



GDPR SRAC POLICY

SRAC-P-53

Approved

Mihaela Cristea

General Director

Edition: 2

Revision: 0

Date of entry into force: 01.07.2024

	Name	Function	Date	Signature
Elaborated	PhD eng. Cristian Roncea	Technical Director	01.07.2024	



GDPR SRAC CPOLICY

CODE: SRAC-P-53

Ed. 2

Rev. 0

LIST OF UPDATES

<i>Edition</i>	<i>Revision</i>	<i>Amendment content</i>	<i>Page</i>	<i>Date</i>
1	0	Initial drafting		28.05.2018
2	0	Up date		01.07.2024

	GDPR SRAC CPOLICY	CODE: SRAC-P-53
		Ed. 2
		Rev. 0

The purpose of this Policy is to explain in a simple and transparent way what personal data we collect and how we process it.

1. It applies to the following individuals:

- SRAC employees,
- SRAC auditors, experts and collaborators,
- any person within or representing SRAC client organizations,
- any natural person who is a client of SRAC, or who requests information, offers or who makes referrals,
- any person within or representing organizations requesting information or offers from SRAC,

Personal data refers to any information that tells us something about, or that we can relate to, the above individuals.

Processing refers to all the operations we may do with the data, such as collecting, recording, storing, adjusting, organizing, using, disclosing, transferring and deleting it.

You communicate personal information to us when you request offers, become a customer, register for our online services, fill in an online form, sign a contract, benefit from our services or contact us through one of our channels.

2. The personal data we collect includes:

- For employees or representatives of legal entity clients:
 - o Identification data: name, surname, position, signature;
 - o Contact data: address, e-mail, telephone;
- for natural persons who are SRAC clients or who request information, offers or who make complaints:
 - o Identification data: name, first name, CNP, position, signature;
 - o Contact data: address, e-mail, telephone;
- for SRAC employees:
 - o Identification data: name, surname, sex, date of birth, function, signature, CNP, nationality;
 - o Personal family data (marital status, details of family/spouse/partner/dependants);
 - o Contact data: address, e-mail, telephone;
 - o Education and work experience personal data (education and training history, qualifications, certifications);
 - o Personal data concerning health;
 - o Data related to bank accounts in order to be able to make payments for work done;
- for auditors, experts and collaborators of the SRAC:
 - o Identification data: name, surname, sex, date of birth, function, signature, CNP;
 - o Contact data: address, e-mail, telephone;
 - o Personal data on education and professional experience (education and training history, qualifications, certifications);
 - o Data related to bank accounts in order to be able to make payments for the work submitted.

	GDPR SRAC CPOLICY	CODE: SRAC-P-53
		Ed. 2
		Rev. 0

3. What we do with personal data

We only use personal data for legitimate business purposes. These include:

- Running certification, verification, inspection and testing processes including:
 - o Contacting the organization directly by SRAC or SRAC staff designated to carry out activities under contract;
 - o collecting and retaining data during the performance of activities as objective evidence to support the award of certificates, or other documents issued by SRAC;
 - o we may use notes from conversations we have with you online, over the telephone or face to face in order to provide the contracted services;
- Customer relationship management. We may ask you for feedback in relation to our services and share it with certain members of our staff in order to improve the services we provide or to provide you with other services similar to, or related to, those contracted and to personalize the services we provide.

4. To whom and why we communicate personal data.

- In certain cases necessary for the performance of the activity, the communication of these personal data may also be made to third parties such as: the accreditation body, ministries, the European Commission, regulatory agencies/authorities in different fields, industry associations (e.g. IQNet), certification scheme owners, to other certification bodies (in case of transfers, joint audits, or legal reporting obligations);
- We communicate information to auditors appointed to provide contracted services;
- To judicial/investigative authorities, such as police, public prosecutors, courts and arbitration/mediation bodies, upon their express and lawful request;
- Lawyers or bailiffs, e.g. in the event of insolvency, bankruptcy or the recovery of debts owed to the SRAC that have not been paid;
- In other situations expressly provided for in applicable legislation/regulations.

In all such situations, we comply with applicable personal data protection legislation, including, but not limited to, the provisions of the General Data Protection Regulation ("GDPR") EU 2016/679, implementing legislation and decisions that the designated supervisory authority may issue in relation thereto.

5. The rights of individuals covered by this policy and how we respect them

These rights include:

- Right of access to personal data.

It allows you to obtain confirmation from us as to whether or not SRAC is processing personal data about you and what such data is being processed. Where personal data concerning you is not collected from you, any available information as to its source, where we do not have a legal prohibition on disclosure of the source.

- Right of rectification

This involves the right to request that inaccurate or incomplete personal data relating to you be corrected or updated, or, where incomplete, completed.

- Right to erasure or 'right to be forgotten'



GDPR SRAC CPOLICY

CODE: SRAC-P-53

Ed. 2

Rev. 0

It entails the right to request erasure of personal data concerning you, in certain circumstances, such as:

- o personal data are no longer necessary for the fulfillment of the purposes for which they were collected or processed,
- o your data have been processed unlawfully,
- o the processing has taken place on the basis of your consent and your consent has been withdrawn.

- Right to withdraw your consent

Consent may be withdrawn at any time where the processing of personal data concerning you has been carried out on the basis of your consent.

- Right to restriction of processing

This entails the right to request and obtain restriction of the processing of personal data concerning you in certain circumstances, such as:

- o you contest the accuracy of the data for as long as it would allow us to verify the accuracy of that data,
- o your data has been processed unlawfully and you object to its erasure by requesting the restriction of its use.

- Right to data portability

It entails the right to receive the personal data concerning you that you have provided to us, with the right to have them transmitted to another controller, where the processing of the data has been carried out either on the basis of your consent or on the basis of the contract concluded with us, and where the processing of personal data has been carried out by automated means.

This right may be exercised, only to the extent that the processing of the data provided has been carried out solely by automated means and only where the extraction of such data is feasible in terms of the technical capabilities used by SRAC.

- Right to object

This implies that, at any time, you have the right to object, on grounds relating to your particular situation, to the processing of personal data in certain circumstances, such as:

the processing was carried out in our legitimate interest; or

- o the processing is for direct marketing purposes, including profiling on the basis of those provisions.

- The right not to be subject to a decision based solely on automated processing of personal data, including profiling that produces legal effects or significantly affects you. It presupposes that you have the right to request human intervention by the SRAC, to express your point of view and to contest the decision.

- The right to lodge a complaint with us and/or the competent data protection authority

- The right to go to court

To exercise your rights or for further information you can contact the SRAC by:

- e-mail at: office@srac.ro,

- by post,

- by fax: +4.021.313.23.80,

- by submitting in person a signed notification in holograph form to the office of the SRAC.

6. How we protect personal data

	GDPR SRAC CPOLICY	CODE: SRAC-P-53
		Ed. 2
		Rev. 0

We apply a set of policies and procedures to keep data secure.

These policies and procedures are regularly updated to comply with regulations. Specifically and in accordance with the law, we take appropriate technical and organizational measures (policies and procedures, IT security, etc.) to ensure the confidentiality and integrity of personal data and the way it is processed.

In addition, SRAC employees and collaborators are obliged to maintain confidentiality and may not disclose your personal data unlawfully.

7. How long we keep personal data

We may only retain personal data for as long as it is necessary for the purpose for which we originally requested it, subject to applicable regulations. After this period, we seek feasible solutions, such as archiving.