erased, but no later than one month from the application of this right. If the erasure breaches the data preservation obligations established by law, contract or by legislative, tax, respectively commercial regulations, or other reasons established by law, instead of erasure, only the pseudonymization of your data can be performed. After the erasure of your data, the receipt of information is no longer possible.

All the personal data that no longer needs to be stored for legislative reasons shall be erased

after the previously mentioned date. The personal data, such as the basic data that must not be erased during storage for legal reasons, shall be blocked for your safety.

9.5. Data portability right (starting from 25.05.2018)

In case you request us the personal data made available, if you want, we shall supply or communicate the data to you or to any other responsible person in a structured, joint and electronically processable format. The latter only if this is technically feasible and only related to the data confided to us by you. The data achieved following the performed services are not covered by the scope of such process, a separate discussion being further approached.

9.6. The right to objection

You have the right to oppose to the processing of the data for direct marketing purposes in any moment and without exposing the reasons. In addition, we draw your attention that by refusing all the data processing processes, the carrying out of the information regarding the above mentioned Golin services can be limited or it is no longer possible for them to be achieved, asking you thus to carefully analyze before transmitting such requests.

9.7. Contact (for the enforcement of the rights of the concerned persons)

If you contact us by email at office@ro.initiative.com or by post at Initiative Media S.A., Metropolis Bravo, 89-97, Grigore Alexandrescu | 010627, Bucharest, Romania, the information supplied by you (your email address, your name and your telephone number, if applicable) will be stored by us in order to answer your questions, respectively in order to satisfy your request. We erase the data that appear in this context after the storage space is no longer necessary or we limit the processing if there are preservation obligations provided by law.

In case of complaints, please contact: **National Authority for the Surveillance of Personal data**. In addition, you have the right to lodge a complaint with a surveillance authority, regarding the processing of your personal data, if you think that your rights regarding data protection have been breached.

10. Questions about data protection

The questions related to all the data processing can be sent anytime at: Initiative Media S.A., Metropolis Bravo, 89-97, Grigore Alexandrescu | 010627, Bucharest, Romania
Telephone: +40.21.301.0000

Email: office@ro.initiative.com

Data protection responsible: cosmin.otel@ro.initiative.com

DPO: anca.pauna@ro.initiative.com