**PRIVACY POLICY**

Last Updated: May 2018

Your privacy is one of our fundamental commitments at S.C. FAIRWAY BROKER DE ASIGURARE S.R.L., located in Constanta, 18 Revolutiei din 22 Decembrie 1989 Street, bl.L9, sc.A, 1st floor, flat no.3, (referred to as “FAIRWAY”).

This document has the scope to inform you in respect of your personal data processing in the circumstances of using the site [www.fairway-broker.ro](http://www.fairway-broker.ro).

**If you are a user of our Internet website:**

We use the personal data we collect from you when you visit our Internet site, [www.fairway-broker.ro](http://www.fairway-broker.ro), in order monitor traffic and improve the content of the website. We base this data processing activity on our legitimate interest in ensuring the proper functioning of our Internet website, as well as its improvement.

The categories of data processed in this context are the hour and date of accessing the Internet website and the IP address from which our Internet website was accessed.

**For all above categories of data subjects,** we may also process your data in the context of changes in structure or similar transactions involving any FAIRWAY entity. In this case, the grounds for provessing may be represented by the legal obligation (in case FAIRWAY is legally obliged to disclose certain personal data to public authorities), the performance of the agreement concluded by FAIRWAY in the context of such transaction (if you are a party to such agreement) or legitimate interest of FAIRWAY to carry out the transaction in the most effective manner (in the rest of the cases).

**PROVIDING THE PERSONAL DATA**

When the data is required directly from you, FAIRWAY kindly asks you to provide all categories of personal data we request in the aforementioned purposes, as otherwise we shall not be able to carry out our activity (including, among others, to provide you with our services).

If you provide to FAIRWAY the personal data of other natural persons, we kindly ask you to communicate to them before such disclosure the modality in which FAIRWAY intends to process their personal data, as described in this Privacy Policy.

**DISCLOSURE OF YOUR PERSONAL DATA**

While as a rule we shall not disclose your personal data to any third parties, we may:

* Disclose your contact details to our affiliates within FAIRWAY;
* If in your interest and necessary, disclose relevant personal data to courts of law and arbitration panels or relevant authorities, in the context of providing the services you have requested from us.

**DURATION OF PROCESSING**

We intend to keep your personal data for the duration of the assistance agreement, as well as afterwards, according to our internal policies and the legal obligations incumbent upon us.

In case the data is not collected in the context of an assistance agreement, such data will be kept for as long as necessary in order to attain the purpose of the envisaged data collection.

**YOUR RIGHTS**

* **the right of access** – allowing you to obtain confirmation that your personal data is being processed by us and, if affirmative, the relevant details of such processing activities;
* **the right to rectification** – allowing you to rectify your personal data if inaccurate;
* **right to erasure** – allowing you to obtain the erasure of your personal data in certain cases (e.g., if the data is no longer necessary in relation to the purposes for which it was collected);
* **right to restriction** – allowing you to obtain the restriction of processing your personal data in certain cases (e.g., when you contest the accuracy of your personal data, for a period enabling us to verify such accuracy);
* **the right to object** – allowing you to object to further processing of your personal data within the conditions and limits set forth by law;
* **right to data portability** – allowing you to receive the personal data concerning you that you have provided to us, in a structured, commonly used and machine-readable format or to transmit this data to another data controller.

We are happy to ensure your exercise of these rights.

You may exercise your aforementioned rights and find out more about such rights by filling with us, as data controller, a written request at FAIRWAY , 18 Revolutiei din 22 Decembrie 1989 Street, bl.L9, sc.A, 1st floor, flat no.3, Constanta, 900735 or by e-mailing us at protectiadatelor@fairway-broker.ro.

You also have the right to file a complaint with the data protection authority.

We are committed to always treat your requests with the utmost attention and address any queries you may have in the shortest time possible.