

PRIVACY POLICY

CABLETEAM S.R.L. is committed to ensuring the full security of your personal data.

Protecting your personal data is important to us, and we want you to feel safe while browsing our website.

This document outlines our organizational practices regarding the processing of personal data and provides important information about your data privacy rights. Please read it carefully to understand how we use your personal data. By accessing our website, you agree to this Privacy Policy. If you do not agree, please discontinue use of our website.

CABLETEAM S.R.L. reserves the right to amend or update this Privacy Policy at any time, so we encourage you to review it periodically.

Definitions:

- **"Personal data"**: 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..
- **"Processing"**: 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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **"Controller"**: the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its designation may be provided for by Union or Member State law.
- **"Processor"**: A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.
- **"Recipient"**: A natural or legal person, public authority, agency, or another body to which the personal data are disclosed, whether a third party or not. However, public authorities that may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of such data by those public authorities shall comply with the applicable data protection rules according to the purposes of the processing.

- **"Consent" of the data subject:** Any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
 - **"Personal data breach":** A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.
 - **"GDPR":** 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.
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Data Controller Information

CABLETEAM S.R.L.

Address: Albești, Str. Braților, Nr. 14, Mureș County, Romania

Registered with the Mureș Trade Registry under no. J26/144/2003

VAT Code: RO15193724

I. DATA CATEGORIES. PURPOSES. LEGAL BASIS

Website Visitors

We may process your personal data for the following purposes:

- **To improve your experience on the site** – as you browse the website, our servers automatically collect information sent by your browser, which is stored in system logs. This information may include data such as: email addresses, IP addresses, browser type, domain, the website visited just before accessing our website or platform, and other related data. The information collected about site users does not allow for direct or indirect identification.

CABLETEAM uses this data exclusively to improve the way content is displayed, in order to ensure the highest quality of service, as well as for statistical, technical, advertising, and functional purposes. This enables us to customize the website to meet your individual needs. We respect your choice; therefore, providing personal data is always voluntary. However, please note that if you do not provide the requested personal data, we may be unable to personalize the content for you, send you the requested information, or enter into contracts with you.

We may also use cookies for this purpose. For more information, please refer to our [Cookie Policy](#).

Legal basis: The processing of your data for this purpose is based on the Controller's legitimate interest in continuously improving the customer experience on the website.

Data source: Typically, all data is voluntarily provided by you. However, there may be cases in which data is obtained indirectly, as outlined below.

Indirectly Collected Data

- **Location Information:** Depending on the permissions granted through your device settings, we may automatically collect and process information about your real-time location using various technologies, such as GPS, IP address, Wi-Fi access points, and mobile cell towers. This allows us to better understand where our users are accessing the website from and to enhance the relevance and functionality of our services accordingly.

Legal basis: The processing of this data is based on your consent, should you choose to provide it. Supplying this information is entirely voluntary, and refusal to consent will not negatively affect your ability to use our services.

- **Handling complaints or inquiries:** In case you submit a complaint or request, we may process certain personal data such as your name, surname, address, phone number, and the information included in your message, for the purpose of managing and responding to your inquiry.

Legal basis: This processing may be based on your explicit consent, the legitimate interest of the Controller in responding to user requests, or the need to comply with applicable legal obligations.

Data source: If you are a visitor to the website, we may process the personal data you provide directly through your interactions with the site – for example, by submitting a contact form, question, or complaint.

Do We Process Sensitive Personal Data?

Under applicable law, certain categories of personal data are recognized as sensitive and are therefore subject to enhanced protection. These may include, for example, data relating to health, sexual orientation, ethnicity, or political opinions.

We do not process sensitive personal data, except for the **Personal Numeric Code (CNP)**, and only where there is a legal basis for such processing.

Additionally, **we do not process data belonging to individuals under the age of 16**. If we identify that data has been submitted by or about a minor, CABLETEAM will proceed to automatically delete that data.

We assure you that the processing of your personal data will be limited to the minimum necessary, in accordance with the principles of **proportionality and necessity**.

If you provide personal data relating to other individuals, **you are responsible for informing them and obtaining their consent**. It is your duty to ensure that the data subjects have been properly notified and that their consent for processing has been duly obtained.

Consequences of Withdrawing Consent

Where the processing of your personal data is based solely on your consent, you have the right to withdraw that consent at any time by submitting a written request either by email to office@cableteam.ro or by post to our registered office at **Str. Calea Barăților No. 14, Albești, Mureș County**. Withdrawal of consent does **not affect the lawfulness of any processing carried out prior to the withdrawal**. Please note, however, that in certain situations, **failure to provide your personal data may prevent us from delivering the services you have requested**—such as responding to inquiries, sending requested offers, or providing updates regarding our services, products, or promotional campaigns.

II. DATA RETENTION PERIOD

We will retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, as outlined in this Privacy Policy.

If you are a user of our services, we will process your data throughout the duration of our contractual relationship and, thereafter, in accordance with the legal obligations applicable to us.

If you choose to delete your user account by selecting the **“Delete Account”** option in the **“My Account Information”** section, we will consider this action as your decision to unsubscribe from receiving commercial communications about our products and services. As a result, you will no longer receive marketing emails or SMS messages from us.

Please note, however, that deleting your account does **not automatically result in the deletion of your personal data**. If you wish to stop the processing of your data or request its deletion, you may exercise your rights as detailed in **Section V** of this Policy. Your account-related data will remain available for a period of **365 days**, after which it will be permanently deleted.

If you withdraw your consent for marketing purposes, **CABLETEAM will cease processing your personal data for that purpose**, without affecting any processing carried out before the withdrawal of consent.

After the retention period has expired, or following a valid deletion request, CABLETEAM will either:

- (i) **delete the data**, provided that there are no overriding legal obligations requiring further retention, or
- (ii) **anonymize the data**, rendering it non-identifiable, and continue processing it for statistical analysis or service quality improvement.

III. DISCLOSURE OF PERSONAL DATA

Your personal data may be disclosed to third parties—both private and public entities—strictly for the purposes for which the data was initially collected. Examples include, but are not limited to: **IT service providers, accounting firms, or relevant public authorities** (local or central).

Such disclosures may occur in the following contexts:

- For the **administration, maintenance, customization, and improvement** of the website and the services provided through it;
- For **data analysis, testing, research, monitoring usage trends**, enhancing security features, and verifying user authentication;
- Where the **disclosure of personal data is required by law**.

Please be assured that no personal data will be disclosed to unauthorized parties. Access to your personal data is limited strictly to individuals who are directly involved in the data processing activities.

CABLETEAM takes appropriate measures to ensure that all third-party recipients of personal data provide **adequate safeguards for data security and confidentiality**, in full compliance with the purpose for which the data was shared and with respect for your rights.

IV. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

As a rule, your personal data will not be transferred to countries outside the European Economic Area (EEA).

CABLETEAM may process personal data of Users only in jurisdictions that ensure an adequate level of personal data protection, in accordance with Regulation (EU) 2016/679 (GDPR), and only if such processing is necessary for the provision of services.

Should CABLETEAM engage a third-party sub-processor located outside the EEA to process Users' personal data, such processing will only take place under one of the following conditions: the European Commission has issued an adequacy decision for the respective country, or CABLETEAM enters into the applicable Standard Contractual Clauses (SCCs) adopted by the European Commission with the sub-processor.

In all cases, CABLETEAM will ensure that appropriate safeguards are in place to maintain the security and confidentiality of your data in accordance with applicable EU data protection laws.

V. DATA SUBJECT RIGHTS

CABLETEAM is responsible for ensuring that you are able to exercise any of the rights set out below.

You may exercise these rights by sending an email to office@cableteam.ro, or by submitting a written request to our registered office located at **Str. Calea Barăților No. 14, Albești, Mureș County.**

To protect your data and prevent misuse by unauthorized individuals attempting to gain access to your personal information, we may require you to undergo prior identification steps to confirm that the request is genuinely made by you. If we receive a request to exercise any of your rights, we may ask for additional information to verify your identity before we take further action.

If the data subject submits a request **electronically**, CABLETEAM will respond in **electronic format** as well, whenever possible—unless a different format is specifically requested by the data subject.

We will aim to respond to your request **promptly**, and in any case **within the timeframes provided by applicable law**—typically within **30 days from the date the request is received**. In specific cases expressly provided for by applicable legislation, we may charge a fee for access requests, based on the administrative costs involved in fulfilling the request.

In the event that, due to legal constraints, **CABLETEAM is unable to fully or partially comply** with a data subject's request, the applicable **exceptions will be communicated** to the requester as part of our formal response to the request.

Right of Access

Under Article 15 of the Regulation, you have the right to obtain confirmation from CABLETEAM as to whether or not your personal data is being processed, and, where applicable, access to the following information: (a) the purposes of processing; (b) the categories of personal data concerned; (c) the recipients or categories of recipients, in particular

those in third countries or international organizations; (d) the expected storage period or, where this is not possible, the criteria used to determine that period; (e) the existence of the right to request rectification, erasure, restriction of processing, or to object to processing; (f) the right to lodge a complaint with a supervisory authority; (g) the source of the data, if not collected directly from you; (h) the existence of automated decision-making, including profiling, and relevant information about the logic involved and the envisaged consequences, mentioned in article 22 (1) and (4) of the Regulation.

If your data is transferred to a third country or international organization, you have the right to be informed of the appropriate safeguards under Article 46 of the Regulation.

Upon request, CABLETEAM will provide a copy of the personal data undergoing processing.

Right to Rectification In accordance with Article 16 of the Regulation, you have the right to obtain from CABLETEAM, without undue delay, the rectification of inaccurate personal data concerning you. Considering the purposes of processing, you also have the right to have incomplete data completed, including by providing a supplementary statement.

Corrections will be made where necessary based on updated information, and you will be informed accordingly.

Under Article 17 of the Regulation, you have the right to request the erasure of your personal data by CABLETEAM without undue delay, where one of the following grounds applies:

Right to Erasure ("Right to be Forgotten")

- (a) the data is no longer necessary for the purposes for which it was collected or processed;
- (b) you withdraw your consent, where processing was based solely on consent and no other legal ground exists;
- (c) you object to the processing on public interest or legitimate interest grounds and there are no overriding legitimate reasons; or you object to processing for direct marketing purposes;
- (d) the data was unlawfully processed;
- (e) the data must be erased to comply with a legal obligation under EU or national law;
- (f) any other cases provided by the Regulation where applicable.

Right to Restriction of Processing According to Article 18 of the Regulation, you have the right to request restriction of processing in the following cases:

- (a) you contest the accuracy of the data, for a period enabling CABLETEAM to verify it;

	<p>(b) processing is unlawful, and you oppose erasure but request restriction instead;</p> <p>(c) CABLETEAM no longer needs the data for processing purposes, but you require it for legal claims;</p> <p>(d) you objected to processing under Article 21(1), pending verification of whether our legitimate grounds override yours.</p> <p>Under Article 20 of the Regulation, you have the right to receive the personal data you have provided to CABLETEAM in a structured, commonly used, and machine-readable format, and to transmit those data to another controller, without hindrance from us, where: (i) the processing is based on your consent under Article 6(1)(a) or Article 9(2)(a), or on a contract under Article 6(1)(b);</p> <p>(ii) the processing is carried out by automated means.</p> <p>Where technically feasible, personal data may be transmitted directly from CABLETEAM to the new controller designated by you.</p> <p>You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data carried out for</p>
Right to Data Portability	
Right to Object (Legitimate Interest/Public Interest)	<p>public interest or based on the legitimate interests pursued by CABLETEAM or a third party, including profiling. In such cases, CABLETEAM will no longer process your data unless it can demonstrate compelling legitimate grounds that override your interests, rights, and freedoms, or the processing is necessary for the establishment, exercise, or defense of legal claims.</p>
Right to Object to Direct Marketing	<p>Where personal data is processed for direct marketing purposes, you have the right to object at any time to such processing, including profiling related to direct marketing.</p>
Right to Withdraw Consent	<p>Where the processing is based on your consent, you have the right to withdraw it at any time. Withdrawal does not affect the lawfulness of processing carried out before consent was withdrawn. This right does not apply where the legal basis for processing is other than consent.</p>

VI. AUTOMATED DECISION-MAKING

We do **not** engage in any decision-making processes based solely on automated processing of your personal data that would produce legal effects concerning you or significantly affect you in a similar manner.

VII. SECURITY MEASURES

The security of your personal data is a top priority for us. Accordingly, we implement **high-level security systems** and maintain strict confidentiality for all information provided. We fulfill all obligations incumbent upon us as a data controller under applicable law and in line with our professional experience.

To ensure the security of your data, **CABLETEAM** applies, among others, the following measures:

1. **Control over the collection, storage, and processing methods**, including physical security measures, to protect against unauthorized access to systems;
2. **Access to personal data is granted only to employees, contractors, or representatives** who need it for processing on behalf of the controller. These individuals are bound by strict confidentiality agreements and may face consequences, including termination of collaboration, for any breach;
3. **We do not share collected personal data with third parties**, except where disclosure is required under applicable law—for instance, upon request from an authorized public authority or court;
4. Your personal data is primarily processed **for the purpose of fulfilling contractual obligations**, and only for the duration necessary to deliver the agreed services. Where processing is based on consent, data will be used until the consent is withdrawn.

Additionally, where legal obligations apply, we will retain personal data for as long as required to meet legal retention periods.

VIII. SUPERVISORY AUTHORITY

You have the right to file a complaint with the **National Supervisory Authority for Personal Data Processing (ANSPDCP)** in Romania. The authority can be contacted at the following address:

B-dul General Gheorghe Magheru 28-30, Sector 1, Postal Code 010336, Bucharest, Romania

You may also submit a complaint using the online form available on the authority's official website: www.dataprotection.ro