



Privacy Policy

Because we collect your personal data, we would like to inform you for what purposes we use it and what are the rights in accordance with EU Regulation 2016/679 on the protection of individuals with regard to the processing of personal data and the free movement of such data.

Definitions:

- personal data: The Regulation defines personal data as "any information about an identified or identifiable individual (" the data subject ")".
- the person concerned - that is, an identified or identifiable individual. An identifiable individual is a person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more many specific elements, of his physical, physiological, genetic, psychic, economic, cultural or social identity.
- operator: the entity, the natural or legal person, who determines the purpose and means of processing personal data.
- the person empowered by the operator: the entity, the natural or legal person, other than the operator of the operator, who processes the data on behalf of the operator.
- processing: processing of personal data is defined by the Regulation as any operation on personal data such as: collecting, registering, organizing, structuring, storing, adapting, modifying, extracting, consulting, using, disclosure by transmission, dissemination, disposition in any other way, alignment, combination, restriction, erasure, destruction
- consciousness consent : any manifestation of the free, specific, informed, unambiguous will of the person concerned through which it accepts, through a statement or unequivocal action, that the personal data concerning it are processed.

1. Identity and contact details of the operator

This site is owned and managed by SC Bright Future Project SRL, a Romanian company, registered at The Trade Register under no. J29 / 1211/2012, CUI R030522146.

Bright Future Project SRL is registered under number 35572 in the General Register of the National Supervisory Authority for Personal Data Processing, according to Law 677/2001 for the protection of individuals with regard to the processing of personal data and the free movement of such data.

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2. The purposes and legal bases of the processing

Bright Future Project SRL processes the data provided voluntarily by initiating an email transfer session and by completing and sending the payment form, or by contacting the company in any way, in order to conclude the service and to execute it.

Bright Future Project SRL processes personal data to fulfill legal obligations such as maintaining accounting and tax records.

Bright Future Project SRL processes personal data to protect the legitimate interests of the operator, such as collecting the IP address to protect against cyber attacks.

According to both current legislation and the GDPR (applicable from May 25, 2018), your consent is not required if the processing is required to complete a contract, meet a legal obligation or interest legitimate.

Bright Future Project SRL processes personal data in order to profile clients or potential clients to offer them services and products that are best suited to their needs through direct marketing. In this case, the basis of processing is consent.

We collect your data for the following operations:

- to initiate and execute the email transfer service
- for payment notifications and invoice delivery
- for technical and / or commercial assistance
- to provide secure access to email transfer services
- to communicate email transfer resolution or status
- to notify breaches of the terms and conditions of the service
- to send you promotional offers / messages only if you have specifically requested this by giving your consent for that purpose

3. Categories of processed personal data

Bright Future Project SRL processes the following personal data categories:

3.1 Proactive data provided voluntarily when using the service and completing payment form on the site or offered directly by contacting the company in any way. In case you want to receive an invoice for the payment required to process the email transfer, you will provide Bright Future Project SRL with both identification data and data necessary to complete the billing procedures.



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- name and surname
- billing address
- E-mail Address

From the moment you become a customer of Bright Future Project SRL, we will process your data and information necessary to deliver the email transfer service and customer logs. In addition, we will store your own emails and other communications electronically the extent to which it will be necessary to transmit these communications.

3.2 Information gathered automatically

When you browse our site, we collect information about your visit to the site. This information includes the IP address, operating system, browser, accessed pages, and other information about how you interact with the site. We can collect this information by using it cookies or other similar technologies and only with your acceptance. You can get more information about how we use cookies in the Cookies Policy

4. Recipients of personal data

We do not transmit, sell or give your data to third parties for marketing purposes. Data transferred to third parties are used exclusively for the delivery of email transfer services as follows:

4.1 Service Providers. We may disclose your information to other companies that provide us with services and act as empowered persons, such as companies that help us with billing, online payment processors, or who send emails on behalf of our courier companies, companies to which we have outsourced accounting services. These entities are selected with special care to ensure that they meet the specific privacy protection requirements. These entities have a capacity limited to using your information for purposes other than providing us with services.

We have taken technical and organizational measures to protect your data against unauthorized loss, manipulation or access. We continuously adapt our security measures in line with technological progress and developments. All details related to payments with the card on the site is taken and processed directly and encrypted in accordance



with international security standards by the payment processor posted on the site, and we do not interfere with your data at any time.

4.2 Courts, prosecutors or other public authorities to comply with the law or in response to a mandatory legal procedure (such as a search warrant or court order);

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4.3 Other parties with your consent or instructions. In addition to the disclosures described in this Privacy Policy, we may transmit the information to third parties to whom you consent or request to make such disclosure.

4.4 Bright Future Project SRL will make available to certain employees (financial, support, billing, legal) information and personal data provided by you for the sole purpose of properly delivering the services. Each of these employees will receive special instructions in relation to the processing of your own personal data, Bright Future Project SRL assuming responsibility for the way in which its employees record, store, use this data.

4.5 In other circumstances, we will disclose your personal data only to the extent that this disclosure will be necessary to identify a person, communicate with, or complain against, in any harm suffered by Bright Future Project SRL, its clients or other third parties. We will also disclose such information, personal data, any authorized bodies in accordance with the applicable laws and international treaties to which Romania is a party, to the extent that there is an obligation to provide them.

4.6 Bright Future Project SRL will not disclose to any third party the parties or the entire electronic communication pertaining to the service, unless disclosure: (a) it is necessary to protect a public interest concerns national health or safety; (b) is requested by competent bodies and institutions; (c) it is necessary to prevent and combat offenses.

4.7 Bright Future Project SRL also declares that it will not censor, edit, modify, delete or monitor the information stored on its own servers made available to customers through the service offered on the site. Bright Future Project SRL will not block the access of any communication between the client and any third party. The basis on which such actions could be taken would be the breach of the contractual obligations by the Client and the circumstances of any other damage or legal imposition.

5. The period for keeping personal data

We will keep your data as long as necessary to meet our contractual obligations or as long as the law requires, but at least for a period of 3 years from the date of your last interaction with us. After that, your personal data will be deleted or anonymous.



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6. Rights of the data subject:

The main rights offered to the persons covered by the Regulation are as follows:

6.1 Right to information

You can access the Privacy Policy at any time for information on how we process personal data. The Privacy Policy is available at the time of collecting the accessible data on the order form with one click.

6.2 Right to access

You have the right to request a confirmation that your personal data is processed and, if so, you have the right to obtain a copy of this data as well as the following information:

- the purposes of the processing
- the categories of personal data in question
- recipients or categories of recipients of the data, if any, in particular any third country or international organization
- the duration of the storage of personal data
- the person's rights to rectify or erase his or her personal data and to restrict the opposition to processing
- the right of the data subject to submit a complaint to the supervisory authority
- information on the source of the data, if it does not come directly from the data subject
- whether the personal data will be subject to automated decisions, including the creation of profiles and, if so, the logic of this decision or profiles and the possible implications
- where the data are transferred to a third party or an international organization, information on the guarantees to be applied

6.3 Right to rectification

If personal data is inaccurate, you are entitled to request the correction and completion of incomplete personal data. Correction can be done for you in the case of data available in the contracted service management platforms.



If necessary, we will take additional steps to verify that the information provided is correct before proceeding with the change.

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6.4 Right to delete data

You have the right to delete your personal data under the following conditions:

- are no longer necessary for the purpose for which they were collected or processed
- you have withdrawn your consent and there is no other legal basis for processing
- oppose your processing and there are no legitimate reasons to prevail in terms of processing - personal data has been processed illegally
- personal data must be deleted to comply with the law
- personal data has been collected in connection with providing children with online services

The operator will decide on the request for deletion of personal data. Data deletion will not be done if:

- are necessary for the exercise of the right to free expression and information
- are required to meet a legal obligation
- are necessary for reasons of public interest in public health
- are required for purposes of archiving in the public interest
- are necessary for the establishment, exercise or defense of a right in court.

6.5 Right to Restrict Processing

You may exercise the right to restrict processing in the following situations:

- you counteract the accuracy of the data for a period that allows the operator to verify the accuracy of the data
- processing is illegal and you oppose the deletion of your personal data by asking for restrictions on their use
- the operator no longer requires personal data for processing, but you request them to find, exercise or defend a right in court
- opt out of processing for the length of time that it is verified that the legitimate rights of the operator prevail over your rights as a target person

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6.6 Right to data portability

You have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and readable form, and you are entitled to transmit this data to another operator without any obstacles our side, where processing is based on consent, on the legal basis of the contract, or when the processing is done by automated means.

6.7 The Right to Opposition

You have the right to oppose data processing that is based on the legitimate interest of the operator or third party or in the public interest.

Once the objection has been made, the organization must justify the reasons on which the processing is based and suspend the processing until the decision has been taken. The organization will no longer process personal data, unless it demonstrates that it has

legitimate and compelling reasons that justify processing and that prevail over the interests of the rights and freedoms of the data subject, or that the purpose is to establish, exercise or defend a right in court.

If personal data is used for direct marketing, the organization will cease processing.

6.8 The right not to be subject to an automatic decision with significant effect

You have the right not to be the subject of an automatic decision, including the creation of profiles if the decision has significant or legal effect on you as the data subject. You have the right to express your point of view, to request human intervention and to challenge the decision.

Exceptions to this right:

- the decision is needed to conclude or execute a contract
- the decision is authorized by national or European law
- is based on the explicit consent of the person concerned

6.9 Right of Withdrawal of Consent

If the processing is based on consent, you may withdraw it at any time by submitting an email to support@hosthub.ro with the subject of "withdrawn consent" or by accessing



the "unsubscribe" link present in any communication for the purpose of marketing we do by email;

6.10 The right to lodge a complaint with the Supervisory Authority

If you believe that your rights to use personal data have been violated, you have the right to file a complaint with ANSPDCP and the right to appeal to the courts.

Rights are not absolute and there are exceptions.

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The response at the request of the person concerned will be made within one month of receipt of the request, except in cases where the application is complex or there are a large number of applications, when it may be extended for a further two months.

If the application is well founded, the exercise of rights will be facilitated. If the request is unfounded, the reason for the refusal of the person concerned will be communicated and the right to file a complaint with ANSPDCP and the right to appeal to the court will be communicated.

The on-demand response is free of charge. In the event of unreasonable or excessive claims, the operator may charge a reasonable charge or refuse to comply with the request.

This Privacy Policy is an integral part of the terms and condition by which Bright Future Project SRL offers the email transfer service.

By accessing our site and by accepting the terms and conditions of the service means that you have taken to aware of the contents of the Privacy Policy, while at the same time agreeing to the processing of personal data with the specifications specified above.

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