Privacy notice for Partners
Version applicable starting from July, 2026

1. PURPOSE OF THE PRIVACY NOTICE

In accordance with Regulation (EU) 2016/679 (GDPR), this privacy notice describes how we process the personal data of legal representatives, employees, or contact persons ("Data Subjects") of our contractual or business partners (current or potential).

By “Partners” we mean the various entities, authorized individuals, or Individual Enterprises with whom we wish to enter into contractual, business, or commercial relationships and/or with whom we conclude contracts.

Depending on the company within the Veolia Romania group with which a Partner comes into contact, the Data Controller is one of the companies mentioned in the Annex of this privacy notice (hereinafter referred to as the "Controller" or "We"), each having an appointed Data Protection Officer who can be contacted at the assigned e-mail address.

2. PURPOSES AND LEGAL BASES OF PROCESSING

2.1 We will process Personal Data mainly for the following purposes:

Purpose of processing	**Legal basis of processing**
Concluding contractual relationships with Partners, preliminary steps for concluding contracts, executing the contract between the Controller and the Partner	*Art. 6(1)(b) GDPR* - processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract, or, as the case may be, *Art. 6(1)(f) GDPR* - legitimate interest in ensuring the conclusion and execution of contractual relationships with the legal entity
Carrying out communications for the signing and execution of the contract, reports, statistics, internal evaluations, for running activities in optimal conditions and increasing their efficiency, respectively for defending the legitimate rights and interests of the Controller	*Art. 6(1)(f) GDPR* - legitimate interest of the Controller to ensure the proper conduct of the company's activities, increasing the efficiency of the activities carried out, respectively to prove, evaluate, document certain facts, situations within procedures, inquiries, investigations
Carrying out internal or external audits regarding the conduct of certain internal processes of the Controller which may also involve Partners	
Knowing the contractual partner and managing cases of conflict of interest and/or corruption	
Preventing and investigating fraud and physical and IT security incidents	
Access to the locations / premises of the Parties and ensuring health and safety in these physical locations	
Compliance with legal obligations regarding the application of international sanctions, anti-money laundering and combating the financing of terrorism (to the extent these obligations apply to the Parties)	*Art. 6(1)(c) GDPR* - legal obligation to apply legislation in the fiscal, banking field or regarding international sanctions, or, as the case may be, *Art. 6(1)(f) GDPR* - legitimate interest of the Controller to ensure the proper conduct of the company's activities, increasing the efficiency of the activities carried out, respectively to prove,

	evaluate, document certain facts, situations within procedures, inquiries, investigations
Transmission of data requested by authorities authorized according to the applicable law	*Art. 6(1)(c) GDPR* - legal obligation to provide the requested information to the authorities

3. DATA SUBJECTS AND PERSONAL DATA

3.1. We will process only the data strictly necessary to fulfill the purposes above depending on the category of data subjects you belong to:

a. **Legal representatives, signatories, contact and execution persons:** name, surname, function/position in the company, signature (classic or electronic), professional contact details (phone number, e-mail address), as well as other data included in the representation documents, if applicable;
b. **Legal representatives, members of corporate governance bodies,** individual shareholders and other individual affiliates, as well as beneficial owners: name, surname, function/position in the company, share of participation (shares/social parts), information regarding the status of publicly exposed person (PEP), and other identification data obtained from incorporation/registration documents or from public sources, necessary within the process of knowing the contractual partner, preventing conflicts of interest, corruption or compliance with the international sanctions regime;
c. **Qualified personnel of the Partner (employees, experts, specialists, subcontractors, technical personnel):** name, surname, function, professional data regarding education, certifications, qualifications, professional authorizations, work experience (CV) or certificates proving specific expertise, to the extent that their transmission is necessary to demonstrate technical capacity or for the actual provision of services covered by the contract concluded between the Partner and the company within the Veolia Romania group.

3.2. From where we collect Personal Data from:

a. **Directly from the data subjects:** when, on their own initiative, the data subject fills out the dedicated form on our website to become a Veolia partner/supplier, or when, at our request, you directly provide us with documents and information necessary to assess technical capacity, conclude and execute the contract (for example: contact details, signatures, professional certificates or CVs);
b. **From the contractual Partner (e.g. the employer of the data subject):** when the data subject's data is provided to us by a representative of the Partner, with whom the data subject has an employment / collaboration relationship;
c. **From public sources and verification processes (indirectly):** from consulting platforms and sources accessible to the public (such as the Trade Register, portals of courts of law, including international databases regarding compliance risks, sanction lists, and specialized monitoring platforms used at the Compliance department level, within the mandatory partner knowledge process), used exclusively in respect of legal representatives, shareholders or beneficial owners, to identify and prevent potential conflicts of interest, acts of corruption, incompatibilities or commercial risks.

4. RECIPIENTS OF PERSONAL DATA

4.1. The data collected through the registration form on the website or during the execution of the contract (e.g. via email directly to our employees) are intended for the internal departments of the Controller with which you come into contact. Depending on the specific interaction, these may be: Procurement Department, Legal Department, Finance-Accounting Department, Compliance Department, as well as the technical or operational departments benefiting from the contract.

4.2.Other categories of recipients of your Data are:

- Companies within the Veolia Group: including parent or affiliated entities (such as Veolia Environnement S.A. / Veolia Environmental Services), which manage the platforms and technical infrastructure used at group level;
- Service providers and subcontractors (Data Processors or associated/independent Controllers): entities located in the European Union/EEA that support us in carrying out our activity, such as: hosting and technical maintenance service providers of the Website/procurement platforms, IT service providers, external consultants and auditors, law firms, etc;
- Public authorities and institutions: state bodies, tax authorities, courts of law, bailiffs or other competent public entities, exclusively for the purpose of fulfilling our legal obligations, defending rights in court or at their express and legal request.

5. TRANSFER OF PERSONAL DATA

Personal Data will be processed in the European Union ("EU") and in countries located in the European Economic Area ("EEA"). For transfers outside the EU/EEA, the Controller will base its transfer of personal data on the standard contractual clauses adopted at the European Commission level or other safeguards recognized by the Regulation and will update this privacy notice accordingly.

6. PROCESSING PERIOD OF PERSONAL DATA

Personal Data will be processed according to the principles of proportionality and necessity. Personal Data will be kept for a period that is proportional to the purpose of processing, taking into account the retention periods provided by law (for example: financial-accounting and tax legislation, archiving), except for situations expressly regulated by law or well-justified cases (for example: in case of research, inquiries, judicial proceedings, etc.) that would determine retention for a longer duration of time.

As an example, we mention the following:

- 30 days for data collected through the form on our website to become a Veolia partner/supplier;
- 5 years for data collected within the process of knowing the contractual partner;
- 5 years from the date of termination of the procurement contract for data collected during the execution of the contract concluded between the Partner and the Controller.

7. SECURITY MEASURES

The Controller will take appropriate technical and organizational measures to ensure that Personal Data is secure and to prevent unauthorized access or disclosure of User Data. Veolia companies in Romania undertake to take all necessary precautions as well as 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.

8. DATA SUBJECT RIGHTS

Data subjects benefit from the following rights related to the processing of Personal Data for the purposes mentioned in this privacy notice and under the conditions provided by the Regulation, as follows:

- the right to have access to Personal Data and to request a copy thereof;
- the right to rectification of Personal Data;
- the right to erasure of Personal Data;
- the right to restriction of processing of Personal Data;
- the right to object to the processing of Personal Data;
- the right to data portability, where technically feasible, and the basis of processing is the contract concluded with the Data Subject;
- the right to lodge a complaint with the National Supervisory Authority for Personal Data Processing, headquartered in Bucharest, B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, postal code 010336, Romania, website: http://www.dataprotection.ro/.

For more information with respect to the processing of Personal Data or to exercise your rights under the Regulation, you can address the Controller at the contact details indicated in this document.

9. RELATED DOCUMENTS

This Privacy Notice is completed by:

a. **Privacy Notice on Cookies** used on the website www.veolia.ro;
b. **Privacy Notice on video monitoring** for situations where you visit one of the Controller's locations where a CCTV monitoring system is implemented.

10. CHANGES TO THE PRIVACY NOTICE

We make changes to the Privacy Notice whenever necessary – for example, when new purposes, processed data, or categories of recipients arise. Each time we make changes, they will be highlighted within this document.

Annex 1 - Data Controller and contact address of the Data Protection Officer

Your Data Controller is the company within the Veolia Romania group with which your entity has entered into a contractual, pre-contractual, or business relationship, which may be one of the following:

- **Apa Nova București S.A.,** headquartered in Bucharest, Tunari str., no. 60A, Ștefan Cel Mare Building, floors 6-9, sector 2, postal code 020528; registered at the Trade Register under no. J40/9006/1999, unique registration code RO12276949.

  Contact details of the Data Protection Officer ("DPO"): ro.anb.dpo@veolia.com.

- **Apa Nova Ploiești S.R.L.,** headquartered in Ploiești, Bobâlna str., no. 10, Prahova county, postal code 100330, registered at the Trade Register under no. J29/527/2000, unique registration code RO 13102711.

  Contact details of the Data Protection Officer ("DPO"): ro.anp.dpo@veolia.com;

- **Veolia Romania Solutii Integrate S.A.,** headquartered in Bucharest, Tunari str., no. 60A, Ștefan Cel Mare Building, floor 1, sector 2, postal code 020528, registered at the Trade Register under no. J40/9004/1999, unique registration code RO12276930.

  Contact details of the Data Protection Officer ("DPO"): ro.vrsi.dpo@veolia.com;

- **Acvatot S.R.L.,** headquartered in Bucharest, Dinu Vintila str., no. 11, floor 5, offices 1-12, Eurotower Building, sector 2, postal code 021101, registered at the Trade Register under no. J1991006629401, unique registration code RO13906.

  Contact details of the Data Protection Officer ("DPO"): ro.acvatot.dpo@veolia.com.

- **VEOLIA BUSINESS SOLUTIONS ROMANIA GIE**, headquartered in Tunari Str., No. 60A, Floor 8, Sector 2, Bucharest, postal code 020528, registered at the Trade Register under no. J2024049210008, unique registration code 51037225.

  Contact details of the Data Protection Officer ("DPO"): ro.anb.dpo@veolia.com.

- **NISAL S.R.L.**, headquartered in Mediaș, Avram Iancu Str., no. 4, ap. 2, floor P, postal code 551058, jud. Sibiu, registered at the Trade Register under no. J32/609/1996, unique registration code 9048436.

  Contact details of the Data Protection Officer ("DPO"): ro.anb.dpo@veolia.com.

- **GENERAL ME.EL ELECTRIC S.R.L,** headquartered in Constantin Dobrogeanu Gherea str. no. 2Bis, Baicoi, jud. Prahova, registered at the Trade Register under no. J29/970/1993, unique registration code 3755713.

  Contact details of the Data Protection Officer ("DPO"): ro.anb.dpo@veolia.com.