

**INFORMATION NOTICE REGARDING THE PROCESSING OF PERSONAL DATA
THROUGH THE CONTROLLER'S SOCIAL MEDIA PAGES (*Facebook - @Autonom,
Instagram - @autonom.romania, LinkedIn - @Autonom Group and TikTok -
@autonom.romania*)**

1. WHO IS PROCESSING YOUR PERSONAL DATA?

At AUTONOM SERVICES S.A. (hereinafter referred to as “the Controller”), the confidentiality of your personal data is a key priority. To this end, we have prepared this information notice through which we commit to safeguarding your personal data and explain the categories of personal data collected by the Controller, how such data is used, and the purposes for which it is processed.

Note: This information notice applies solely to the personal data we process as a result of your interaction with our social media pages: Facebook: @Autonom/ Instagram: @autonom.romania/ LinkedIn: @Autonom Group/ TikTok: @autonom.romania.

We would like to inform you that we have implemented all necessary measures to ensure the confidentiality of your data, which is processed exclusively by AUTONOM SERVICES S.A. personnel who are trained and authorized in personal data processing.

To formally introduce ourselves, please find our identification details below.

The data controller responsible for processing your personal data when you interact with our Facebook, Instagram, LinkedIn and TikTok pages is:

AUTONOM SERVICES S.A.,

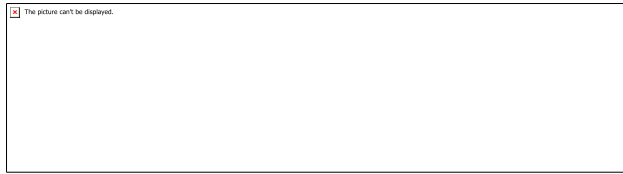
Registered office: *Str. Fermelor Nr. 4, Piatra Neamt, Romania;*

Administrative office: *Calea Floreasca, Nr. 131–137, 7th Floor, Sector 1, Bucharest, Romania;*

Registered with the Trade Registry under no. *J2006000280271;*

Tax Identification Number (CUI): *18433260.*

If you have any questions or concerns regarding the protection of personal data, you are invited to contact us in writing at:



Postal address: *Calea Floreasca, Nr. 131–137, 7th Floor, Sector 1, Bucharest, Romania;*

Email address: *protectiadatelor@autonom.ro.*

Please include a subject line such as “Personal Data Protection”, “Personal Data”, or “GDPR” to ensure your request is prioritized and handled appropriately.

As the administrator of our Facebook, Instagram, LinkedIn and TikTok pages, we process various categories of personal data resulting from your interactions with these platforms. This processing is conducted jointly with the following service providers:

- Meta Platforms Ireland Limited, with its registered office at Merrion Road, Dublin 4, Dublin, Ireland, as the provider of Facebook and Instagram;
- LinkedIn Ireland Unlimited Company, with its registered office at Wilton Place, Dublin 2, Ireland, as the provider of LinkedIn.
- TikTok Inc., with its registered office at 5800 Bristol Parkway, Suite 100, Culver City, CA 90230, as the provider of the TikTok platform.

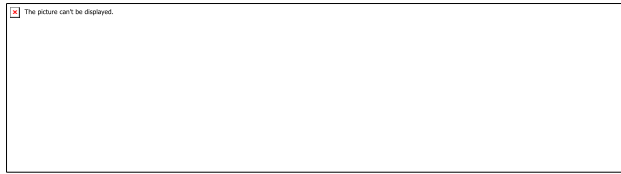
Regarding the collection and processing of your personal data by Meta Platforms Ireland Limited, over which we have no control or responsibility, we invite you to consult its privacy information available at: [Facebook Privacy Policy](#)/ [Instagram Privacy Policy](#).

Similarly, for the collection and processing of your personal data by LinkedIn Ireland Unlimited Company, over which we likewise have no control or responsibility, please consult its privacy policy here: [LinkedIn Privacy Policy](#).

With regard to the collection and processing of your data by TikTok Inc., over which we have no control or responsibility, we invite you to consult TikTok's privacy notice, available at the following link: <https://www.tiktok.com/legal/page/us/privacy-policy/en?cms=1>.

! Important: This information notice does not apply to the processing of your data when you access links posted on our Facebook, Instagram, LinkedIn or TikTok pages that redirect to our website at www.autonom.ro. In such cases, you will be subject to the privacy and cookie policies available on that website.

Finally, we wish to inform you that our Facebook, Instagram, LinkedIn and TikTok pages are operated in accordance with the data policies specific to each respective social media platform.



2. DEFINITIONS

- ❖ “**Personal Data**” means any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to their physical, physiological, mental, economic, cultural, or social identity.

! For clarity, within the context of this document, personal data refers to information about the user interacting with the Facebook page @Autonom, Instagram @autonom.romania, LinkedIn @Autonom Group and TikTok @ autonom.romania.

- ❖ “**Processing of Personal Data**” means any operation or set of operations performed on personal data, whether by automated or non-automated means, such as collection, recording, organization, storage, adaptation or alteration, extraction, consultation, use, disclosure to third parties by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- ❖ “**Controller**” means the natural or legal person who alone or jointly with others determines the purposes and means of the processing of personal data.

! With respect to the processing activities described in this information notice, AUTONOM SERVICES S.A. is the Controller, together with Meta Platforms Ireland Limited, LinkedIn Ireland Unlimited Company and TikTok Inc., as independent data controllers.

- ❖ “**Data Subject**” means the individual whose personal data is the subject of processing.
- ❖ “**Consent**” of the Data Subject means any freely given, specific, informed, and unambiguous indication of the Data Subject’s wishes by which they, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to them.
- ❖ “**Third Party**” means any natural or legal person, public authority, agency, or body other than the Data Subject, Controller, Processor, and persons who, under the direct authority of the Controller or Processor, are authorized to process personal data.
- ❖ “**Processor**” means a natural or legal person who processes personal data on behalf of the Controller. This may include partner companies of the Controller.
- ❖ “**Recipient**” means any natural or legal person, public authority, agency, or other body to whom personal data is disclosed.



3. WHAT TYPES OF PERSONAL DATA DO WE PROCESS?

The purposes for which personal data are processed, as well as the personal data that **AUTONOM SERVICES S.A.** may process as a result of your navigation on the Facebook page **@Autonom**, Instagram **@autonom.romania**, LinkedIn **@Autonom Group** and **TikTok @autonom.romania**, are as follows:

- To respond to your requests for information, questions, or complaints and to provide the requested information, **AUTONOM SERVICES S.A.** may process the following personal data, depending on the data you voluntarily provide: full name, nickname/username associated with your Facebook/Instagram/LinkedIn/TikTok profile (assuming it is not public and cannot be viewed by any other social media user), telephone number, email address, and data contained in attachments you may send, such as images, videos, audio files, texts, etc. These data may be requested if you wish to be contacted to receive a response by phone or in writing via email from the Controller's personnel.

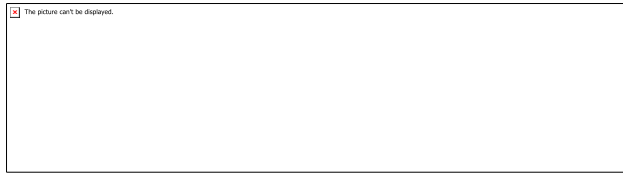
Note: Any personal data provided by users for the purpose of being contacted to resolve received requests will be used exclusively for handling such requests and not for commercial or marketing purposes.

Note: Personal data that are not requested by the Controller and may consist of text, photographs, audio-video recordings, or documents such as identity cards or civil status documents, voluntarily submitted by users without a prior request, will be automatically deleted from the databases of **AUTONOM SERVICES S.A.** The Controller complies with the provisions regarding personal data processing and ensures that it collects only the data necessary to fulfil the purposes for which they are processed.

- To facilitate your access to services provided and promoted by **AUTONOM SERVICES S.A.** on the website www.autonom.ro. For this purpose, data such as full name, telephone number, and email address may be processed.

4. WHAT IS THE LEGAL BASIS FOR THE PROCESSING OF YOUR PERSONAL DATA VIA FACEBOOK / INSTAGRAM / LINKEDIN??

The Controller processes the personal data of visitors to its Facebook, Instagram, LinkedIn and TikTok pages based on its legitimate interest, as provided by **Article 6(1)(f) of the GDPR** –



namely, the processing is necessary for the purposes of the **legitimate interests** pursued by the Controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject that require protection of personal data, particularly where the Data Subject is a child.

The legitimate interests of the Controller refer to its ability to respond to requests received from users holding Facebook, Instagram, LinkedIn or TikTok accounts by providing relevant information regarding the services presented on the website www.autonom.ro, as well as the possibility of resolving any complaints received through this communication channel.

5. WHO ARE THE RECIPIENTS OF YOUR PERSONAL DATA?

AUTONOM SERVICES S.A. will disclose your personal data solely for the purposes and to the third parties described below. Given that your data may also be processed by third parties, we assure you that we have taken all appropriate and relevant measures to ensure that such data are processed in accordance with applicable personal data protection laws.

Regarding the sharing of your data by **Meta Platforms Ireland Limited**, we invite you to read the privacy policies of these platforms, accessible via the following links:

- <https://www.facebook.com/privacy/policy/>
- <https://help.instagram.com/1558337079000388>

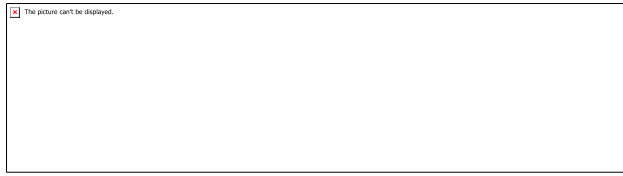
Regarding the sharing of your data by **LinkedIn Ireland Unlimited Company**, we invite you to consult the privacy policy of this platform, accessible here:

- <https://www.linkedin.com/legal/privacy-policy>

Regarding the sharing of your data by **TikTok Inc.**, we invite you to read the platform's policy, which can be accessed by clicking the link below:

- <https://www.tiktok.com/legal/page/us/privacy-policy/en?cms=1>

a) Disclosure of Data to Third Parties



Your personal data may be disclosed to the following third parties:

- i. **Meta Platforms Ireland Limited**, which is an independent data controller of your personal data and the provider of the Facebook and Instagram platforms;
- ii. **LinkedIn Ireland Unlimited Company**, which is an independent data controller of your personal data and the provider of the LinkedIn platform;
- iii. **TikTok Inc.**, which is an independent controller of your personal data and the provider of the TikTok platform;
- iv. Public authorities and institutions, upon justified request;
- v. Service providers and partners of **AUTONOM SERVICES S.A.**

Furthermore, we may disclose your personal data in the following situations and to the following recipients:

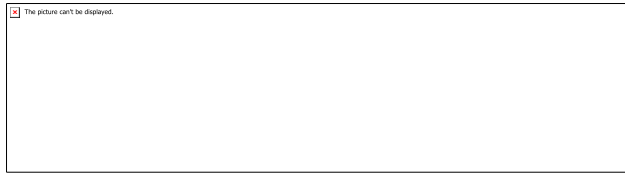
- i. If you request us to transfer your data to another controller and give your consent to such transfer (data portability);
- ii. To persons who demonstrate that they have the legal authority to act on your behalf;
- iii. In the event that our Facebook, Instagram, LinkedIn or TikTok pages are transferred to the administration of another entity;
- iv. Where we are legally obliged to disclose your personal data or upon requests received from public authorities and authorized bodies, for reasons of public interest in the field of health, etc., as specified in the General Data Protection Regulation;
- v. For the establishment, exercise, or defence of legal claims.

The Controller has taken all necessary measures to ensure that the recipients of this data also process the data in compliance with applicable personal data protection laws.

Your data transmitted to recipients will not be subject to transfers outside the European Union (except for social media platforms).

b) Restrictions on the Use of Personal Data by Recipients

Third parties to whom we provide your personal data, as outlined above, are restricted (by law



and through agreements entered into by **AUTONOM SERVICES S.A.** with them and/or similar organizational measures) as to how they may use your personal information.

We will always take all reasonable measures to ensure that any third parties with whom we share your personal data are subject to confidentiality and security obligations in accordance with this notice and applicable data protection legislation.

6. RETENTION PERIOD OF PERSONAL DATA

The Controller retains the personal data of visitors to its Facebook, Instagram, LinkedIn and TikTok pages only for as long as necessary to fulfill the purpose for which the data were processed and in accordance with legal requirements. Subsequently, upon the expiration of any legal archiving obligations, the data will be deleted or erased from the company's records.

The Controller guarantees the Data Subjects that periodic reviews are conducted to ensure that personal data are not retained for an excessive period on the social media platforms.

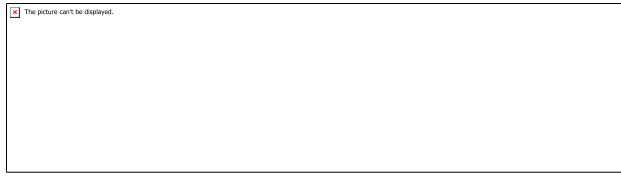
Any data not requested by the Controller and not necessary to fulfil the processing purposes will be deleted without undue delay from the company's records.

7. SOURCE OF PERSONAL DATA

The data processed by AUTONOM SERVICES S.A. through the social media platforms Facebook, Instagram and LinkedIn are provided directly by the individuals who interact with the Facebook page @Autonom, the Instagram page @autonom.romania, the LinkedIn page @Autonom Group and the TikTok page @ autonom.romania, either voluntarily by submitting such data or by creating posts on any of the Controller's pages, or by reviewing the Controller's activity, provided that such posts or reviews are approved by the administrator of the social media page.

8. TRANSFERS OF DATA OUTSIDE THE EUROPEAN UNION

As a general rule, your personal data will not be transferred to recipients located outside the European Union/European Economic Area (EU/EEA). In the event that such a transfer does occur, we will take all necessary measures to ensure that the recipient protects your information, and we will enter into processing agreements outlining the conditions under which the recipient may process your data.



However, Meta Platforms Ireland Limited, LinkedIn Ireland Unlimited Company and TikTok Inc. may transfer your data outside the European Union. For this reason, we kindly invite you to consult the specific privacy policies of these independent data controllers.

9. WHAT RIGHTS DO YOU HAVE AS A DATA SUBJECT?

As a data subject, you have certain specific rights regarding the personal data we collect in connection with your interaction with our Facebook, Instagram, LinkedIn and TikTok pages.

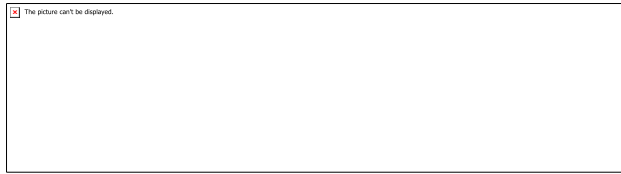
Although we act as Data Controllers, there is no genuine joint processing of data between AUTONOM SERVICES S.A. and Meta Platforms Ireland Limited, LinkedIn Ireland Unlimited Company or TikTok Inc., and therefore we can only address your requests concerning the processing of personal data by AUTONOM SERVICES S.A. If you wish to exercise your rights in relation to Meta Platforms Ireland Limited, LinkedIn Ireland Unlimited Company or TikTok Inc., we kindly invite you to contact them according to the instructions set forth in their respective privacy policies.

In accordance with Regulation (EU) 2016/679 (GDPR) and Law no. 190/2018, as a data subject you may exercise the following rights vis-à-vis the Controller:

Right of access: The right of the data subject to obtain confirmation from the Controller as to whether or not personal data concerning them is being processed and, if so, access to such data and information about how the data is processed;

Right to rectification: The right to have inaccurate personal data rectified without undue delay or completed if incomplete. Requests for rectification can be submitted by sending an email to: protectiadatelor@autonom.ro;

Right to erasure ("right to be forgotten"): The right to request the deletion of personal data without undue delay where one of the following grounds applies: the data are no longer necessary for the purposes for which they were collected; the data subject withdraws consent and no other legal basis for processing exists; the data subject objects to the processing and no overriding legitimate grounds prevail; the data were unlawfully processed; deletion is required to comply with a legal obligation; or the data were collected in relation to information society services offered directly to a child;



Right to restriction of processing: The right to request restriction of processing where the data subject contests the accuracy of the data, the processing is unlawful but the data subject opposes erasure, the Controller no longer needs the data for processing but they are required by the data subject for the establishment, exercise, or defense of legal claims, or where the data subject has objected to processing pending verification of legitimate grounds;

Right to data portability: The right to receive the personal data concerning the data subject, which they have provided to the Controller, in a structured, commonly used and machine-readable format, and the right to transmit those data to another Controller, where the processing is based on consent or contract and is carried out by automated means, if technically feasible;

Right to object: The right to object at any time to the processing of personal data for the performance of a task carried out in the public interest or in the exercise of official authority, or based on legitimate interests pursued by the Controller;

Right to object to automated decision-making: The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning the data subject or similarly significantly affects them. However, this right may not be exercised where such decisions are necessary for entering into or performance of a contract between the data subject and AUTONOM SERVICES S.A., are authorized by applicable law ensuring adequate protection of rights and freedoms, or are based on the data subject's explicit consent obtained in compliance with applicable legislation;

Right to lodge a complaint: The right to lodge a complaint with the National Supervisory Authority for Personal Data Processing (ANSPDCP) if the data subject considers that the rights set out above have been infringed.

Contact details of the **ANSPDCP** are as follows:

Address: Mun. Bucharest, Sector 1, General Gheorghe Magheru Boulevard no. 28-30;

Phone: 0.318.059.211 / 0.318.059.212;

Fax: 0.318.059.602;

E-mail: anspdcp@dataprotection.ro;

Website: www.dataprotection.ro.

To exercise the rights set forth above, the data subject shall contact **AUTONOM SERVICES S.A.** by sending a request to the following address: Calea Floreasca, No. 131-137, 7th Floor, Sector 1, Bucharest, or by electronic mail at: protectiadatelor@autonom.ro.

10. FINAL PROVISIONS

We reserve the right to modify, update, or amend our data protection practices and this Notice at any time, as deemed appropriate.

For this reason, we encourage you to periodically review the information notice posted on Facebook - @Autonom; Instagram - @autonom.romania; LinkedIn - @Autonom Group and TikTok - @autonom.romania.