

PRIVACY POLICY

Definitions

For a better understanding of this policy, the terms used have the following meanings:

Personal Data - any information relating to an identified or identifiable natural person; a natural person can be identified, directly or indirectly, by reference to specific elements such as: name, surname, identification number, location data, online identifier, one or more elements characteristic of their physical, genetic, psychological, economic, cultural or social identity.

Processing of Personal Data - any operation or set of operations performed on personal data, with or without the use of automated means, such as collection, recording, organization, structuring, storage, adaptation or modification, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Controller - our portal, which determines the purposes and means of processing personal data.

Processor - a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller.

Data Subject - the natural person to whom the personal data refers.

Introduction

Our portal is the Controller of personal data transmitted through the website www.4news2use.com and its associated subdomains.

We are committed to respecting the confidentiality of your personal data.

All personal data provided will be treated as confidential, and we will only process information permitted by applicable legislation.

This privacy policy describes our purpose and means of processing regarding the collection and use of personal data and establishes your privacy rights.

Information confidentiality is an ongoing responsibility, and our policy will be updated as we implement new practices regarding personal data or adopt new privacy policies.

Regarding the processing of data based on consent, we will notify you of any changes and request additional consent if necessary.

Data Protection Officer

The person authorized by us for the protection of personal data, who processes the data on our behalf and answers questions related to their processing, can be contacted at the email address: contact@4news2use.com

Collection and Processing of Personal Data

Personal Information We Collect:

We may collect, store, and process the following types of personal data:

- a) Information about your computer and about your visits to and use of our websites, including IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views, and website navigation paths;
- b) Information provided to us to participate in marketing campaigns, including participants' names and email addresses;
- c) Information provided when you use our services or information generated during the use of these services, including the schedule, frequency, and manner of service use;
- d) Information contained in or related to any communication sent through our websites, including correspondence with us, communication content, and data associated with the communication;
- e) Information provided for purchasing advertising services on our websites and broadcasting advertising messages to distinct target groups;
- f) Any other personal data you may provide to us.

Purposes of Using Personal Data

Personal data transmitted through our websites and personal data collected from you, third parties, or public sources will be used for the purposes specified in this Privacy Policy.

The processing of your personal data is based on the following legal grounds:

- a) **Communications, based on our legitimate interest:** if you have contacted us through our websites or otherwise, we will process your name, contact details, location, and other information you have provided to us in order to respond to your questions, schedule meetings, phone calls, or other communications;
- b) **Marketing and public relations, based on your consent:** as a visitor to our websites, we may process through cookies and web beacons, your IP address, geographical location, browser type and version, operating system, referral source, length of visit, log files, interactions with our websites and our online campaigns, data automatically collected about you or your device in accordance with this Privacy Policy, information you have provided through forms on our websites or purchased services - value, date, data sources, notes and remarks - to conduct marketing research and analyze the characteristics of our website visitors, to evaluate the impact of our marketing communication and adapt it to detected trends, to plan our future

marketing activities, to prepare our business analysis, to personalize services and communications for you, to target advertising or to offer direct marketing for the same or similar products and services.

Also, if you are subscribed to our newsletter, we may process the personal data you have provided to us to distribute promotional materials, to inform you about additions and changes to our services, to personalize our websites and marketing communication for you, to send you email notifications (for example about our offers) or to send you marketing communications related to our activity that we believe may be of interest to you. You can inform us at any time if you are no longer interested in these materials.

c) **Security:** if you are a visitor to our websites, we may process personal data that you have uploaded, data automatically collected about you or your device, in accordance with this privacy policy - for example through cookies, web beacons - to keep our websites secure against fraud, to protect our rights and interests and those of third parties, and to protect intellectual property rights. We mention that this information may be disclosed for the purpose of criminal investigation or prosecution.

Your Rights Regarding Personal Data

Right of Access to Personal Data:

By virtue of this right, you may request information related to the personal data we hold about you, including information related to the categories of data we hold or control, what they are used for, the source from which we collected them if we obtained them indirectly, and to whom these data are disclosed, if applicable.

We will provide you with a copy of your personal data upon request. If you request multiple copies of your personal data, you may be charged a reasonable fee based on administrative costs.

Exercising this right also implies the right to information regarding our protection measures for transferring your personal data to a country outside the European Union and the European Economic Area, to the extent that you ask us to confirm the processing or non-processing of your personal data, and we transfer your personal data to a country outside the EU and EEA.

Right to Rectification of Personal Data:

You have the right to obtain from us the rectification of personal data concerning you. For this purpose, you can use the functionalities of your account and, additionally, you can address a request to us, including in electronic format.

Right to Restriction of Processing:

You may obtain from us restriction of processing of your personal data, in cases where:

a) You contest the accuracy of your personal data, for the period necessary to verify their accuracy;

- b) The processing is unlawful, but you oppose the deletion of personal data, requesting instead the restriction of their use;
- c) We no longer need the personal data, but you request them for the establishment, exercise, or defense of a legal claim;
- d) You object to processing, for the period during which we verify whether our legitimate interests prevail over your interests.

Right to Data Portability:

You have the right to receive your personal data that you have provided to us, and where technically feasible, to request that we transmit your personal data - which you have provided to us - to another organization.

You benefit from exercising these rights only if the following conditions are cumulatively met:

- a) The processing of your personal data is done by automated means;
- b) The processing of your personal data is carried out based on your consent or our processing of your personal data is necessary for the conclusion or performance of a contract to which you are a party;
- c) Your personal data are provided to us by you;
- d) The transmission of your personal data does not have a negative effect on the rights and freedoms of other persons.

You have the right to receive your personal data in a structured, commonly used, and machine-readable format.

The right to receive your personal data must not negatively affect the rights and freedoms of other persons. This could happen if a transmission of your personal data to another organization also involves the transmission of personal data of other persons (who do not consent to this transfer).

The right for your personal data to be transmitted by us to another organization is a right you have if this transmission is technically feasible.

Right to Erasure of Data - "The Right to be Forgotten":

You have the possibility, at any time, to delete the documents you have uploaded.

We will delete the documents uploaded to your account, even without a request, in the following situations:

- a) Two years after you delete your account;
- b) Two years after the termination of the contract.

Regarding other data we hold, you have the right to request their deletion, and we have the obligation to comply with your request only if:

(i) We process your personal data; (ii) The personal data are no longer necessary for the purposes for which they were collected; (iii) You object to processing for reasons related to your particular situation; (iv) The personal data have been unlawfully processed; (v) The personal data must be deleted for compliance with a legal obligation incumbent on us.

Exceptions to this obligation exist if the data are necessary:

(i) For exercising the right to freedom of expression and information; (ii) For compliance with a legal obligation that requires processing by us; (iii) For archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes; (iv) For the establishment, exercise, or defense of legal claims.

Right to Object:

Where processing is not based on your consent but on our legitimate interests or those of a third party, you may object at any time to the processing of personal data for reasons related to your particular situation.

In this case, we will no longer process your personal data, except in cases where:

(i) We can demonstrate compelling legitimate reasons justifying the processing and which prevail over your interests, rights, and freedoms; (ii) In case the purpose is the establishment, exercise, or defense of a legal claim.

The request regarding the objection to processing must contain an explicit and unequivocal expression of your wish for personal data to be deleted, because, otherwise, we will only restrict them.

You can always object to the processing of personal data for marketing purposes based on our legitimate interest, whatever your reason. If marketing was based on consent, you can withdraw your consent.

Important Aspects Regarding the Exercise of Rights:

a) **Time Period:** We will try to fulfill your request within 90 days from the date of its transmission, a period that may be extended due to reasons related to the specific right invoked or the complexity of the request. In any case, if this period is extended, we will inform you about the term and reasons for the extension.

b) **Access Restriction:** In certain situations, we may not be able to grant you access to all or part of your personal data due to legal restrictions, following to communicate/inform you of the refusal and its reasons.

c) **Impossibility of Identification:** In certain cases, we may not be able to identify your personal data due to the identification elements you provide in the request. In such cases, if we cannot identify you as the data subject, we cannot comply with your request in accordance with

this section, unless you provide us with additional information that allows us to identify you. We will inform you and give you the opportunity to provide us with such additional details.

d) **Exercising Your Rights:** To exercise your rights, please contact us in writing, including electronically, using the following contact details: contact@4news2use.com.

Retention of Personal Data

Personal data are stored by us on our servers.

Personal data that we process based on your consent will be kept for an unlimited period of time or until consent is revoked, unless applicable legal requirements provide otherwise, and this is necessary for the purpose of processing.

If you have not provided us with your consent for data processing or have revoked the consent, we will store only minimal data about you - name, surname, contact details, references, and notes - for statistical purposes and for reporting needs or to the extent justified on the basis of another legal ground, such as our legitimate interest.

Without prejudice to the other provisions of this section, we will retain information and documents, including electronic documents, containing personal data:

- a) To the extent that we are obliged to do so by law;
- b) If the information/documents are relevant to any ongoing or potential legal proceedings;
- c) To establish, exercise, or defend our legal rights (including providing information to other persons for the purpose of fraud prevention).

Security of Personal Data

To protect the confidentiality of data and personal information that you transmit through the use of our websites, we will maintain physical, technical, and administrative safeguards, continuously updating and testing our own security technology.

We will restrict access to your personal data only to those employees who need to know the respective information to provide you with benefits or services.

In addition, our employees will be trained on the importance of confidentiality and maintaining the confidentiality and security of your information.

If a personal data breach occurs, we will act immediately to eliminate it and to assess a level of risk related to the breach in accordance with our policy on personal data breaches.

If it is found that the breach may lead to physical, material, or non-material harm to you - for example, discrimination, identity theft, fraud, or financial loss - we will contact you without undue delay, unless the law provides otherwise. All our actions will be taken in full cooperation with the competent supervisory authority.

Policy Changes

We reserve the right to update this information document at any time and without prior notification, by publishing a new version on our websites.

Updates will consider situations where new legal provisions, recommendations, and interpretations of national and international supervisory authorities regarding the protection of personal data appear.

Any change to our privacy policy will be displayed on this page, so that you are aware of our policies.

The provisions contained in this document replace all previous announcements or statements regarding our privacy practices that govern the use of these websites.

Third-Party Websites

Our websites may include hyperlinks and details about third-party websites. We and our representatives or processors have no control over and are not responsible for the privacy policies and practices of third parties.