

For **Escape Group**, ensuring the confidentiality and security of your personal data is an obligation, but also a challenge that we take on with all our hearts. Beyond the legal obligation to comply with the provisions of the EU Regulation 679/2016 (General Data Protection Regulation – abbreviated GDPR), we believe that it is extremely important for our partners and customers to know that, at any time, Escape Group conducts its business based on the premises that it is absolutely natural to ensure the conditions for the confidentiality and security of personal data. Through this notice, we would detail the way we process your personal data, when: you visit escapegroup.ro, when you communicate or order from us.

Controller's identity and contact data

ESCAPE GROUP SRL, personal data controller (hereinafter referred to as the Controller), headquartered in Bucuresti, Str. Voila nr. 10, bl.21, etaj 3, apt. 56, District 4, registered with the Trade Register under the no. J40 / 14521 / 2005, having the Tax Registration Number (CIF): RO 17888760, and bank account no. RO77 BRDE 441S V515 0607 4410, opened with BRD –Vacaresti Branch, Bucharest, email: office@escapegroup.ro; telephone: +40720 200 585, processes legally and responsibly the personal data collected through escapegroup.ro website, by complying with GDPR and the provisions of domestic law and by implementing and periodically reviewing the organizational and technical security measures.

What categories of personal data do we process?

Most of the time, the personal data detailed below are processed directly from you, when you contact us by phone, when you place an order or when you send us an email. When using the official means of contact and the escapegroup.ro webpage, the following types of personal data are processed:

· last name and first name; · email address; · telephone number; · home/correspondence address; · bank information; · industry (field of activity); · CNP (Personal Identification Number) (for invoices issued to natural persons); · IP, used browser and data regarding the escapegroup.ro webpage visitor behaviour.

We do not process special personal data, as defined by GDPR. We also do not want to collect or to process data from minors under the age of 16.

What are the purposes of data processing? On what grounds is this achieved?

The abovementioned personal data are processed for the following purposes:

1. invoicing of the products you purchased;
2. communication of information between the parties in respect of the purchased products;
3. solving the issue connected to the products ordered and shipped to you (return, reimbursement of the amounts paid for returned items);
4. delivery, by means of express courier services, of the products you ordered.

The processing of personal data for such purposes (1 – 4) shall be carried out pursuant to Art. 6, para. 1, letters a, b, c of GDPR and, in most of the cases, is needed to enter into and execute an agreement (distance contract) between the parties. Also, some processing determined by these purposes are required under the applicable laws in the field of tax and accounting.

5. improving the services we provide to you.

For this purpose, we can process some information connected to your behaviour as purchaser/visitor of escapegroup.ro website. We base this type of processing, which is being carried out under Art. 6, para. 1, letter f of GDPR, on our legitimate interest to carry out commercial activities, always taking care that your fundamental rights and freedoms are not violated.

6. protection and security;

Escape Group may place security cameras at the company's headquarters and at the other premises held, in order to protect its legitimate interests. The areas where security cameras are placed shall always be marked by a warning. We may process the data obtained through this type of processing based on a legitimate interest, which consists in ensuring the protection and security of our systems and clients.

The processing of personal data shall be carried out by automated and manual means.

Processed data storage period

We will process the personal data throughout the time necessary to perform the contractual obligations by any of the parties. The personal data will be stored as long as necessary for the purposes stated above or for a period of time set forth by the legal provisions. In certain cases, as per the legal requirements, we may keep some of your personal data, should there be a negative balance or an unsettled dispute. Not all your personal data are subject to the same storage period. The accounting documents, for example, the invoices issued by the Controller, shall be archived according to the law, for a period of 10 years as of the issuance thereof.

What categories of recipients do we share your data with?

The personal data processed by the Controller are/can be shared with the following categories of recipients:

- a) courier services providers;
- b) providers of banking and non-banking services;
- c) companies that provide services related to the operation of information systems;
- d) companies providing hosting services;
- e) public authorities, when we have a legal obligation or if we have to protect a legitimate interest.

When we use a natural person or a legal entity as entity empowered to process some parts of your personal data, we will make sure that they undertake the obligations to process the data as per our instructions and to implement measures to protect privacy. We do not transfer nor do we intend to transfer your personal data to other companies, organizations or individuals in third countries.

Security of personal data

Having in view the processing of your personal data, the Controller shall apply the technical and organizational measures needed in order to ensure the security thereof, the protection against accidental or illegal destruction, amendment, disclosure or unauthorised access, as per industry standards. Continuous improvement of computer security measures is one of our priorities.

What rights do you have? How can you use them?

According to GDPR, you have the following rights (they are disclosed in detail in Articles 12 – 23 of GDPR):

- **information and access** (you can obtain information on the processing of your personal data, based on a request to which we will respond within maximum 30 days);

- **correction** (the right to obtain the correction of incorrect data or the supplementation of incomplete data);
- **deletion of data** (“the right to be forgotten”);
- **processing restriction** (you can reasonably request the restriction of your data processing);
- **data portability** (you can request the receipt of personal data, upon request, in a structured format, currently used and which can be read automatically);
- **objection to data processing** (for example, you have the right to object at any time to our processing of your personal data for direct marketing);
- **the right not to be subject to an automated individual process.**

You have the right to address the courts of law or the National Supervisory Authority for Personal Data Processing. You can exercise these rights at any time, via email, at the following address: office@escapegroup.ro, or you can send us a letter at Bucharest, 10th Voila St., bl.21, 3rd floor, apt. 56, District 4, zip code 041944

This document, disclosed as a first issue, shall be applicable as of 25.05.2018. We reserve the right to make any necessary additions or amendments.