

## FirstFarms personal data policy

The **FirstFarms** group of companies as a personal data controller, collects and processes personal data in accordance with the provisions of **Regulation no. 679 of 27 April 2016** on the protection of individuals with regard to the processing of personal data and on the free movement of such data and according to the legislation in force in every country in which it operates.

The purpose of this document is to be transparent and unambiguous regarding the purposes of data processing, the legal basis of the processing, the duration of the processing, the recipients of the collected personal data, the ways of exercising the individual rights as well as the information about the secondary purpose of the processing, if the data will be processed for a purpose other than that for which they were collected by the associated operators.

In the data processing operation, the **FirstFarms** Group takes into account the legal regulations in force in this field, respects and applies the principles underlying the protection of personal data and ensures data confidentiality and security through appropriate organisational and technical measures.

This policy applies to the processing of personal data in the activities of companies belonging to the **FirstFarms** Group.

### Principles of personal data processing

The collected personal data will be:

- processed legally, fairly and transparently, respecting the principles of legality, fairness and transparency;
- collected for determined, explicit and legitimate purposes and will not be further processed in a manner incompatible with these purposes; further processing for purposes of archiving in the public interest for purposes of scientific or historical research or for statistical purposes is not considered incompatible with the original purposes;
- Relevant and limited to what is required in relation to the purposes for which they are processed.
- accurate and, if necessary, up-to-date; we will take all necessary measures to ensure that personal data which are inaccurate, given the purposes for which they are processed, are erased or rectified without delay;
- kept in a form that allows the identification of the data subjects for a period that does not exceed the period necessary for the fulfilment of the purposes for which the data are processed; personal data may be stored for longer periods to the extent that they will be processed solely for purposes of archiving in the public interest for purposes of scientific or historical research or for statistical purposes subject to the application of technical measures and organisational arrangements provided by law to guarantee the rights and freedoms of the data subject;
- processed in a way that ensures the adequate security of personal data, including protection against unauthorised or unlawful processing, and loss, destruction or accidental damage by taking appropriate technical or organisational measures.

#### The purpose of processing personal data

Personal data of individuals are collected for the purpose of fulfilling legal obligations (including money laundering / terrorist financing / application of international sanctions, prevention and identification of frauds and other legitimate purposes, archiving), the conduct of direct mail transmission of bills such as and any other information of interest to you regarding the performance of your contractual relationship.

### Legal issues

The collection and processing of personal data for the purposes mentioned above is based on:

- Consent
- Legal obligation
- Closing (including the pre-contract stages), execution, management of a contract;

The refusal to provide personal data to the companies from the **FIRSTFARMS** group leads to the impossibility of offering and concluding various contracts, given that this information is absolutely necessary for the execution of commercial / labour relations, etc.

## The length of personal data processing

The length of processing of personal data in connection with the different types of contracts is specific to each type of processing, taking into account the above-mentioned considerations, as well as for fulfilling their legal obligations (tax, archiving, etc.)

In order to limit the processing, **FIRSTFARMS** will periodically review the need for data processing to limit as much as possible the scope of the data subject to processing.

## Personal data recipients

Personal data will be disclosed to our employees / agents for the performance of their activities in connection with the execution of the contracts concluded only for the purpose of their management, except for the following situations:

- if, according to the law, **FIRSTFARMS** has the obligation to communicate these data to public authorities;
- when this communication is made under the law to protect the rights and interests of **FIRSTFARMS**;
- when the data transmission is expressly requested by the data subject. In fulfilling their obligations and commitments in the contracts concluded with the clients / providers and in order to ensure the efficient and professional processing of personal data, **FIRSTFARMS** may transmit the personal data to third persons, empowered with whom he has concluded an appropriate contract. These processors (empowered persons) are required to comply with the requirements for processing security and take the necessary technical and organisational measures to ensure the protection of personal data.

Depending on the type of processing, personal data may be processed by:

- Those who participate in the negotiation or direct execution of contracts (IT operators and other intermediaries);
- Those who ensure full operability in fulfilling the contract and all transactions related to the contract, as well as with the systems in which the contract is taken into account;
- Those who provide security and other protection to **FIRSTFARMS** data systems;
- Those who ensure the quality level to meet customer requirements;
- Those who collaborate in collecting customer receivables (if applicable);
- Those who store customer records;

The empowered agents (imputernicitii) are companies located in one of the European Union and their legislation provides protection regarding personal data.

If it is necessary to surrender and process your personal data in a state outside the European Union, **FIRSTFARMS** will ensure that personal data processing complies with the security requirements that are processed in the European Community, whose component is compliance with EU standards on personal data processing, thus ensuring the fulfilment of the goals set by the legislation on the protection of personal data.

For atypical cases, **FIRSTFARMS** will request the National Supervisory Authority for Personal Data Processing permission to transmit personal data to countries whose legislation does not provide for a level of protection at least equal to that offered by the legislation in force in the countries where our company carries out its activities.

## **Data subjects' rights and ways to exercise them**

### **1. The right of access to the database and the right to information**

- 1.1 The individuals concerned have the right to obtain on request and free of charge data on the processing of data concerning them carried out by the **FirstFarms** Group companies as well as the right to obtain information regarding the purpose of the processing, its time, the period for which the data are stored and the rights it benefits by virtue of the legal provisions in the matter.
- 1.2. The application must be submitted in writing and sent to [info@firstfarms.com](mailto:info@firstfarms.com), and must contain mention regarding the option to communicate the response, either physically or electronically.
- 1.3. The response to such requests will be communicated within 30 days of receipt of the request. If the claims of a person concerned are manifestly unfounded or excessive, especially because of their repetitive nature, **FIRSTFARMS** is entitled either to charge a reasonable fee, taking into account the administrative costs of providing the information, or may refuse to respond to the request.

### **2. The right to interfere with data**

- 2.1. The persons concerned have the right to obtain, on request and free of charge, the rectification, updating, blocking, restriction or deletion of data whose processing is not in compliance with the law, especially inaccurate data, data that are no longer required for the purposes for which they were collected or when the data subject withdraws the consent on the basis of which the processing takes place.
- 2.2. In the case of inaccurate or incomplete information concerning it, the data subject may request and obtain the completion, respectively the rectification thereof, including by providing an additional statement.
- 2.3. If the person concerned obtains restriction of processing, it will be informed by the operator before the lifting of the processing restriction.
- 2.4. The application must be submitted in writing and sent to [info@firstfarms.com](mailto:info@firstfarms.com) and must contain mention regarding the option to communicate the response, either physically or electronically.
- 2.5. The response to such requests will be communicated within 30 days of receipt of the request.

### **3. The right of opposition**

- 3.1. Persons concerned have the right to oppose at any time, for legitimate reasons related to their particular situation, that data that concern them are subject to processing.
- 3.2. The application must be submitted in writing and sent to [info@firstfarms.com](mailto:info@firstfarms.com) and must contain mention regarding the option to communicate the response, either physically or electronically.
- 3.3. The response to such a request will be communicated within 30 days of receipt of the request.
- 3.4. If the data subject opposes processing, **FIRSTFARMS** will not process any personal data unless it demonstrates that they have legitimate and compelling reasons that justify processing and which prevail over the person's interests, rights and freedoms.

### **4. The right to data portability**

- 4.1 The persons concerned have the right to receive the personal data concerning them and which they have provided to the operator and to transmit them to another operator, respectively to transmit them directly from one operator to another, where this is feasible from technically.
- 4.2 The right not to be subject to an individual decision, based solely on automatic processing including the creation of profiles;
- 4.3 The right to appeal to the courts to defend any rights guaranteed by law, the right to request the deletion of the data, if it is no longer necessary for the purpose and if there are no other legal requirements, execution of a contract or legitimate interest that can be invoked;
- 4.4 The right to be notified by **FIRSTFARMS** of security breaches that could / would impact the data of the data subjects.

In addition to the above-mentioned situations, the data subjects will be able to address a complaint against the data processing method by email to - [info@firstfarms.com](mailto:info@firstfarms.com) and following that the e-mail it will be forwarded to the responsible company from the group.

The complaint should mention the reason for the dissatisfaction and / or the rights they consider was violated. In this case, the concerned person will receive a response within 30 days from the date of registration in the records of the company.

Apart from the above-mentioned way of solving any disputes, the persons concerned have the possibility to submit (directly or through a representative) a complaint to the National Supervisory Authority for Personal Data Processing from its country.

The provisions of this policy are valid for all the companies in **FIRSTFARMS** Group until new modifications and will be completed accordingly from case to case by the laws valid in the concerned countries.