

Website Privacy Notice for www.veolia.ro

Last update: **09th of August 2022**

This **Website Privacy Notice for www.veolia.ro** (hereinafter referred to as "**Privacy Notice**") is dedicated to visitors and users who access the website www.veolia.ro (hereinafter referred to as **the "Website"**).

This website is the official website of the Veolia companies in Romania and was created in order to ensure greater transparency and for a better understanding of the activities carried out by the companies within the Veolia Group in Romania and in the world.

1. Who are the Data Controllers of your Data

The Data Controllers of the Website are the Veolia Companies from Romania, i.e. those companies that are part of the Veolia France Group (Veolia Environmental) and are registered in Romania (hereinafter referred together as "Joint Controllers" or "Veolia Companies from Romania" or Data Controllers), respectively:

- **Apa Nova București SA**, with headquarters in Bucharest, Tunari str., no. 60A, Ștefan Cel Mare Building, floors 6-9, sector 2, postal code 020528; registered in the Trade Register with no. J40/9006/1999, unique registration code RO12276949,
- **Apa Nova Ploiești SRL** with headquarters in Ploiești, Bobâlna str., no. 10, Prahova county, postal code 100330, registered in the Trade Register with no. J29/527/2000, unique registration code RO 13102711,
- **Veolia Romania Solutii Integrate SA**, with headquarters in Bucharest, str. Profesorilor no. 2, postal code 040156, registered in the Trade Registry with no. J40/9004/1999, unique registration code RO12276930,
- **Acvatot SRL**, with headquarters in Bucharest, Dinu Vintila str., no. 11, floor 5, offices 1-12, Eurotower Building, sector 2, postal code 021101, registered in the Trade Register with no. J40/6629/1991, unique registration code RO13906.

2. The purpose of the Information Note and the Users concerned

This "Website Privacy Notice" aims to inform the visitors and users of the Website regarding the data processed during the use of the Website, the purposes for which these data are used, the rights of the persons concerned as well as other aspects on the protection of this data, in accordance with Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of this data (GDPR), but also in accordance with the applicable national legislation in the field data protection (for example, Law 506/2004 on the processing of personal data and the protection of privacy in the electronic communications sector).

We, the Veolia Companies in Romania, can modify the Information Website privacy Notice at any time, in particular to comply with any editorial or technical regulatory changes.

This "Website privacy Notice" is an integral part of the general terms and conditions of use of the Website.

3. Description of processing

a) Purposes of processing

Data Controllers process personal data collected through the Website, for the following purposes:

- to allow Users to access the functions and information offered through the Website,
- to ensure the security of the Website,
- to defend our rights in case of litigious actions,
- to carry out and manage audit and internal control operations,
- to contact us through the section <https://www.veolia.ro/ro/contact>,

b) What categories of data are processed?

Data collected directly from you:

- **Contact data:** refers to the mandatory data that Users enter by completing contact forms, for example: first name, last name, phone number, address, email address.
- **Data voluntarily transmitted by the User:** Refers to personal data that Users voluntarily provide to the Operator by filling in the text boxes provided for this purpose in the contact form(s), i.e. "Subject of Your message" and "Message". The Data Controllers strongly recommend Users to avoid providing any personal data through these text boxes and, in any case, to provide only information that is strictly necessary to process the User's request (hereinafter referred to as "Published Data").
- **Data related to professional experience and education:** refers to the User's CV, studies and/or presentation message. Such Data are provided by the User when applying for a professional or internship opportunity within a Veolia company in Romania.
- **Data related to the IP and the type of device you use when you visit the Website.**

Mandatory fields to be completed in the contact form(s) and/or when submitting an application are marked with an asterisk. If you do not fill in the mandatory fields, we will not be able to respond to your request.

Data collected indirectly from you:

- **Data obtained from third parties:** for example, if you are a representative of a legal entity, we may check public information from the Trade Registry Office to obtain more information about your capacity as a representative or to validate the data that you sent us.
- **Inferred data:** We may check our internal database for any link between your complaint and combine the information to send you our response.

Please note that we do not verify or combine the information provided by social platforms (for example, Facebook, Instagram, etc.) to formulate a response to you.

When you apply for a professional or internship opportunity within a Veolia company in Romania, we can check the social platforms dedicated to the professional area, namely LinkedIn.

All such data will be collectively referred to as "**Data**".

In addition to the Data mentioned above, we also process data collected through Cookies. For these categories of data, purposes and storage terms, we recommend that you consult **Cookie Notice**.

c) What is the legal basis for processing User Data?

Data processing is only lawful if it is carried out on one of the legal grounds defined by the GDPR. The legal basis for the processing of data carried out in connection with the use of the Website is as follows:

- When you submit a complaint through the Contact section - the execution of the contract (art. 6.1 letter b GDPR) or the legitimate interest of the operator to whom you have addressed (6.1 letter f GDPR), depending on the specifics of the complaint.
- When submitting a CV or intending to be part of an internship program: carrying out pre-contractual steps to respond to the request of the applicant/potential applicant (6.1 letter b GDPR).
- When you visit the website for information purposes - our legitimate interest (6.1 letter b GDPR).
- when we use the Data for audit purposes, internal control or to defend our interests and rights in litigious actions - our legitimate interest (6.1 letter b GDPR).

d) Recipients

The data collected through the contact form or through the Careers section are intended for the internal departments of the Operator to whom you addressed in the respective request. Depending on the case, they can be: the Communication Department, the Human Resources Department, etc.

Other categories of Data recipients are:

- **our contractual partners located in Europe** (authorized persons or data controllers). Data may be transferred or made accessible to our service providers and their subcontractors when they: a) have a role in the technical and/or operational implementation of the Website; or b) helps us fulfill our processing purposes. This category includes: the Website hosting service provider and the IT service providers that perform the technical maintenance services of the Website, lawyers or external collaborators, external auditors.
- **to the authorities / state institutions when requests are addressed to us by them according to their legal attributions.** The data may be transmitted upon request to the competent authorities and in particular to public bodies exclusively for the fulfillment of legal obligations, law enforcement officers, ministerial officials and organizations responsible for the recovery of claims, as well as in connection with the pursuit of the perpetrators of crimes committed online.
- **Veolia Environmental Services France** - company that technically manages the platform on which the Website is located.
- **Social networks.** Users can share pages that look at them on social networks by clicking the share buttons. The collection of data through social network sharing buttons is subject to the Privacy Policies of these third parties. We recommend that you read the social media policies to learn how your personal data is used.

4. Exercise of Users' rights

In accordance with the GDPR, all Users who are natural persons have the following rights **regarding their personal data**: a) access, b) rectification, c) deletion; d) to withdraw your consent, e) restriction, f) portability, g) opposition, h) not to be subject to a decision based exclusively on automatic processing; i) the right to submit a complaint to ANSPDCP.

How you can exercise your rights regarding your personal data

- a) **submit a written request directly to the operator you wish to contact, at the following address:**
- **Apa Nova București SA**, with headquarters in Bucharest, Tunari str., no. 60A, Ștefan Cel Mare Building, floors 6-9, sector 2, postal code 020528,
 - **Apa Nova Ploiești SRL** with headquarters in Ploiești, str. Bobâlna, no. 10, Prahova county, postal code 100330,

- **Veolia Romania Solutii Integrate SA**, with headquarters in Bucharest, str. Profesoresilor no. 2, postal code 040156,
- **Acvatot SRL**, with headquarters in Bucharest, str. Dinu Vintila, no. 11, floor 5, offices 1-12, Euro Tower Building, sector 2, postal code 021101.

b) Contact online the Data Protection Officer of the Veolia company you wish to contact at the following e-mail addresses:

- Apa Nova București SA: ro.anb.dpo@veolia.com
- Apa Nova Ploiești SRL: ro.anp.dpo@veolia.com
- Veolia România Solutii Integrate SA: ro.vas.dpo@veolia.com
- Acvatot SRL: ro.acvatot.dpo@veolia.com

Term to answer. Our intention is to respond to your requests with priority, respecting **the legal response period of 30 calendar days**. If your request involves complex analysis or obtaining additional information, or if you have made several requests within a single request, we will respond to you within a maximum of two months, with your prior notice.

Taxes. We will not charge costs or fees to respond to your requests to exercise your rights. However, we reserve the right to charge a reasonable fee when your request is repetitive or excessive.

Third party rights. Your rights are not absolute rights, therefore, their exercise must not harm the rights of other people (including ours or other data controllers).

- c)** By contacting **the National Authority for the Supervision of Personal Data Processing (ANSPDCP)**, whose details you can find at: **www.dataprotection.ro**. If you consider that the response of the Data Protection Officer is not satisfactory, you can also file a complaint with ANSPDCP.

5. Data storage and archiving period

User data will not be stored longer than is strictly necessary for the purposes pursued as specified, in accordance with the laws in force.

In this regard, Data collected to respond to information requests and questions by Users is stored in an active database during the calendar year from receipt of the User's request, and then for five years.

The Data is stored in a temporary archive to allow the Veolia Companies in Romania to defend themselves in any legal proceedings or for the purpose of tracking, recording and prosecuting crimes, so that the Data can be made available to the judicial authority.

At the end of the temporary archiving period, the User Data will be permanently deleted.

In addition, the Operator may keep the Data permanently anonymously for statistical studies. These studies will in no way make it possible to identify Users and will only refer to trends resulting from their Aggregated Data.

6. Security

The Operator will take appropriate technical and organizational measures to ensure that the Data is secure and to prevent unauthorized access or disclosure of the User Data. However, the Operator cannot guarantee that all risks of hacking, falsification, illegal reproduction or misuse of the Data have been eliminated.

The database created when Users send a request through the contact form is strictly confidential.

The Veolia companies in Romania undertake to take all the necessary precautions as well as the appropriate organizational and technical measures to protect the security, integrity and confidentiality of the Data and, in particular, to prevent its distortion or damage or access by unauthorized third parties.

7. Data transfer outside the European Union

In the case of the transfer of User Data to a subsidiary of the Veolia Group or a third party located outside the European Union, the Veolia Companies in Romania will ensure that the country where the data is transmitted offers adequate protection (European Commission of made a suitability decision regarding the destination country). Otherwise, the Veolia Companies in Romania undertake to restrict the transfer through appropriate legal instruments, and in particular through the standard contractual clauses of the European Commission.

Users who wish to receive more information about how the Veolia Companies in Romania protect their Data or to obtain a copy of the legal instruments introduced, can send a request to the e-mail addresses mentioned in point 4 above.