

PRIVACY POLICY

Date: 25.08.2026

Operator

The operator of this website is Electro-Alfa International S.A., a Romanian commercial company with fully private capital, having its registered office at 15 Calea Națională Street, Botoșani, Botoșani County, registered with the Trade Register under no. J1994001310079, Unique Registration Code: RO 7348194, telephone: (0372) 319 911, e-mail: marketing@electroalfa.ro.

You can find more information about our company here: www.electroalfa.ro.

Legal Framework and General Principles

The protection of personal data is a priority for us. In this regard, we constantly take measures to ensure the protection of the personal data we process in the course of our day-to-day activities, ensuring that we comply with the applicable legal principles.

The processing of personal data is carried out by us in full compliance with the applicable legal provisions, namely the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 – abbreviated as GDPR), as well as with the relevant national and European legislation.

Electro-Alfa International S.A. undertakes to comply with the applicable legislative provisions and undertakes to process the personal data that are/have been provided by you securely and only for the stated purposes. In this context, Electro-Alfa International S.A. guarantees that access to personal data is granted only to its employees and



contractors engaged for support services, within the limits established by their job descriptions or by specific contractual provisions, and solely for the purpose of carrying out the tasks assigned to them. We have a strict personal data protection policy and constantly ensure that our employees and contractors are aware of the importance of this matter and of the risks to which they are exposed or to which they may expose the company in the event of any failure to comply with personal data security requirements.

In addition, we would like you to be aware that the personal data we process is stored on our IT systems, which benefit from an adequate level of security, or in physical documents archived under appropriate security conditions. When we carry out personal data processing operations, we ensure that an adequate level of protection is maintained and take all necessary measures to ensure the confidentiality of such data. Electro-Alfa International S.A., as the author/owner/administrator of the website <https://electroalfa.ro/>, ensures and respects, in accordance with the law, the confidentiality of users' personal data and their right to privacy. This obligation does not apply to information deliberately disclosed by users to third parties, either before or after providing such information to us.

Electro-Alfa International S.A. collects personal data only with your consent, through the voluntary provision of such data via the website <https://electroalfa.ro/>, by using the contact form or by subscribing to our newsletter. The personal data collected is intended to be used by Electro-Alfa International S.A. for the purposes and under the conditions set out in this document and will not be disclosed to any third party, except for our contractors engaged for support services, within the limits established by specific contractual provisions, and to public authorities, at their request, in accordance with the law.

The following personal data may be collected and processed:

- First name, last name, job title
- Contact details – e-mail address, telephone number
- County/region





Refusal to provide personal data may result in Electro-Alfa International S.A. being unable to provide the relevant services and/or fulfill the other processing purposes. We also confirm that we do not request, collect or, therefore, process special categories of personal data, such as political opinions, religious beliefs, sexual orientation, etc.

In addition, Electro-Alfa International S.A. uses traffic analysis systems on the website www.electroalfa.ro, such as Google Analytics, which collect information about the pages accessed within the website, including the following technical information: the IP address from which the website is accessed (collected in anonymized/truncated form, in accordance with the privacy settings enabled in our Google Analytics account), the operating system used, the browser type and the type of device used to access the website. To anonymize the IP address, we have enabled the mechanisms provided by Google prior to storage, thereby reducing the risk of directly identifying users. We also use other Google services, such as Google Marketing Platform and Google Ads, which help us better analyze which of the "Google Ads" advertisements we place are received by internet users.

On our website, provided that you have given us your consent for this purpose, we also use Facebook CAPI or the "Facebook Pixel" for advertising purposes. Through this integration of Facebook CAPI and Facebook Pixel, Meta Platforms Ireland Limited ("Meta"), as a Facebook provider, receives information that you have accessed the corresponding page on our website using your device at that time. If you are logged in to Meta services (e.g., Facebook, Instagram), Facebook may be able to attribute the visit to your Meta profile. Data processing also takes place in the United States. In this regard, Meta Platforms Ireland Limited has entered into the so-called EU Standard Contractual Clauses with its US parent company in order to ensure an adequate level of data protection. With reference to the relevant case law of the CJEU ("Schrems II"), we would like to emphasize that, in principle, there is no adequate level of data protection in the United States and, in particular, there are no adequate legal remedies available to EU citizens against state surveillance measures. More information about the processing of data by "Meta" is available here: <https://de-de.facebook.com/privacy/policy/>.

Similarly, Google services (Google Analytics, Google Marketing Platform, Google Ads) may involve the transfer of certain data to the United States. Google LLC is certified under the EU-U.S. Data Privacy Framework, adopted by the European Commission in 2023, which constitutes the legal basis for these transfers.

In addition, Electro-Alfa International S.A. uses cookies to temporarily store certain anonymized information unrelated to personal data, in order to ensure the functionality of the website and the information contained therein, improve the services provided, and make the visitor experience efficient and valuable.

Detailed information about the categories of cookies used (necessary, analytics and marketing) and how you can give or withdraw your consent for each category is available in the Cookie Policy accessible on our website at the following link: https://electroalfa.ro/f/elements/465/ro/Politica_cookies.pdf

The personal data collected and the basic information mentioned above are used for the following purposes:

- For contacting potential customers and for statistical and marketing analyses;
- For advertising and publicity purposes, including direct marketing and commercial communications (newsletters) regarding Electro-Alfa International S.A.'s services and products;
- For sending communications (newsletters) on topics of interest within our field of activity;
- For monitoring traffic and improving our services. The processing of your data for this purpose is based on Electro-Alfa International S.A.'s legitimate interest in ensuring the proper functioning of the website, as well as continuously improving the experience of website visitors, including by providing responses to various questions, comments and complaints;
- For the protection of our legitimate interests (protecting against the risk of cyberattacks, preventing and reporting fraud, etc.).

Purpose and Legal Basis for Processing

The personal data you provide to us will be processed strictly for the purposes for which it was collected, namely for the purpose of carrying out our collaborative relationship, on a contractual or purely conventional basis. The processing of personal data by us is carried out:

- on the basis of **consent** – (point (a) of Article 6(1) of the GDPR)
- on the basis of an **assessment of interests** – (point (f) of Article 6(1) of the GDPR)
- in order to fulfill a **legal obligation** – (point (c) of Article 6(1) of the GDPR)

Data Retention Periods

We process your personal data for the following periods, depending on the purpose of the processing:

- **Data collected through the contact form:** for the duration of the correspondence and for an additional 3 years from the last contact, in order to address any subsequent requests;
- **Data collected for the newsletter:** for the entire duration of the subscription, until you unsubscribe, plus an additional period of 30 days for the technical processing of the unsubscribe request;
- **Data processed for traffic analysis (Google Analytics):** in accordance with the retention period set in the account, namely 14 months;
- **Data processed for advertising purposes (Google Ads, Meta):** for the duration of the consent given, which may be withdrawn at any time;



Upon expiry of these periods, the data is deleted or anonymized, except where the law requires a longer retention period.

Your Rights as a Data Subject

Everyone who visits the Electro-Alfa International website is guaranteed the rights provided for under Regulation (EU) 2016/679 on the protection of personal data (GDPR). Accordingly, you have the following rights, which you may exercise at any time by sending us an e-mail to marketing@electroalfa.ro, specifying your name, postal address or e-mail address (depending on your preferred method of communication), telephone number, and the purpose of your request:

a. Right of access. The personal data concerning you is or is not being processed and, where this is the case, upon request, you have the right to access such data and to receive information regarding the processing carried out.

b. Right to withdraw consent. You may withdraw your consent to the processing of your personal data at any time. Withdrawal shall not affect the lawfulness of processing based on consent given prior to its withdrawal.

c. Right to rectification. You have the right to request the rectification (updating/correction) of inaccurate data or the completion of incomplete data.

d. Right to restriction of processing. Subject to the applicable legal provisions, you have the right to request and obtain the restriction of the processing of your personal data.

e. Right to erasure of data ("right to be forgotten"). You have the right to request the erasure of processed personal data if there is no longer a legal basis for processing such data, for example, if there is no legal obligation or legitimate interest requiring its retention. This right is not absolute and may be refused with justification, in accordance with the law.

(e.g.: if the data is processed lawfully and is necessary for the purpose for which it was collected).

f. Right to object. You have the right to object to the processing of your personal data based on the legitimate interest of the controller or a third party. In particular, you have





the right to object at any time, without conditions, to the processing of your data for direct marketing purposes, including the creation of marketing profiles related to this type of commercial communication. This right to object may be exercised by sending an e-mail to marketing@electroalfa.ro or by using the unsubscribe link included in any newsletter received.

g. Right to data portability. You have the right to receive your personal data that is subject to processing in a structured format, commonly used and machine-readable, and to request the transmission of such data to another controller;

h. Right to lodge a complaint. Users have the right to lodge a complaint with the supervisory authority for the processing of personal data. If you are a resident of another Member State of the European Union, you also have the right to lodge a complaint with the supervisory authority in the Member State where you have your habitual residence, place of work or where the alleged infringement took place.

We aim to respond to any valid requests within a maximum of 30 days, unless we require additional time, in which case we will inform you accordingly.

Data Protection Officer (DPO)

We have a Data Protection Officer. The DPO can be contacted as follows:

Electro-Alfa International S.A., registered office: mun. Botoșani, 15 Calea Națională Street, Botoșani County,

Romania

D.P.O. (Data Protection Officer)

E-mail: marketing@electroalfa.ro

In order to exercise your right to lodge a complaint with a supervisory authority, you may contact the data protection supervisory authority using the following contact details:

National Supervisory Authority for Personal Data Processing





Address: B-dul G-ral. Gheorghe Magheru no. 28-30, Sector 1, postal code 010336, Bucharest, Romania

Telephone: +40.318.059.211 or +40.318.059.212;

E-mail: anspdcp@dataprotection.ro

Website: www.dataprotection.ro

Amendments to this Privacy Policy

This Privacy Policy is reviewed periodically to reflect changes to the website or other circumstances that require it to be updated. The updated version of the policy will be continuously available on this website, ensuring easy access to the latest information regarding data protection. We recommend reviewing this section periodically to stay informed about any changes.