

INFORMATION NOTICE REGARDING THE PROCESSING OF PERSONAL DATA

Addressed to the legal and commercial representatives of business partners, including customers and users of the Affinity Platforms according to the settings made by customers with access rights

Introduction

This information notice describes how Affinity Transport Solutions S.R.L. processes your personal data, the purposes and legal grounds for processing, the categories of data concerned, the recipients of such data, retention periods, the security measures applied and the rights you benefit from under the applicable legislation.

The processing of personal data is carried out in compliance with Regulation (EU) 2016/679 ("GDPR"), applicable in the European Union since 25 May 2018, Law no. 190/2018 on measures for the implementation of the GDPR, as well as any other applicable legal acts in the field of personal data protection.

Personal data means any information relating to an identified or identifiable natural person, such as first name, last name, contact details, identity document data, online identifiers, location data or any other elements specific to the physical, economic, cultural or social identity of the data subject.

Our company processes personal data only to the extent necessary for the stated purposes, based on an appropriate legal ground and in compliance with the principles of lawfulness, fairness, transparency, minimisation, accuracy, storage limitation, integrity and confidentiality.

This notice does not cover processing operations carried out independently by partners holding or operating points of sale where Fuel Cards may be used, such as the partners' own video surveillance systems. For such processing, the respective partners act in accordance with their own privacy policies and are liable under the law.

We recommend that you read this notice carefully and contact us for any additional information or clarifications regarding the processing of your personal data.

Categories of Processed Data, Legal Grounds and Purposes of Processing

Within the existing or potential commercial relationships between Affinity Transport Solutions S.R.L. and you or the company you represent, we may process certain personal data necessary for initiating, concluding, performing and administering contractual relationships, for fulfilling legal obligations and for protecting the legitimate interests of the company.

The categories of data, legal grounds and main purposes of processing are summarised in the table below. Depending on the specific situation, Affinity Transport Solutions S.R.L. may process only part of these data.

Categories of data	Legal ground	Main purposes
Name, surname, position/capacity, professional contact details, signature, identity document data, personal identification number where required by law, identifiers in applications/platforms, vehicle data and Fuel Card transaction data, to the extent that they may identify a natural person.	Performance of the contract or pre-contractual steps; fulfilment of legal obligations; legitimate interest; consent, where required.	Administration of the commercial relationship, validation and settlement of transactions, operational communications, accounting and tax records, management of platform access, defence of the company's rights and interests and transmission of commercial communications under the law.

Image, video or audio recordings, where surveillance or recording systems exist in locations managed by the company.	Legitimate interest regarding the security of persons, assets and premises; legal obligations, where applicable.	Access control, security of premises and prevention of security incidents.
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Retention of Personal Data

Personal data are retained only for as long as necessary to fulfil the purposes for which they were collected or for the period required by law. Retention periods may vary depending on the type of data and the purpose of processing: for example, video recordings are generally kept for a limited period, while accounting and tax documents are retained in accordance with the terms provided by applicable legislation.

Upon expiry of the retention periods, data are deleted, anonymised or archived, as applicable, in compliance with internal policies and applicable legal requirements. In the event of disputes, audits, investigations or requests from authorities, certain data may be retained for the period necessary to defend the company's rights and legitimate interests.

In order to ensure your right to protection with regard to the processing of your personal data, our company has implemented, for certain categories of sensitive data or data capable of significantly affecting your rights, special technical and organisational measures designed to protect such categories of personal data.

Personal data	Retention method	Retention period
Name and surname; identity card identification data; data included in identification documents, such as sex, age, personal identification number, date of birth; professional telephone number; professional email address; handwritten signature.	In electronic format, on AFFINITY's own server, on equipment used by AFFINITY staff involved in the commercial relationship with the respective customer/supplier and within the GITS accounting record system.	10 years, in accordance with accounting legislation.
Name and surname; identity card identification data.	In paper format, in the visitor/access register.	5 years, in accordance with accounting legislation.
Photograph; video/audio recording.	In electronic format, within video monitoring equipment at AFFINITY locations.	30 days.
Professional telephone number and professional email address.	In electronic format, on AFFINITY's own server.	Throughout the commercial relationship and for 15 years from its termination.
For users of the platforms made available by Affinity and of the Fuel Cards issued to the	In electronic format, on AFFINITY's own server, within the platforms	Throughout the commercial

Client: professional telephone number, professional email address, capacity (e.g. driver), platform identifier, fuel station/point of sale, vehicle number and Fuel Card transaction details, to the extent that they constitute data identifying the data subject.	made available by Affinity and through the transaction validation mechanism with partners holding points of sale where Fuel Cards are used.	relationship and for 15 years from its termination.
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Data Security and Protection Measures

Type of data / medium	Security measures
Data stored electronically, including in IT systems, platforms, servers and company equipment.	Access controlled based on rights and passwords, limitation of access to authorised persons, appropriate technical and organisational measures, staff training and monitoring of compliance with internal policies.
Data stored in physical format, including contractual documents, registers or accounting documents.	Storage in areas with restricted access, controlled archiving and access permitted only to authorised staff.
Video or audio recordings, where surveillance systems exist.	Restricted access, limited retention period and use exclusively for security purposes, in compliance with applicable legislation.

Recipients of Personal Data

Personal data may be transmitted, to the extent necessary and in compliance with the law, to public authorities, tax institutions, auditors, consultants, IT service providers, archiving service providers, credit institutions, contractual partners involved in the validation and settlement of transactions, as well as to other entities where such transmission is necessary for fulfilling a legal obligation or for the performance of commercial relationships.

Where Affinity Transport Solutions S.R.L. and partners holding points of sale jointly determine the purposes and means of certain processing activities, they may act as joint controllers within the meaning of Article 26 of the GDPR. The essential elements of the arrangement between joint controllers may be made available to data subjects, in accordance with the law and subject to confidentiality and trade secret requirements.

Your Rights and How to Exercise Them

As a data subject, you benefit from the rights provided by the GDPR, within the limits and conditions established by law: the right of access, the right to rectification, the right to erasure, the right to restriction of processing, the right to object, the right to data portability, the right not to be subject to a decision based solely on automated processing, the right to withdraw consent where processing is based on consent, and the right to lodge a complaint with the competent supervisory authority.

- 1. Right of access.** The right of access allows you to obtain confirmation as to whether or not your data are being processed, as well as information regarding the purposes of processing, categories of data, recipients, retention period and the rights you benefit from. The first copy of the data is provided free of charge, while a reasonable fee may be charged for additional copies, in accordance with the GDPR.
- 2. Right to rectification.** The right to rectification allows you to request the correction of inaccurate data and the completion of incomplete data.

3. **Right to erasure.** The right to erasure may be exercised in the cases provided by the GDPR, without affecting situations where the company has a legal obligation or legitimate interest to retain certain data.
4. **Right to restriction of processing.** You have the right to obtain restriction of the processing of your personal data, in particular where you contest the accuracy of the data, where the processing is unlawful or where our company no longer needs the data according to the law.
5. **Right to object.** You have the right to object to the processing of your personal data by us, in particular where the processing is carried out for marketing purposes or on grounds relating to your particular situation.
6. **Right to data portability.** The right to data portability allows you, under the conditions of the GDPR, to receive the data provided by you in a structured, commonly used and machine-readable format and to request transmission of such data to another controller, where technically feasible.
7. **Right to withdraw consent.** Where processing is based on consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing carried out before such withdrawal. This right is not absolute, meaning that there are cases where your data will not be erased following withdrawal of consent, for example where the data are used to comply with a legal obligation, for public health security or for scientific research.
8. **Right to lodge a complaint.** You have the right to lodge a complaint with the supervisory authority for personal data processing, namely the National Supervisory Authority for Personal Data Processing (ANSPDCP), regarding matters concerning the processing of your personal data by our company.

How You Can Exercise Your Rights

To exercise your rights or for any questions regarding the processing of personal data, you may contact us using the contact details indicated in this notice. Requests will be analysed and resolved within the time limits provided by the GDPR, with the possibility of extension in complex cases, in accordance with the law.

What Happens If You Do Not Provide Personal Data

The provision of certain personal data is necessary for initiating and carrying out commercial relationships, for access to platforms or for fulfilling legal obligations. Refusal to provide the necessary data may result in the impossibility of initiating, performing or continuing commercial relationships or in the limitation of access to certain services.

Therefore, if you do not provide personal data or request their withdrawal or erasure, AFFINITY may be unable to conduct the commercial relationship under optimal or lawful conditions, with the risk that such relationship may need to be terminated.

Changes and Information Regarding Secondary Purposes

This notice may be updated periodically to reflect legislative, operational or technical changes. Any relevant change will be brought to the attention of data subjects by appropriate means, without limiting their rights under the applicable legislation.

If we intend to process your data for purposes other than those indicated in this notice, we will inform you in advance and, where necessary, request your consent or indicate the legal ground applicable to the new processing.

Contact Details

For any requests, questions or clarifications regarding the processing of personal data, you may contact us at the following details:

AFFINITY TRANSPORT SOLUTIONS S.R.L.

Registered office address: Bd. Timișoara no. 4A, AFI Park 4&5 Building, AFI Park 4 Wing, 1st floor, Sector 6, Bucharest, 061328, Romania.

Email address: affinity.ro@affinity-ts.com

For the prompt resolution of requests, please mention in your correspondence that the request concerns personal data protection / GDPR matters.

AFFINITY TRANSPORT SOLUTIONS S.R.L. TEAM