

## PRIVACY POLICY

Thank you for visiting our site. When you contact us or when you access our services, you entrust us with your information. The purpose of this Privacy Policy is to explain what data we process, why we process it and what happens to it. We take privacy seriously, so we never sell lists or email addresses. Being fully aware that your personal information belongs to you, we therefore do our best to store it securely and to process the information you share with us carefully. We do not provide information to third parties without informing you. This information is important. We hope you read it carefully.

By browsing the [www.artrom.com](http://www.artrom.com) website, you declare that you have been properly informed of the data processing by going through this document, hereinafter referred to as the "Privacy Policy".

### DEFINITIONS

We will begin to define some concepts to help you understand this Privacy Policy.

According to Regulation (EU) 679/2016 applied in Romania since May 25, 2018, the companies ARTROM STEEL TUBES S.A. (Romania), manufacturer of seamless pipes, together with the ARTROM ITALIA s.r.l. (Italy) and ARTROM Deutschland GmbH (Germany) are personal data controllers.

When we say "**GDPR**" we refer to Regulation (EU) 679/2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC.

**"Personal data"** means any information relating to an identified or identifiable natural person ("the data subject");

According to the legislation, you, as a site visitor, are a "data subject", that is an identified or identifiable natural person. An identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identifying element, such as a name, an identification number, location data, an online identifier, or one or more many specific elements, proper to his physical, physiological, genetic, mental, economic, cultural or social identity.

### WHO WE ARE

Both the companies ARTROM STEEL TUBES S.A. (Romania), manufacturer of seamless pipes, together with ARTROM ITALIA s.r.l. (Italy) and ARTROM Deutschland GmbH (Germany), as well as their partners pay special attention to the protection of your personal data. Compliance with EU law, namely Regulation 679/2016 on the protection of personal data and good practices in the field, as well as ensuring a climate of transparency, security and trust for our present and future customers is a priority for us, for which employees, collaborators, our partners and our leadership firmly declare their support.

## **QUESTIONS AND REQUESTS**

If you have any questions or concerns regarding the processing of your data or wish to exercise your legal rights in relation to the data we hold, or if you are concerned about the way we treat any confidentiality issue, you can write to us at e- mail: [dpo@artrom.com](mailto:dpo@artrom.com)

## **WHAT INFORMATION DO WE COLLECT, FROM WHOM AND FOR WHICH PURPOSE (categories of data subjects)?**

### **- Business partners (suppliers, carriers, customer, etc.):**

- identification and contact details
- data on goods and delivery data
- invoicing and payment details
- data from the communication between the company and you
- if you visit us in person, we also process the camera recordings from our headquarters.

### **PURPOSE:**

- If you have purchased goods from us or have given us permission to send commercial messages, we may send you information about our products.
- Identification of goods, invoicing and payment.
- Personality of the company's legal obligations (tax laws, accounting documents, etc.).
- Your identification for the purpose of concluding a contract and its subsequent performance (for example, you are the contact person or the person acting in the contract).
- Recovery of claims from the contract and protection against claims, the pursuit of economic activity and the protection of goods and safety.
- Settlement of disputes, investigations or any other petitions / complaints / requests to which the company is a party.
- For a number of secondary purposes (e.g. for archiving, internal, external audit, etc.), which are always consistent with the main purposes for which the data was originally collected by the company.
- Centralization of operations and maintenance of an internal database, in which the information about the data subjects is stored, so that it can be used by the departments and structures of ARTROM STEEL TUBES S.A., ARTROM ITALIA s.r.l. and ARTROM Deutschland GmbH in carrying out their activity (e.g.: the use of these data involves their processing by internal applications which are used by the relevant departments in carrying out the activity);

### **- Visitors and delegates:**

- Name and surname
- The company represented by the visitor / delegate
- The compartment / section where it moves
- Check-in / check-out time and Signature.

### **PURPOSE:**

The purpose of the processing is to have a record of persons / vehicles that have received access to the premises of the company in order to maintain a high level of Security according to Law 333/2003, with subsequent updates and amendments, (Annex 2d and 2e, of Decision no. 301/2012 on the methodological norms of application, with subsequent updates and amendments).

### **- Candidates for vacant positions:**

- Identity and contact details of the candidate (name, surname, date of birth, marital status, telephone number, email, driving license, nationality, sex);
- Relevant data in recruitment / selection procedures through which the candidate demonstrates that he / she fulfills the legal requirements and requirements of the post / competition.

**PURPOSE:** To carry out recruitment / selection activities for filling vacant posts and to manage recruitment / contest files during the various stages of recruitment / selection procedures, with a view to organizing the exam / competition for filling the vacancy.

### **-The Employees of our companies:**

- data on studies, qualifications and specializations;
- seniority data - for granting the seniority bonus;
- name and surname;
- identity card number and series;
- personal identification code;
- home address - as the mailing address;
- bank account number - for wage transfer;
- shoe size and shoe number data - for ordering work equipment;
- marital status, data on military service (required for Mobilization at Work in case of need or state of war); criminal record (only to check compatibility with the post in question);
- brand number - as an identification element within ARTROM STEEL TUBES S.A.;
- family members' data - for personal deduction and private health insurance;

- health status - to establish working conditions and payment of medical leave, the issuance of medical certificates;

**PURPOSE:** Contractual and legal purpose for determining salary, working conditions, rights and obligations for employees, this processing being performed by our employees, professionals who have the obligation to maintain professional secrecy and confidentiality.

**- Practitioners or interns within our companies:**

- Identity and contact details of the practitioner (name, surname, date of birth, marital status, telephone number)
- Relevant data by which the practitioner demonstrates that he / she fulfills the legal conditions to be able to practice in a particular department / section (data included in the practice agreement, health data included in the medical file required for the issuance of the skills certificate by the occupational medicine doctor).

**PURPOSE:**

- management of internship files in the different stages of the internship within ARTROM STEEL TUBES S.A.

**- Former employees requesting the issuance of documents regarding the activity carried out in our companies:**

- identity and contact details of former employees (name, surname, date of birth, surname, address, home address, telephone number).
- data included in the personnel file and in the payroll files in the company's archives, data necessary for the issuance of the required certificates (period worked, bonuses received, days of medical leave)

**PURPOSE:**

- Issuing seniority certificates for former employees of ARTROM STEEL TUBES S.A., following requests received from them.

**The information you provide to us voluntarily**

When you use the site, when you contact us by phone or e-mail or communicate with us in any way, you voluntarily give us the information we process. This information includes your last name, last name, email address and phone number.

By providing this information, we keep it securely and confidentially in our database. We do not disclose or transfer information to third parties.

### **The information that we collect automatically**

When you browse our website, to search for our products and services and to view the information we make available, we collect information about your visit to the website, because we use cookies to improve the use and functionality of our website and to better understand how visitors use our website.

Additional information on the use of cookies on our website can be found in the Cookie Policy

### **WHAT IS THE LEGAL BASIS FOR PROCESSING?**

According to Regulation (EU) 679/2016 (applied in Romania since May 25, 2018), your consent is not required if the processing is necessary to take steps to conclude a contract, fulfill a legal obligation or a legitimate interest.

### **HOW LONG WE STORE DATA?**

We store personal data only for the time required to meet the purposes or for archiving purposes in accordance with applicable law.

### **HOW DO WE DISCLOSE YOUR DATA?**

We will not disclose your information to third parties without your consent. However, it is possible, where necessary, to disclose your information to the following entities:

- *Service providers.* We may disclose your information to other companies that provide us with services and act as processor. These entities are carefully selected to ensure that they meet the specific requirements for the protection of personal data. These entities have a limited ability to use your information for purposes other than providing us with services;
- Courts, prosecutor's offices or other public authorities to comply with the law or in response to a mandatory legal procedure (such as a search warrant or a court decision);
- To other parties with your consent or to your instructions. In addition to the disclosures described in this Privacy Policy, we may disclose information to third parties to whom you consent or request us to make such disclosures.

The personal data you have provided to us are processed within our companies only by our employees authorized to have access to this information, professionals who have the obligation to maintain professional secrecy and confidentiality. Where applicable, the processing is also carried

out by our processors who have the same legal obligations regarding the protection of personal data.

## **WE TRANSFER DATA TO THIRD COUNTRIES?**

As a general rule, we do not transfer your data to countries outside the European Economic Area. In the event that we change the policy, we will inform you accordingly, giving you the relevant guarantees, and we will ask for your consent in this regard, if applicable. In this case, we will ensure that there is adequate protection, either through appropriate contractual arrangements or in accordance with applicable law.

## **WHAT ARE YOUR RIGHTS?**

- **The right to withdraw consent;**
- **The right to fill a complaint with a supervisory authority;**
- **The right to go to court;**
- **Right of access;**

You have the right to obtain confirmation from us whether or not personal data concerning you are being processed and, if so, you have the right to access such data.

- **The right to rectification;**

You have the right to obtain from us, without undue delay, the rectification of inaccurate personal data that concerns you. Taking into account the purposes for which data was processed, you have the right to obtain the completion of personal data that are incomplete, including by providing an additional statement.

- **The right to delete data (the "right to be forgotten");**

In situations where (1) the data are no longer necessary for the fulfillment of the purposes, (2) the consent has been withdrawn and there is no other legal basis for the processing, (3) you are opposed to the processing, and there are no legitimate reasons to prevail processing or (4) personal data have been processed unlawfully, you have the right to obtain the deletion of the data that concerns you without undue delay.

- **The right to restrict the processing;**

You have the right to obtain from us restriction of processing if one of the following cases applies:

- (a) dispute the accuracy of the data for a period that allows us to verify the accuracy of the data;
- (b) processing is illegal, and you will oppose the deletion of your personal data, requesting instead the restriction of their use;
- (c) we no longer need personal data for the purpose of processing, but you request it from us in order to establish, exercise or defend a right in court;

(d) you have objected to the processing in accordance with Article 21 (1) of Regulation (EU) 679/2016, for the period during which it is verified whether our legitimate rights prevail over your rights.

- **The right to data portability**

You have the right to receive personal data concerning you and which you have provided to us in a structured, commonly used and automatically readable format and you have the right to transmit this data to another operator without obstacles from our part, if:

(a) processing is based on consent pursuant to Article 6 (1) (a) or Article 9 (2) (a) of Regulation (EU) 679/2016 or a contract pursuant to Article 6 (1) (a) (b) of Regulation (EU) 679/2016; and

(b) processing is performed by automatic means.

- **The right not to be the subject of a decision based solely on automatic processing**, including profile creation, which produces legal effects concerning you or similarly affects you to a significant extent.

You do not have this right if the decision:

(a) is required for the conclusion or performance of a contract between you and a data controller;

(b) is authorized by Union or national law applicable to the controller and also provides for appropriate measures to protect the rights, freedoms and legitimate interests of the data subject; or

(c) is based on your explicit consent.

**Please note the following:**

- **Response time period:** We will try to respond to your request within 30 days. However, the time limit may be extended for specific reasons related to the specific legal right or complexity of your request.

- **Access restriction:** In some cases, we may not be able to give you access to all or some of your personal data due to legal provisions. If we deny your request for access, we will inform you of the reason for the refusal.

- **Failure to identify you**

In some cases, we may not be able to search for your personal data because of the identifiers you provide in your request.

In such cases, if we are unable to identify you as the data subject, we are unable to comply with your request, unless you provide us with additional information to identify you.

**Our contact details**

If you have any comments, suggestions, questions or concerns regarding any information in this note or any other matter relating to the processing of your data that we perform, please do not hesitate to contact our data protection officer at any time.

You can contact us through any of the communication channels below. Our entire team will make every reasonable effort to ensure that we respond to you as quickly and completely as possible.

**Contact details:**

**a) Romania**

**Company name: ARTROM STEEL TUBES S.A.**

Address of registered office: 30 Draganesti street, Slatina, Olt County, postal code 230119

Fax: +40(249)434330

Phone no: +40(372)498100

Mail Slatina Office : [office.slatina@artrom.com](mailto:office.slatina@artrom.com)

Website: <http://www.artrom.com/>

**Contact details of the Data Protection Officer**

Mail address: 30 Draganesti street, Slatina, Olt County, postal code 230119

Phone number: +4 0372.498.125

Email address: [dpo@artrom.com](mailto:dpo@artrom.com)

**b) Italy**

**Company name: ARTROM ITALIA srl**

Address of registered office (mailing address): Corso Martiri della Liberazione, 45 I-23900 Lecco (LC) Italia

Phone no: +39 (0341) 36-51-51

Email address: [info.it@artrom.com](mailto:info.it@artrom.com)

Website: <http://www.artrom.com/>

**Contact details of the Data Protection Officer**

Address of registered office: Corso Martiri della Liberazione, 45 I-23900 Lecco (LC) Italia



Phone no: +39 (346) 7881236

Email address: [alberto.ferri.it@artrom.com](mailto:alberto.ferri.it@artrom.com)

**c) Germany**

**Company name:** ARTROM Deutschland GmbH

Address of registered office (mailing address): Katzbergstraße 3a, 40764 Langenfeld, Germany

Phone no: +49 (0) 2173 / 267860

Email address: [info.de@artrom.com](mailto:info.de@artrom.com)

Website: <http://www.artrom.com/>

**Contact details of the Data Protection Officer**

Address of registered office: Katzbergstraße 3a, 40764 Langenfeld, Germany

Phone no: +49 / 2173 / 2678623

Email address: [Stephan.Ritter.de@artrom.com](mailto:Stephan.Ritter.de@artrom.com)

**HOW DO YOU EXERCISE YOUR RIGHTS?**

To exercise your legal rights, please contact us at [dpo@artrom.com](mailto:dpo@artrom.com)

For more information on personal data protection, please access the following link:  
[https://www.dataprotection.ro/index.jsp?page=noua%20 pagina\\_regulamentul GDPR&lang=en](https://www.dataprotection.ro/index.jsp?page=noua%20pagina_regulamentul_GDPR&lang=en)

We regularly review and, if necessary, regularly update this privacy policy when changes occur as a result of the provision of services.