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Foraj Sonde Policy with regard to processing personal data

External policy

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HIGH IMPORTANT:

Please note that you have the right to oppose the processing of your personal data at any time.

The right of opposition can be exercised by the data subject (i.e. by you) towards the operator (Foraj Sonde) only in one of the following two cases:

„At any time, the data subject has the right to oppose, for reasons related to the particular situation in which he is, to the processing according to Article 6 (1) (e) or (f) of the GDPR, the personal data pertaining to them, including the creation of profiles based on those provisions. The operator no longer processes the personal data, unless the operator demonstrates that he has legitimate and compelling reasons that justify the processing and that prevail over the interests, rights and freedoms of the data subject or that the purpose is to find, exercise or defend a right in court.”

1. "When the processing of personal data is intended for direct marketing, the data subject has the right at any time to oppose the processing for this purpose of the personal data concerning him, including the creation of profiles, to the extent that he is related to the direct marketing.

Identity and contact details of the operator of your personal data

Foraj Sonde S.A. (Foraj Sonde) is a personal data operator.

Foraj Sonde S.A. has its registered office in Craiova, Fratii Buzesti street, no. 4 A, Dolj County, it is registered with the Trade Register with no. J16 / 2746/1992 and has Unique Registration Code (CUI) RO 3730778.

The Contact Details of Foraj Sonde S.A. are the following:

Craiova, Fratii Buzesti street no. 4 A, Dolj County

Telephone: 0251.415.866; 0251.411.510; 0723.633.734

Fax: 0251.406.482

Email: office@craiovadrilling.ro

2 The contact details of the person in charge of the protection of your personal data

Foraj Sonde has appointed a person responsible for the protection of personal data, and this can be contacted at the e-mail address dpo@craiovadrilling.ro

3 To the extent that it is not desired to contact the person responsible for the protection of personal data by e-mail, any other type of correspondence can be used, using the contact data of Foraj Sonde mentioned in the chapter. 1 precedent.

4 The categories of personal data we process

Depending on the category of persons you are a part of, as well as depending on how your personal data comes into our possession, we may process, in whole or in part, the following categories of personal data:

1. identification data using remote means of communication (e.g. telephone number, email address, IP of a device),
2. data on the job / profession (e.g. job, job, etc.),
3. data on how you conduct your activity (e.g. when you start the work program, when you actually get to work, how you negotiate the conclusion of a contract with us, the content of an email sent from an address your work place etc

4. graphoscopic data (e.g. your signature applied to a contract concluded with us),
5. biometric data (e.g. your image recorded by one of our cameras, your image contained in an identity document of yours stored by us
6. data regarding the shares held by you within our company (eg the number of shares held, their nominal value, the date you acquired them, their value on the stock exchange, the rights related to the shares held, etc.),
7. data on how you will exercise the rights conferred by the shares held in our company (e.g. the GMS meetings you attend, the votes expressed during the GMS meetings, etc.),
8. financial data (e.g. your bank account, the bank to which it is opened, the date of a payment, the justification of a payment etc.),
9. location data (e.g. the place where you carry out the activity, such as the location of a drilling rig, etc.),
10. your opinions (e.g. your opinion regarding the services provided by our company, your opinions expressed by completing start-up cards, etc.)

The sources from which we obtain your personal data

The sources from which we obtain your personal data are varied, from case to case, and may consist of:

1. your person (e.g. send us an e-mail or contact us by phone, send us a CV in order to be employed in our company, buy shares in our company, enter the scope of a camera owned by us, send us an offer request, participate with our team from the probe to the training sessions, etc.),
2. the company / entity where you are employed (e.g. your company sends us your personal data in order to be able to contact you in order to initiate and maintain a dialogue on a specific topic, your company sends us your data in order to allow you access to a certain probe, etc.),
3. the company / entity with which you are in a collaborative relationship (e.g. one of our subcontractors / partners subcontracts you for the provision of a certain service, such as the drilling installation management, etc.),

4. the central depository (e.g. in order to establish the shareholder structure on a certain reference date, the central depository provides us with the shareholders register, etc.),
5. other persons / entities that hold your personal data (e.g. an employee of ours, a company to which you were employed, another client of ours etc.),
6. public sources (e.g. contact data from the Trade Register, search results displayed by a search engine, etc.).

The ways in which we process your personal data

Foraj Sonde may process your personal data, in whole or in part, in the following ways:

1. collection (e.g. receiving a contract signed by you, receiving a request for an offer from you, signing a training report by you, receiving your data from the Central Depository, etc.),
2. storage (e.g. keeping an email received from you, keeping a contract with you, keeping a contract signed by you on behalf of the company you represent, keeping a start-card made by you, keeping a report of instruction signed by you etc)
3. registration (e.g. your registration in our customer base under a certain number, your registration in the database of our subcontractors / partners etc.),
4. visualization (e.g. viewing your contact data from our database, viewing a document transmitted by you, etc),
5. modification (e.g. when you ask us to change your contact details, etc.),
6. encryption (e.g. when encrypting devices that store your personal data),
7. transmission / disclosure (e.g. when we send your contact details rig to the manager (probe manager) in order to be able to contact you, when we send your contact details to the procurement department in order to be able to issue an order, when we send your data to the stock exchange of Bucharest Securities through a current report, etc),
8. destruction (e.g. when we delete you from the active client's database, etc),

9. any other operations performed on / in relation to your personal data (e.g. restriction of access, pseudonymization of data, anonymization of data etc).

11. The purposes for which your personal data are processed and the legal bases for the processing of personal data

Foraj Sonde processes a series of personal data based on one or more purposes, as well as one or more legal bases, as set out below.

In order to understand the purposes and legal bases for which we process your personal data please access the category of persons you belong to.

a. Potential clients / Clients / Former clients of Foraj Sonde and other persons connected with them:

1. individuals,
2. their representatives (ex: administrator, general manager, financial director etc.),
3. their employees (e.g.: employees, civil servants, contract staff etc.),
4. the representatives of the suppliers / partners / subcontractors / consultants / etc (e.g.: the administrator of the accounting firm, the coordinating lawyer) etc.),
5. employees of their suppliers / partners / subcontractors / consultants / etc (e.g. the employee of the mobile service provider, the supervisor of the beneficiary of our services, etc.),
6. the representatives of a public authority / institution connected with it (e.g. an ANAF (National Agency for Fiscal Administration) inspector etc.),
7. employees of a public authority / institution connected with them (e.g. an inspector from the Environment Authority, an ANRE employee, an ASF (Financial Supervisory Authority) representative etc.),
8. any other natural person in any kind of connection with them (e.g.: a car mechanic who participates in an intervention with one of our clients, etc.).

Pre-contractual period

Processing purposes

Foraj Sonde aims to offer / assure its services to a large number of persons / entities.

During the pre-contractual period Foraj Sonde will process your personal data for the following purposes:

1. in order to initiate and maintain a dialogue with you,
2. in view of the presentation of our services,
3. in the view of obtaining from you some information on the basis of which we can offer you services adapted to your requirements,
4. in view of writing the documents related to the pre-contractual period (offer, contract model etc.),
5. in view of understanding the requirements and trends of the profile market (e.g. what services are being sought, by what categories of customers, at what prices etc.)
6. in view of understanding how we can improve our services (e.g. evaluating internal employees, analysing the opportunity of hiring additional staff etc.),
7. in view of understanding how we should organize our activity from all points of view (commercial / marketing / HR / IT / financial etc) (e.g. evaluation of contracts concluded in a month compared to the previous month, evaluation of the benefits of a certain work for our company , evaluating the way in which our employees fulfil their duties, analysing how we present ourselves as a company, etc.),
8. in the view to protect our rights and interests (e.g. if you consider yourself prejudiced in any way how we presented our services).

The legal bases of the processing

The legal bases for processing your data:

1. The necessity of making requests at your request (e.g. we formulate a contract model, we formulate a personalized offer to your needs etc.),
2. Our legitimate interests to achieve the goals set out above.

Considering the above mentioned it is possible that Drilling Probes will contact you, either on your own initiative (e.g. send you an email), or on your own initiative (e.g. contact us by phone, visit our website etc.) , or at the initiative of another person / entity (e.g. you and we receive an email from an intermediary).

To the extent that you become a customer Drilling Probes, your data is processed according to the ones shown in the head. 6.1.2. following:

Period of data storage

In If you do not become a customer Foraj Sonde, your data will be permanently deleted within 30 calendar days from the moment it becomes certain that you will not become our customer (e.g. you send us an email through who inform us, interrupt the communication with us for a period of time that exceeds a reasonable period, we inform you that we cannot offer the requested services, etc.).

Contractual / post-contractual period

Processing purposes

Foraj Sonde provides / assures services to its clients, fulfills a series of legal / conventional obligations and adapts its business strategy according to the demands of the profile market.

In the contractual / post-contractual period Foraj Sonde will process your personal data for the following purposes:

1. in view of the execution of the contract concluded with you and / or the company to which you are employed,
2. in the vision of initiating and sustaining a dialogue with you and / or the company you are employed with,
3. in the view of presenting our services, other than the ones that you have already contracted / which the company to which you are employed has contracted,
4. in the view of obtaining from you / the company to which you are employed some information on the basis of which we can offer you other services that may suit you, other than those already contracted and / or may fit the company at that you are employed,
5. in order to draft the documents related to the contractual period (e.g. service contract, additional documents, activity reports, training reports, firm orders, invoices etc),
6. in order to fulfil some legal obligations (e.g. the obligation to draw up and maintain the primary accounting documents, the obligation to transmit your data to the Central Depository, the obligation to transmit your data to the Bucharest Stock Exchange, etc.)),
7. in view of understanding the demands and trends of the profile market (e.g. what services are being sought, by what categories of customers, at what prices, etc.),
8. in view of understanding how we can improve our services (e.g. evaluating internal employees, analysing the opportunity of hiring

additional personnel, analysing the opportunity of purchasing new drilling installations, etc.)),

9. in view of understanding how we should organize our activity from all points of view (commercial / marketing / HR / IT / financial etc) (e.g. analysing how we present our company etc.),
10. in order to protect our rights and interests (e.g. if you do not pay the amount of the invoices issued and we are required to initiate a civil trial).

The legal bases of the processing

1. the processing is necessary for the execution of the contract concluded with you (ex: in order to provide our services etc.),
2. the processing is necessary in order to fulfil some legal obligations incumbent on us (e.g.: the obligation to draw up and keep records of primary accounting, such as the contract concluded with you, the invoices issued to you, etc),
3. our legitimate interests (the interests of achieving the goals set out above).

Period of data storage

Your data will be stored by us throughout the contractual period, as well as after the termination of the contractual relations for a period of 5 calendar years, calculated from January 1 of the year following the one in which the contract ends.

As an exception, part of your data will be stored either for a longer period or for a shorter period, when a normative / administrative act that applies to us imposes such an obligation (e.g. The National Archives Law requires / could require us to keep certain documents for a period of 20 years, the Capital Market Law requires / could require us to keep your data for a period of 10 years, the Fiscal Code requires / could impose the storage of your data for a period of 7 years, etc.).

The reasons why we store your data for the above period are as follows:

1. during the duration of the contract, the data are necessary to know what are the parameters that we have to respect towards you / the company you are employed in (e.g.: what services should we provide you, where, under what conditions, at what cost, etc),
2. during the duration of the contract, as well as subsequently, the data are included in a series of financial-accounting documents that the law obliges us to keep (e.g.: the contract, the invoices issued, the payment orders, the bank records, receipts, etc.),

3. during the duration of the contract, as well as later, the data is required to inform you / to inform the company to which you are employed about the opportunity to provide services that might suit you and / or match you. better to the company where you are employed, services different from those initially contracted (e.g. we might recommend using a drilling installation with a larger capacity to reduce the actual implementation time of the well etc),
4. during the duration of the contract, as well as later, the data are needed to be able to analyse the viability / technical efficiency / cost efficiency / any technical problems regarding the services offered, so that we understand as much as possible all the technical / economic aspects of the of the services offered (e.g. analysing how many repairs require a certain equipment, type / cost of repairs and at what time intervals, we can recommend a more efficient and technically / economically efficient equipment, etc.)),
5. during the duration of the contract, as well as later, the data are needed to understand market trends, what kind of services are sought, what is on the market, what are the costs that customers are available to allocate, etc., knowing this information by helping - adapt our business strategy to stay on the profile market in the most competitive way and as close to the real needs of you and / or the company you are employed for,
6. during the duration of the contract, as well as afterwards, there is the possibility that between our company and you / the company to which you are employed there may be some misunderstandings / disputes regarding the execution of the contract, in which case the data are necessary to protect us the rights (e.g. in the case of a trial we can prove that we have fulfilled our obligations, in the case of the failure to pay a bill we can prove that we have provided the invoiced services etc.),
7. during the duration of the contract, as well as later, the data are needed for analysing our own activity and how we conduct it (internal analysis) so that we adapt to the market in the most appropriate way (e.g. we analyse if they are necessary new employees, if in what department, we analyse the efficiency of our employees, we analyse the knowledge and professionalism of our employees, etc.),
8. after the performance of the contract there is the possibility that you / the company to which you are employed or we may be subject to a control by the fiscal bodies / other authorities / public institutions in case we have to prove, fully, the contractual relations between us and the way in which they were executed both by you / the company you are employed in, as well as by us.

b. Foraj Sonde suppliers and other persons connected with them

Foraj Sonde processes the personal data of its potential suppliers / suppliers / former suppliers, of goods and / or services and / or solutions, as well as of other persons in a certain relationship / relationship with them as mentioned in the chapter. 3.1.

Chapters. 6.1.1. – 6.1.2. apply also to Foraj Sonde suppliers.

c. Foraj Sonde partners and other persons connected with them

Foraj Sonde processes the personal data of its potential partners / partners / former partners, as well as of other persons in a certain relationship / relationship with them as mentioned in the chapter. 3.1

Chapters. 6.1.1. – 6.1.2. apply to Foraj Sonde partners.

Shareholders / former shareholders of the Foraj Sonde

Processing purposes

During the period in which you hold the shareholder status, as well as later, Foraj Sonde processes your personal data for the following purposes:

1. in order to initiate and maintain a dialogue with you,
2. in order to respect and exercise your rights as a shareholder / former shareholder,
3. for the drafting of the acts imposed by the law and / or the norms contained in our constitutive act (e.g. convening the GMS, presence lists of the GMS, minutes of the meeting within the GMS, the decisions of the GMS, the updated constitutive documents, etc.),
4. in order to fulfill some legal obligations (e.g. the obligation to draw up and maintain the primary accounting documents, the obligation to transmit to the tax authorities the amount of dividends granted to you, the obligation to transmit to the trade register certain documents, the obligation to transmit to BVB current information reports etc.),
5. 5. in order to understand how we can improve our services (e.g. taking into account your opinions and decisions expressed during the AGA meetings etc.),

6. in order to understand the way in which we must organize our activity from all points of view (commercial / marketing / HR / IT / financial etc.) (e.g. taking into account your opinions and decisions expressed during the GMS meetings, etc.),
7. in order to protect our rights and interests (e.g. if you cause us harm and we have to start a civil trial),
8. 8. in order to carry out its own activity (e.g. in order to conclude a contract with the object of providing services it is possible to provide an extract from the trade register to the other contracting party etc.).

The legal bases of the processing:

1. the processing is necessary in order to fulfill some legal obligations incumbent on us (e.g.: the obligation to draw up and keep primary accounting documents, the obligation to withhold and turn over to the state budget the health insurance contributions owed by you, the obligation to you will pay dividends when this is decided by the GMS, etc.),

2. our legitimate interests (the interests of achieving the goals set out above).

Period of data storage

Your data will be stored by us throughout the period you hold the shareholder status, as well as after the termination of this quality for a period of 5 calendar years, calculated from January 1 of the year following the one in which your shareholder status ceases.

As an exception, part of your data will be stored either for a longer period or for a shorter period, when a normative / administrative act that applies to us imposes such an obligation (e.g. The National Archives Law requires / could require us to keep certain documents for a period of 20 years, the Capital Market Law requires / could require us to keep your data for a period of 10 years, the Fiscal Code requires / could impose the storage of your data for a period of 7 years, etc.).

The reasons why we store your data for the period described above are as follows:

1. as long as you hold the shareholder data, we need to know what are the parameters that we must respect towards you (e.g.: what share do you own from the share capital, what are the rights that will be yours? as shareholder etc.),
2. for as long as you hold the shareholder status, and subsequently, the data are contained in a series of financial-accounting documents that the law obliges us to keep (e.g. payment orders, bank records, etc.),

3. as long as you hold the shareholder status, and subsequently, there is the possibility that between our company and you there may be some misunderstandings / disputes regarding the execution of the relations between us, in which case the data are necessary to protect our rights (e.g. in the case of a trial we can prove that we have fulfilled our obligations, etc.),

4. as long as you hold the shareholder quality, and subsequently, the data are necessary for analyzing your own activity and how we conduct it (internal analysis) so that we adapt to the market in a most appropriate way (e.g. we analyze if new hires are needed, if in what department, we analyze the efficiency of our employees, we analyze the knowledge and professionalism of our employees, we analyze what kind of drilling equipment we need, etc.),

5. for as long as you hold the shareholder status, and then there is the possibility that you or we may be subject to control by the tax bodies / other authorities / public institutions in which case we must be able to fully prove the relationships between us and the way in which they were executed by both you and us.

Other persons

Foraj Sonde processes the personal data of other persons than those set out in chapter 6.1. - 6.4:

1. representatives of public authorities / institutions (e.g. ANRE - Romanian Energy Regulatory Authority inspectors, ANAF inspectors, Competition Council inspectors, consultants from the National Archives, etc.),

2. visitors to our headquarters and our work points / platforms where we carry out drilling operations,

3. visitors to our site,

4. other people with whom we can get in touch, etc.

Processing purposes

Foraj Sonde aims to offer / assure its services to a large number of persons / entities, but also to fulfill their legal obligations, namely to maintain it in a visible and efficient way on the profile market.

Foraj Sonde will process your personal data for the following purposes:

1. in order to initiate and sustain a dialogue with you / the company you are employed in,

2. in order to present our services,
3. In order to obtain from you / your company you are employed some information based on which we can offer you the services that best suit you and / or best suit the company you are employed in,
4. in order to write the documents related to the pre-contractual period (offer, contract model, etc.),
5. in order to understand the demands and trends of the profile market (e.g. what services are being sought, by what categories of customers, at what prices, etc.),
6. in order to understand how we can improve our services (e.g. evaluating internal employees, analyzing the opportunity of hiring additional staff, etc.),
7. in order to fulfill some legal obligations (e.g. the obligation to provide the documents and information requested by a public authority / institution that initiates a control regarding us),
8. in order to understand how we should organize our activity from all points of view (commercial / marketing / HR / IT / financial, etc.) (e.g. evaluating how our employees fulfill their service duties, analyzing how we work we present the company etc),
9. in order to protect our rights and interests (e.g. in the case of a research / investigation initiated by a public authority / institution we can defend our rights, etc.).

The legal bases of the processing

The legal bases for processing your data:

1. the processing is necessary in order to fulfill some legal obligations incumbent on us (e.g.: if we are subject to a fiscal control, we provide the documents and information regarding you to the fiscal inspector, etc.),
2. our legitimate interests (the interests of achieving the goals set out above).

Period of storage

The storage period varies from case to case depending on the particularities of the data (e.g. the number of visitors to our site can be held for a period of 3 months necessary for a specific survey or a period of 1 year can be held for the analysis of evolutions etc).

However, we assure you that we will not hold your data after the time when the purpose for which we collected it was achieved.

Recipients / categories of recipients of your personal data

Your personal data, depending on the circumstances, may / will be transmitted by us to:

1. the persons who act under our careful guidance (e.g. our employees),
2. our co-operators of personal data (e.g. the company you are employed in, etc.),
3. the persons who act under the careful guidance of our co-operators of personal data (e.g. employees of the company in which you work etc.),
4. the persons empowered to process the personal data on our behalf (e.g. a courier company, a bank, the central depository, etc.),
5. the persons acting under the careful guidance of the persons empowered to process personal data on our behalf (e.g. a driver employed by a courier company, an employee of a bank, etc.),
6. you, to the extent that you agree to exercise one of the rights provided by law (e.g. the right of access),
7. any other person / entity other than those set out in points 1 to 6, for example a distinct operator of personal data (e.g. ANAF, ANRE, BVB, CNCIR, etc.).

The transmission of personal data to the persons mentioned above will be carried out only and only to the extent that this transmission:

1. either it is imposed by the need to achieve the purposes for which we process your personal data,
2. either it is required by law.

12. Transfer of your personal data outside the European Union

Foraj Sonde keeps your personal data, either in physical or digital format, or in both formats, within the territory of the European Union.

However, in certain situations, Foraj Sonde will transmit your personal data outside the European Union (e.g. by sending an e-mail to your company that owns its own e-mail server outside the European Union).

In the latter cases, Foraj Sonde will ensure that the data transfer will be carried out only to the extent that the conditions imposed by the European legislation regarding the protection of personal data are fulfilled (eg there is a

compliance decision issued by the European Commission, an agreement to provide the necessary guarantees, etc.).

13. Your rights

Regarding your personal data, you have a number of rights:

1. the right of access to your data,
2. the right to rectify your data,
3. the right to get your data deleted,
4. the right to obtain the restriction of the processing of your data,
5. the right to oppose the processing of your data,
6. the right to lodge a complaint with the competent authority regarding the processing of personal data.

Foraj Craiova facilitates the exercise of your rights, which is why you do not hesitate to contact us at dpo@craiovadrilling.ro

Your obligation or lack thereof to provide us with your personal data As a general rule, Foraj Sonde will not oblige you, in any way, to send us your personal data.

However, in certain situations, if you do not transmit your personal data to us, we cannot fulfill the purposes set out above.

For example, as long as you do not send us the contract bearing your signature, we cannot consider that a valid contract has been concluded between us For example, to the extent that you refuse to sign the training report before drilling begins, we will not be required to allow you access to the drilling process..

14. The absence of an automated decision-making process

Foraj Sonde does not own / use any automated decision-making process, including profiling for you, and all decisions / actions / inactions / measures taken / adopted / made by our company are based solely on the human factor.

Although we use a number of IT equipment, the decisions we make regarding you are made only by the people within our team, based on their own beliefs and appreciation, and not automatically, by the IT equipment used.

15. Modification of the present policy

Foraj Sonde informs you that the present policy of processing your personal data is a presentation of how we, today, when reading this material, process your personal data.

It is possible for us to update this policy from time to time (e.g. due to legislative changes, because we want to process your data for other purposes and / or based on other legal grounds, etc.).

In the latter cases, the updating of the policy will be carried out without affecting, in any way, the legal rights and interests regarding the protection of personal data.

16. The exclusive character of this policy

The present policy for the processing of personal data was developed by Dumitru, Popescu and Asociatii S.P.A.R.L. (DPA Legal Team) in collaboration with the members of the Foraj Sonde team, exclusively for Foraj Sonde and is the exclusive property of Foraj Sonde.

Reproduction, in whole or in part, of this policy can only be done with the express written consent of Foraj Sonde.