



<http://www.geticfierycrystalx-onlineenglishtutoring.com>

# Privacy Statement

## Policy regarding the processing of personal data

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### Art. 1. General Information

In the course of its activity, FIERY CRYSTAL X S.R.L., based in Str. Nicolae Ciucurette-Rusu No.2, Bl. 18A, Et. 1, Ap.5, Buzău municipality, Buzău county, Romania registered at the Trade Register Office of the Buzău Courthouse under no. J10 /1455/2019, unique registration code 42044789 (the "Company"), processes your personal data when you access the website [www.geticfierycrystalx-onlineenglishtutoring.com](http://www.geticfierycrystalx-onlineenglishtutoring.com) (the "Website").

The Company ensures, at all times, compliance with all the principles and legislation regarding the protection of personal data, regarding the processing, collection, processing, storage and transfer of personal data, as they are regulated by the law in force, as well as by the law. the provisions of **European Union Regulation 2016/679** on the protection of individuals with regard to the processing of personal data and on the free movement of such data ("**GDPR**").

This policy sets out the key principles regarding data protection and how The Company manages the personal data you transmit to us by accessing the Website. The company assures you the update of this policy and publishes on its website the latest version of it.

### DEFINITIONS

The following definitions of terms used in this document are extracted from Article 4 of the **GDPR**:

**Personal Data:** It means any information about an identified or identifiable natural person ("Target Person") that can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, identification number, data location, an online identifier, or to one or more elements specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.

**Processing:** It means any operation or set of operations performed on personal data or on personal data sets, with or without the use of automated means, such as collecting, recording, organizing, structuring, storing, adapting or modifying, extracting, consulting , use, disclosure by transmission, dissemination or making available in any other way, alignment or combination, restriction, deletion or destruction of data.

**PDO:** It means the person in charge of data protection, more precisely the person in charge of data protection.

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## **Art. 2. Categories of personal data**

We know the importance of your personal data and we are committed to protecting their privacy and security. Therefore, it is important for us to inform you about the processing of your personal data as a user of our Website, through this policy.

The categories of personal data processed by the Company vary depending on the interaction and the reports you record on our Website. Thus, your personal data may be provided by you within the various sections of the Website, in particular in the following situations: when you become a member of the Website, and when you complete the contact form of our Website.

### **Article 2.1. Categories of data that can be processed:**

- a) When completing the contact form available on the Website: first name, e-mail address, telephone number, Skype ID name;
- b) When subscribing to the Website: e-mail, first name, last name, telephone number.

The data you provide must be real, accurate and up-to-date, and you have the right to provide it. The data mentioned in points a) - b) above, are provided by you on a voluntary basis when interacting with the Company according to the purpose transmitted by you. You are, therefore, responsible for the data you provide within the Website, both to us and to any third party who may be harmed by providing the data.

The Website may also collect certain information about your browsing and interactions with its various sections. We will store or access information and cookies files in your terminal equipment (computer, phone, tablet, etc.) only under the conditions described in the corresponding Cookies section. The categories of personal data that are processed concern: the time and date of accessing the site, as well as the IP address of the terminal from which the Website was accessed.

### **Article 2.2. The company can process the data mentioned in art. 2.1, above, for the following purposes:**

- a) Marketing: transmission of newsletters to subscribers by means of communication such as e-mail, telephone; processing of this personal data is done based on your consent;
- b) For the purpose of managing requests, complaints, suggestions: data processing for completing the contact form; processing of this personal data is performed based on your consent, as well as in the legitimate interest of the Company in order to resolve complaints, improve services, manage suggestions and requests sent to the Company;

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c) In the context of the processing of the data of the visitors of the Website, in order to ensure a good functioning of the Company's Website; the legal basis of the takeover is the legitimate interest of the Company to improve its services.

### **Art. 3. The basic principles regarding the processing of personal data**

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The processing and management of your personal data is carried out in compliance with the following principles:

- It is open and transparent about what it does with the data and why it uses it;
- Keep data safe;
- Ensures that it always has a legal basis to manage the data;
- Collects and uses the minimum necessary data, thus respecting the principle of minimization;
- Keeps the data updated, correct and complete;
- Do not keep the data longer than necessary, ensuring the implementation of data retention periods, where there is no mandatory period provided by law;
- Respects the legal rights of the data subjects, regarding their personal data;
- Do not transfer the data abroad without taking the measures provided for the data transfer, and not before informing the data subjects in this regard.

#### **Art. 3.1. Fairness and transparency**

Personal data are processed legally, fairly and transparently in relation to the data subject. This is the basic principle and means that we use personal data only insofar as the persons entrusting them to the Company have been informed in advance about the use.

You may request from the Company, at any time, information on the following main issues:

- What kind of data will be collected;
- For what purpose will they be used;
- With whom they will be shared (if applicable);
- If they will be transferred to other countries;
- How long they will be kept;
- What rights do individuals have regarding their personal data;
- Indication of the contact channels through which the data subjects can exercise these rights.

Personal data will only be processed for the purpose communicated to the data subject. Subsequent modifications of the processing purpose will be communicated to the data subject, prior to the use of his personal data.

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### **Article 3.2. Legality**

The Company understands to carry out all the processing activities both for a purpose well determined and related to its activity, but also confined to an appropriate legal justification, as well as in order to fulfill the legitimate interests of the Company in the context of carrying on its object of activity, as follows:

- subscription to the Company Website through which we will send new services launches, commercial communications regarding the promotions and campaigns carried out by the Company independently or in collaboration with one or more partners (if applicable), useful information about the services offered, etc.;
- offering answers in case of filling in the contact form;

### **Article 3.3. Consent of the data subject**

Obtaining the consent of the person whose data is to be collected and processed, represents another legal basis provided by the GDPR, and the Company will process the personal data, only on the basis of your explicit and unequivocal consent, in all situations in which its necessity is required.

### **Article 3.4. Data minimization**

Personal data will only be used when absolutely necessary and relevant to a particular process or project task.

If the use of personal data cannot be avoided, the Company will use only the minimum data necessary for the fulfillment of that purpose.

### **Article 3.5. Accuracy of data**

Data protection legislation requires that personal data be kept accurate, complete and up to date. The Company will ensure the correction, supplementation, updating or deletion, as the case may be of inaccurate or incomplete data.

### **Article 3.6. Period of data storage and storage**

We will keep your personal data for a period that does not exceed the period necessary to fulfill the purposes for which the data are processed, except where the legal provisions provide or oblige us otherwise.

So:

- regarding the subscription of the Company's Website, we will keep your e-mail address in the Website's database as long as your subscription is active; Once we receive your unsubscribe

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request, we will disable sending newsletters to your email address; at which time, the e-mail address will be deleted from the Website subscribers database;

- regarding the contact form, we will keep your personal data for the period necessary to respond to your messages and requests and to prove the correspondence carried with you, but not more than **1 year** after receiving them;
- regarding the analysis of website navigation and user interactions with the Website, we will keep data on your interactions for up to **3 years**.

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The Company may delete your personal data when it deems it no longer necessary for the purposes for which it was collected.

We do not store information and do not access the information stored in your terminal equipment (computer, telephone, tablet, etc.) except with your prior consent or when these operations are performed solely for the purpose of transmitting a communication through an electronic communications network, or are strictly necessary for the purpose of providing an information society service expressly requested by you (for example, for storing information about your activities on the website or mobile or tablet application, for use with ease the website or mobile or tablet application for later access).

For the use of cookies for which your prior consent is required, the Website will ask for your consent through a banner displayed on the website at the time of accessing them. This banner gives you the option to accept cookies as well as the option to refuse them. If you have given your consent but have subsequently changed your mind, you can use the settings of your web browser (browser) to delete stored information or to refuse cookies. This personal data protection policy is available right above the contact form with us and in the footer of our Website.

### **Article 3.7. Data security**

The Company provides and implements the technical and organizational security measures required by law and industry standards, to protect your personal data against accidental or unlawful destruction, loss, modification, disclosure or unauthorized access, as well as against any other form of illegal processing. We also take steps to ensure that we use your personal data exactly as described in this Policy and to respect your choices regarding the processing of your personal data.

### **Article 3.8. Disclosure to third parties**

Except as set out below, we will not disclose without authorization any information regarding your data. Based on your consent, express and unequivocal, provided in this way and only within the limits of the legislation in force or for the purpose of fulfilling a legal obligation and / or protecting for a legitimate interest, we may transmit your personal data to:

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- Service providers in the following fields: marketing, administrative services and transaction processing;
- Other service providers, all having signed agreements to maintain the confidentiality of information;
- Organizations or companies that coordinate specific studies and which agree to keep the information received confidential;
- State agencies, governmental, if the law stipulates this;
- Other authorities and bodies, in order to fulfill our legislative obligations and / or to protect our legitimate interests;
- Other companies with which we can develop joint programs to offer our services on the market;
- Companies within Wix.com.

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The transmission of your personal data to the aforementioned recipients will be done only on the basis of a commitment of confidentiality and to ensure an adequate level of security on their part, which guarantees that the personal data are kept safe.

#### **Art. 4. The rights of natural persons**

According to the legal provisions in force, the data subjects benefit from the following rights:

- The right to be informed about how and why the use of personal data;
- The right to request copies of personal data held by an entity (including information contained in emails, instant messages, notes, etc.);
- The right to request the correction of any inaccuracies in their personal data;
- The right to order the deletion of personal data (including the definitive deletion of the Company's systems and of any systems of an outsourcing provider to which the Company has allowed access);
- The right to request the Company to cease the processing of personal data;
- The right to oppose the use of their personal data for direct marketing purposes;
- The right to have any personal data that has been provided to the Company transferred to another party (for example, another banking service provider) "in a structured, frequently used and automatically readable format"; and
- The right not to be subjected to a fully automated decision-making process (i.e. a decision generated by the system without a human contribution), if the result has a legal effect or a similar significant effect on the person concerned;
- The right to withdraw one's consent when it has been granted for processing purposes;
- The right to address the National Supervisory Authority for the Collection of Personal Data, if considered necessary.

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If the Company receives a request from you in the exercise of any of the aforementioned rights, we will respond to the request within 30 days, with the possibility of extending this term, only after informing the data subject and provided there is a valid reason that to justify the impossibility of formulating an answer within 30 days.

### **Art. 5. Violation of data security**

In the event that personal data is lost, damaged, stolen, compromised or as a result of a complaint about how the Company handled personal data, the Company will report the breach to the **National Supervisory Authority for Personal Data Processing (https://www.dataprotection.ro/)** within 72 hours of finding the violation and notifying the relevant persons without delay if they are likely to be affected by the incident. In addition, the Company will make reasonable efforts to limit the damage caused by the breach of data security.

### **Art. 6. Organization and responsibilities**

The responsibility for ensuring adequate processing of personal data lies with any person who works for or is found in a form of collaboration with the Company and who has access to the personal data processed.

#### **Article 6.1. DPO contact information**

If you have a question about exercising any of your rights mentioned above or any request for an address, you should contact your local DPO, **Tina Dan**, at the following email address: **geticinfinityfierycrystal10@gmail.com**. You can also send requests, in writing, to the correspondence address of the Company, detailed in the introductory part of this policy.

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