GENERAL INFORMATION NOTE

Personal data processing

1. Introduction

1.1. Application of the information note and its aiming

This document is designed to explain how **While1 Software S.R.L.**, private limited company, as "**Controller**" (having its registered office in Șoseaua Mihai Bravu 255 (1st Floor), Sector 3, , Bucharest, Romania, registered at the Trade Register Office of Bucharest Court under no. J2014003715401, tax identification number RO32979978, contact@while1.ro, Tel: +40 312285005), processes your personal data and how they ensure their protection, in compliance with the legislation in force, including *(EU) Regulation 2016/679 on 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).

This privacy note is applied in connection with the data processing performed by **While1 Software S.R.L.** in the context of:

- online, on While1.biz domain, their subdomains and all the contents of the domains or subdomains
- if you have a While1 account, when using While1 platforms and applications
- personal information shared with us or which you make publicly available when interacting with our social media accounts or by visiting our pages on social media sites; however, such sites are not owned, managed or controlled by While1. The collection, use, and disclosure of your personal information while visiting these other sites is subject to their respective privacy policies - so please review those policies before disclosing any personal information on those sites
- While1's online marketing, sales and advertising campaings
  offline, when you interact with While1 at its headquarters and offices and your personal data is involved

and it is relevant for you, regardless of your position: client or potential client, contractual partner (account owner or representative of a client/partner – natural person at least 18 years of age), a person who requests a quote or contacts us for other purposes (e.g.: requests or complaints), a visitor to our office/working point, visitor of our website, a representative of a public authority or institutions etc.

This privacy note does not cover the privacy practices of users of e-commerce or VoIP telephony services provided by While1.
If you are the customer of a merchant or other third party who uses the While1 platform / applications on their website, please refer to the privacy policy on that site for information about how they may process of your personal data.
If you are a While1 business customer, you may be subject to additional privacy terms as a supplement

to this privacy policy as part of a SaaS contract or other agreement in place between you and While1.

2. Content

2.1. Personal data collected by us

Even if most of While1 Software clients are legal persons, the company is processing personal data, because any client who is a legal person acts via individuals. While1 Software will process the personal data of persons who represent and/or act and/or sign, on behalf of, as well as on account of the legal person or public institutions/administrations.

2.1.1. As a Data Controller, we collect and process personal data:

a. From the Beneficiaries of While1 Software products and services - when engaging in a contractual relationship with While1, as a Client

We collect business data (about representatives, contacts in connection with the contract), banking data and electronic identification data. We use this information to provide you with our products and services - to contact you, to provide assistance related to our services, to keep you up to date with the related updates and developments and to invoice you. We also use this information to ensure that we comply with legal requirements.
We collect personal information when you enter into a contract with While1, when you use our products and access our services from the helpdesk / on the site or ask us for various services by e-mail.

- *Surname and forename (s)*
- *Phone number*
- *E-mail address*
- *Position*
- *IT credentials (logging data) Information on how you use the applications made available by While1 (date, time, duration, module, changes history, etc.)*
- *Voice – Recording phone conversations / messages (e.g. when you are contacting or are contacted via telephone by While1, for the purpose of executing the contract between While1 and its Client/ Provider, whose representative you are or for the purpose of entering into a contract; based on the consent of being recorded)*
- *Image (photo) and ID, both provided by the data subject when opting to sign a contract with advanced electronic signature*
- *Signature (e.g.: contracts, addenda, protocols, etc. concluded between While1 Software and the Client/ Provider/ Institution you represent)*
- *Bank card details: Credit or debit card number - we will keep the last four digits for our*

recordings only after payment; Date of expiry of card or token (reference automatically saved to the card);

- *Payment transaction details: Payment amounts and payment date, Payment status, Payment description, Transaction ID*

b. From the Visitors of the while1.biz website - when you prospect While1 services by browsing our website or when you express an interest in entering into a contract with While1 (when you engage us by e-mail, web forms, telephone) or when you visit us at our premises:

- *Email address (when filling out web forms, when you provide telephone information directly)*
- *Phone number (when requesting telephone assistance)*
- *Voice - Recording of telephone conversations/Voice messages (when you request telephone assistance and consent to be recorded)*
- *Voice - when you are in the premises of While1 Software, within the range of audio-video surveillance cameras installed for the purpose of ensuring the security of data, spaces and assets, as well as for the purpose of preventing incidents (data theft, equipment theft) and the audio recording function is activated*
- *Image - when you are in the premises of While1 Software, within the range of video surveillance cameras installed for the purpose of ensuring the security of data inside the premises, spaces and assets, as well as for the purpose of preventing incidents (data theft, equipment theft)*
- *Requests for information/ requests for quotation in connection with While1 products/services made through the website (email)*
- *We use cookies and similar technologies to process information about the utilized device and browser, preferences and browsing history of site users, IP address – for more details visit the* ***About cookies*** *page*

2.1.2. As a Data Processor of the Client's Personal Data (Beneficiary of While1 Software products and services and Data Controller) we process personal data of the data subjects targeted by the *Client*

During the provision of support and technical assistance services, certain While1 Software employees have incidental access to personal data processed in platforms developed by While1 and used by the Clients. While1 Software processes personal data ***as a data processor of the Clients' personal data*** *(Personal Data Controllers), beneficiaries of While1 software products, only within the framework of an* ***Agreement on the Protection of Personal Data****.*

The processing of personal data by While1 on behalf of the Client (Personal Data Controller) is

*carried out **within the limits necessary to provide the contracted service**, the processing being approved so that While1 be able to ensure the service level according to the contract.*
*While1 agrees to process the Client's personal data **only in compliance with its instructions** and only for the purpose of providing the software services (Software as a Service – 'SaaS') stipulated in the contract, such as: hosting, maintenance and technical support services for Shop / Voice software programs. While1 complies with its obligations as a Processor and adopts all necessary measures concerning the security of data processing, in compliance with Article 32 of the Regulation.*

***If you are a While1 Client** (**Beneficiary of our products and services**), you must inform your Fnbuyers or customers about what data you collect and how you process their personal information as Data Controller or with the help of the Processor, in this case together with While1. **Therefore, if you use While1 platforms and services, you agree to publish a privacy policy on your website in compliance with the legislation in force, clear and up to date. You are also required to obtain consent from your buyers/customers in order to be able to process certain types of personal information (e.g. recording telephone calls) through While1 platforms, in order to comply with the Regulation (GDPR) and the national legislation on the protection of personal data**.*

2.2. Obligation of providing personal data

There is no obligation for you to provide your personal data to While1 Software SRL. However, you may not be able to use our services unless you provide us with certain data. Your decision to provide us with your personal data is completely voluntary. If you do not succeed or do not wish to provide us with your personal data and this provision is optional, then this cannot affect the performance of the contract between you/the company you represent and While1 or has no other kind of consequences that can affect you.

If you do not succeed or do not wish to provide us with your personal data and this provision isnecessary so that you can benefit from the While1 products and services , then the consequences are liable to affect you: in the absence thereof, we cannot conclude a service contract with you or with the legal person whose representative you are and, subsequently, we cannot fulfill our contractual obligations arising from it (e.g. submission of documents to the company, e-mails, notices, making payments etc.).

It is also necessary for us to keep any documents issued by public authorities or institutions, which may contain personal data of its representatives – such as surnames, forenames, position, signature (e.g.: an address or a notification issued by a public authority/institution, either ex-officio or after a request, reports prepared following an inspection, etc.).

Subsequently, this data must be kept and updated according to the legal provisions in the field of accounting or other legal provisions, depending on the data collected.

2.3. When and how we collect personal data and the categories of data subjects

We collect from and about your personal data via various channels, in different situations, such as:

- When you access our site, While1.biz
- When you contact us through the forms on our website While1.biz
- When you access the While1 eCommerce platform/cloud telephony application (once you become our client or act as a representative of a While1 client)
- When you are called on the telephone by one of our representatives
- When you call us to request technical support from us or for requesting offers
- When you sign a service contract with While1 Software or you are the representative of a company with which we have concluded a contract
- When you receive e-mails from us
- When you choose to receive our newsletters
- When you create tickets in our technical support application
- When you provide us directly with data, as a customer or visitor (on the site or at the premises), even outside any contractual provisions
- When you pay invoices issued by While1When you communicate with us through social networks belonging to third parties
- When are issued documents concerning us, on behalf of a legal person or on behalf of any authorities or public institutions
- When you visit us at our headquarters or attend meetings with While1

Please keep in mind that we may be able to aggregate personal data from previously described different sources.

We collect personal data directly from you, when you provide them directly to us and are part of the following categories:

- You represent a Client/Partner/Provider, in a service contract, concluded between While1 Software and the company you represent or when you show your intention to enter into a contract with While1, on your behalf or of a legal person
- You are interested in our offers and services and subscribe to the newsletter
- You represent a public authority or institution issuing ex-officio or on request various documents in connection with the business of the company While1 Software.

We collect personal data by automated means (indirectly) when:

- You exercise your job duty as a representative of a Client/Partner/Provider of While1 Software and log in with your account in any of the proprietary applications or those used by While1 Software (for example, we collect: username, date, time, duration of action, mode, changes history)
- You exercise your position as a representative of a Client/Potential Customer/Partner/Provider/Public authority and you are engaged in a telephone call with While1 Software or receive emails from While1 Software
- You are interested in our services and access the website While1.biz, where we collect personal data through certain technologies (cookies, log files (logs), etc.); for more details on how to collect personal data via cookies, visit "About Cookies" page
  You represent a Client/Potential Client/Partner/Supplier/Authority in a service contract or you are interested in our services or you find yourself in the premises of While1 Software as a visitor, in audio-video surveillance areas, signposted by visible warning signs

2.4. Purpose and grounds of your personal data processing

While1 processes your personal data for real, present and legitimate purposes. While1 processes your personal data solely for the purposes for which your personal data are collected initially and, where secondary purposes are identified, requiring the processing of your data, this processing will not be done without your prior information and consent or without a legitimate interest in this respect and without a legal basis.

We use your personal data for the following purposes:

- To conclude or execute the service contract between While1 Software and you, or the company you represent, grounded on the **performance of the contract** and the contractual obligations deriving from it or, where applicable, **our legitimate interest** (when you represent a company entering into a contract with While1 Software)

- For the identification and authentication of the signatory when signing a contract with advanced electronic signature, the processing being necessary to **comply with a legal obligation**; the legal basis of processing is LAW no. 455 of July 18, 2001 on electronic signature, Art. 4, point 4, in order to ensure the identification of the signatory. Processing is also necessary for the **performance of the contract** to which the signatory is party or in order to take steps at the request of the data subject prior to entering into a contract.

- To protect its data and IT systems against attacks and other similar acts in the virtual

environment, following **its legitimate interests or, where appropriate, fulfilling its legal obligations,** While1 Software has automated monitoring options enabled for accessing its applications by authorized or unauthorized users (e.g. access logs and concerning the activity of users in its softwares, such as IP address or other online identifiers)

- For the provision of our products and services (technical support, good management of relationship with Clients, assurance of a certain level of services, etc.), While1 Software will register the telephone conversations in which you are engaged, in connection with the products and services While1, the processing being founded on your **consent,** explicitly and voluntarily expressed; other personal data processing may be based on the **grounds of the execution of contract** (requests, complaints, requirements by email or in applications, etc.).

- For marketing communications with clients or potential clients, to send you offers and information on our products and services (from our own initiative), the processing is founded on **your consent**.

- To improve your browsing experience on our websites, to adapt our website to the device you are using, to solve the problems you might encounter when accessing, we process various personal data; the basis for processing will, in most cases, be **your consent or our legitimate interest**.

- To know your views communicated to us through social networks (comments on our posts, redistributions, etc.), we will mainly process your data sent by you, **based on your consent**.

- Keeping documents issued by public authorities/institutions, containing personal data, keeping personal data in various registers or communicating answers to various requests of public authorities/institutions, based on the grounds for fulfilling **our legal obligations.**

- Information containing personal data obtained from automated audio-video surveillance in the premises of While1 Software is processed on the legal basis of the **legitimate interests of While1 Software to ensure the integrity and continuity of data, the security of premises and assets, as well as for the purpose of incident prevention**. Personal data obtained in this way shall not be used for any purpose, other than the one mentioned in this Note.

  Automated monitoring (e.g. image and voice in the premises of the headquarters, activity logs in While1 softwares) is followed by occasional analysis of the data collected, involving human factor and depending on the technical events that take place. The monitoring described in this Note is <u>not followed by automated individual decisions with legal or significant effect for the data subjects.</u>

- In general, for any other situations that may involve the legal obligation of While1 Software to respond to requests from authorities, the performance of transactions or restructuring, the defence of our rights and interests or other persons, prevention of frauds or as an evidentiary matter and for archiving purposes; in all these cases, the processing of your personal data, personal information, regardless of your position, could be based on **our legal obligations or on our legitimate interest**, as appropriate.
  We process your data, based on some interests that are legitimate, real and present, while reasonably protecting your rights and freedoms. Our legitimate interests may be removed by your interests, provided that your fundamental rights and freedoms are threatened.

2.5. About third parties' data

If you submit us personal data regarding other persons, you must make sure that you have informed them of this and that you have provided them with this information on how While1 Software processes personal data.
We will inform those persons accordingly about how we process their data, where appropriate.

2.6. Processing the minors' personal data

We do not intentionally collect any personal data belonging to persons under 16 years of age. If While1 Software finds that a person under the age of 16 has provided personal data, While1 Software will take the reasonable measures to remove such information in the shortest possible time and/or to obtain the consent set forth in Art. 8 of the GDPR.

2.7. Recipients of your personal data

While1 collaborates with third parties and service providers to provide you with services and we may share personal information with them. As a rule, we will not disclose your data to other natural or legal persons, except as described below.

We can disclose your data, when strictly necessary, on a need-to-know basis, to other companies or individuals, such as*: service providers (natural or legal persons) who assist us on the basis of a contract in our business operations and who act as authorized persons for us in various fields* (such as archiving documents or storing data, payment services, hosting service providers, various services that we can outsource-for example human resources, accounting services), *other persons, courts, authorities*. Also, While1 Software can communicate your personal data to those partners who offers specialized support to the company such as lawyers, consultants in different fields, judicial executors, etc.
In these cases, we will strictly disclose the data necessary for fulfilling such purpose, for legitimate reasons related to our business.

While1 Software ensures through contractual regulations that such external service providers are processing personal data in compliance with the European data protection legislation and only in connection with the provision of their services, in the capacity of Processor, to ensure a high level of data protection.
The data recorded through the audio-video surveillance systems in the premises of While1 Software is intended for use by While1 Software for the purpose of monitoring the access of persons to the premises, ensuring the security of the company's data, spaces and assets, as well as for the purpose of preventing incidents (equipment theft, data theft) and is made available to the judicial bodies and other institutions empowered by law to request this information, at their express request.

At the time of generating this Information Note, we share your data where strictly necessary and on a need-to-know basis, to the following third parties:

- *Digi Romania, Vodafone, Orange, IBM, Hetzner* - cloud hosting platforms where we host websites or PBX platforms used by the Clients (Data Controllers)
- *PayU* - for processing online payments of invoices using bank card
- *FAN Courier* - for delivery of B2B correspondence
- *Marco Expert SRL* - for the preparation and submission of financial statements in relation to the state authorities
- *Microsoft OneDrive, Microsoft Office 365* - for managing internal and external communications, as well as for other business processes
- *Amazon SES (Sendy App* to send emails to clients, SMTP to send transactional emails to clients*)*
- *Google Adwords and Google Analytics* - to promote and collect anonymous statistics about visitors of our while1.biz website.

We can also disclose your data to certain third parties, in the following situations:

a. If we have your consent for such disclosure.

b. To persons who demonstrate that they are acting legally on your behalf.

c. Where it is in the legitimate interest of While1 to manage or develop the business:

- If we sell the business or parts of it, we could disclose your personal data to the potential buyer of the business or parts thereof, given the need to maintain business continuity

- If While1 sells a substantial part of its assets or undertakes bankruptcy, dissolution, reorganization procedures or any other transaction or similar procedure takes place, then it is possible that the personal data processed by While1 be transferred to a third party
- If required by law, in the event of legal requests from the authorities to disclose a certain type of information, necessary for the proper conduct of investigations, if we are obliged to comply with the national security or law enforcement requirements or to prevent illegal activity

d. If we have to respond to any complaints, in order to protect our rights or rights of a third party, to protect the safety of our employees, clients, suppliers or any persons.

Any third parties to whom we disclose your information are limited (by law and by contract) in their ability to use your personal information only for the specific purposes identified by us. Except as the situations expressly detailed above, we will not disclose, sell or rent personal information to any third party.
In case it is necessary to disclose your personal data to a recipient, other than those mentioned above, then we will inform you of the time of disclosure and the name of the recipients and, possibly, we will ask for your consent.

2.8. Online Social Media

While1 is present online on social networks and platforms to communicate with clients, stakeholders and users and to inform them about its services. We use *Facebook* and *Linkedin* and when you visit each of these platforms, you, as a user, agree to the terms and conditions of processing the data of the corresponding data controller.
Unless otherwise specified in our information note on the processing of personal data, we process user data if users communicate with us on these social networks and platforms, e.g. they publish posts on our pages or send us messages.

While1 Software processes user data only when it is in its client's legitimate interest to do so in compliance with Article 6, (1) (b) GDPR. As a company, we have the legal right to obtain general information about clients. We also use client's data in order to communicate with them, at their request.
For detailed information about the data processing operations of the providers below, as well as the opt-out options, please check the links listed below:

- Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland
  Data Policy: https://www.facebook.com/about/privacy/
  Opt-out: https://www.facebook.com/settings?tab=ads

Facebook is committed to adhering to EU data protection laws under the "Privacy Shield Framework":
https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active

- LinkedIn, LinkedIn Ireland Unlimited Company, Attn: Legal Dept. (Privacy Policy and User Agreement) ,Wilton Plaza, Wilton Place, Dublin 2, Ireland
  Privacy Policy https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy

2.9. Transferring your personal data outside the European Union or the European Economic Area

While1 Software does not transfer personal data to countries outside the EU or EEA, or to international organizations.

2.10. Safety measures regarding your personal data

While1 Software takes all reasonable security and confidentiality measures on a continuous basis, in order to protect personal data.

Technical and organisational measures are focused on ensuring an adequate and reasonable level of protection and prevention of: unauthorised and unlawful processing, accidental or unlawful loss, accidental or unlawful destruction of data, accidental or unlawful damages. We use a variety of technologies and security procedures at industry standards to protect your personal data.

If we detect that a breach of the security of your personal data processing has occurred, we investigate the security incident, take all reasonable actions to mitigate the immediate risk of injury and notify the Supervisory Authority of the security incident, if the breach is likely to lead to a high risk for your rights and freedoms.
We will inform you directly on the breach of security, if the breach is likely to lead to a high risk for your rights and freedoms, as quickly as possible through appropriate contact channels.

We are not obliged to inform you directly, if we have taken the necessary measures to make your personal data be incomprehensible to any person who is not authorized to access them or the high risk for your rights and freedoms, it is no longer possible to produce or involve disproportionate efforts. In such a case, we will inform you, through public networks. We remind you that you assume all risks when you provide us with personal data. No way of sending data over the Internet and no way of storing data is 100% secure.

If you believe that the security of your data has been breached, contact us at dpo@while1.ro.

2.11. Retention period of personal data

We limit the storage period of your personal data to what is necessary for our processing purposes. We store your data in compliance with our data retention policy, which assigns a retention period depending on the purpose of processing and the category of processed data. Those periods are based on the legal provisions, where there are indications in this respect (obligation of storing certain data, applicable prescription deadlines, etc.)

Personal data obtained by While1 Software following the telephone conversations in which you are engaged, for the purpose of fulfilling the job tasks or as a result of accessing our sites and applications, are stored for a reasonable and limited period of time.

Recordings containing the voice and image of natural persons, made in the areas under audio and video surveillance, signposted by visible warning signs in the premises of While1 Software, will be kept for a limited period of time, according to the stated purposes and the legislation in force – 30 days from the date of recording of the image/sound. Upon expiry of the storage period, the data shall be deleted by automatic procedure (overwriting) in the order in which they were recorded.

We annually review the need to keep your personal data, in order to filter, sort and maintain processing only for data which has a valid purpose of processing.

We delete your data at the time when you request this, except for the data whose supply and processing is imposed by a legal provision, which we delete within the time stipulated by the law for this end. Storing personal data for a longer period of time can be achieved for statistics, improvement of services, management of active customers' accounts, research/market survey.

2.12. Your rights regarding the provided personal data

While1 Software guarantees that the rights of data subjects are protected, in accordance with ***Regulation No. 679/2016 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.

All persons involved in audio-video surveillance and those responsible for the management of recorded images will follow the procedure of access to personal data.

In connection with your personal data, you may request to exercise the following rights:

- **Right to be informed**

You have the right to know who is processing your personal data.

- **Right of access by the data subject**
  You have the right to request and receive information on personal data that has been collected about you, as well as a copy thereof (does not include anonymous data).

- **Right to rectification**
  If data we hold about you should be updated or if you consider that they may be incorrect, you can update them through a written request. We must communicate the rectification of your personal data to the recipients of your personal data (if any). We do not communicate the rectification of your data to the recipients of your personal data if the communication to the recipient is impossible or implies a disproportionate effort.

- **The right not to be subject to a decision based solely on automatic processing, including profiling, which produces legal effects relating to the data subject or similarly affects it to a significant extent**
  While1 Software does not make such profiles that are followed by automated decisions with legal or significant effect for its clientsor collaborators. If we process such data we will notify you before processing and you will have the right to refuse to use your personal data by automated systems (e.g. AI).

- **Right to erasure ("right to be forgotten")**
  You have the right to request us the deletion of your personal data we hold related to you and, if personal data have been sent to other Controllers or Processors, the submission of the deletion request to them. We do not communicate the deletion of your personal data to recipients to whom we disclose them, if the communication to the recipient is impossible or involves a disproportionate effort. Your request. will be analyzed and following this analysis it is possible to result that While1 Software still holds legal bases or obligations for the processing of your personal data and they cannot be deleted.

- **Right to object**
  You have the right to give your consent in order to process your data, to withdraw your consent or to object to the processing of your personal data, if you consider that your interests, rights and freedoms are affected by our legitimate interests. In situations where we process your data under consent, you have the right to withdraw your consent at any time; withdrawal of consent will not affect the legality of the processing of the data concerning you, which we carried out before the withdrawal. If your personal data are processed under a contract, a legal obligation or under a vital interest of persons, then you may not be able to object to the processing.

- **Right to restriction of processing**
  You have the right to obtain the restriction of processing, where one of the following applies:
  - the accuracy of the personal data is contested by the data subject;
  - the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
  - the data subject requires the personal data for the establishment, exercise or defence of legal claims;
  - the data subject has objected to processing pursuant to Article 21(1) - GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

- **Right of portability of data**
  If your data are processed under the consent or the contract, by automated means, you have the right to request the receipt of this data or their portability to another controller.

- **Right to lodge a complaint with a supervisory authority**
  If you consider that the processing of your personal data is done with violation of the legal provisions, you can address the the Competent Authority in Romania - the National Supervisory Authority for the Processing of Personal Data (ANSPDCP), B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, postal code 010336, Bucharest, Romania, + 40 318059211 / + 40 318059212, anspdcp@dataprotection.ro. The supervisory authority must inform you within a reasonable time of the progress and outcome of the complaint. You have the right to exercise, on your own behalf or by authorizing an organization, a judicial remedy at law in the EU and in the EEA against a controller, a processor and a Supervisory Authority.

These rights may be limited in certain situations laid down by law. Such restrictions will be checked individually and will be communicated to the data subject depending on the situation.

2.13. How you can exercise your rights

To exercise one or more of these rights or to address any questions about any provision in this information or on any other matters of your processing by While1 Software, please submit your requestrelating to the protection of personal data, in writing, to the email address dpo@while1.ro, where it will be taken over by a person responsible for handling your requests regarding the protection of your personal data.
It is advisable that your request contains a detailed and precise description of the right you wish to exert.

You may need to provide us with a copy of an identification document in order to confirm your identity, your personal data being used in a limited way to the confirmation activity of your identity, stored for a limited period, according to the purpose declared and any other data contained in the copy of the identification document, which exceed the data requested by While1, such as a photograph or any other personal features, may be concealed by you or will be anonymised in processing.
At the time of identification, you will be informed of the documents or personal data necessary for your verification in our reference system. If you do not agree with the proposed solution and wish to propose alternatives, we will evaluate them on a case-by-case basis.

You will receive our answer to your requests, aiming at your personal data protection on your behalf, to the email address provided/authenticated in our system.

The term during which we handle your request regarding the protection of your personal data is 30 days from the date of receipt of the request, but we may extend this deadline for specific reasons related to the complexity of your request. In all cases, if this period is extended, we will inform you on the extension period and the reasons leading to it.

Contact data
Please ask your questions concerning the subject matter of data protection and any requests in the exercise of your legal rights at the following contact details:
dpo@while1.ro
S.C. While1 Software S.R.L., Mihai Bravu 255, 1st Floor, Sector 3, Bucharest
We will investigate and try to resolve any request or complaint regarding the use or disclosure of your personal data.

3. Definitions of the used terms

- **Supervisory authority for the processing of personal data**: an independent public authority which, according to the law, has powers related to supervising the observance of the legislation of personal data protection. In Romania, this supervisory authority is the National Supervisory Authority for the Processing of Personal Data (ANSPDCP).
- **Special categories of personal data (sensitive personal data/sensitive data):** personal data revealing racial or ethnic origin, political views, religious confession or philosophical beliefs or membership of trade unions; genetic data; biometric data for the unique identification of a natural person; data on health, sex life or sexual orientation of an individual.
- **Personal data**: any information on an identified or identifiable individual (called the "data subject"). An individual is identifiable if it can be identified, directly or indirectly, in particular by reference to an identification element, for example: name, identification number, location data, online identifier, one/more specific elements, particular for physical, physiological,

genetic, mental, economic, cultural or social identity of that person. Thus, for example, in the notion of personal data, the following are included: name and surname; home or residence address; email address; telephone number; personal identification number (PIN); accessed medical services (they are sensitive data); established diagnosis (they are sensitive data); genetic data (they are sensitive data); biometric data (they are sensitive data); geolocation data. The categories of personal data that concern you and which we process are listed above.

- **Recipient**: a natural or legal person, public authority, agency or other body to whom the personal data are disclosed, whether or not a third party. However, the public authorities to whom personal data may be reported in the context of a particular investigation in accordance with the European Union law or national law shall not be considered as recipients; the processing of such data by those public authorities shall comply with the applicable data protection rules, in compliance with the purposes of the processing.
- **Controller:** a natural or legal person deciding why (for what purpose) and how (by what means) personal data are processed. According to the law, the responsibility for complying with the legislation on personal data rests primarily with the congtroller. In relation to you, we are the controller and you are the data subject.
- **Processor:** any natural or legal person who processes personal data on behalf of the Controller, other than the controller's employees.
- **Data subject**: the physical person to whom (which "belong") certain personal data. In relation to us (the controller), you are the data subject.
- **Processing of personal data**: any operation/set of operations performed on personal data or on sets of personal data, with or without the use of automated means; for example: collection, registration, organisation, structuring, storage, adaptation or modification, extraction, consultation, use, disclosure by transmission, dissemination or making available in any other way, alignment or combination, restriction, deletion or destruction of such personal data/sets of personal data. These are just examples. Basically, processing means any operation on personal data, whether by automated or manual means.
- **Restriction of processing**: means the marking of stored personal data in order to limit their processing in the future.
- **Purpose of processing**: means the reason for the processing of personal data.

4. Changes to the Information Note

It is possible for us to change this note at any time and for any reason.
We will notify you of any changes thereto by publishing a new information note concerning personal data on www.while1.biz and by modifying the date for "last update".
It is your responsibility to periodically review this Note to find out about any modifications, if any.
Last update: This version was reviewed on January 14, 2026.