

CONFIDENTIALITY POLICY

Preambles

This Confidentiality Policy is aimed solely at the customers SPHERA FRANCHISE GROUP and users of our online services and at the visitors of www.spheragroup.com/ website. The provisions of this Policy will be interpreted in conjunction with the provisions of the Data Protection Policy applicable to the data processed through the website and the provisions of the Terms and Conditions (available at www.spheragroup.com/) for consultation.

SPHERA FRANCHISE GROUP endeavors to ensure protection of confidentiality of your personal data while you are using our services. For this purpose, our policy is aimed at providing for the way to process your personal data as well as the way to protect such data. Any amendment to this Confidentiality Policy may be found if you visit our website www.spheragroup.com/ .

If you have any queries about the information on this page or if you need information about the processing of personal data by our company, feel free to contact us at our address in Bucharest, 239 Calea Dorobantilor, 2nd floor, Sector 1, telephone: 021.20117.57, fax: 021.201.17.59, e-mail: office@spheragroup.com , as well as on protectiadatelor@spheragroup.com .

Purpose of your personal data use

By providing your personal data, you hereby consent, expressly and unequivocally, to the use of the collected data by SPHERA FRANCHISE GROUP for the following purposes:

- (i) to take any complaints and/or suggestions you may have and to address them properly, in which case we will require, among others, your name, cell phone number, e-mail address;
- (ii) to deliver marketing offers such as newsletters, in which case we will require, for instance, your e-mail address and your name;

Your personal data will be kept for as long as such data are necessary for the intended purposes for which they were collected or for as long as the law requires; then, the personal data will be deleted or anonymized, unless there is a mandatory legal provision stating they should be kept.

Your rights

According to Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR") as well as Law 677/2001 on the protection of individuals with regard to the processing of personal data and the free movement of such data, as amended and supplemented ("Law 677/2001"), the data subjects will have the following generic rights:

- a) Right of information;
- b) Right of access;
- c) Right to rectification;
- d) Right to erasure;
- e) Right to restriction of processing;
- f) Right to data portability;
- g) Right to object;
- h) Rights related to the issuance of automation and profiling decisions.

Right of information:

According to the law, you shall have the right to be provided at least the following information, unless you already have it in your possession:

(i) the identity of the controller and, where applicable, of the controller's representative;

(ii) the purposes of the processing for which the personal data are intended;

(iii) additional information such as: the recipients or categories of recipients of the personal data; if the provision of all the data requested is mandatory and what are the implications of refusing to provide them; existence of rights arising from Law 677/2001 on the protection of individuals with regard to the processing of personal data and the free movement of such data, as amended and supplemented ("Law 677/2001") with respect to the data subject, especially of the right of access, of interference with the data and of objection as well as the terms in which they can be exercised;

(iv) any other information requested by the supervisory authority, having regard to the specifics of the processing.

Right of access to data:

As data subject, you have the right to obtain from SPHERA FRANCHISE GROUP, on request, and free of charge, confirmation of whether or not your data are processed by SPHERA FRANCHISE GROUP.

Where SPHERA FRANCHISE GROUP processes your personal data, it should communicate at least two pieces of information to you:

- (i) information about the purpose of processing, the categories of data envisaged and the recipients or the categories of recipients to which such data are revealed;
- (ii) the communication of the data subject to processing as well as any information available regarding the origin of same, in an intelligible form;
- (iv) information about the principles of operation of the mechanism used to process your data automatically;
- (e) information about the right to request rectification or erasure of personal data or restriction of taking personal data or of the right to object to processing
- (vi) the right to lodge a complaint with the supervisory authority and the right to challenge the controller's decisions in court proceedings.

The right to interfere with the data:

Where your personal data are either incomplete or inaccurate, you have the right to request SPHERA FRANCHISE GROUP the following:

- (i) rectification, update, denial or erasure of these data;
- (ii) anonymization of the data;
- (iii) a notice to the third parties to whom the data of any of the operations stated above were disclosed subject to the terms of Article 14, letter c), final sentence of Law 677/2001.

Right to object:

You may withdraw consent regarding the use by SPHERA FRANCHISE GROUP of the personal data for direct marketing purposes (i.e. newsletter delivery) at any time, free of charge and without any justification.

To obtain these information in writing from SPHERA FRANCHISE GROUP, based on the requests outlined above, you may contact us at the following e-mail address: contact@spheragroup.com, protectiadatelor@spheragroup.com.

Right to portability:

You have the right to receive information about the personal data concerning yourself, which you provided to SPHERA FRANCHISE GROUP, in a structured, commonly used and machine-readable format. You also have the right to transmit these data to another controller, where:

- a) processing is based on consent, under Article 6 (1) a) of GDPR or Article 9 (2) a) or on a contract, pursuant to Article 6 (1) b);
- (b) the processing is carried out by automated means.

In exercising his or her right to data portability pursuant to the provisions mentioned previously, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

The right to not be subject to an individual decision:

Under the provisions of Article 17 of Law 677/2001 you may request and obtain withdrawal or annulment or any decision that produces legal effects against you as well as revaluation of any decision concerning you and affecting you materially, where such decisions rely on personal data processing exclusively.

Right to seek judicial redress:

Where you consider you suffered damage or some rights conferred to you under the law were breached as a result of personal data processing, without prejudice to your right to lodge a complaint with the supervisory authority, you have the right to refer to the relevant courts seeking defense for your rights and/or reparation for the damage incurred, as the case may be.

Legal basis for the processing of your personal data:

- a) Execution of the contracts with the SPHERA FRANCHISE GROUPpartners;
- b) Your consent;
- c) Legal obligations;

SPHERA FRANCHISE GROUP will inform you before your personal data are processed for purposes other than those for which you disclosed them.

Processors at SPHERA FRANCHISE GROUP

SPHERA FRANCHISE GROUP may use processors for personal data processing, such as IT, Marketing, Human Resources solution providers as well as other fields of activity required for the management of the business.

SPHERA FRANCHISE GROUP will enter into agreements for personal data processing with all the processors to secure undertaking and observance of the obligations to process personal data (including the obligation to erase such data), in strict compliance with the applicable laws and provision of appropriate protection for your personal data.

Data access

SPHERA FRANCHISE GROUP shall not transfer, sell or exchange your data to third parties for marketing purposes.

Security of your personal data

SPHERA FRANCHISE GROUP took technical and organizational measures to provide an appropriate level of protection and security during the operations involving personal data by limiting unauthorized access or the losses or any unauthorized handling of data. Furthermore, in agreement with the technological advances in the IT field, we make continuous efforts to adopt security measures.

About “cookies”

The <http://www.spheragroup.com/> website uses “cookies”.

The information below is intended to inform the user / visitor about the location, use and management of the “cookies” used by the <http://www.spheragroup.com/> website and should be read carefully. Should you find the information below unsatisfactory, you may contact us using the following e-mail address: contact@spheragroup.com .

Our website is using “cookies” to collect information regarding, among others, the type of browser and the operating system, the source page, the name of the field the visitor / the user used to connect to the www.spheragroup.com/ website for the purpose of understanding how the visitors use our web page.

“Cookies” play an important role in facilitating the access and delivering the many services the user is enjoying while surfing the internet, such as:

- (i) customization of such settings as: the language in which a website is viewed, the currency in which prices of fees are expressed, the preservation of options for various products in the shopping cart (and the memorizing of such options);
- (ii) “cookies” give site owners important feedback on the use of their sites by the users while allowing them to make their websites even more efficient and more accessible to the users;
- (iii) improve the efficiency of online advertising.

What is a “cookie”?

An “Internet Cookie” (also called “browser cookie”, “HTTP cookie” or “cookie”) is a small file made of letters and numbers which will be stored on your computer, your mobile terminal or other device while you are browsing. A “cookie” is installed at the request generated by a web server for a browser (i.e.: Internet Explorer, Chrome) and is completely “passive” (in that it contains no software, viruses or spyware programs and is unable to access the information on the hard drive of a user such as yourself).

An actual “cookie” does not require personal information for any type of processing and, in most cases, do not identify the Internet providers directly.

Types of “cookies”

- (i) session “cookies”: are stored in the temporary cookie folder of your web browser to be memorized until the user leaves the website or closes the window of the browser (i.e. on log-in to/ log off from a webmail account or the wall of social media sites);
- (ii) persistent “cookies”: are stored on the hard drive of a computer or on the device of a user. Persistent “cookies” include the cookies generated by a website other than the one being visited by a user at the time - also known as “third party cookies” (“cookies” generated by third parties) – which may be used anonymously to memorize a user’s interests to allow delivery of ads that are relevant to the users.

What are the benefits of the “cookies”?

A “cookie” contains information that links a web browser (the user) to a specific web server (the website). If a browser accesses that web server again, the server is able to read the information already stored and act accordingly (i.e. the preferences regarding online confidentiality, the options regarding the language of the site, shopping carts or relevant advertising).

What is the lifetime of a cookie?

“Cookies” are managed by web servers. The lifetime of a “cookie” may vary significantly, depending on the purpose for which it was generated. Some “cookies” are used for one session only (“session cookies”) and will not be memorized after the user has left the website, while other “cookies” are memorized and reused each time the user returns to that website (“permanent cookies”). However, the “cookies” may be deleted by a user at any time, through their browser settings.

SPHERA FRANCHISE GROUP will keep your information for as long as they are required to improve our activity and address your preferences and facilitate your browsing through the website, subject to the laws in force.

Please remember you have the right at any time to request SPHERA FRANCHISE GROUP to erase your data.

What are third party cookies?

Certain sections of content on some sites may be provided through third parties. (i.e. an ad). These third party websites are not controlled by SPHERA FRANCHISE GROUP and are outside the scope of this Confidentiality Policy. If you access other websites using the provided / suggested links, the operators of these websites may collect your personal data. You should make sure that you agree with the Confidentiality Policy of these third parties before providing your personal information to them. SPHERA FRANCHISE GROUP is attempting as much as possible to make sure that all these websites have similar personal data protection measures. However, we shall not be responsible under the law for the activities or the confidentiality policies of these third parties.

What purpose do the “cookies” used by the www.spheragroup.com/ website serve?

SPHERA FRANCHISE GROUP may use any of the following types of “cookies”:

(i) website performance “cookies”: for this purpose, your preferences as visitor / user of this website are stored and do not have to be set up each time you visit this website (i.e. the video streaming speed with which the browser is compatible, the settings of the volume for the video player, etc. etc.);

(ii) visitor analysis “cookies”: each time a visitor visits our site, the analytics software provided by a third party will generate a user analysis cookie. It is with the help of this cookie that we will be able to determine whether or not you visited this site previously. The browser will also tell us if you have this cookie; if you

do not, one will be generated for you. This will enable the monitoring of the sole users that visit us and how often they do it.

If you did not register to our website, this cookie may not be used to identify individuals, it is to be used for statistical purposes only. If you registered, we will be able to identify the details you provided to us (i.e. e-mail address and user name; these data are subject to the confidentiality regime stated in the Confidentiality Policy and to the personal data protection laws in force.

(iii) geotargetting “cookies”: are used by a piece of software which determines the country of the visitor / user. This cookie is completely anonymous and is used only for content targeting - even when you are on our Romanian webpage;

(iv) registration “cookies”: the minute you register to our site, a cookie is generated that announces us whether or not you are registered. Our servers use these cookies to indicate the account you use to register and whether you have permission for a specific service. It also allows us to associate any comment you may post on our website to your username. Unless you selected “keep me registered”, this cookie will be erased automatically when you close the browser or shut down your computer;

(v) advertising “cookies”: they allow us to learn whether or not you viewed an online ad, the type thereof and the time elapsed since you saw the advertising message. These cookies are also used to target online advertising.

(vi) advertising provider “cookie”. Some of the ads on this site belong to third parties. Some of these third parties use their own anonymous cookies to analyze the number of individuals exposed to an advertising message or to see the number of individuals exposed to the same message on more than one occasion.

Please note that the third parties generating these cookies have confidentiality policies of their own.

You should note that these “cookies” may originate from third parties.

Other third party cookies

Third parties may set up their own anonymous cookies on some pages to monitor the success of an application or to customize an application. Due to the method of use, our site is unable to access these cookies just like the third parties are unable to access the cookies of our site.

Are “cookies” viruses?

Cookies are not viruses! They use plain text formats; they are not comprised of pieces of codes. Thus, they are unable to duplicate or replicate on other networks to run or replicate again. Being unable to carry out these functions, they may not be treated as viruses.

However, cookies may be used for adverse purposes. As they store information about the preferences and the navigation history of the visitors / users, on a certain site as well as on a number of sites, cookies may be used as a Spyware form. Many anti-spyware products are aware of this fact and are constantly marking the cookies to be erased within the anti-virus / anti-spyware delete / scan procedures.

Usually browsers have integrated confidentiality settings that provide various cookie acceptance levels, the period of validity and automatic deletion after the user visited a certain site.

Can cookies be deleted?

All modern browsers enable the change of the cookies settings. These settings are usually found in “options” or in the “preferences” menu of the browser of the visitor / user.

To learn about these settings, you may use the “help” tool of the browser for further details.

(i) cookie settings in Internet Explorer;

(ii) cookie settings in Firefox;

(iii) cookie settings in Chrome;

(iv) cookie settings in Safari.