

## PRIVACY POLICY

### INFORMATION NOTE

#### Regarding the Policy of Personal Data Processing Performed for the 7card Program

##### *Who we are*

We are **Benefit Seven S.A.** (a joint stock company with registered office in Roşiorii de Vede, Mărăşeşti Street, Bl. S111, ground floor, Teleorman County, and mailing address 11 Zării Street, Basement, Ground Floor, and First Floor, Sector 5, Bucureşti, registered with the National Trade Register Office with the number J34/387/2004, unique fiscal code RO16696040, with paid up share capital of 100.000 RON) and this information note is aimed at informing all current 7card Subscribers and future 7card Subscribers about the conditions under which we process their personal data for the 7card Program, starting with the moment when they enroll in the 7card Program.

You can always contact us at the address: 11 Zării Street, Sector 5, Bucharest, at phone number +40 21 539 7770, and at the e-mail address: 7card@benefitseven.ro.

The services provided by Benefit Seven S.A. for the benefit of 7card Subscribers are established through the contracts signed between Benefit Seven S.A. and each employer of the Employee ("the **Client**"), including the elements related to the cost of the service, the limits for the use of the 7card card (for example, the number of visits allowed per day);

Benefit Seven S.A. has a direct contract with each of these Clients, and these contracts establish the terms which govern the access of the Client's Employees (and of their Companions) to the 7card Program, taking into account the rules stated in the Rules and Regulations of the 7card Program, and also the rules for enrollment in the 7card Program.

This information note was created according to the requirements of current legislation regarding personal data processing specifically applicable in Romania (especially taking into account the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL 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 (General Data Protection Regulation) and also taking into account the Law nr. 506/2004 issued by the Romanian Parliament regarding the processing of personal data and the protection of private lives in online communications).

Benefit Seven SA undertakes with regard to the Subscribers, in relation to the processing of personal data, in accordance with GDPR regulations, obligations that are intrinsic to the role of entity authorized by the Client, as well as, as is the case and for limited purposes, obligations intrinsic to the role of processor of personal data.

**Categories of persons in question** (the persons whose personal data we process as part of running the 7card Program)

1. The Employee - the natural person with whom the Client has a contractual relationship based on an employment contract, a mandate, an administration contract, a service contract, or any other type of civil law contract with similar legal consequences.
2. The Companion – the natural person designated by the Employee to benefit from 7card in the same conditions of use as the Employee. The Companion is not an Employee of the Client and can be any natural person. The Companion has to comply with the Rules and Regulations that apply to the Employee. The Employee shall not enroll in the 7card Program a person that does not agree with the 7card Program Rules and Regulations.
3. The minor Companion – the natural person under 16 years of age, son or daughter of the Employee, designated by the Employee to benefit from the 7card in the same conditions as the Employee. The minor Companion takes part in the 7card Program only through the initiative and following the proceedings performed by his/her parent (who is an Employee of the Client) and who, by enrolling the minor in the 7card Program is giving their explicit consent for the minor to participate in the 7card Program; at the same time, the parent-Employee of the Client is taking on the full responsibility for the minor Companion complying with the rules stated in the 7card Program Rules and Regulations, as well as for the processing of the minor’s personal data by Benefit Seven SA as stated in this Information Note.

*Note: Personal data of minors. The protection of the personal data of minors is very important to us. Benefit Seven SA is processing exclusively the data that is necessary for ensuring the minor has access to the services of the 7card Program according to the Rules and Regulations of the 7card Program. We will not process the data of minors for profiling with the aim of sending customized offers through SMS messages, e-mail, or other communication channels, will not monitor minor activity through cookies, or perform other online activity tracking techniques that are used for creating customized offers.*

### ***The Categories of Personal Data That We Process***

The personal data processed by Benefit Severn S.A. that are necessary for the Subscribers to take part in the 7card Program according to the Rules and Regulations for the 7card Program are stated below:

For the Employee: family name and name, mobile number, home address, workplace address, work e-mail address, gender, date of birth, unique Subscriber code (assigned by Benefit Seven SA when the Subscriber enrolls in the Program);

For the Companion: family name and name, mobile number, address, workplace address, work e-mail address, gender, date of birth, unique Subscriber code (assigned by Benefit Seven SA when the Subscriber enrolls in the Program);

For the minor Companions (natural persons under 16 years old), the personal data processed by Benefit Seven SA are as follows: family name and name, gender, date of birth – these will be provided exclusively by the parent of the minor Companion when he/she enrolls their son(s)/ daughter(s) in the Program, unique Subscriber code (assigned by Benefit Seven SA when the Subscriber enrolls in the Program);

Transactional communications – push notifications in the 7card application, SMS messaging, e-mailing regarding a specific initiative/action of the Subscriber.

The Subscriber's visit/access history at Partner locations – sports clubs/venues, providers of other recreational activities;

Online identifiers: IP address of the device that the Subscriber uses to access [www.7card.ro](http://www.7card.ro) and/or the 7card application; the internet browser the Subscriber uses and the version of the OS of the device that accesses the site/the application; HTTP/HTTPS protocol data;

Benefit Seven S.A. will process, exclusively for the purpose of informing the Subscriber about his/her proximity with relation to the location of a sports club/recreational activities venue of a Partner, the location of the Subscriber's device (the location of the mobile phone having the number provided by the Subscriber when enrolling in the Program) at that moment, only with the Subscriber's permission expressed right before the location of the sports club/recreational activities venue in their proximity is displayed.

Benefit Seven S.A. will not store/keep the data related to the location of the device. Given the fact that the 7card Program entails issuing of 7card cards/personal application codes, it is compulsory that the Subscribers provide the following personal data: family name and name, mobile phone number (*will not be requested for the minor Companions*), home address, work e-mail address (*will not be requested for the minor Companions*), date of birth; failure to provide this personal data will make it impossible for Benefit Seven S.A. to issue the 7card card and to ensure access to the benefits of the Program (a circumstance for which Benefit Seven S.A. or its Partners – sports venues and providers of other recreational activities cannot be held accountable).

### ***How We Process the Personal Data of the Subscribers***

We collect the personal data of the Subscribers directly, when they provide us the enrollment data or when they update existing enrollment data on the 7card platform and/or in the 7card application, as well as through our Clients (when they provide us with data about the Subscribers, in their quality of employers of the Subscribers).

At the same time, in certain circumstances, we can collect 7card Subscriber's enrollment/update data partially from the Client and partially from the 7card Subscriber.

When we collect data from the 7card Subscriber we always do it based on the responsibilities and the instructions received from the Client in this regard.

The Companions' data is provided by the Subscribers; Benefit Seven S.A. informs the Companion about the conditions of enrollment in the Program, including regarding the terms of personal data processing as stated in the current Information Note, as soon as possible after the Companion's data has been registered in the 7card platform.

We collect location data automatically, only if the 7card Subscriber is logged in in their 7card application user account, and they have given their permission that the device display the location, strictly in order to indicate its position with regard to the locations of our Partners that are in its proximity, for the purpose of offering support/recommendation in the relationship between the two parties.

We do not keep the location related data. To turn off the location feature, use the Settings menu of the device used to access the 7card application account.

When the 7card Subscribers access the Partner locations, we collect data about the Subscribers' access/visits at the Partners by means of devices placed at the Partners' location as well as through the dedicated documentation available at the Partners' location (the registry form available at the Partner's location).

The data we collect automatically through cookies is presented in the Cookie Policy document; we must state though that we cannot identify you by collecting data through these cookies.

At the same time, we collect data about the activity of the Subscriber on the Benefit Seven S.A. website, related to: the IP of the device used to log in, visits to the pages of our website.

The data collected when the Subscribers take part in contests/raffles organized by Benefit Seven S.A., according to the Subscriber's decision to participate, as well as details related to such initiatives/projects/events are available in the Regulations of each such event/project.

Benefit Seven S.A. does not collect (nor directly, neither indirectly) and does not process special data (for example, data about the health of the Subscribers) and does not monitor/evaluate the evolution of the Subscribers following their participation in the activities where 7card offers access according to the Rules and Regulations of the 7card Program.

Data that the Subscribers provide of their own choice and that Benefit Seven S.A. did not request (for example, conversations, evaluations, feedback through the 7card application and/or the [www.7card.ro](http://www.7card.ro) website and or through the correspondence between the Subscriber and Benefit Seven S.A., including through Facebook).

Benefit Seven S.A. does not process such data except for the situation when it has to comply or answer a request from the Subscribers, and if it does, it's only for the limited duration necessary to solve the issue brought to our attention.

***The Purpose for Which We Process the Personal Data of the 7card Subscribers and the Legal Grounds for the Processing***

Purpose of Processing	Legal Grounds for Processing
To inform the Subscriber about the 7card Program.	To fulfill the obligations taken on through the Rules and Regulations document, related to the 7card Program, and pre-enrollment operations.
To ensure the Subscriber's access to the facilities offered by the 7card Program ( <i>e.g., access to the Partner's locations at convenient tariffs and maintaining those tariffs according to the terms specified below</i> ).	To fulfill the obligations taken on through the Rules and Regulations document, related to the 7card Program.
To validate enrollment in the Program, to create the personal card of the Subscriber, to send the 7card to the Subscriber, to invoice the services, to notify about the status of the account/invoices/due payments.	To fulfill the obligations taken on through the Rules and Regulations document, related to the 7card Program.
To authenticate the Subscriber (recognize Subscriber's identity) when logging in to the account associated to the 7card card (including when accessing the 7card application on the device used for the connection).	To fulfill the obligations taken on through the Rules and Regulations document, related to the 7card Program (including the preliminary stages of enrollment in the 7card Program).

<p>To validate enrollment in the Program, to generate the account in the 7card application, to invoice services, to notify about the status of the account/invoices/ payments including by means of push notifications in the 7card application/e-mails/sms messages.</p>	<p>To fulfill the obligations taken on through the Rules and Regulations document, related to the 7card Program.</p>
<p>To process payments related to the participation of the Subscriber in the 7card Program.</p>	<p>Legitimate interest of Benefit Seven S.A.</p> <p>To fulfill the obligations taken on through the Rules and Regulations document, related to the 7card Program.</p>
<p>To manage issues such as card cancellation or any type of problem occurred in the 7card Program, including changes occurred in the Program (for example, new sports clubs/venues/recreational activities centers joining the Program as Partners or removal of existing Partners from the Program)</p>	<p>To fulfill the obligations taken on through the Rules and Regulations document, related to the 7card Program.</p>
<p>To contact/send correspondence to the Subscriber, at his/her voluntary request and/or according to our client relationship policies.</p>	<p>To fulfill the obligations taken on through the Rules and Regulations document, related to the 7card Program.</p>
<p>To contact/send correspondence to the Subscriber regarding aspects of the client relationship.</p>	<p>To fulfill the obligations taken on through the Rules and Regulations document, related to the 7card Program.</p>
<p>To ensure the Subscriber's access to contests organized by Benefit Seven SA for the Subscribers.</p>	<p>Legitimate interest of Benefit Seven SA.</p>

<p>To track Subscriber's behavior as well as the status of payments for the services offered by the 7card Program with the purpose of improving and diversifying the services and benefits offered by Benefit Seven SA through the 7card Program.</p>	<p>Legitimate interest of Benefit Seven SA (business interest).</p>
<p>To evaluate the products and services offered by Benefit Seven SA and to compile reports/statistics regarding Benefit Seven SA with the purpose of improving and diversifying the services and benefits offered by Benefit Seven SA.</p>	<p>Legitimate interest of Benefit Seven SA (business interest).</p>
<p>To perform expenses payments as is the case between: (i) Benefit Seven S.A. and Partners, (ii) Benefit Seven S.A. and Subscribers, (iii) Benefit Seven S.A. and Clients.</p>	<p>Legitimate interest of Benefit Seven SA (business interest).</p>
<p>To create statistics, reports, and statements regarding the use of the 7card card.</p>	<p>Legitimate interest of Benefit Seven SA (business interest).</p>
<p>To prevent and combat fraud (the card is personal and can be used exclusively by the person for whom it was issued).</p>	<p>Legitimate interest of Benefit Seven SA (business interest).</p>

<p>To improve and diversify the services offered by Benefit Seven SA using the technical procedure called “profiling”.</p>	<p>Legitimate interest of Benefit Seven SA (business interest).</p> <p>For details regarding profiling for this purpose, see the <b>Profiling</b> section below.</p> <p>In case a Subscriber considers that there are reasons related to his/her particular situation that entitle him/her to object to their data being processed for the purpose of our legitimate interest, including his/her profiling, the Subscriber can exercise their right to object at any moment, as stated in the <b>Subscribers’ Rights</b> section of this Information Note.</p>
<p>To maintain and secure the website <a href="http://www.7card.ro">www.7card.ro</a> / the 7card application/ the 7card platform.</p>	<p>Legitimate interest of Benefit Seven SA (business interest).</p>
<p>To perform company transactions (for example, purchases, sales) that require audits/analyses of the contractual documentation and/or of the platforms or the databases of Benefit Seven S.A.</p>	<p>Legitimate interest of Benefit Seven SA (business interest).</p>
<p>To defend our rights in the justice system (for example, in order to reclaim due payments, or when protecting our interest against unjustified claims/complaints).</p>	<p>Legitimate interest of Benefit Seven SA.</p>



<p>To send personalized offers, based on the technical procedure called “profiling” for direct marketing purposes, through the following communication channels: SMS/e-mail/phone calls, push notifications in the 7card application.</p>	<p>The Subscriber’s consent for profiling and receiving personalized offers through the communication channels chosen by the Subscriber (SMS/e-mail/phone calls, push notifications in the 7card application.)</p> <p>More details about the way we do profiling for direct marketing purposes can be found below in the <b>Profiling</b> section.</p> <p>The Subscriber can object to profiling at any moment, as stated in the <b>Subscribers’ Rights</b> section in this Information Note.</p>
<p>To send general commercial communications related to services/benefits offered by Benefit Seven S.A.</p>	<p>Subscriber’s Consent</p> <p>At any moment, the Subscriber can withdraw their consent to receive such communications by accessing the link available at the end of the e-mail message or by directly sending an e-mail message to the address <a href="mailto:7card@benefitseven.ro">7card@benefitseven.ro</a>.</p>

<p>To send personalized offers regarding Benefit Seven S.A. products/services, based on the navigation history and the behavior of the Subscriber on the website <a href="http://www.7card.ro">www.7card.ro</a>, which are monitored through cookies.</p>	<p>Cookie Consent</p> <p>The Subscriber who wishes to opt out of the cookie monitoring for the purpose of targeted on-line advertising, can deactivate the corresponding general cookie setting in the browser.</p> <p>The Subscriber can also deactivate the cookie modules for advertising services of the browser services provider (for example, Google) by choosing the settings that block cookies of a specific domain.</p> <p>In this regard the Subscribers are encouraged to consult <a href="http://www.youronlinechoices.com/ro/optiunile-mele">www.youronlinechoices.com/ro/optiunile-mele</a>. Opting out of targeted behavior-based on-line advertising will not prevent general adverts from being shown, because these adverts are not personalized according to the Subscribers' interests.</p>
<p>To send personalized offers based on Facebook personalized audiences (client lists).</p>	<p>Subscriber's Consent</p> <p>At any moment, the Subscriber can easily withdraw their consent by directly sending a message to the address <a href="mailto:7card@benefitseven.ro">7card@benefitseven.ro</a>.</p>
<p>To send commercial communication regarding the services/products of Partners or of other collaborators of Benefit Seven S.A.</p>	<p>Subscriber's Consent</p> <p>At any moment, the Subscriber can easily withdraw their consent by directly sending a message to the address <a href="mailto:7card@benefitseven.ro">7card@benefitseven.ro</a>.</p>

<p>To validate the participation of the Subscribers, to validate the winner and to offer the prizes for the online contests organized on <a href="http://www.7card.ro">www.7card.ro</a> and for the contests organized on the 7card Program Facebook page (for this purpose we process: family name and name, e-mail address, phone number). We publish the family name and the name of the winners of the contest on the official Benefit Seven S.A. Facebook page and/or on our website <a href="http://www.7card.ro">www.7card.ro</a> .</p>	<p>The consent given by the Subscriber for the purpose of participating in the contests organized by Benefit Seven S.A. and for the purpose of offering the corresponding prizes.</p>
<p>To perform the annual financial audit, to send the official fiscal and accountancy declarations to the fiscal authorities.</p>	<p>Legal obligations of Benefit Seven S.A.</p>
<p>For procedures and investigations performed by the authorities and/or judicial authorities (exceptionally and according to official procedures specified by the law).</p>	<p>Legal obligations of Benefit Seven S.A.</p>

**Profiling**

We can use certain profiling techniques, that is, a method of automatically processing the Subscribers’ data that consists of specifically analyzing and interpreting their personal data in order to evaluate or predict certain aspects related to their preferences, their interest in accessing sports activities/recreational activities through the 7card card.

For the purpose of profiling, Benefit Seven S.A. does not process sensitive data related to the health, the religious beliefs or the political preferences of the Subscribers.

The behavior and the personal preferences of the Subscriber for certain sports activities/ recreational activities is inferred from his/her history of visits to the Partners enrolled in the Program, as well as from the use of the 7card mobile application, from the age of the Subscriber, from his/her preference of certain days/time intervals when they participate in the

sports activities/recreational activities, and from other personal interests that they have provided, interests that they share with other clients.

Specifically, Benefit Seven S.A. creates a Subscriber's profile as follows:

- Based on the history of his/her visits to the venues/recreation centers of the Partners (including the preferred days, time intervals, months);
- Based on the data related to the recurrence of these visits/instances of access;
- Based on demographic data: age, gender, city;
- Based on the length of the subscription.

When we do the profiling, we collect your data from sources such as: access to the Partner locations and the providers of advertising services with which we collaborate.

We use profiling when we send the Subscribers personalized offers through the direct marketing channels (SMS, e-mail, push notifications) in a way that is relevant and useful to the Subscribers.

Each Subscriber can object to profiling for the purpose of direct marketing and can send his/her objection using any of the communication channels that they previously chose to express their consent.

For details, see below the section **Your Rights and Your Options**.

Using profiling to group Subscribers into segments/categories according to their preferences essentially helps us to calibrate the offer of services that are relevant to both Clients and Subscribers (for example, we decide on whether or not to open new partnerships with Partners for specific sports activities that are preferred by the Subscribers), and thus allows us to better and more promptly answer the needs and interests of the Subscribers (for example, we decide on whether or not to include in the 7card Program new types of recreational activities for the Subscribers).

This approach of Benefit Seven S.A. is based on our legitimate interest, which is our business interest aimed at permanently improving and diversifying the services we provide. We consider that profiling does not affect and does not harm the interests, rights, and liberties of our Subscribers.

Under no circumstance the personal data of the minor Companions will be the subject to processing for the direct marketing activities performed by Benefit Seven SA, or will be published on the internet by Benefit Seven SA or will be in any way processed through electronic messaging. The upload of/access to the personal data of the minor Companions through the secured link to the sign-up page of the [www.app.7card.ro](http://www.app.7card.ro) website is performed

exclusively by the legal representative of the minor, who has to authenticate using a unique password that is exclusively held by the legal representative of the minor.

### ***With Whom We Share the Personal Data of our Subscribers***

The personal data mentioned above will be sent by Benefit Seven S.A. (adhering to the strictest safety and security measures in order to ensure confidentiality) to the following categories of recipients:

1. The Employer (Client), for and while executing the rights and obligations taken on according to the Rules and Regulations for the Use of the Program and also according to the contract between Benefit Seven S.A. and the Employer;
2. The companies and entities from the group of companies that Benefit Sever SA is a part of.
3. The Partners – sports clubs/venues/recreational activities centers – will only receive the family name and name of the person in question, exclusively for the purpose of paying the cost of the visits and of the services provided by these.
4. Our providers who perform:
  - Document storage/archiving services (including providers of cloud storage services);
  - Automatic e-mailing services;
  - Automatic SMS messages services;
  - IT Development and maintenance services;
  - Invoicing services;
  - Other types of support services for the execution of the Subscriber relationship.
5. Government institutions, organizations and authorities, courts of law and other public authorities if we are legally required to do so.
6. In case we go through a legal reorganization procedure or a sale to another company, we will communicate the Subscribers' data to that company.
7. Third parties, when performing joint campaigns with that third party (for the Subscribers who gave their consent). The third party is responsible with complying with existing applicable data protection legislation.

### ***The Duration of Processing of Subscribers' Data***

The personal data of the Subscribers (including the history of participation in sports/ recreational activities) will be kept on the Benefit Seven S.A. platform (the corresponding paper documents are archived by authorized third parties) for a maximum period of 3 (three) years since the last day of validity of a Subscriber's subscription.

In case the contract between Benefit Seven S.A. and the Client ceases, regardless of the reason, the 3 (three) year period is computed since the date the contractual relationship between Benefit Seven S.A. and the Client has ended (this clause regards the data of the Employees of this Client and the data of the Companions of these Employees).

After the specified period has ended, the personal data that needs to be stored for longer periods (e.g., financial documents, invoices) will be kept safely for the duration specified by the current legislation while for the rest we will use anonymization/erasure (so that the person in question cannot be identified), except for the case where we are required by law or by our legitimate interest to do otherwise.

With regard to the personal data used with the prior consent of the person in question, we will process this data exclusively for the purpose for which the Subscriber gave their consent only until they choose to withdraw their consent, except for the case when we are required to keep the data for a longer period, according to existing legislation or for inquiries executed by the relevant authorities or for preserving our rights.

### ***Transfer of Personal Data to Third Parties (States)***

Currently, our data is stored in locations in countries from the European Union. In case it is necessary to transfer the Subscribers' data to non-SEE companies/partners (*SEE countries are the countries that are part of the European Union plus Switzerland, Iceland, Liechtenstein and Norway – that are considered to have equivalent data privacy legislation*), we will always ensure that a corresponding contract covering such a transfer is signed, according to the standards adopted by the European Commission in this regard.

Nevertheless, in case the third party does not have laws equivalent to the EU standards regarding data protection, we will always request the third-party recipient that they sign a binding contract that upholds the necessary standards.

### ***The Subscribers' Rights as Persons in Question***

In order to make sure that each Subscriber has control over their personal data, we make sure that each person in question has at their disposal, according to the available technology, the following options:

- Can manage their own Account and can modify/delete/edit their data;
- Can manage cookie settings/delete cookies from their browser;
- Can make their own decision from their respective social media accounts (for example, Facebook) with regard to data sharing with other websites.

Also, as the person in question, according to REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL, the Subscriber enjoys the rights detailed below (we can request that the Subscriber prove their identity and the fact that they are the owner of the 7card card before we analyze any request).

We will try to answer the requests we receive from the Subscribers without delay and no later than 30 days (or within a different reasonable time period, according to REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL).

### ***The Right to Be Informed***

The Subscriber has the right to receive information that is clear, transparent, easy to understand and access regarding the way we process their personal data, including details about his/her rights as a person in question.

This information is presented in this Information Note.

### ***The Right to Access One's Personal Data***

The Subscriber has the right to access his/her personal data that we process according to the rules stated in this Information Note; we will not charge a fee for the initial requests.

In case the Subscriber requests copies of data already provided, we can charge a reasonable fee taking into account the administrative costs we incur when providing this information.

We reserve the right to deny excessive or repetitive requests. The Subscriber should send the request to access their own personal data at the following e-mail address:  
7card@benefitseven.ro.

### ***The Right to Modify***

The Subscriber who notices that the personal data regarding him/her, and that we process is incomplete or incorrect can send us a request to update or modify that data at the following e-mail address: 7card@benefitseven.ro.

### ***The Right to Object to Direct Marketing***

The Subscriber can object anytime to direct marketing and can unsubscribe from receiving our direct marketing materials.

To unsubscribe, the Subscriber can use the unsubscribe link that is available in each and every communication of this type that they receive from us, or by means of a written request sent to the e-mail address: 7card@benefitseven.ro.

Withdrawal of the consent (by unsubscribing or by sending a written request) does not affect the legality of the processing occurred based on the consent, before the consent was withdrawn.

### ***The Right to Object to the Processing We Do Based on Our Legitimate Interest***

The Subscriber can object anytime to any type of processing based on our legitimate interest.

In the Legal Grounds column from the table above, you can easily identify the cases when we process personal data based on our legitimate interest.

The Subscriber can exercise their right to object by sending a written request at the following address: 7card@benefitseven.ro.

### ***The Right to Erasure of Personal Data (the Right to Be Forgotten)***

The Subscriber has the right to request the erasure of the data that regards him/her in any of the following situations:

- (a) the personal data are no longer necessary for the purpose for which they have been processed;
- (b) the Subscriber has withdrawn their consent based on which we performed the processing and we no longer have legal grounds to continue the processing;



(c) the Subscriber objects to processing of their personal data for direct marketing purposes (including for the creation of the direct marketing profile, as is the case);

(d) The Subscriber objects to the processing based on our legitimate interest, and we cannot provide a reason why our legitimate interest should prevail over their interests, rights, and liberties;

(f) personal data has been processed illegally;

(g) personal data has to be deleted in order to comply with the law. The right to data deletion is not an absolute right. We can reject the request in case:

(i) we are obliged, according to the law, to preserve the data; or

(ii) the data is necessary in order to exercise or to protect our rights before a court of law. The Subscriber can request the deletion of their personal data by sending a request to the e-mail address: [7card@benefitseven.ro](mailto:7card@benefitseven.ro).

### ***The Right to Request the Restriction of the Processing***

The Subscriber has the right to obtain from Benefit Seven S.A. the restriction of the processing of their personal data in the circumstances described below:

(a) The Subscriber challenges the accuracy of the personal data, for the period that allows Benefit Seven S.A. to verify the accuracy of the data;

(b) Processing is illegal and the Subscriber objects to the deletion of the personal data, requesting nevertheless the restriction of the processing;

(c) We no longer require the personal data for the purpose of processing, but the Subscriber requests it for establishing, exercising, or defending a right before a court of law;

(d) The Subscriber has objected to processing based on our legitimate interest, for the period required to establish if the legitimate rights of the operator prevail over the rights of the Subscriber;

The Subscriber can exercise their right to erasure by sending a request to the e-mail address: [7card@benefitseven.ro](mailto:7card@benefitseven.ro).

### ***The Right to Data Portability***

When we process the Subscriber's personal data through automatic means based on their consent or based on executing a contract, the Subscriber can request that their personal data be transferred to:

- (a) The Subscriber or
- (b) Another operator indicated by the respective Subscriber.

The Subscriber can request the transfer only of the personal data that he himself/she herself has directly and actively transmitted (except for any data that we inferred or that we created/determined).

The Subscriber can exercise his/her right by sending a request to the e-mail address: [7card@benefitseven.ro](mailto:7card@benefitseven.ro).

### ***The Right to File a Complaint with ANSPDCP***

In case the Subscriber considers that their personal data processing occurred as stated in this Information Note has harmed them in any way, the Subscriber can file a complaint with the National Authority for the Supervision of Personal Data Processing Activities, their website is [www.dataprotection.ro](http://www.dataprotection.ro).

### ***Technical and Organizational Aspects of Personal Data Processing***

Benefit Seven S.A. takes the responsibility to comply with (and to make sure that their representatives who act according to instructions received from Benefit Seven S.A. also comply), with regards to the personal data mentioned in this document, the adequate technical and organizational measures for the protection of personal data against accidental or intentional destruction, loss, change, disclosure or unauthorized access, especially if the respective processing involves transmission/transfer of data along a network, as well as against any type of illegal processing.

Thus, we take the technical and organizational measures necessary to securely collect, process, and store the personal data, including against unauthorized access and use. These measures are at least:

- (i) Administrative and organizational measures aimed at ensuring the trustworthiness of the persons who have actual access to the data;
- (ii) Operational workflows and procedures in order to ensure the persons in question can exercise their rights;

(iii) Secure data storage mediums;

(iv) Ensuring, through reasonable measures, that our partners/subcontractors define and implement adequate security measures regarding the personal data that we distribute;

Benefit Seven S.A. implements, together with each Client, specific mechanisms and processes in order to answer the requests of the Subscribers related to the personal data processing operations performed by Benefit Seven S.A.

### ***Frequently Asked Questions Related to This Information Note***

We can answer any request for information received from a Subscriber related to this Information note. You can contact us using any of the following methods:

- Through e-mail, at: [7card@benefitseven.ro](mailto:7card@benefitseven.ro);
- By traditional mail at the address: str. Zării 11, sector 5, București;
- By phone, at: +40 21 539 7770.

### ***Relevant Definitions***

**“Personal data”** means any data regarding a natural person that is identified or that can be identified (**“the person in question”**); a natural person that is identifiable is a person that can be identified, directly or indirectly, especially by means of an element of identification, such as a name, an identification number, localization data, an online identifier, one or more specific elements, intrinsic to their physical, physiological, genetic, psychic, economic, cultural or social identity;

**“Processing”** means any type of operation or set of operations performed on personal data or on sets of personal data, with or without the use of automatic means, such as, collection, registering, organization, structuring, storing, adaptation or modification, extraction, consulting, use, disclosure through transmission, dissemination or making available in any other way, aligning or combination, restricting, erasure or destruction.

**“Operator”** means the natural or legal person, the public authority, the agency or any other organization that, independently or together with others, establishes the purposes and means of processing the personal data according to existing legislation; when the purposes and the means of processing are established by the EU legislation or by internal laws, then the operator and the specific criteria for designating an “operator” can be stated in the EU legislation or in the internal national legislation;

**“Authorized person or entity”** means natural or legal person, public authority, agency or other organization that processes personal data in the name of the operator;

**“Profiling/Profile creation”** means any type of automatic personal data processing which consists of using personal data in order to evaluate certain aspects related to a natural person, especially with the purpose of analyzing and predicting their performance at the workplace, their economic status, their health, personal preferences, interest, trustworthiness, behavior, the location of that person or their movements;

**“Recipient”** means the natural or legal person, public authority, agency or any other organization with whom personal data is shared, regardless of whether they are or not a third party;

**“Consent”** of the person in question means any manifestation of the free will, specific, informed, and without any doubt of the person in question by which they accept, in a statement or through an unequivocal action, that their personal data be processed.

**“The Subscriber”/“The 7card Subscriber”/“The User”** – Employee or Companion, who has the right to use the products and services offered in the 7card Program;

**“The 7card Program”** or **“The Benefits Program for the Employees”** or **“The Program”** – the set of offers selected by Benefit Seven SA, aimed to meet the needs of the Employer (a client of Benefit Seven SA) consisting of products and services available for the Subscribers, provided for them for the duration validity of contract between the Employer of the Employee and Benefit Seven SA by the Benefit Seven SA Partners.

**“Rules and Regulations for Use of the Program”** – all the instructions, norms, and rules regarding the access of the Subscribers to the services from the Program contracted by the Client in their relationship with Benefit Seven SA.

This Information Note is valid starting on the 25<sup>th</sup> of May 2018. This Information Note is available on [www.7card.ro](http://www.7card.ro) and in the 7card application. Benefit Seven SA can modify this note at any time, and the Subscribers will be notified accordingly.

**BENEFIT SEVEN S.A.**