

# Protection of personal data

RFTA understands its obligations to you and aims to always protect your personal data. At the same time, out of a desire to be transparent about the categories of data processed, it aims to help you understand how and why your data is processed.

## 1. Identity and contact details of the controller of your personal data

The Romanian Foundry Technical Association (RFTA) is the controller of personal data.

RFTA has its registered office in Bucharest, sector 6, Splaiul Independentei, no. 313, corp J, Sala JB 203, 2nd floor, is registered with the Trade Register under no. 423/PJ/1990 and has CUI 8704265.

RFTA's contact details are as follows:

Address: Bucharest, sector 6, Splaiul Independentei, no. 313, corp J, Sala JB 203, 2nd floor.

Email: [office@foundry-attr.ro](mailto:office@foundry-attr.ro)

## 2. Contact details of your personal data protection officer

RFTA has appointed a personal data protection officer, who can be contacted at [office@foundry-attr.ro](mailto:office@foundry-attr.ro).

Insofar as you do not wish to contact the personal data protection officer by e-mail, you may use any other type of correspondence using the RFTA contact details mentioned in Chapter 1 above.

## 3. General conditions regarding the processing of personal data

RFTA focuses on compliance with the principles related to the processing of personal data which state that personal data are:

1. processed lawfully, fairly and transparently in relation to the data subject ("lawfulness, fairness and transparency");
2. collected for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes;
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ("data minimisation");
4. accurate and timely;

5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data are processed;

6. processed in a way that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing and accidental loss, destruction or damage, by taking appropriate technical or organisational measures ('integrity and confidentiality').

#### **4. Categories of personal data we process**

"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 his or her physical, physiological, genetic, mental, economic, cultural or social identity;

RFTA only processes personal data necessary for the purposes of carrying out its activities and fulfilling its contractual obligations.

RFTA processes a range of personal data from several categories of persons as follows:

- 1) natural persons who are former members/members/potential members;
- 2) natural persons who are representatives of former members/ members/ potential members/ legal entities; (e.g. administrator, general manager, economic director, etc.);
- 3) natural persons who are employees of former legal entity members / legal entity members / potential legal entity members (e.g. employees, civil servants, contract staff, etc.);
- 4) natural persons who are former sponsors/sponsors/potential sponsors;
- 5) natural persons who are representatives of former sponsors/ sponsors/ potential sponsors (e.g. administrator, general manager, economic director, etc.);
- 6) natural persons who are employees of the former sponsors/prospective sponsors (e.g. employees, civil servants, contract staff, etc.);
- 7) natural persons who are former partners/partners/potential partners;
- 8) natural persons who are representatives of former partners/partners/potential partners (e.g. administrator, general manager, economic director, etc.);
- 9) natural persons who are employees of the former partners/partners/potential partners (e.g. employees, civil servants, contract staff, etc.);
- 10) natural persons who are representatives of former suppliers/suppliers/potential suppliers (e.g.: administrator of a bookkeeping company, administrator of an outsourced accounting and auditing company, director of a bank where the client has an account, etc.);

8) natural persons who are employees of former suppliers / suppliers / potential suppliers (e.g.: employee of a bank where the client has an account, employee of an outsourced audit company, etc.);

9) natural persons who are former participants/participants/potential participants in the scientific and technical activities and events they organise;

10) natural persons who are representatives of a public authority/institution in contact with potential suppliers/suppliers/former suppliers (e.g. an ANAF director etc.);

11) natural persons who are employees of a public authority / institution in contact with potential suppliers / suppliers / former suppliers (e.g. an ANAF inspector etc.);

12) any other natural person in any kind of relationship with potential members / members / former members (e.g. a former employee of a member, etc.).

Depending on the category of persons to which you belong, and depending on how your personal data comes into our possession, we may process all or part of the following categories of personal data:

1) identification data (e.g. name, surname, CNP, address, ID/Passport number and series, date and place of birth, nationality, data recorded in civil status documents, etc.);

2) identification data using remote communication means (e.g. telephone number, e-mail address, IP address of a device);

3) data relating to place of work/profession (e.g. profession, function, place of work, etc.);`

4) data on how you carry out your work (e.g. how you negotiate a contract with us, the content of an e-mail sent from an address related to your workplace, etc.);

5) graphical data (e.g. (5) graphical data (e.g. your signature on a contract with us, your signature on a document sent to us, etc.);

6) biometric data (e.g. your image contained in an identity document of yours stored by us etc);

7) financial data (e.g. your bank account, the bank where it is opened, the date of a payment, the justification of a payment etc);

8) your opinions (e.g. your opinion on the services/products provided by RFTA, etc.);

9) other categories of personal data, including special data, depending on the circumstances (e.g. to the extent that you inform us that you are unable to attend a scheduled appointment with us due to medical reasons, we will process the data submitted on your health, etc.).

The processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic data, biometric data, data concerning a natural person's sex life or sexual orientation is permitted only in the situations clearly set out in Article 9(2) of Regulation (EU) 2016/679.

## **5. Sources from which we obtain your personal data**

The sources from which we obtain your personal data are varied from case to case and may consist of:

- 1) your person (e.g. you send us an email or contact us by phone, etc);
- 2) the company/entity where you are employed (e.g. (e.g. your company sends us your personal data so that we can contact you to initiate and support a dialogue on a specific topic, etc.);
- 3) the company/entity with which you are in a certain relationship (e.g. the company for which you provide certain goods and/or services without being an employee, etc.);
- 4) other persons/entities that hold your personal data (e.g. a friend, a company where you were employed, another RFTA member, etc.);
- 5) public sources (e.g. data provided by the Trade Registry Office, search results displayed by a search engine, etc).

## **6. The ways in which we process your personal data**

RFTA may process your personal data, in whole or in part, in the following ways:

- 1) collection (e.g. receiving a contract signed by you, receiving an email from you etc);
- 2) storage (e.g. storing an e-mail received from you, storing a document sent by you etc);
- 3) registration (e.g. registering you as a member or in our supplier base etc);
- 4) viewing (e.g. viewing your contact details in order to send an e-mail etc);
- 5) modification (e.g. when you ask us to modify your contact details etc);
- 6) encryption (e.g. (6) encryption (when we encrypt the devices that store your personal data etc);
- 7) transmission / disclosure (e.g. when we transmit your contact data to a courier etc);
- 8) destruction (e.g. when we delete you from the database of active members and suppliers etc);
- 9) any other operations carried out on / in relation to your personal data (e.g. restriction of access, pseudonymisation of data, anonymisation of data etc).

## **7. The purposes for which your personal data are processed and the legal grounds for processing personal data**

According to GDPR 679/2016 "processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automatic 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;

RFTA collects and processes your personal data for the following purposes:

- distributing relevant information, news and upcoming events among association members;
- distributing relevant information and news of upcoming events to individuals and legal entities, other than RFTA members, potentially interested in participating;
- to carry out activities necessary to fulfil the purpose for which the association was created in accordance with its object of activity, but also in connection with the carrying out by RFTA of complementary activities: accommodation services, catering, recreational activities, rental of premises, etc.
- to make contacts to discuss membership and future sponsorship proposals.
- for the purchase of products and services needed to carry out the activity;

## **8 Data storage period**

Personal data that have been or will be requested will be provided by the data subject or their legal representatives and will be processed for a period of time as provided for in European and national legislation, in accordance with the GDPR and other legal bases that so require, respecting the principles of ensuring their security and respecting your rights.

## **9. Categories of recipients of personal data**

Personal data are intended for use by the controller (RFTA) and are disclosed to the following recipients, where applicable:

- 1) Commercial organisations: banks, accommodation establishments, food establishments, etc.;
- 2) National Post Company (for printed mail - if required);
- 3) Professional organisations: e.g. WFO, AGIR, etc.
- 4) IT service providers (maintenance, software development);
- 5) Archiving in physical and/or electronic format; auditing; etc.;
- 6) Public institutions: social and health services (CASMB, CNAS, etc.), central and local public authorities in Romania (e.g. ANAF, National Archives), police bodies, Romanian Court of Accounts;
- 7) Judicial bodies in Romania and other countries (EU, recognised by the EU as complying with personal data protection rules or having personal data protection agreements with Romania), as well as courts, prosecutors' offices;

The disclosure of data by RFTA to third parties is made in accordance with the legal provisions for the categories of recipients specified above.

## **10. Legal basis of data processing by RFTA**

The lawfulness of the processing of your personal data is:

- 1) Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation);
- 2) Regulation (EU) 2015/759 of the European Parliament and of the Council of 29 April 2015 amending Regulation (EC) No 223/2009 and the MEN - National Statistical Institute (NSI) Convention on data processing for the production of official education and training statistics;
- 3) Law No 190 of 18 July 2018 on measures implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation);
- 4) Law No 544/2001 on free access to information of public interest;
- 5) Law 333/2003 on the protection of objectives, goods, values and persons and its implementing rules;
- 6) GD 301/2012 Methodological rules for the application of Law 333/2003;
- 7) Accounting Law No 82/1991 republished and updated.

## **11. Rights of the data subject**

According to EU Regulation 679/2016, the data subject benefits from:

- 1) Transparency of information, communications and ways of exercising the data subject's rights - RFTA provides and communicates any information relating to the processing of personal data in a concise, transparent, intelligible and easily accessible form (as per Art. 15 GDPR);
- 2) the right to rectification - without undue delay, of inaccurate personal data (as per Article 16 GDPR);
- 3) the right to erasure of data ("right to be forgotten") - the data subject has the right to obtain from UPB the erasure of personal data concerning him or her (as per Art. 17 GDPR);
- 4) the right to restriction of processing - the data subject may obtain restriction of processing if one of the cases referred to in Article 18 GDPR applies;
- 5) The RFTA has an obligation to notify rectification or erasure of personal data or restriction of processing (as per Art. 19 GDPR);

6) the right to data portability - RFTA may on request transfer the data of the data subject originally provided to another controller (as per Art. 20 GDPR);

7) the right to object - the data subject has the right to object within the limits of the law in force (as per Art. 21 GDPR);

8) the right not to be subject to an individual decision and the right to have recourse to the courts (as per Art. 22 GDPR).

You also have the right to lodge a complaint with the National Supervisory Authority ([www.dataprotection.ro](http://www.dataprotection.ro)) and to apply to the courts.

To exercise these rights, you can address a written, dated and signed request to the RFTA Data Protection Officer. The letter can be sent electronically to the e-mail address [office@foundry-attr.ro](mailto:office@foundry-attr.ro).

In these requests, please do not disclose sensitive personal data (information on religious beliefs, ethnic or racial origin or any other information related to health or trade union membership).

In the case of specific requests relating to how we handle your data, we will try to resolve these issues, but please note that there may be circumstances where we cannot comply with certain requests. In this case RFTA has an obligation to demonstrate that the request is manifestly unfounded or excessive

## **12. RFTA commitment and policy on data protection and security**

RFTA takes data protection and security very seriously.

All documents containing personal data are recorded and follow the rules for storage, processing, duplication, transport, transmission and archiving laid down by training legislation, archiving law, accounting legislation, labour law and internal procedures.

Only persons with specific duties within the RFTA may have access to the personal data of beneficiaries of educational services. They are trained and obliged under penalty of the Penal Code to keep your personal data confidential.