

PRIVACY POLICY

1. Overview

The protection of your personal data is of the utmost importance to **mateco SRL**, with registered office at 3 Nerva Traian, City Business Center, 3rd floor, 3rd District, Bucharest, 031041, Romania, ROONRC.J40/4133/2005, VAT RO 17310790. In this privacy statement we describe the measures taken to ensure the protection of your personal data in accordance with the objectives and obligations arising from the General Data Protection Regulation (Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons about the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC) (hereinafter the 'GDPR') and other relevant laws and regulations. With this explanation we would like to inform you clearly how we take care of your personal data within **mateco**.

mateco acts not only as a controller of personal data in the various processes and systems that are applicable or in use within **mateco**, but also as a processor where we may come into contact with personal data of our customers that we process at their request. As a processor, a data processing agreement is provided for in accordance with the legislation that must be read and signed by both parties.

mateco, as controller and/or processor, will take the necessary technical and organizational measures to protect the personal data. As processor, we will always provide assistance to the data controller in accordance with our data processing agreement.

This privacy policy was last updated on 11th September 2021.

Activities of **mateco**

mateco rents or sells new or second-hand machinery and other types of equipment, including ancillary services, as requested by our customers, and offers VCA / IPAF/ OTHERS approved training courses.

2. What personal data do we collect?

"Personal data" means all information relating to an identified or identifiable individual.

We receive and process data from customers/suppliers/partners/on-line or on-site visitors, etc. (i.e. data subjects) as part of a cooperation or future cooperation (prospecting).

These "Personal Contact and Identification Data" are:

- Company name
- Address details (Street, number, postal code, town/city)
- Name
- First name
- E-mail address
- Phone number, mobile number, fax number
- VAT number
- Other unique details such as your job title
- Financial data
- IP address
- Copy of identity card / driver's license (in specific cases)
- Copy of vehicle registration used to pick up the rented goods
- Image of the individuals entering our premises recorded by the video surveillance systems
- Geo-location (see point 12)
- Statistical information about the use of the rented goods, the websites and the apps
- Interest of person to buy or rent a certain machine type
- Actions performed by user within the website and/or the app

The personal information we collect is adequate and relevant to our purposes. We limit our collection of your personal data to a minimum amount required for the purposes for which we process the personal data.

3. Why do we collect personal data?

We collect your personal data to the extent that this is required for the performance of an agreement you have entered into with us or, at your request, to take the necessary steps to reach an agreement with us.

We need this information for our standard business operations and the performance of our services. In accordance with GDPR, this corresponds to the data controller's "legitimate interest" and "contractual obligation".

All personal data (general identification data) will only be used for the following purposes:

- Professional contacts by telephone, mobile phone, email, etc.
- Service to your company and employees
 - Orders
 - Deliveries
 - Repairs and maintenance
 - Fleet management
- Financial data
 - Price requests
 - Invoicing (both digital and by mail)
 - Geo-location (see point 12)
 - Check credit worthiness
- Newsletters, product catalogue and information about our services, current topics and corporate communications. For this communication there is an opt-in/opt-out possibility.
- Sending **mateco** marketing material.
- Offering certified training courses.
- Customer satisfaction surveys and market research studies, including questionnaires and/or interviews.
- Collecting late due amounts.
- Enforcing our legal rights to repossess the machinery when the rental is terminated, or the sale is rescinded due to defaults in the payment of the sale price.

4. How do we collect your data?

Data collection can be done in various ways, including:

- Personal/telephone/mail contact
- Contact form on our website
- Contacts at network events/fairs
- Website using cookies to collect a number of personal data
- The **mateco** apps
- Track & trace devices

5. How long do we store your data?

As long as the cooperation is in place and has not been terminated by either party, the personal identification data will be kept. As a data subject, you can explicitly request that these be deleted earlier, but without violating the legal retention periods (e.g. 5 to 10 years for personal data necessary to be stored pursuant the tax laws, 3 to 10 years for personal data necessary to any party to defend their legal rights in the courts of justice, etc.).

6. Recruitment & Selection

In order to provide the best possible employment opportunities, we need to process certain information about you. We only ask for details that we think will genuinely enable us to help you, such as your name, age, contact details, education details, employment history, emergency contacts, immigration status, psychological profile, intellectual abilities and social security number (and of course you may choose to share other relevant information with us). Where appropriate and in accordance with local laws and requirements, we may also collect information related to your health, diversity information or details of any criminal convictions.

We collect your personal data from third parties (for example via professional networking, job aggregators and job site providers).

To the extent that you access our website or read or click on an email from us, we will also collect certain data automatically or through you providing it to us.

If you are a temporary worker, we collect your personal data either:

- From you; or
- From third parties (e.g. interim offices).

If we employ or engage you directly as a temporary worker, the main reason for using your personal details is to ensure the smooth running of our temporary relationship and to comply with our contractual and other duties to each other as well as to our clients, and to comply with our duties to third parties such as tax authorities and government agencies.

7. Who do we share your data with?

7.1. We do not sell or rent your data to persons or companies that are not part of the **mateco** group.

We do not share your personal data with third parties, unless at least one of the following conditions is met:

- we have received your prior consent for this
- the recipient is our subcontractor/supplier/affiliate and it is necessary to share your personal data with it for the purposes detailed in the section 3 hereinabove.
- we are performing pre-contractual activities for offering you our products and services
- we are performing the services you acquired from us
- we are obliged to do so within the context of a regulation or legal procedure (see 7.2)
- we are requested to do so by legislative or judicial authorities (see 7.)

For the processing of your personal data, we may use third parties who receive your data. We require these third parties, as processors, to handle your data in accordance with our instructions and (security) standards. We register these agreements with each processor in a so-called Data Processing Agreement.

Some of these processors may be located outside the EU. If this is the case, we will ensure that we have made additional agreements with these parties, so that an adequate level of protection is guaranteed.

7.2. In the event of a complete or partial reorganization or transfer of activities of **mateco**, whereby it reorganizes, transfers, ceases its business activities or if **mateco** goes bankrupt, this may mean that your data are transferred to new entities or third parties through which the business activities of **mateco** are carried out in full or in part.

mateco will make reasonable efforts to inform you in advance of the fact that **mateco** discloses your data to the said third party, but you also acknowledge that this may not be technically or commercially feasible under all circumstances.

7.3. In rare cases, **mateco** may be required to disclose your personal information pursuant to a court order or to comply with other mandatory laws or regulations.

7.4. When we have identified you as a Prospective Candidate for a vacancy, we may share your information with any of our group companies and associated third parties (such as our service providers) in order to get in touch with you about our services.

7.5. If we employ or engage you directly as a temporary worker, we may share your personal data with appropriate colleagues within the **mateco** group (this may include colleagues in other offices/countries).

8. Access by third party

8.1. In order to process your personal data, we may allow third parties to access your personal data.

8.2. In that case, we guarantee the same level of protection that is in line with this Privacy Policy by making contractual obligations enforceable against these employees and co-workers.

9. Social media

Via the web and (our own) social media channels, we like to engage in a dialogue with customers, users of our services / apps and visitors to the website about our organization, products and/or services. The purpose is to provide useful and relevant information and/or to answer questions asked via social media. We actively follow the internet and social media channels, such as Facebook, Instagram, YouTube, LinkedIn and blogs. We explicitly

reserve the right not to respond to each question or comment. No rights whatsoever can be derived from whether or not we respond to the content.

When participating in feeds and answering questions or responding to comments, we may collect (personal) data. We will of course process this data in accordance with this privacy statement. We are not responsible for the content that other users of social media channels post or how they handle personal data.

You are free whether or not to follow **mateco** through these social media.

10. Automatic decision-making & profiling

We may use profiling. Profiling means the collection, analysis and combination of (personal) data for the purpose of classifying you into certain categories. For the build-up of your profile, the profiling algorithm can, in theory, include all relevant data types mentioned under point 2. For more information on how we obtain the data, please check our cookie policy at <https://www.mateco.ro/en/cookie-policy>.

After the data has been obtained, analyses are carried out to ensure that we automatically add certain categories to your profile. In this way, profiling ensures that both the content of our websites, apps, e-mails, offers and advertisements better match your interests.

Profiling can have an impact on your privacy (e.g. if we have linked wrong (interest) categories to you based on incorrect or outdated information). In that case, you can contact us on our privacy mail address privacy@mateco.ro to have your data corrected.

11. How do we secure your personal data?

Your personal data will be considered strictly confidential. Therefore, we provide the necessary technical and organizational measures to guarantee the security of your personal data.

We make every effort to thoroughly protect our network against unauthorized access and to safeguard the confidentiality of the personal and business data of our customers, suppliers and prospects.

In terms of organization, we have a privacy statement and clear responsibilities and authorities. We also have the necessary processes and procedures in place to optimally implement and follow this policy.

When engaging with processors, the security of your personal data has been enforced by a contractual agreement.

12. Use of tracking devices and telematics services

Our devices may be equipped with tracking devices that send real-time GPS and telematics data to **mateco**.

We collect following technical data (related to the connected machine only) via the GPS tracking devices:

- Geolocation data: especially the last known location, latitude and longitude of the location (e.g. in case of theft);
- Usage data: in particular the number of hours the machine was used (for invoicing purposes), the speed, the distance, ...;
- Component data: in particular engine coolant temperature, engine oil temperature, engine oil pressure, ambient temperature, engine fault codes, transmission fault codes, fuel level, ...

These data are collected through devices and services made available to us, managed and serviced by the manufacturers of the machines or by third-party specialized providers who are located in the EU and the US. Therefore, their access to your personal data is inherent and the security of your personal data has been enforced by contractual agreements between us and them.

13. What are your rights and how can you execute them?

You have the right to ask us to view, correct or delete your personal data.

You can also notify us of your wish to exercise your right to limit the processing and transferability of your data or to object to the processing of it.

These rights can be exercised free of charge by submitting a clear request to our privacy mail address privacy@mateco.ro, where you clearly state which right you wish to invoke, together with an explanation, a copy of your identity card and how we can contact you.

If you disagree with the response we provided, you have the right to file a complaint to the Supervisory Data Protection Authority:

National Supervisory Authority for Personal Data Processing

B-dul G-ral Gheorghe Magheru nr.28-30, sector 1, 010336, București, România,

Phone: +40.318.059.211, +40318.059.212

E-mail: anspdcp@dataprotection.ro

www.dataprotection.ro

14. Updates to this Privacy Policy

We may update or complete this statement on our own discretion. Although we may send e-mail notices to all our customers informing them on changes to this Privacy Policy, there is no guarantee that all the recipients will receive our message in due time. That's why, before using our websites, apps and/or services, we encourage you to periodically review this statement to learn how we process and protect your personal data.

Notice to Data Subjects

on processing of personal and special data (article 13 and 14 of the EU Regulation no. 679/2016)

We, the company **mateco SRL**, with registered office in Str. Nerva Traian nr. 3, City Business Center, Bl. M101, Et. 3, sector 3, București, Romania, 031041, ROONRC.J40/4133/2005, VAT RO 17310790 (hereinafter called "**mateco**" or „**Processor**"), hereby inform you that we will collect and process *your personal data, consisting in the name, surname, ID card or a photocopy thereof, bank account, phone number, e-mail address, title, vehicle's registration plate and image, video image, signature of the visitors, the prospects, the clients, the suppliers and their representatives or delegates.*

With respect to the clients and suppliers, as well as their representatives or delegates, who receive assets from **mateco**, we will collect and process personal data as the geolocation and the usage behaviour of that assets and of the individuals who use them, according to the data transmitted by the geolocation and alarm systems pre-installed on these assets.

mateco will process your personal data for the following purposes: (i) in the case of *visitors*, to ensure the proper guard of the assets and protecting people, to prevent and deter unlawful deeds, (ii) in the case of *prospects*, for marketing, to offer products and services and to conclude the agreements related to these products and services, (iii) in the case of *clients or suppliers*, including their *representatives and delegates*, for carrying out the contractual relationships, for offering products and services, as well as for keeping the internal reports on business activities and for financial bookkeeping or for compliance with any other legal obligations related to reporting to the competent institutions and authorities, and (iv) in the case of all categories of data subjects above mentioned, for exercise or defense of legal claims of **mateco** by any legal way.

The legal grounds of data processing by **mateco** are, as the case may be: (i) the consent of the *prospects* for marketing purposes, for offering of products and services and for entering into agreements concerning these products and services; (ii) the performance of the agreement entered into with the *clients or suppliers* or for dealing with the request of the *prospects* to undertake the necessary measures to enter into an agreement with **mateco**; (iii) the compliance with the legal obligations incurring to **mateco** concerning the *clients, suppliers, prospects and visitors*, arising from the legislation regarding the financial reporting, statistical reporting, guarding and protection of assets and individuals, as well as from any other applicable legal provisions; (iv) the necessity to exercise and defend the legitimate interests of **mateco**, as well as for exercising and defending its legal claims in court or before any other competent authority.

The personal data processes by **mateco** shall be transmitted, as the case may be, depending on the category of data subject (visitors, prospects, suppliers and/or clients), to persons employed or contracted by **mateco** for carrying out its business (employees, collaborators, companies providing services of transport, technical assistance, geo-tracking and telematics, security and protection, IT, telecommunications, marketing, consultancy, legal assistance, etc.), to affiliated entities with **mateco**, as well as to competent institutions and authorities, according to applicable legal provisions.

The personal data received from you may be subject to an automated customized decision process or profiling, and may be transferred to cross-border processors or suppliers of **mateco**, within or outside the E.U.

The personal data received will be retained for a definite period, in compliance with the minimum and maximum limits under the applicable law (maximum 30 days video surveillance, at least 10 years for the financial books and the related justifying documents, and for other types of data, 3 years or until the final resolve of an eventual dispute between parties or until the claims are becoming statute barred).

To the extent permitted by the applicable law, you have the right to have your personal access, rectify, erase, and portability, as well as the right to request the restriction of their processing. In the event of processing of your personal data based on your consent, you are entitled to withdraw it at any time. You may exercise these rights by filling in and sending written request via e-mail to privacy@mateco.ro or by postal services to Jilava, Șos. Giurgiului nr. 48U, jud. Ilfov, 077120, România.

As data subject, you are entitled, according to fill in a complaint with the A.N.S.P.D.C.P on how your personal data are processed or your rights are respected in connection with this processing. The contact address of this authority is: B-dul G-ral Gheorghe Magheru nr.28-30, sector 1, 010336, București, România, e-mail: anspdcp@dataprotection.ro.

In some cases, it might be possible that part of your personal data to have been received before directly from you or from specialized and authorized entities in collecting, processing and transferring of these data, who has received them either from public sources (O.N.R.C., M.F.P., AEGRM, Portal of the Courts of Justice, C.I.P., press releases, social networks, etc.), either directly from you, based on your consent.

The contact data of the Data Protection Officer: Jilava, Șos. Giurgiului nr. 48U, Ilfov county, 077120, Romania, e-mail: privacy@mateco.ro.

Subject Data Request
(for exercising the rights under article 7, 12-22 of the EU Regulation no. 679/2016)

Details concerning the subject data (claimant):

Name, Surname:	
Contact details (e-mail address or postal address):	
Client ID (if the case may be):	

Subject matter of the request:

Please select the subject matter of your request:

- Withdrawal of the consent for personal data processing*
- Request to access the processed personal data*
- Request to update/rectify the processed personal data*
- Request to erase the processed personal data*
- Request to restrict the processing of personal data*
- Request to port the processed personal data*
- Request to oppose to the processing of personal data*
- Request regarding the automated processing and profiling*

The types of personal data subject of the request:

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Details of your request:

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Signature (for requests sent via postal service):	
Date:	

After filling in, please send this form either by e-mail, at privacy@mateco.ro, either by post, at: Jilava, Șoseaua Giurgiului nr.48U, județ Ilfov, 077120, România.

Thank you!

mateco team