

## **Confidentiality Policy on the processing of personal data**

### **Who are we and how can you contact us?**

eMAG is the commercial name of DANTE INTERNATIONAL S.A., Romanian legal entity, Romanian nationality, with registered office in Bucharest, 148th Soseaua Virtutii, district 6, with serial number in the Trade Register J40 / 372 / 23.01.2002, unique registration tax code RO14399840. Within this Policy, eMAG refers to and targets the companies in the eMAG group mentioned in the Speak-up Policy.

Whereas we are always open to find out about your opinions, as well as to provide you with additional information which you might need regarding the processing of your data, we encourage you to contact the Data Protection Officer at the email address mentioned at the end.

We consider ensuring the right to the protection of personal data as a fundamental commitment, therefore, we will dedicate all our necessary resources and efforts to process your data in full accordance with Regulation (EU) 2016/679 ("General Data Protection Regulation" or "GDPR"), as well as with any other applicable legislation on the Romanian territory. Whereas one of the essential principles of this legal framework is represented by transparency, we have prepared this document by which we wish to inform you about the manner in which we collect, use, transfer and protect your personal data when you interact with us, in relation to the sending of reports under the Speak-up Policy – The Policy regarding the manner of reporting of law or conduct rules violations..

### **What categories of personal data do we process?**

For the above-mentioned purpose (except for the case where you choose to anonymously report), we collect your personal data, as data controller, so that you have control over the information type you provide to us:

- first and last name, email address, phone number,
- other personal data that you provide to us within the report (either captured in the message, or provided by means of an annex).
- during a (potential) investigation, eMAG may also process other personal data regarding the circumstances of the reported conduct or incident, which could be connected to you.

We do not collect or otherwise process sensitive data, included by the General Data Protection Regulation in special categories of personal data.

### **What are the purposes and grounds of processing?**

We will use your personal data for the purpose of carrying out the investigation regarding the reported improper situation or conduct.

Your personal data collected for the above purpose will be processed:

- according to the legal obligation provided by the applicable law in the field of warnings; as provided by the Speak-up Policy; and for the legitimate interest of eMAG which, specifically, supports (i) the monitoring of compliance of the Code of Conduct and of other policies of the eMAG Group; (ii) the prevention of improper conduct and/or; (iii) the establishment, exercise or defence of actions in court.

### To whom do we send your personal data?

By filling in your data in the online reporting system provided by the Speak-up Policy, by sending a notification at [speak-up@emag.ro](mailto:speak-up@emag.ro) or by oral reporting you accept that your personal data is:

- included in the database located on the servers hosted and managed in Germany by GCS Compliance Services Europe Limited, a NAVEX branch, for the purpose of processing reports;
- communicated by eMAG to the Prosus Group of which it is part, for purpose of internal reporting, to consultants, auditors or to the personnel involved in solving reports, and if applicable, to the competent authorities.

We make sure that access to your data by private legal third parties is carried out in accordance with the legal provisions on data protection and information confidentiality, based on contracts concluded with them.

### How do we keep your personal data secure?

We are committed to ensuring the security of personal data by implementing appropriate technical and organizational measures, according to industry standards.

### What rights do you have?

The general data protection regulation will recognize a number of rights in relation to your personal data. You may request access to your data, the correction of any errors in our files and/or you can object to the processing of your personal data. You can also exercise your right to complain to the competent supervisory authority or to go to court. As the case may be, you can also enjoy the right to request the deletion of your personal data, the right to restrict the processing of your data and the right to data portability.

More information on each of these rights can be obtained by consulting the table presented below.

To be able to exercise your rights, you can contact us using the contact details set out above. Please remember the following aspects if you want to exercise these rights:

**Identity.** We treat the confidentiality of all records containing personal data with utter seriousness.

**Fees.** We will not charge a fee to exercise any right regarding your personal data, unless your request to access information is unjustified, repetitive or excessive, in which case we will charge a reasonable amount in such circumstances. We will inform you on any fees applied before settling your request.

**Response time.** We aim to respond to any valid requests within a maximum of one month, except when this is particularly complicated or if you have made several requests, in which case we will respond within a maximum of two months. We will let you know if we require more than a month. We might ask you if you can tell us exactly what you want to receive or what exactly concerns you. This will help us act faster and shorten the response time to your request.

**Rights of third parties.** We must not comply with a request if it would negatively affect the rights and freedoms of other data subjects.

Data subject's rights	Description
<b>Access</b>	You may ask us: <ul style="list-style-type: none"><li>• to confirm if we are processing your personal data;</li><li>• to provide you with a copy of such data;</li></ul>

	<ul style="list-style-type: none"> <li>to provide you with other information on your personal data, such as the data we have, what we use it for, to whom we disclose it, if we transfer it abroad and how we protect it, how long we keep it, what rights you have, how you can file a complaint, where we obtained your data from, to the extent that the information has not already been provided to you through this document.</li> </ul>
<b>Correction</b>	<p>You can ask us to correct or supplement your inaccurate or incomplete personal data. It is possible to attempt to check the accuracy of the data before correcting them.</p>
<b>Data deletion</b>	<p>You can ask us to delete your personal data, however, only if:</p> <ul style="list-style-type: none"> <li>they are no longer necessary for the purposes for which they were collected; or</li> <li>you have withdrawn your consent (if data processing is based on consent); or</li> <li>you exercise a legal right to object; or</li> <li>they were processed illegally; or</li> <li>we have a legal obligation in this regard.</li> </ul> <p>We must not comply with your request to delete your personal data if the processing of your personal data is required:</p> <ul style="list-style-type: none"> <li>to comply with a legal obligation; or</li> <li>for establishing, exercising or defending a right in court.</li> </ul> <p>There are certain other circumstances when we are not obliged to comply with your data deletion request, although these two are the most likely circumstances when we may refuse your request</p>
<b>Restriction of data processing</b>	<p>You can ask us to restrict your personal data, however, only if:</p> <ul style="list-style-type: none"> <li>their accuracy is challenged (see the correction section), to allow us to verify their accuracy; or</li> <li>the processing is illegal, but you do not want the data to be deleted; or</li> <li>they are no longer necessary for the purposes for which they were collected, but you need them to establish, exercise or defend a right in court; or</li> <li>you have exercised your right to object, and the verification of whether our rights prevail is underway.</li> </ul> <p>We may continue to use your personal data following a restriction request, if:</p> <ul style="list-style-type: none"> <li>we have your consent; or</li> <li>for establishing, exercising or defending a right in court; or</li> </ul>

	<ul style="list-style-type: none"> <li>to protect eMAG's rights or the rights of another natural or legal entity.</li> </ul>
<b>Data portability</b>	<p>You can request us to provide your personal data in a structured, commonly used and machine-readable format, or you can request that it be "<i>ported</i>" directly to another data controller, but in each case only if:</p> <ul style="list-style-type: none"> <li>the processing is based on your consent or on the conclusion or execution of a contract with you; <u>and</u></li> <li>the processing is done by automatic means.</li> </ul>
<b>Objection</b>	<p>You can object at any time, for reasons related to your particular situation, to the processing of your personal data based on our legitimate interest, if you consider that your fundamental rights and freedoms prevail over this interest.</p> <p>Also, you can object at any time to the processing of your data for direct marketing purposes (including profiling), without stating any reason, in which case we will cease this processing as soon as possible.</p>
<b>Automated decision making</b>	<p>You can request not to be subject to a decision based exclusively on automatic processing, however, only when that decision:</p> <ul style="list-style-type: none"> <li>produces legal effects for you; or</li> <li>it affects you in a similar way and to a material extent.</li> </ul> <p>This right does not apply if the decision reached following automated decision-making:</p> <ul style="list-style-type: none"> <li>is necessary for us to conclude or execute a contract with you;</li> <li>is authorized by law and there are adequate guarantees for your rights and freedoms; or</li> <li>is based on your explicit consent.</li> </ul>
<b>Complaints</b>	<p>You have the right to file a complaint with the supervisory authority regarding the processing of your personal data. In Romania, the contact details of the supervisory authority for data protection are as follows:</p> <p>National Authority for the Supervision of Personal Data Processing</p> <p>Bld. G-ral. Gheorghe Magheru no. 28-30, District 1, postal code 010336, Bucharest, Romania</p> <p>Telephone: +40.318.059.211 or +40.318.059.212;</p> <p>Email: <a href="mailto:anspdcp@dataprotection.ro">anspdcp@dataprotection.ro</a></p> <p><b>Notwithstanding your right to contact the supervisory authority at any time, please contact us in advance, and we promise that we will make every effort to solve any problem amicably.</b></p>

We remind you that you can contact the eMAG Data Protection Officer at any time by sending your request via any of the following methods:

- by email at: [data.protection@emag.ro](mailto:data.protection@emag.ro).