

PERSONAL CHARACTER DATA PROCESSING POLICY

On the grounds of Decision no. 200 from 2015 regarding the determination of the processing cases for which the notification of the National Supervision Authority of Personal Character Data is not necessary, DENTCOF RESEARCH, through the companies which form this brand, S.C. DENTCOF S.R.L. and DENTCOF RESEARCH S.R.L. respectively, is exempt from the obligation of notifying the supervision authority.

However, although it is not necessary to notify the National Supervision Authority of Personal Character Data, DENTCOF RESEARCH shall continue to observe its obligations stipulated within the Law no. 677/2001 for personal protection regarding the personal character data and free circulation of this data, amended and supplemented.

DENTCOF RESEARCH has the obligation to safely manage and only for the specified purposes the personal data provided by you

1. Personal character data collecting and processing

The protection of the information during the processing of your personal data is a major concern for DENTCOF RESEARCH. This is why we want to offer you a safe online experience, observing your rights.

DENTCOF RESEARCH does not encourage SPAM, does not provide your e-mail address to third parties (physical or legal persons), does not sell, offer, exchange e-mail addresses obtained through this site, and does not disclose your e-mail address to other persons accessing this site without your express approval. Any user who has expressly provided his/her e-mail address on the site may choose to have this deleted from the database.

DENTCOF RESEARCH shall not perform commercial communication through electronic mail, except for the cases when the user has expressly its consent to receive such communications.

Any person visiting the Site who offers personal character data and information through this site gives his/her express and clear consent for the use of the data provided for the below mentioned purposes.

The personal data shall be memorized only if they are offered voluntarily by you, for example, in the context of filling in a form, a opinion poll or during the performance of a contract (such as contracting a service).

The nature of the information requested refers especially to personal data (surname, name, telephone numbers, e-mail addresses), but may also include other information in close connection to the performance of an APPOINTMENT or offering a feedback for the services provided by DENTCOF RESEARCH.

Your filling in of the forms on the site equals thee unconditional acceptance that the data provided by you on these forms be included in our databases and the use and processing by DENTCOF RESEARCH and its partners for the performance of the processing activities and seminars organizing services provisions regarding dentistry and / or management themes, economic and financial management, marketing and publicity, statistical but also for electronic communication services (by e-mail, SMS or telephone).

The termination of the personal character data processing operation may be done using the following methods:

- processing for other purpose, with the consent of the person in question;
- deleting, destroying, archiving.

2. Measures taken in order to ensure the security of the personal character data processing



DENTCOF RESEARCH guarantees the security and confidentiality of the data hosted and transmitted through its informational system but does not undertake the responsibility for the information losses caused by any malfunctions or errors of the soft used which is provided by third parties computer programs producing companies. Although DENTCOF RESEARCH has taken security measures in order to prevent the data losses, incorrect or inadequate and unauthorized access, the absolute security of the data transferred on the internet cannot be guaranteed.

The measures applied by DENTCOF RESEARCH regarding the security of the personal character data observe the legal provisions and are the following:

- Identification and authentication of DENTCOF RESEARCH assistants / collaborators by entering a identification code from the keyboard (a string of characters) which acts under the authority of the companies which form the brand name DENTCOF RESEARCH and which were acknowledged the access right to the personal character data databases.
- All personal data collected by the DENTCOF RESEARCH websites is stored in a database hosted in 2 separate data centers in Europe, owned by Amazon Web Services (AWS). AWS ensures physical security and restricted access to it's data centers. More details can be obtained from this url: <https://aws.amazon.com/security/>
- The database service used by the DENTCOF RESEARCH websites is protected by strong user authentication, complex passwords, and 2 levels of firewalls. Also, all access to the database is done via SSL-encrypted connection.
- The department which ensures the technical support may have access to the personal character data in order to solve exceptional cases.
- The assistants / collaborators of the companies which form the DENTCOF RESEARCH brand name shall be especially designated and authorized for the collection and entry operations of the personal character data in an information system.
- Any modification of the personal character data may only be made by the authorized users especially designated for that purpose.
- During the users training courses, the operator informs them regarding the provisions of Law no. 677/2001 for the personal protection regarding the processing of the personal character data and free circulation of this data, the minimum security requirements of the personal character data processing but also regarding the risks of personal character data processing
- The users who have access to the personal character data are trained by the operator regarding their confidentiality. The users are obligated to close the work session when leaving the workplace.
- Any personal character data printed on physical format shall be saved and archived in a locked room with restricted access.
- For the purpose of maintaining the security of the personal character data processing (especially against information viruses) the operator takes measures which consist of:
 - ✓ forbidding the use by the users of software programs which come from external or questionable sources;
 - ✓ the informing of the assistants / collaborators with access to the databases regarding the danger of the information viruses;
 - ✓ the implementation of automatic systems of devirusing and security of information systems;
- Data encryption through SSL security certificate for the encryption of the information which travel through the internet channels between site and its user.



DENTCOF RESEARCH makes all the reasonable efforts, commercially justified in order to protect the personal character data collected, analyzing new technologies in the field and, when applicable, we apply them in order to upgrade our security systems.

3. Use and disclosure of personal data and specifying the purpose

The information you provide shall be used for the purpose for which you provided them and shall be treated according to the current legislation regarding the Personal Character Data Protection and shall be used by DENTCOF RESEARCH for the following purposes:

- services provision of organizing seminars regarding dentistry and/or management themes;
- informing the users / clients regarding the status of the courses by telephone and e-mail;
- invoicing the services ordered;
- assessment of the services offered;
- direct marketing, informing through written messages sent by e-mail respectively regarding the services, promotions or any other marketing actions performed by DENTCOF RESEARCH and its partners and administration of the clients database (consumers), only if the person in question has expressed its clear and express consent for the e-mail and/or telephone number processing for this purpose;
- performance of market studies, consumer behavior monitoring;
- processing and solving by DENTCOF RESEARCH of the requests, questions and complaints addressed (see the "CONTACT" section displayed on Site);
- other activities performed by DENTCOF RESEARCH and allowed by law which are not the object of an approval from the receiver.

Thus, DENTCOF RESEARCH undertakes not to make public the personal character data sent by you through the site, not to trade and disclose them to third parties, without the previous approval of the user.

DENTCOF RESEARCH may disclose the personal character data to third parties if this is requested by law or in cases of good faith for conformity with the legal provisions. When DENTCOF RESEARCH is requested to provide personal character data under the law, only the necessary data for the strict compliance of the object of the request shall be disclosed.

According to the requirements of Law no. 677/2001 for personal protection regarding the personal character data processing and free circulation of this data, amended and supplemented, DENTCOF RESEARCH has the obligation to manage in safety conditions and only for the purposes specified the personal data you provide.

By filling in the data in the form made available by DENTCOF RESEARCH the user states and accepts unconditionally that his/her personal data be included in the DENTCOF RESEARCH database and gives his/her express and clear approval that all this personal data be stored, used and processed by DENTCOF RESEARCH, the entities which form the DENTCOF RESEARCH brand and its partners for the performance and/or development by DENTCOF RESEARCH, the entities which form the DENTCOF RESEARCH brand and its partners of activities such as, but without limiting to, commercial activities, products and services promotion activities, marketing, publicity, media, management, development, market research, statistical, follow up and monitoring of sales and consumer behavior activities. Also, the user gives its express and clear consent that this personal data be transferred (assigned) by DENTCOF RESEARCH to the entities which form the DENTCOF RESEARCH brand.

4. Access rights of the users over the personal data

You and all the persons who send personal data to the site are guaranteed your rights according to the provisions of Law 677/2001 for personal protection regarding the personal character data processing and free circulation of this data, amended and supplemented.

By reading the Confidentiality policy, the personal character data protection policy and the "Terms and Conditions" of this Site, you are acknowledging the fact that your rights under the law are guaranteed, respectively the right of information, the

right of access to the data, the right of intervention over the data, the right of opposition, the right of not being subject to an individual decision, the right of addressing the justice and free circulation of this data. Also, you have the right to oppose the processing of your personal data and request the update, total or partial deletion of the data.

You can exercise, freely and without any justification, any of the rights listed above, as follows:

- the right to information, DENTCOF RESEARCH respectively is obligated to provide information regarding the identity of the personal character data operator, the purpose of the data processing, if the provision of all the data is mandatory and the consequences of the denial to provide them but also the existence of the rights you have;
- the right of access, DENTCOF RESEARCH respectively is obligated to confirm to the requester if they process personal data or not, freely, in the limit of a request per year, on the basis of a written, dated, signed and sent request at the address Timisoara, Simion Barnutiu street, no. 62, Timis county – ROMANIA – to the attention of Florin Cofar, also you have the right of seeing the evidence record of the personal character data processing, to file a complaint before the supervision authority, but also to challenge the decisions of the operator, according to the legal provisions.
- the right of intervention over the data, DENTCOF RESEARCH respectively is obligated to rectify, update, block, delete or transform in anonymous data, freely, the data whose processing is not according to the provisions of Law no. 677/2001 of personal protection regarding the personal character data processing and free circulation of this data, amended and supplemented;
- the right of not being subject to an individual decision;
- the right of addressing the justice;
- the right to oppose the processing of your personal data and to request the deletion of your personal data. Any person has the right to oppose, for legitimate reasons¹, the processing of personal data.

Based on a written, dated, signed and sent request to the address: Timisoara, Simion Barnutiu street, no. 62, Timis county – ROMANIA – to the attention of Florin Cofar you may freely exercise, through one request per year, to be confirmed that your personal character data are processed or not, the method of personal character data processing but also the possibility to consult the evidence register of the personal character data before filing a complaint to the supervision authority but also to challenge the decisions of the operator according to the legal provisions.

Also, DENTCOF RESEARCH may provide the personal character data of the user to other partner companies but also to the entities which form the DENTCOF RESEARCH brand, but only on the grounds of a confidentiality commitment from them guaranteeing that this data is kept safe and that the provision of this personal information is made according to the legislation in force.

DENTCOF RESEARCH undertakes not to expressly request personal character data relating to the state of health of the users through its forms.

If by filling in the data in the form made available by DENTCOF RESEARCH, the user communicates to DENTCOF RESEARCH data regarding his/her state of health, this is made only on the basis of his/her express consent for the communication and processing of this data.

5. Use of Cookies

¹Any person has the right to oppose freely and without any justification, the processing of his/her personal data for purposes of direct marketing. You have the right to request the deletion of the information regarding you by contacting us in writing at the address: Timisoara, Simion Barnutiu street, no. 62, Timis county – ROMANIA – to the attention of Florin Cofar; or by e-mail: office@dentcof.ro

You understand and accept the fact that DENTCOF RESEARCH may gather and keep statistical and anonymous data without identifying the persons visiting this Site.

When you visit the site, the web server automatically records data such as the name of your internet provider and the website you are visiting. This is anonymous data without having any link between this and your personal data.

For the improvement of the online navigation experience and in order to ensure that the service is relevant for your needs, the Site uses cookie modules and Google Analytics web analysis service (belonging to Google Inc. Company). Google Analytics gathers and processes statistical information in order to assess your use of the site and the elaboration of reports regarding the activity of the site. In order to gather this data, Google uses cookies, but the IP address sent by the browser from where you access the Site in Google Analytics shall not be linked to other data held by Google or by DENTCOF RESEARCH.

You may reject the use of cookies by deleting the cookie modules from the computer (access the instructions from the menu of the browser used, click on the Help button). If you choose not to use cookie modules when you visit the site, some functions and pages shall not function accordingly.