



GTS TELECOM PRIVACY POLICY

Scope of application of this Policy

We are committed to providing you with a professional, valuable and personalized service whilst safeguarding your privacy. This Privacy Policy ("Policy") will help you understand what kind of information we collect in connection with our services and how we process such information. This Policy applies to GTS Telecom and covers personal data collected by GTS Telecom through this website. Throughout this Policy the term "personal data" means information relating to an identified or identifiable individual, i.e. a natural person. "GTS Telecom" refers to GTS Telecom S.r.l., a company having its registered office at 92-96 Izvor Street, 1st floor office A and 2nd floor office A and B, 5th district, Bucharest, Romania, also referred to as "we", "us", or "our".

This Policy applies to personal data collected in connection with services offered by GTS Telecom or from other interactions with GTS Telecom where a link or other reference of incorporation to this Policy is made. Personal data is any information that allows you to be identified. The types of personal data GTS Telecom will collect may include details of your name, address, telephone number, e-mail address, fax number, date of birth, or any other information that may be necessary to perform the services of GTS Telecom.

We may provide additional or amending privacy information in connection with a particular GTS Telecom service. In the event of any conflict, such additional or amending privacy information will prevail over this Policy. This website may contain links to websites of other companies and other third party services that may have privacy policies of their own. We recommend that you read the privacy policies related to such services. GTS Telecom is not responsible for the privacy practices or contents of any such third party websites or services.

By using this website and/or by submitting personal data to GTS Telecom, you express your consent to the processing of your personal data in the manner provided in this Policy. If you do not agree with this Policy, please do not use this website and do not provide GTS Telecom with your personal data.

Use of personal data

GTS Telecom may collect personal data from you through the use of enquiry and registration forms, direct personal contact with you (for example, over the telephone) and every time you send us e-mail messages reflective of your details. GTS Telecom will only use your personal data where such use is relevant to the interaction between you and GTS Telecom, to supply to you any of the agreed services of GTS Telecom or its affiliates, for invoicing, network management, where necessary for us to comply with mandatory provisions of applicable laws, to protect our rights and legitimate interests and in other instances where we are allowed to do so without your prior consent, or where GTS Telecom has secured your consent.

GTS Telecom will only use your personal data in a way that is fair and lawful, in accordance with your consent and for one or more purposes identified in your consent, and to the extent necessary for GTS Telecom to use your personal data in its interaction with you and for such purposes as have been disclosed to you in this Policy. GTS Telecom will not sell, trade or rent your personal information to others.

The purposes for which GTS Telecom may process your personal data

GTS Telecom may process your personal data for the purposes described in this Policy. Please note that one or more purposes may apply simultaneously.

Provision of products and services We may use your personal data to fulfil your requests, process your orders or as otherwise may be necessary to perform or enforce the contract between you and GTS Telecom, to ensure the functionality and security of our products and services, to identify you and to prevent and investigate fraud and other abuses.

Development of services We may use your personal data to develop our services. However, for the most part we only use aggregate and statistical information in the development of our services. We may also use your personal data to personalize our offering and to provide you with service more relevant to you, for example, to make recommendations and to display customized content and advertising available services on our websites. We may combine personal data collected in connection with your use of a particular GTS Telecom service with other personal data we may hold about you, except where such personal data was collected for a different purpose. We may create aggregate and statistical information based on your personal data.

Communicating with you and marketing We may use your personal data to communicate with you, for example, to provide information relating to products or services you are using or to contact you for customer satisfaction surveys. We may use your personal data for marketing or research purposes, for example, to conduct market research and we may, in accordance with applicable laws, contact you to inform you of new services or promotions we may offer. Also, some of our products and services may be used to promote services of other companies. However, GTS Telecom will not disclose your personal data to any other company for marketing purposes without your prior consent.

Use of "Cookies"



GTS Telecom may use "cookies" on its websites. A "cookie" is information that a website leaves on a hard drive so that it can remember certain information about you when you next visit the website or a related website. GTS Telecom will not use your personal data sent in a cookie for marketing purposes and will not share such personal data with third parties without your consent. If it is your preference not to receive cookies from the websites of GTS Telecom, you can set your browser to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence. You can also turn cookies off in your browser, but this may impair your web site experience.

Means of data processing and data security

GTS Telecom has implemented appropriate technical and organizational information security measures to prevent unauthorized or unlawful disclosure or access to or, accidental or unlawful loss of or destruction, or alteration, transfer or unauthorized disclosure of or access to, or other damage to your personal data. Such measures include the use of firewalls, secure server facilities, encryption, proper access rights management systems and processes, careful selection of processors and other technically and commercially reasonable measures to provide appropriate protection for your personal data against unauthorized use or disclosure. Where appropriate, we may also take backup copies and use other such means to prevent accidental damage or destruction to your personal data. These measures ensure an appropriate level of security in relation to the risks inherent in the processing and the nature of the personal data to be protected. Your securely held personal data will only be accessible by selected authorized personnel of GTS Telecom. To process your personal data, we use manual means (such as paper-based procedures) and automatic means (such as electronic based procedures) of data processing.

Data controller and data processors

The data controller is GTS Telecom S.r.l., 92-96 Izvor Street, 1st floor office A and 2nd floor office A and B, 5th district, Bucharest, Romania, ID number J40/19010/1993, registered with the Commercial Register in Bucharest. Within GTS Telecom, the personal data will be processed by the employees in charge of the relevant function. Such employees are "persons in charge of the processing" of personal data under the control of the data processor.

Transfer of personal data

GTS Telecom is part of an international group of companies operating across multiple jurisdictions, commonly known as GTS Central Europe and comprising the following companies: GTS-Datanet Telecommunications Ltd. (13-15 Ipartelep u., 2040 Budaörs, Hungary), GTS Energis Sp. z o.o. (Al. Niepodległości 69, 02-626 Warsaw, Poland), GTS NOVERA s.r.o. (Premyslovská 2845/43, 130 00 Prague 3, the Czech Republic), GTS Slovakia, a.s. (Einsteinova 24, 851 01 Bratislava, Slovakia) and GTS Telecom S.r.l. (92-96 Izvor Street, 1st floor office A and 2nd floor office A and B, 5th district, Bucharest, Romania). Our products and services may be provided using resources and servers of the enumerated GTS companies located across Central Europe. Therefore, your personal data may be transferred across borders outside the country where you use our services to one or more GTS companies which will be processing your personal data as data processors or data controllers. If the level of personal data protection in a specific country is not equal to that in the European Economic Area, we take steps to ensure that there is a legal basis for a transfer of data and that adequate protection is afforded your personal data as required under applicable laws. For example, we use standard agreements approved by relevant authorities, the data exchange and data protection agreement between GTS companies, and we require the use of appropriate technical and organizational information security measures whenever personal data is processed by one GTS company on behalf of another.

Your rights to your personal data held by GTS Telecom

GTS Telecom will only keep your information for as long as we are required to do so by law, or as is relevant for the purposes for which the information was collected, however no longer than ten years. Under the Law no. 677/2001, as subsequently amended, you have the right (i) to inquire what personal data about you we hold and process; (ii) to update, rectify, block, anonymize or delete any incomplete, incorrect or outdated personal data; and (iii) to refuse at any time the processing of your personal data, for any purpose. You may exercise your rights by contacting us in writing through the contact points referred on this website. Please note that you are entitled by law to inquire about your rights and obtain our response within the period of time prescribed by law, free of charge once per year. Please note, however, that in some cases, particularly, if you wish us to delete or cease the processing of your personal data, this may also mean that we may no longer be able to continue provision of services to you.

Enforcement of this Policy

GTS Telecom has appointed a data protection officer. Upon your request, we will be able to put you in contact with such officer. If you have a question or enquiry about this Policy or a complaint about the way GTS Telecom has used your personal data, he or she will be able to assist you.

If you make a complaint to GTS Telecom data protection officer and your complaint is unable to be resolved to your complete satisfaction, your complaint will be passed to the Chief Legal Officer of GTS Telecom to be resolved. If your complaint is still unable to be amicably resolved, it will be escalated. Any finding of abuse of your personal data by GTS Telecom will be remedied as soon as reasonably practicable. In the event such abuse is not remedied within a reasonable time, the matter may be referred to the competent court of justice in order to be settled in accordance with applicable laws.