

Privacy Policy

Last updated: April 1, 2025

This <u>Privacy Policy</u> will help you to understand how we collect, use, and share your personal information.

Creating a Privacy Policy that satisfies everyone can be difficult. Although most people prefer a concise and easy-to-understand document, we must comply with legal requirements by providing detailed information as mandated by regulators.

With this in mind, we have made our Privacy Policy as simple as possible to help you make informed choices when using our website and to ensure that you understand and have control over what information we collect, how we will use it, and when it is shared.

1. Introduction

This Privacy and personal data protection Policy describes how your data is collected, used, stored and disclosed when you interact with us using the website www.monamour-masaj.ro, with all subdomains of this one.

By using this website, you consent to the collection and use of your personal information (if provided) according to this Policy.

This Policy also describes the measures we take to ensure the security of information and how you can contact us about the implementation of data protection and to exercise your rights.

2. Who we are

Mon Amour Massage is the trade name of **Ego Exclusiv Management, LLC**, a legal entity of Romanian nationality with a social headquarters in Bucharest, 72b Caderea Bastiliei Street, District 1, 010616, registered with the Trade Register under number J40/955/2021, with tax registration code R043596900 (referred to in this Privacy Policy as "Mon Amour Massage").

Mon Amour Massage is responsible for processing the personal data of people who access/use our website or who communicate with us through various other communication channels (e-mail, phone, mail, etc.) of customers, employees and other natural persons, collected directly and voluntarily from them.

Mon Amour Massage collects data as a personal data controller. It is legally obligated to provide information about the authority, the types of personal data we collect, how

we use it, to whom we will send the data and the rights and choices individuals have regarding processing personal data.

3. How to contact us

If you wish to exercise any of your rights related to the processing of your data or obtain clarification or additional information, please get in touch with our data protection officer in any of the following ways:

- by e-mail to the address: dpo@monamour-masaj.ro
- by post or courier to the address: Bucharest, 72b Caderea Bastiliei Street, District 1, 010616 (with the mention "To the attention of Mon Amour Massage data protection officer")

Any requests for accessing, correcting, restricting, or deleting personal data must be made in writing and are subject to forceful legal restrictions. Please also contact us immediately if you consider that your data has been provided without your consent, by written and dated request accompanied by proof of your identity.

We will ensure that we take all appropriate steps to resolve your request without delay and, in any event, within 30 (thirty) days of receipt of your request. We will send the information electronically unless you request a written response.

If we cannot identify you, we may refuse to provide you with the requested information that may not belong to you. We may also deny accept your claims if you ask for the same information repeatedly, excessively, or without legal basis.

4. The legal basis for data processing

We are committed to protecting your privacy by the highest level of privacy regulation. As such, we comply with the obligations defined in the rules below:

- Regulation (EU) 2016/679 on protecting natural persons in processing personal data and the free movement of such data (General Data Protection Regulation).
- <u>Directive 2002/58/EC</u> of July 12, 2002, on processing personal data and protecting confidentiality in the public communications sector (Directive on privacy and electronic communications).
- <u>Law no. 190</u> of July 18, 2018, on measures to implement Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons about the processing of personal data and the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation).

The National Supervisory Authority's recommendations for Personal Data Processing are also respected, as are any other national and European legal regulations regarding data processing.

5. The data we collect

Personal data means any information relating to an identified or identifiable natural person (data subject). An identifiable natural person can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more specific physical, physiological factors, genetic, mental, economic, cultural or social of that natural person.

A. Our website provides booking, employment and contact forms, which we use for service booking, registration or electronic correspondence. Data is entered into a form, transmitted to us and then stored. When you submit the forms, we will collect the following data:

- Name
- E-mail address
- Phone number
- Town
- Age
- Image files

Upon registration, we will collect the following additional:

- The user's IP address
- The language and URL of the page accessed
- User's browser and operating system
- Date and time of registration
- Date and time of registration confirmation
- The date and time you consented to the data protection statement
- The website on which you registered

You can express your consent (if you choose to provide it) to the processing of your data by filling in and checking the appropriate box in the forms available on the website.

Personal data is not publicly displayed, is only used for communication with the data subject, and is not shared with third parties.

- **B.** Our system automatically collects data and information from the access device whenever a user visits our website. We will collect the following data:
- Information about the browser type and version used
- The user's operating system
- The user's Internet service provider
- The user's IP address
- Date and time of access
- Duration of the user's visit
- User's country of origin
- User's preferred language
- The time of the user's first visit and the time of their most recent visit

This data is securely stored in our log files, separate from the user's personal information.

C. Our website uses cookies. Cookies are small text files stored by the user's Internet browser.

When a user visits a website, we may place cookies locally on the user's device. This cookie file contains a string of characters representing a unique browser identification code, which will be recognised by the system the next time the user visits the website.

We use cookies to make our website easier to use. Certain features on our website necessitate continued browser identification even after leaving our page.

Cookies store and transmit the following data:

- Login information
- Google Analytics Services
- Google Maps integration

Our website also uses cookies to analyse the user's navigation and website use. We will collect the following data:

- Search terms entered
- Page views

Technical methods anonymise the data collected about the user. Thus, we can no longer trace the data back to the user who made the access. The data is kept separate from the user's other personal information.

Users are informed about using cookies for analysis through an informative banner that refers to a data protection statement when accessing the website. The banner includes information on how to prevent the placement of cookies by changing your browser settings.

For more information about cookies, please see the <u>Cookie Management Policy</u> on our website.

D. This website uses <u>Google Analytics</u>, a Google Inc. web analysis service ("<u>Google</u>"). Google Analytics uses cookies and text files stored on your computer or mobile device, enabling an analysis of your use of this website.

The information generated by the cookies about your use of this website is usually transmitted to a Google server in the USA and stored there.

We want to point out that this website uses Google Analytics with the extension "_anonymizelp()," which means that only truncated IP addresses are processed to exclude any direct reference to a person.

Google will truncate your IP address in European Union member states or other signatory states of the Agreement on the European Economic Area. The full IP address is only sent to a Google server in the USA and is truncated there in exceptional cases.

6. Purposes of data processing

A. We exclusively process personal data submitted via an online form to process user requests. In the case of contact by e-mail, this also includes the legitimate interest necessary for data processing. Any personal data processed during dispatch is essential to prevent the improper use of the contact form and protect the security of our IT systems.

B. Our system temporarily stores the user's IP address so they can deliver the website to the user's device. This temporary storage is essential for ensuring security and a personalised experience. The data is stored in log files to guarantee our website's proper functioning. We use the data to optimise the website and protect the security of our IT systems.

C. Using strictly necessary cookies is crucial for making the website more accessible. Disabling cookies may result in some functions on our website being unavailable. These functions require that the browser be recognised after it has left the website, illustrating the role of cookies in maintaining a seamless user experience.

D. Data processing aims to improve the website and user experience sustainably. Google uses this information on behalf of the website operator to evaluate your use of this website, compile reports on website activities, and provide other services to the website operator associated with using this website and the Internet.

7. Duration of data storage

A. Once the intended purpose of data collection through the online form has been fulfilled, we will promptly delete all submitted data. Rest assured that we will never store any personal data you enter into the online form on our servers.

You have complete control over your data. Once our correspondence with you has ended, we will delete any data sent via e-mail.

If you send us a booking, we will contact you using the e-mail double opt-in process. If you reply to the contact e-mail, we will delete the data within 24 hours.

We may still need to receive a response from you regarding your contact e-mail. In that case, we will retain your order request for two weeks to allow you to place the order you have already sent us.

B. After fulfilling the intended purpose of data collection, we are committed to promptly deleting all submitted data. When data is collected to operate the website, this happens as soon as the respective session ends.

We will securely delete data stored in log files within 14 days. However, we may store data for more extended periods in certain circumstances. In this scenario, the user's IP addresses are either deleted or shortened, eliminating the ability to trace them back to the accessing client.

C. The user's computer stores and transmits cookies to our website, but our client has complete control over the use of cookies.

You can change your Internet browser settings to disable or restrict the transmission of cookies. You can also delete the cookies placed at any time, an operation that you can set automatically.

If cookies are disabled, you may be unable to use our website's full range of features.

D. After fulfilling the intended purpose of data collection, we are committed to promptly deleting all submitted data.

8. Merger or acquisition

If we are involved in a merger, acquisition or sale of assets, we may transfer your personal information. We will notify you before your data is transferred and becomes the subject of another Privacy Policy.

Additionally, we may be obligated to disclose your personal information in response to valid requests from public authorities, such as a court of law or a government agency. We respect your privacy and are committed to transparency in such cases.

9. How we protect personal data

Mon Amour Massage has implemented administrative, technical, organisational and physical security measures to protect your data against accidental, unlawful or unauthorised destruction, loss, alteration, access, communication or other use.

We are also proactive in our approach to data protection. We continuously update and test our security technology, ensuring your data is always safe.

At the same time, we limit access to your data only to those employees who need it to provide services to you.

Furthermore, we provide comprehensive training to our employees on the importance of confidentiality and the need to maintain the privacy and security of your information.

In case of a personal data breach, we will do our best to remove it and assess its risk level following our data breach Policy.

Suppose we determine that the data leakage may result in material or non-material harm to you (e.g. identity theft, fraud or financial loss, discrimination). In that case, we will contact you without undue delay unless otherwise required by law.

We will take all necessary steps in full cooperation with the competent supervisory authority regarding possible incidents of incorrect use or unauthorised incursions on the website www.monamour-masaj.ro.

Despite the measures taken to protect your data, we draw your attention to the fact that the transmission of information over the Internet, generally or through public networks, is only partially secure. There is a risk that third parties, including unauthorised parties, will see and use your data.

While we take extensive measures to protect your data, it's important to note that we cannot be held responsible for vulnerabilities in systems that are beyond our control. We are committed to transparency and want to ensure that you clearly understand our limitations.

10. Transmission/disclosure of data

Mon Amour Massage may disclose your data to the extent that we are required to do so by law at the request of tax authorities or other competent control authorities.

We will not transfer personal data to countries outside the European Union.

11. Your rights regarding your data

Under the conditions provided by data protection laws, as a data subject, you have the following rights:

- The right to be informed

You can receive data processing details described in this Privacy Policy.

- The right of access

You have the right to find out whether we are processing your data and to request a copy of that data and details of the processing activities.

- The right to rectification

You have the right to obtain the correction of incomplete or incorrect personal data that we process.

- The right to be forgotten (the right to erasure)

You have the right to request the deletion of the data we process unless we need to retain it to comply with a legal obligation or to establish, exercise, or defend against legal claims.

- The right to restriction of processing

You have the right to restrict our processing of your data in certain circumstances. In this case, we will only process the data to store it.

- The right to portability

You have the right to obtain the personal data we hold about you in a structured electronic format and to transmit such data to another data controller if it is personal data that you have provided to us you have provided and if we process that data based on your consent.

- The right to opposition

Suppose the legal justification for processing your data is in our legitimate interest. In that case, you have the right to object to such processing for reasons related to your situation. We will comply with your request if we do not have legitimate and compelling reasons that justify the processing and which prevail over your interests and rights or if we need to continue processing the personal data for the establishment, exercise or defence of a legal right.

- The right to withdraw consent

You have the right to withdraw your consent to processing your data at any time. If you wish to withdraw your consent, please contact us using the information at the top of this page.

- No discrimination and no retaliation

You have the right not to be denied service or to have a different experience because you have exercised your rights.

- Submission of an appeal

If you exercise these rights, you can appeal against our response. If you disagree with

how we have dealt with your complaint, you can appeal to a regulatory body.

- Filing a complaint

Suppose you believe that processing your data violates data protection laws. In that

case, you can complain to the supervisory authority about data processing. In

Romania, the contact details of the supervisory authority for data protection are as

follows:

The National Supervisory Authority For Personal Data Processing (ANSPDCP)

28-30 G-ral Gheorghe Magheru Bld., District 1, 010336, Bucharest, Romania

Phone: +40.318.059.211

E-mail: anspdcp@dataprotection.ro

12. Changes

We may periodically update the content of this Policy by republishing the revised

version on the page you are currently viewing. We will notify you of any significant

changes by posting a notice on our website stating the date of the last update at the

top of the document.

The revised version is effective from the date of publication on the website. You must read and accept our Privacy Policy when using our services. Acknowledgement will allow us to record your acceptance and notify you of any future changes to this Policy.