

Your privacy is a fundamental commitment for Tax Point Services SRL (referred as “TPS” or “we”).

Therefore, we take utmost care to process your personal data in accordance with the principles set forth in the data protection legislation applicable in Romania, including (EU) Regulation 2016/679 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 (“GDPR”). Personal data represents any information relating to an identified or identifiable natural person, and an identifiable person is that person that may be identified directly or indirectly, particularly by reference to an identification number or to one or more factors specific to its physical, psychological, mental, economic, cultural or social identity.

This privacy policy regards the personal data of our clients, business partners, other persons contacting and visiting us and of the representatives thereof, potential employees, interns or associates and it applies to data collected through our website, [www.tpssoft.ro](http://www.tpssoft.ro), as well as to all other personal data we collect through e-mail or other off-line contacts. The privacy policy describes:

- the purposes for which we collect and use your personal data;
- the processing grounds for such purposes;
- the categories of personal data we collect from you and process;
- the duration of processing of such data;
- your rights as data subjects and the manner in which you may exercise them;
- to whom we may disclose your personal data

## **PURPOSES, GROUNDS FOR PROCESSING AND CATEGORIES OF PERSONAL DATA**

In the context of your interaction with TPS, you, as a natural person, may be subject to the data processing activities that we perform. Thus, we use your personal data in the following cases:

### **1. If you are a client or potential client of TPS:**

#### 1.1. Providing the tax-related services requested from us

We use your relevant personal data in order to prepare and provide the services requested from us. For instance, in preparing materials required during tax inspection, litigation and arbitration proceedings, we may have to rely on your personal data of relevance for your case. We rely in this case on the performance of our agreement as grounds for processing.

#### 1.2. Communicating with you

We use your contact details in order to communicate with you with respect to your requests and any other relevant business-related matters. We also rely in this case on the performance of our agreement as grounds for processing.

## 1.3 Data processing as obligation imposed by the law and by the statute governing the tax consultancy profession

We may process some of your data in the context of providing the services based on legal obligations or obligations imposed upon TPS by the statute governing the tax consultancy profession (e.g., a know-your-client obligation). In such case, the grounds for processing is the legal obligation.

## 1.4 Sending tax-related newsletters

We may also use your contact details in order to provide to you in electronic form our specialized newsletters on relevant developments in the legislation, case studies, and authorities' practice, but only if you have subscribed and, hence, given your express consent to such processing. You can always withdraw your consent expressing thereby your option of not receiving our newsletters in the future by clicking "Unsubscribe" when you receive the respective e-mail or by writing at [contact@tpsoft.ro](mailto:contact@tpsoft.ro)

The categories of data processed in the context of our relationship with you are your name, e-mail, phone, fax, address, as well as other personal data you may provide directly to us.

## **2. If you are a representative or contact person of a TPS's client or potential client**

### 2.1. Providing the tax-related services requested from us

We use your relevant personal data in order to prepare and provide the services requested from us. For instance, we may use the personal data to manage the relationship with the client you represent or we may have to rely on your personal data in preparing materials required during the course of tax inspection, litigation and arbitration proceedings. We rely in this case on the legitimate interest in providing our services according to our area of activity and managing the relationship with our clients.

### 2.2. Communicating with you

We use your contact details in order to communicate with you with respect to your requests and any other relevant business-related matters. We also rely in this case on the legitimate interest in providing our services according to our area of activity.

### 2.3 Data processing as obligation imposed by the law and by the statute governing the tax consultancy profession

We may process some of your data in the context of providing the services based on legal obligations or the obligations imposed upon TPS by the statute governing the tax consultancy profession (e.g., a know-your-client obligation). In such case, the grounds for processing is the legal obligation.

### 2.4 Sending tax-related newsletters

We may also use your contact details in order to provide to you in electronic form our specialized newsletters on the relevant developments in the legislation, case studies, and authorities' practice, but only if you have subscribed and, hence, given your express consent to such processing. You can always

withdraw your consent expressing thereby your option of not receiving our newsletters in the future by clicking “Unsubscribe” when you receive the respective e-mail or by writing at [contact@tpsoft.ro](mailto:contact@tpsoft.ro).

In all cases, the data is provided either directly by you or by the client. The categories of data processed in this context are generally your name, position, e-mail, phone, fax, address, identification data, as well as other personal data provided to TPS, usually by you, as needed to fulfill the above purposes.

### **3. If you are an employee or other collaborator of a TPS client or potential client**

#### 3.1. Providing the tax-related services requested from us

We use your relevant personal data in order to prepare and provide the services requested from us. For instance, we may use the personal data to manage the relationship with the client you represent or we may have to rely on your personal data in preparing materials required during the course of tax inspection litigation and arbitration proceedings. We rely in this case on the legitimate interest in providing our services according to our area of activity.

#### 3.2. Communicating with you

We use your contact details in order to communicate with you with respect to your requests and any other relevant business-related matters. We also rely in this case on the legitimate interest in providing our services according to our area of activity.

#### 3.3 Data processing as obligation imposed by law and by the statute governing the tax consultancy profession

We may process some of your data in the context of providing the services based on legal obligations or the obligations imposed upon TPS by the statute governing the tax consultancy profession (e.g., a know-your-client obligation). In such case, the grounds for processing is the legal obligation.

#### 3.4 Sending legal, tax and IP-related newsletters

We may also use your contact details in order to provide to you in electronic form our specialized newsletters on relevant developments in the legislation, case studies, and authorities’ practice, but only if you subscribed and, hence, given your express consent to such processing. You can always withdraw your consent expressing thereby your option of not receiving our newsletters in the future by clicking “Unsubscribe” when you receive the respective e-mail or by writing at [contact@tpsoft.ro](mailto:contact@tpsoft.ro).

In all cases, the data is provided either directly by you or by the client. The categories of data processed in this context are generally your name, position, e-mail, phone, fax, address, identification data, as well as other personal data provided to TPS, usually by you, as needed to fulfill the above purposes.

### **4. If you are a business partner of TPS**

#### 4.1. Maintaining our contractual relationship with you

We use your relevant personal data in order to maintain our contractual relationship with you. We rely in this case on the performance of our agreement as grounds for processing.

## 4.2. Communicating with you

We use your contact details in order to communicate with you with respect to any relevant business-related matters. We also rely in this case on the performance of our agreement as grounds for processing.

## 4.3 Data processing as obligation imposed by law and by the statute governing the tax consultancy profession

We may process some of your data in the context of providing the services based on legal obligations or the obligations imposed upon TPS by the statute governing the tax consultancy profession. In such case, the ground of the processing is the legal obligation.

The categories of data processed in the context of our relationship with you are your name, e-mail, phone, fax, address, as well as other personal data you may provide directly to us.

## **5. If you are a representative, contact person, employee or other collaborator of a TPS's business partner**

### 5.1. Maintaining our contractual relationship with our business partner

We use your relevant personal data in order to maintain our contractual relationship with our business partner. We rely in this case on the legitimate interest in ensuring that the contractual relationship is managed properly.

### 5.2. Communicating with you

We use your contact details in order to communicate with you with respect to any relevant business-related matters. We also rely in this case on the legitimate interest of ensuring that the contractual relationship is adequately carried out.

### 5.3 Data processing as obligation imposed by law and by the statute governing the tax consultancy profession

We may process some of your data in the context of providing the services based on legal obligations or the obligations imposed upon TPS by the statute governing the tax consultancy profession. In such case, the grounds for processing is the legal obligation.

In all cases, the data is provided either directly by you or by the business partner. The categories of data processed in this context are generally your name, position, e-mail, phone, fax, address, identification data, as well as other personal data provided to TPS, usually by you, as needed to fulfill the above purposes.

## **6. If you are a job/internship applicant:**

We use the personal data contained in the CVs we receive in order to assess the applicants' qualifications for a position within TPS, including in relation to our internship program. We rely our processing on the grounds of entering into and performing of the agreement.

The categories of data processed in the context of our relationship with you are your name, e-mail, phone, fax, address, personal data included in CVs, education and training details, professional qualifications, as well as other personal data you may provide directly to us.

## **7. If you are a visitor of our premises:**

We use your personal data in order to ensure the security of our premises, assets and personnel. In this case, we base our data processing on the legitimate interest of TPS, namely the protection of such premises, assets and personnel.

The categories of data processed in this context are your name as well as other personal data you may provide directly to us.

## **8. If you are a user of our Internet website:**

We use the personal data we collect from you when you visit our Internet site, [www.tpssoft.ro](http://www.tpssoft.ro), in order to monitor the traffic and improve the content of the website. We base this data processing activity on our legitimate interest in ensuring the proper functioning of our Internet website, as well as its improvement.

The categories of data processed in this context are the hour and date of accessing the Internet website and the IP address from which our Internet website was accessed.

For all above categories of data subjects, we may also process your data in the context of changes in structure or similar transactions involving any TPS entity. In this case, the grounds for processing may be represented by the legal obligation (in case TPS is legally obliged to disclose certain personal data to public authorities), the performance of the agreement concluded by TPS in the context of such transaction (if you are a party to such agreement) or the legitimate interest of TPS to carry out the transaction in the most effective manner (in the rest of the cases).

## **PROVIDING THE PERSONAL DATA**

When the data is required directly from you, TPS kindly asks you to provide all categories of personal data we request in the aforementioned purposes, as otherwise we shall not be able to carry out our activity (including, among others, to provide you with our services).

If you provide to TPS the personal data of other natural persons, we kindly ask you to communicate to them before such disclosure the modality in which TPS intends to process their personal data, as described in this Privacy Policy.

## **DISCLOSURE OF YOUR PERSONAL DATA**

While as a rule we shall not disclose your personal data to any third parties, we may:

disclose your contact details to our affiliates within TPS;

if in your interest and necessary, disclose relevant personal data to courts of law and arbitration panels or relevant authorities, in the context of providing the services you have requested from us

## **DURATION OF PROCESSING**

We intend to keep your personal data for the duration of the assistance agreement, as well as afterwards, according to our internal policies and the legal obligations incumbent upon us.

In case the data is not collected in the context of an assistance agreement, such data will be kept for as long as necessary in order to attain the purpose of the envisaged data collection.

### **YOUR RIGHTS**

In your capacity as data subjects, the GDPR provides you with a series of rights including:

- the right of access – allowing you to obtain confirmation that your personal data is being processed by us and, if affirmative, the relevant details of such processing activities;
- the right to rectification – allowing you to rectify your personal data if inaccurate;
- right to erasure – allowing you to obtain the erasure of your personal data in certain cases (e.g., if the data is no longer necessary in relation to the purposes for which it was collected);
- right to restriction – allowing you to obtain the restriction of processing your personal data in certain cases (e.g., when you contest the accuracy of your personal data, for a period enabling us to verify such accuracy);
- the right to object – allowing you to object to further processing of your personal data within the conditions and limits set forth by law;
- right to data portability – allowing you to receive the personal data concerning you that you have provided to us, in a structured, commonly used and machine-readable format or to transmit this data to another data controller.

We are happy to ensure your exercise of these rights.

You may exercise your aforementioned rights and find out more about such rights by filing with us, as data controller, a written request at Tax Point Services, ½ Traian Avenue, Baia Mare, Maramures, Romania or by e-mailing us at [contact@tpsoft.ro](mailto:contact@tpsoft.ro).

You also have the right to file a complaint with the data protection authority.

We are committed to always treat your requests with the utmost attention and address any queries you may have in the shortest time possible.

### **VERSIONS TO THIS PRIVACY POLICY**

This Privacy Policy is in force as of May 25, 2018.

This Privacy Policy may be updated from time to time. Any updates will become applicable within 15 days as of the publication of the new version on TPS's website.