

# GDPR Compliance Privacy Policy

The privacy of the personal data of our users is one of the fundamental commitments of **Planet Program SRL („the Company” sau „us”)** which shall take into account and respect the applicable legal principles so that all data processing be lawful, fair and transparent and the collected data be appropriate, relevant and limited to what is required in relation to the purposes for which it is processed.

We take your data protection rights seriously, reason for which we ensure you that your personal data is treated in a safe and confidential manner and is processed only after you have been informed of the purposes of the processing, your rights and the measures taken to ensure security of the processing of personal data.

The following Privacy Policy describes:

- the purposes for which we collect and use your personal data;
- the processing reasons for such purposes;
- the categories of personal data we collect from you and which we process;
- the length of processing of these data;
- your rights as individuals and how you can exercise them;
- to whom can we disclose the personal data.

The Company processes such personal data as a subject to the Privacy Policy, in accordance with the principles set forth in the applicable data protection legislation in Romania, including the *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 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 („GDPR”)*.

We reserve the right to update and periodically modify this Privacy Policy to reflect any changes to the legal requirements of the way we process your personal data or any changes to the applicable legal provisions. In the event of any such change, we will display on our website the modified version of the Privacy Policy, so please periodically review the content of this Policy.

## **1. Who are we? How can you contact us about issues related to personal data?**

Our company, **Planet Program SRL**, is a Romanian legal person, identified by CUI 15852558, registered at the Trade Register under no. J40/14435/2003. The headquarters

of our company is located in Bucharest, district 4, 13 Izvorul Mureşului St., bl. 4, sc. D ap. 31, ground floor. You can also contact us via e-mail, at: [support@futureofdigital.info](mailto:support@futureofdigital.info).

As regards the protection of personal data, we are an operator when we are processing your personal data. Since we are always open to knowing your opinions and providing you with any further information you may need regarding the processing of your data, we inform you that, strictly as regards to personal data protection, you may contact the person in charge with these aspects at the email address: [dpo@futureofdigital.info](mailto:dpo@futureofdigital.info).

## **2. What is personal data and what does it mean to process it?**

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

Through "**processing**" we understand any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## **3. What categories of personal data do we process?**

In general, we collect your personal data directly from you during the pre-registration, registration, account customization, purchase of products and services, etc. so that you have control over the type of information you provide us. For example, we receive information from you as follows:

- During the pre-registration process, as well as when you create a Future of Digital account, you send us your e-mail address, your first and last name, the IP address; your e-mail is indispensable for the system to work in your favour since it enables us to offer you our services and it is also the main means of communication between us and you as well as between you and your customers;
- On your personal page on Future of Digital you can submit additional information, such as: phone number, date of birth, profile picture, addresses for your Telegram accounts and / or Facebook, LinkedIn, Twitter, Google as well and other accounts provided by you, available on other social networks. The phone number provided at registration will be the main means by which we can contact you to provide technical support, but the phone number and other data correspondent to your

other social network accounts can only be provided through your express option to post them on your personalized web pages; these will give your potential customers the opportunity to contact you;

- When you purchase a subscription, you provide us with additional information such as billing details, credit card data, etc .;
- In the case of members who opt for Basic accounts and submit the ID/driving license as well as the proof of their domicile/residence, all the data contained therein and so transmitted to us are processed exclusively in the form of the collection;

We can also collect and then process certain information about your behavior while you visit our website to personalize your online experience. The list of these data may vary according to the nature and characteristics of the services and activities contracted by you or in relation to which you are interested, as well as the legal provisions applicable to the activities of the Company.

We do not want to collect or process data of minors who are under the age of 18.

#### **4. What are the purposes and grounds of processing?**

We will use your personal data for the following purposes:

##### ***A. To deliver Future of Digital's services in your benefit:***

This general purpose may include, on a case-to-case basis, the following:

- Pre-registration and registration of an account within the Future of Digital platform;
- Processing your purchases, including invoicing these;
- Tracking of placed orders;
- Providing the opportunity to get in touch with future customers;
- Subsequent offering of Referral Fees;
- Solving various requests/questions/notices submitted by you;
- Technical support for your activity within Future of Digital;
- Potential reimbursements.

Processing your data for these purposes is, in most cases, based on the legitimate interest of the Company in order to be able to offer you the services it provides, but also on your consent or on the conclusion and performance of the contract between the Company and you.

### ***B. To improve our services***

We always want to offer you the best online experience. To do this, we may collect and use certain information about your user behavior, or we can conduct research and market research directly or through partners.

We base these activities on our legitimate interest in doing business, always taking care that your fundamental rights and freedoms are not affected.

### ***C. For marketing reasons***

We want to keep you informed about the evolution of Future of Digital services. In this sense, we can send you general and thematic newsletters through electronic communication channels (e-mail / SMS, etc.), information about the Company's services and other similar communications. In order to provide you with information of interest to you, we may use certain data about your user behavior to create a profile. We always ensure that such processing is done with due respect for your rights and freedoms, and that decisions made thereon have no legal effect on you and do not affect you in a similar manner, to a significant extent.

In most cases, we base our marketing communications on your prior consent, expressed by ticking the boxes displayed during your registration in our Community.

Please be aware that we take care and take all necessary measures to ensure that your fundamental rights and freedoms are not affected. However, you may, at any time, request us, by the means described above, to disable the processing of your personal data for marketing purposes. We will, as soon as possible, but no later than 30 calendar days, comply to your request.

### ***D. To defend our legitimate interests***

There may be situations in which we use or transmit information to protect our rights and activity. These may include:

- Measures to protect the Future of Digital website and users from cyber attacks;
- Measures to prevent and detect fraud attempts, including the transmission of information to competent public authorities;
- Measures aimed at the legitimate interest of the Company; for example, for the purpose of establishing, exercising or defending a right, for internal administrative purposes, to invoice the services rendered and make the related payments; to protect copyright and related rights;
- Measures to manage various other risks.

The ground for these types of processing is our legitimate interest in defending our business, being understood that we ensure that all the measures we take guarantee a balance between our interests and your fundamental rights and freedoms.

## **5. How long do we keep your personal data?**

As a general rule, we will store your personal data as long as you have an active account on the Future of Digital platform. These will be deleted when they are no longer reasonably required for the authorized purposes or when you withdraw your consent (where applicable) and it is no longer legally necessary for us to continue storing the data.

Under certain circumstances, we may keep your personal data for longer periods of time (up to 3 years) so we can accurately record your relationship with us in case of any complaints or problems that may arise or if we reasonably believe that a litigation regarding your personal data or the performed purchases has the potential of occurring.

In the case of personal data covered by the legal provisions governing the archiving process of documents, the storage of such data will be done throughout the time required by the respective legal provisions.

In the case of members who opt for Basic accounts and submit their ID/driving license and proof of domicile/residence, the personal data collected and the documents submitted are kept for a maximum of 5 working days, after which they are permanently deleted from the database of the Company.

You may, at any time, request us to delete certain data by filling in, signing and submitting by e-mail to the address [dpo@futureofdigital.info](mailto:dpo@futureofdigital.info), the Personal Data Removal Request. Requesting deletion of certain personal data does not affect the lawfulness of the processing based on consent prior to its withdrawal.

## **6. To whom do we submit your personal data?**

As the case may be, we may transmit or give access to certain personal data to the following categories of recipients:

- Future customers;
- Future of Digital's technical support team;
- Future of Digital's accounting team;

If we have a legal obligation or if it is necessary to protect our legitimate interest, we may also disclose certain personal data to public authorities, state bodies or courts.

We ensure that any potential access of third-party private law entities to your data is done in accordance with the legal provisions on data protection and confidentiality of information, based on contracts concluded with them.

## **7. In which countries do we transfer your personal data?**

We currently store and process your personal data on the territory of Romania.

## **8. How do we protect the security of your personal data?**

We commit to ensure the security of personal data by implementing appropriate technical and organizational measures, according to the industry's standards.

We keep your personal data on secured servers using state-of-the-art encryption algorithms. Certain types of personal data (for example, contained in invoices) can be stored on paper, but these are secured, and the storage method complies with the safety standards.

Despite the steps taken to protect your personal data, we draw your attention to the fact that sending information via the Internet in general or through other public networks is not completely secure; there is a risk that the data may be seen and used by unauthorized third parties. We can not be responsible for such vulnerabilities of systems that are not under our control.

## **9. What rights do you have?**

In order to exercise your rights, you may contact us by email using the contact details listed above. Please note the following if you wish to exercise these rights:

- **Identity and requests.** We take seriously the confidentiality of all records that contain personal data. For this reason, please send us any request regarding such records in writing using the e-mail address [dpo@futureofdigital.info](mailto:dpo@futureofdigital.info) and including the reason for your request. We reserve the right to verify your identity by requesting additional information with this specific purpose;
- **Fees.** We will not require a fee to exercise any right with respect to your personal data, unless your request for access to information is groundless, repetitive or excessive, in which case we will charge a reasonable amount. We will inform you of any fees applied before we resolve your request;

- **Response time.** We plan to respond to any valid requests within a maximum of 30 days, unless this is particularly complicated, the Company has a very large volume of requests to resolve or if you have submitted various requests - in which case we will respond within 60 days. We will let you know if we will need more than 30 days within the 30-day deadline. We may request clarifications regarding what information you want to receive or what concerns you. This will help us act faster and shorten the response time to your request.
- **Third party rights.** We do not have to respect a request if it adversely affects the rights and freedoms of other persons concerned.

### ***Concerned rights and their description***

#### **Access**

You can request from us:

- to confirm that we process your personal data;
- to provide a copy of these data;
- to give you other information about your personal data, such as what date are we in possession of, what data we use, who we divulge these data to, whether we transfer the data abroad and how we protect these, how long we store them, what rights you have, how you can submit a complaint, how we obtained your data - to the extent that the mentioned information has not already been provided to you through the present Policy.

#### **Rectifications**

You may ask us to rectify or complete your inaccurate or incomplete personal data. We might attempt to verify the accuracy of the data before rectifying it.

#### **Deleting data**

You may ask us to delete your personal data, but only if:

- these are no longer necessary for the purposes for which they were collected; or
- you have withdrawn your consent (if the data processing is based on consent); or
- you have a legal right to oppose; or
- the data have been illegally processed; or
- we have a legal obligation to do so.

We are not obliged to comply with your request for deletion of your personal data if processing the data is required:

- to comply with a legal obligation; or
- for acknowledging, exercising or defending a right in court.

These two situations are the most probable circumstances in which we may refuse your request.

Please be aware that the data deletion process and possibly the deletion of the Future of Digital account as a consequence, with all data and documents related to it, is an irreversible process.

### **Restriction of data processing**

You may ask us to restrict the processing of personal data, but only if:

- the accuracy of the data is contested (see rectification section) to allow us to verify their accuracy; or
- processing is illegal, but you do not want the data to be deleted; or
- the data are no longer necessary for the purposes for which they were collected, but you need them to acknowledge, exercise or defend a right in court; or
- you have exercised the right to oppose and verifying whether our rights are prevailing is ongoing.

We may continue to use your personal data following a restriction request if:

- we have your consent; or
- to acknowledge, exercise or secure the defense of a right in court; or
- to protect the rights of other individuals or legal entities.

### **Data portability**

You may ask us to provide your personal data in a structured, commonly used and readable form or request it to be "ported" directly to another data operator, but in each case only if:

- processing is based on your consent or on the conclusion or performance of a contract with you; and
- processing is done by automatic means.

### **Opposition**

You may oppose at any time, for reasons related to your particular situation, to the processing of your personal data based on our legitimate interest if you believe that your fundamental rights and freedoms prevail over this interest.

You can also oppose any time the processing of your data for direct marketing purposes (including creating profiles) without invoking any reason, in which case we will cease this processing as soon as possible.



### **Automated decision-making**

You may ask not to be the subject of a decision based exclusively on automatic processing, but only when that decision:

- produces legal effects on you; or
- affects you in a similar way and in a significant measure.

This right does not apply if the decision taken following an automatic decision-making process:

- is necessary to us in order to conclude or perform a contract with you;
- is authorized by law and there are adequate safeguards for your rights and freedoms; or
- it relies on your explicit consent.

### **Complaints**

You have the right to complain to the competent supervisory authority about the processing of your personal data. In Romania, the contact details of the competent data protection authority are as follows:

*The National Supervisory Authority For Personal Data Processing*

Address: 28-30 G-ral. Gheorghe Magheru Bd, district 1, postal code 010336, Bucharest, Romania

Telephone: +40.318.059.211 or +40.318.059.212

E-mail: [anspdcpc@dataprotection.ro](mailto:anspdcpc@dataprotection.ro)

**Without affecting your right to contact the supervisory authority at any time, we kindly ask you to contact us in advance, we will do our best to resolve any issues amicably.**