

# Senior Interactive SRL Privacy Policy

## Introduction

Senior Interactive SRL respects your right to privacy when you are using our digital media and communicating with us.

Therefore, we have developed this Privacy Policy in order to inform you of how Senior Interactive SRL collects, stores, uses and processes the personal information provided by you through the web pages and mobile applications developed by us.

The developed websites and applications comply with the General Data Protection Regulation (“GDPR”) - (Regulation (EU) 2016/679), that is a mandatory legislative act.

GDPR creates new rights for individuals and consolidates some rights that existed in accordance with Directive 95/46/EC.

Directive 95/46/EC shall be replaced starting with 25 May 2018.

This statement complies with GDPR and, therefore, with Directive 95/46/EC and the national rules, until they expire on 25 May 2018.

The contact data for Senior Interactive SRL are:

[www.seniorgroup.net](http://www.seniorgroup.net)

You can contact the Senior Group SA DPO using:

telephone: +4(021) 410 24 40

e-mail address: [dpo@seniorprogramming.ro](mailto:dpo@seniorprogramming.ro)

## 1 What personal data do we collect and how do we collect such data?

Personal data means any information that can be linked to an identified or identifiable natural person (data subject). Personal data includes all types of direct or indirect (i.e. used in connection with other data) information referring to the data subject, such as name, date of birth, addresses, e-mail addresses, phone numbers, name of the current position, etc., as well as the online identifiers provided by devices, applications or protocols, markers such as Internet protocol addresses, even cookies or radio frequency tags.

The personal information is collected, in accordance with this privacy policy:

1. Presentation website ([www.seniorgroup.net](http://www.seniorgroup.net))

The Senior Group presentation website ([www.seniorgroup.net](http://www.seniorgroup.net))

The data collected here are: name and first name, e-mail address, subject, message.

The data are used in order to contact a possible app/service buyer that has expressed his/her desire and given his/her approval to be **contacted**.

## 2 Use of tracking technologies

Senior Interactive SRL uses cookies, IP addresses or log files in order to collect certain information:

- type of browser and operating system,
- reference page,
- through the website,
- ISP domain

for the purpose of improving the use and functionality of our websites and gaining a better understanding of how visitors use the provided instruments and services.

Website users can control the use of cookies at the level of the browser. However, if the user decides to deactivate cookies, this shall restrict some features and functions of our website and services.

- Cookies – we use cookies to improve the use and functionality of the provided products (websites and applications). Subject to your consent, if this is necessary in accordance with the applicable law, our products use cookies and similar technologies ("cookies"). Cookies are small files are placed on your device and serve several purposes, such as to allow you to navigate efficiently between pages, to remember your preferences and to give you an all-round better experience. The use of cookies in our products allows you to enjoy more visits without interruptions and to measure the behaviour of our website more accurately. You can find out more about the cookie modules that we use and about how you can deactivate cookie modules in the [Cookie Policy](#);
- An IP address is a number that is used by the computers in the network in order to identify the computer whenever you connect to the Internet. We may track the Internet Protocol (IP) addresses for:
  - o troubleshooting technical issues,
  - o maintaining the safety and security of the website,
  - o restricting access to websites and apps for certain users,
  - o seeing how the websites and apps are used
  - o geographical targeting;
- We (or a third party acting on our behalf) may collect information in the form of logs that record our digital activity and collect statistics with regard to users' browsing habits. These entries are generated anonymously and help us collect:
  - o a user's type of browser and operating system;
  - o information about a user's session (such as the URL address that it originated from, the date and time when the user visited the website/app, as well as the pages/sections that the user viewed and for how long)
  - o other browsing data or similar data flow. In addition, we use the information collected in the log file for our internal marketing and demographic studies, in order to constantly improve and customize the online services that we offer. The log files are only used internally and are not associated with any particular user.

### 3 For what purposes do we use your personal information?

All of the collected information is used for the purpose for which you provided the information to us or for the purpose that was otherwise identified when the information was collected or in this Privacy Policy.

The purposes are described below:

- we may also use your e-mail address to send transactional or administrative communications (confirmation e-mail when you complete an action, take part in an activity), as well as notifications regarding the services (notifications with regard to our privacy updates, the features of the provided services, the modifications to our online services or the technical assistance policies or other related modifications).
- if you contact us through an online contact form, your information shall be used in order to respond to your request.

### 4 Processing security

Senior Interactive SRL takes all of the necessary technical and organizational measures in order to protect the privacy and security of your personal information. These efforts include, without being limited to:

- storing personal information on secure operating media that are not generally available and that can only be accessed by the authorized employees of Senior
- checking the identities of the registered users before they are able to access the personal information that we hold with regard to them

### 5 Access and rectification or erasure of personal data

If your personal information has been processed based on your consent, you can withdraw your consent at any moment by contacting Senior Interactive SRL (using the contact data above).

You can access your personal information as processed by us by contacting [dpo@seniorprogramming.ro](mailto:dpo@seniorprogramming.ro). If you request such access, we shall provide you with all of the information required by the law for the processing purposes, the categories of processed data, the categories of recipients, the data retention period, the right to rectify, erase or restrict the accessed data, if applicable, etc.)

You can also contact [dpo@seniorprogramming.ro](mailto:dpo@seniorprogramming.ro) in order to express the following options:

- You can request the rectification of your personal information if it is inaccurate, incomplete or obsolete
- You can request that your personal information be erased
- Together with any e-mail communication sent to you, we offer you the possibility of interrupting the receipt of future communications (i.e. unsubscribe). Just follow the unsubscribing process or the instructions provided in the e-mail.

### 6 How long do we retain your personal information?

We may retain the personal information that you submit to us through the website and the apps in our databases. We retain your personal information for as long as your account is active, since we have a contract with you or when this is necessary in order to provide you with the requested services or answer

your questions or solve your problems, to offer new and improved services. In addition, we may retain the personal information for a reasonable period of time and, if necessary, in order to observe our legal and regulatory obligations, settle legal actions, enforce our agreements and manage similar records.

Thus, we may retain your personal information for a reasonable period of time after you have ceased using the services of Senior Interactive SRL.

If you request that we stop using your personal information in order to provide services to you, please contact us in accordance with the indications in article 6.

## 7 Responsibility

Senior Interactive SRL is responsible and must be able to prove at any time the compliance with GDPR and the principles established in this document. Senior Interactive SRL shall maintain, at its own responsibility, an archive of the processing activities containing the information provided by GDPR and, where necessary, shall provide such information to the supervisory authority.

Any questions with regard to this privacy policy can be addressed to Senior Interactive SRL, e-mail: [dpo@seniorprogramming.ro](mailto:dpo@seniorprogramming.ro).

## 8 Complaints

Clients may submit a complaint with regard to the processing of their personal data. All questions and complaints shall be processed by Senior Interactive SRL in a timely manner and in accordance with its internal procedures.

In the improbable case that clients have suffered losses due to the breach of their rights in accordance with the personal data protection policy and Senior Interactive SRL did not treat the complaint appropriately, the clients can lodge a complaint with the superior authority.

Complaints can be submitted to Senior Interactive SRL, e-mail: [dpo@seniorprogramming.ro](mailto:dpo@seniorprogramming.ro).

## 9 Modifications to this policy

This policy may be updated from time to time, such as due to a modification of the relevant legislation. If material modifications are made, clients shall be notified via e-mail or through the website before the modifications enter into effect. We encourage clients to check this page from time to time in order to keep up with the latest developments with regard to our privacy practices.