



## **POLICY ON PERSONAL DATA PROCESSING AND PROTECTION WITHIN SNN**

The objective of this Policy consists of establishing a general organizational framework, the responsibilities, processes, operational and information flows required to protect personal data.

### **Who are we?**

We are the National Company Nuclearelectrica SA based in Bucharest, 65 Polona Street, registered with the Trade Office Register under no. J40/7403/1998, having Sole Identification Code RO10874881, website [www.nuclearelectrica.ro](http://www.nuclearelectrica.ro), telephone 021.203.82.00, fax 021.316.94.00, email address [office@nuclearelectrica.ro](mailto:office@nuclearelectrica.ro), dully represented by the General Manager, Cosmin Ghita

### **Contact details of person in charge of personal data protection:**

**E-mail: [dpo@nuclearelectrica.ro](mailto:dpo@nuclearelectrica.ro)**

This Policy shall apply within SNN (head office and CNE Cernavoda and FCN Pitesti branches), with regard to the processing processes for personal data of natural persons in order to protect their rights and liberties, the main categories of targeted persons being:

- SNN SA staff and their relatives/next of kin, including children,
- Visitors of offices/premises of SNN, including children,
- SNN SA shareholders,
- Public, mass media, nongovernmental organizations, trade unions having relations with SNN SA staff,
- Staff and representatives of authorities,
- Staff and representatives of organizations - legal entities collaborating with SNN SA in the performance of a business relationship or during its preceding stages in order to establish such business relationship
- Candidates to vacant positions at SNN,
- Persons using the whistleblower platform available on SNN website, in case they choose to communicate their personal data.

**National Company NUCLEARELECTRICA S.A.**

65 Polona Street, District 1, 010494, Bucharest, Romania; Tel +4021 203 82 00, Fax +4021 316 94 00;

Trade Registry number: J40/7403/1998, Sole registration code: 10874881,

Paid and subscribed capital: RON 3,015,138,510

[office@nuclearelectrica.ro](mailto:office@nuclearelectrica.ro), [www.nuclearelectrica.ro](http://www.nuclearelectrica.ro)

This list is not exhaustive and SNN must protect the rights and liberties of all collaborating targeted persons, in terms of their personal data processing.

### **Processing of special personal data categories**

We do not collect data regarding your health condition, ethnicity, religious or political beliefs, trade union membership, etc., except when this is strictly required by law and/or for the protection of your interests, rights and/or liberties or when such information is provided by you. In the cases where we collect such data, we are restricted only to specific circumstances.

### **Data of minors**

We collect data related to minors in the following cases:

- Children of our employee (or assimilated personnel, like mandate-based manager), with the consent of parents or guardians,
- When a visit is organized at SNN head office or one of its branches and where access is allowed only based on a credentials file which includes personal data,
- When endorsement requests are received from non-governmental organizations, provided based on the consent of parents and guardians of relevant minors.

**In the meaning of European Regulation 2016/679 and of this Policy, the following terms shall be construed as follows:**

**Personal data** – any information related to an identified or identifiable (“targeted person”) natural person; an identifiable natural person is the person who can be identified, directly or indirectly, especially by reference to an ID element like a name, ID number, location data, online identifier or by reference to one or several particular elements, specific to own physical, physiological, genetic, psychical, economic, social or cultural identity.

**Processing** - any operation or set of operations performed on personal data or personal data sets, with or without the use of automatic means like collecting, registering, organizing, structuring, storing or changing, extracting, viewing, using, disclosing by transmission, disseminating or making available in any other way, aligning or combining, restricting, deleting or destroying the data.

### **Principles applied by SNN to protect your rights:**

According to the principles established by European regulation no. 2016/679 related to personal data processing, SNN shall implement the following principles concerning the personal data. As such, your personal data:

- shall be processed legally, fairly and transparently in relation to you (“legitimacy, fairness and transparency”);
- shall be collected for specified, explicit and legitimate purposes and shall not be subsequently processed in a manner which is not compatible with said purposes; subsequent processing for archiving of public interest, scientific or historic research or for statistical purposes shall not be deemed incompatible with the original purposes (“legal purpose-related restrictions”); Personal data may be processed only for the purpose they were originally collected. Subsequent changes of the purpose shall be possible only in a limited degree. Such changes may be carried out based on an agreement with you, collective contracts, consent granted by you or based on the national legislation.
- shall be appropriate, relevant and limited to what is required in relation to the

processing purposes (“minimum reduction of data”);

- shall be accurate and, where necessary, shall be updated; all actions must be taken to ensure that, in terms of the processing purposes, inaccurate personal data are deleted or corrected without delay (“accuracy”);
- shall be kept in a form which enables the identification of targeted persons and for a period not exceeding the time frame required to fulfill the processing purposes; personal data may be stored on longer periods insofar as such data will be processed exclusively for public interest archiving, scientific or historic research or statistical purposes, provided that the adequate technical and organizational actions are taken, as specified in the regulation, in order to guarantee the rights and liberties of targeted person (“storage-related restrictions”);
- shall be processed in a way which ensures real personal data security, including the protection against unauthorized or illegal processing, against loss, destructions or accidental deterioration, by applying the technical and organizational measures which are adequate (“integrity and confidentiality”)

#### **How do we process personal data?**

Personal data processing activities performed by SNN shall be restricted to fulfilling the purpose such data were collected for and may include: collection, registration, organization, structuring, storing, adapting or changing, extraction, viewing, use, disclosure by transmission, dissemination or availability, aligning or combining, restricting, deletion or destruction.

#### **How are we protecting your rights?**

When performing its business, SNN must collect and use certain information related to natural persons (targeted persons). This may include clients, suppliers, business partners, employees, relatives of employees, visitors, staff of authorities or trade unions and other persons having relationships with the company or who the company may need to contact.

By defining and implementing adequate technical and organizational actions, SNN ensures:

- Compliance with the regulation related to data protection, as well as compliance with the good practices,
- The security of personal data throughout SNN data management flow,
- The non-transfer of personal data outside the country and/or European Union in the absence of adequate guarantees, observance of mandatory corporate rules and/or legitimate interests,
- Protection of staff, clients, shareholders and partners’ rights,
- Protection against risks connected to a breach of data security.

Rules shall apply regardless if data are stored in electronic format, conventional format or in other formats. Personal information shall be legally processed.

#### **How does SNN guarantee the confidentiality of data sent via SNN website?**

Information presented on [www.nuclearelectrica.ro](http://www.nuclearelectrica.ro) shall be deemed as public interest data and may be distributed or copied, except when there are specifications prohibiting such actions.

If the visitors of [www.nuclearelectrica.ro](http://www.nuclearelectrica.ro) website are providing certain personal data, especially requested for the recruitment process by SNN Jobs online app or by the form related to the “Whistleblower” domain, including name, surname, professional history, CV, mailing address, telephone numbers, photographs and other data provided by you, such data shall be

managed securely and by complying with all provisions applicable pursuant to EU regulation no. 2016/679.

SN NUCLEARELECTRICA SA (SNN SA) shall take all actions required to guarantee the security of personal data. In performing its services, the company shall use only employees and third party companies which are subjected to the obligation of observing the professional secret principles. Interested persons may contact SNN SA, anytime, in order to exercise the rights applicable pursuant to the provisions of regulation no. 679/2016 (access, correction, deletion or restricting, portability or opposition of stored personal data processing, or in order to revoke the consent for personal data processing.

At SNN SA level, a series of procedural actions shall be established for the compliance and protection of physical and electronic security of personal data collected. Your personal data shall not be distributed to other institutions or public authorities except when there is a legal obligation or your consent for such distribution.

Website visitors shall enjoy the rights guaranteed by law, namely the right to information, the right to data access, the right to oppose, the right of not be subjected to an individual decision and the right to go to court in case of a breach of rights provided by the European regulation no. 2016/679 regarding the protection of natural persons in relation to personal data processing.

The [www.nuclearelectrica.ro](http://www.nuclearelectrica.ro) website does not collect data for commercial purposes.

### **Policy related to cookies files**

SNN website is using cookies. The following explanations are designed to provide information related to the cookies management on SNN website when you browse our website.

The term “cookie” means cookie modules and similar technologies used to automatically acquire data.

An “Internet Cookie” (term also known as “browser cookie” or “HTTP cookie” or “cookie”) is a small size file, composed of letters and digits, which will be stored on the PC, mobile terminal or other equipment of one user and that are used to access the internet.

Cookies are set up based on a request sent by a web-server to a browser (for instance: Internet Explorer, Firefox, and Chrome). Once set-up, cookies have a predetermined life cycle, remaining “passive” in the sense that they do not include software, viruses or spyware and will not access the information stored on the hard-drive of the user on whose equipment they were installed.

Cookies used by SNN website are designed to provide the users of this webpage with a better browsing experience for each user to:

- improve the use of this webpage, including by identifying any errors which occur during the viewing/use of the page by the users;
- provide anonymous statistics related to the way this webpage is used by SNN as owner of the page;

- determine the language used to view the webpage;

Based on the feedback sent by the cookies with regard to the way this webpage is being used, SNN may implement actions for a better efficiency and accessibility of the webpage.

As such, the use of cookies shall enable the storage of certain settings/preferences established by this webpage users, like: frequency of access, pages viewed, search engine used to access this website, most of the cookies being Wordpress specific (this being the platform where SNN website was created). SNN website does not use advertising cookies.

List of cookies used by SNN website:

|                        |   |
|------------------------|---|
| _ga                    | used by Google Analytics to distinguish between users and other metadata. Validity term: 2 years        |
| _gat                   | Used by Google Analytics to regulate the number of requests. Validity term: 1 minute                    |
| __gid                  | used by Google Analytics to identify users and other metadata. Validity term of 24 hours                |
| PHPSESSID              | Used by PHP to initiate a session   |
| _drip_client_6994213   | Persistent cookie with average validity term of 730 days.   |
| _icl_current_language. | Cookie used by Multilanguage plugin of Wordpress to store the language used by the user on this website |
| _mcnc                  | Cookie used by the website's micro caching module   |
| wordpress_test_cookie  | Test cookie initialized by wordpress to test http protocol  |
| wp-settings-1          | Initialized by Wordpress for settings   |
| wp-settings-time-1     | Initialized by Wordpress for hour and time zone settings  |

SNN website cookies have a validity term which depends on the purpose of each cookie:

- Session cookies – A “session cookie” is a cookie being automatically deleted when you close the browser.
- Persistent or fixed cookies - A “persistent cookie” or “fixed cookie” is one being stored on your terminal until it reaches a certain expiry date.

SNN website accessing involves your agreement for cookie installation on your PC.

Deactivation and refusal to receive cookies may render this webpage difficult to view, generating restrictions related to the possibilities of its use.

Users are able to configure their browser to reject cookie files or to accept cookie files from a certain webpage. All current browsers are providing the possibility to change cookie settings. Usually, these settings may be accessed under “options” domain or in “preferences” menu of the browser.

## **For what purpose do we process your personal data?**

SNN processes personal data only if and insofar as at least one of the following conditions applies:

- You grant your consent for the processing of personal data for one or several specific purposes;
- processing is required for the execution of a contract you are party to or to take action, upon your request, prior to the conclusion of a contract;
- processing is required in order to fulfill a legal obligation imposed on SNN SA;
- processing is required to protect your essential interests or those of another natural person;
- processing is required in relation to the legitimate interests sought by SNN or by a third party, except when your fundamental interests or rights and liberties prevail, requiring the protection of personal data especially when the targeted person is a child.

For example, we will collect your data for operations like:

- corporate events (General Assembly of Shareholders, payment of dividends, dividend payment document processing, registered capital increases/decreases, etc.)
- organizing visits on location, based on a credentials file
- trade activities based on contracts
- human resources activities, like recruitment, selection, etc.
- activities performed with mass media representatives
- CSR activities, endorsements

## **What types of information do we collect?**

Via SNN website:

### **For job offers:**

- Your contact details, CV, certifications, degrees and information about desired job.
- Name, address, email address, telephone number and other contact details;
- CV or letter of intent, previous work experience and/or relevant work experience or other skills, studies and other information you provide in support of an application and/or in support of the application and recruitment process;
- Any other demographic data obtained during the application or recruitment process, like gender, information of your citizenship, medical or health data communicated by candidates, criminal record
- Reference data and/or information obtained based on background checks (where applicable), including information provided by third parties; including but without limitation to recommendation forms.
- Information related to any previous conditions associated to prior employment relations.

### **For the whistleblower:**

- Identification data (name, surname, date of birth, profession, mailing address, e0mail address, contact telephone number) in order to register your notice and the possibility to contact you for future clarification/information about the investigation progress;
- Supporting documents related to the notice submitted;

- Other personal data obtained from you during the investigation process related to the notice submitted by you (historic data, financial data, social and demographic data, etc.), depending on the relevant case and only insofar as such data will be absolutely needed to conduct the investigation.

#### Directly collected data:

- Name, surname, citizenship, work place, ID card series and number, date of issuance and of expiry, personal numeric code, series number for cameras brands, sticks, memory cards, laptops and other similar equipment, registration number and brand of vehicle, data required to prepare the credentials file in case of visits to SNN, CNE Cernavoda and FCN Pitesti premises.
- Commercial data from contractors: name of company, headquarters, trade registry number, sole identification code, address, legal representatives, bank accounts, personal data of legal representatives, financial data required to submit tenders for public procurement procedures, CVs of employees, certifications, approvals
- Personal data obtained from third parties based on exercising various legal rights, these data being sent by email or mail
- Personal data from the shareholders register, required to execute capital market operations according to the legislation applicable. SNN shall not directly collect personal data of shareholders but is receiving these data in a secure way from the Central Repository. The exception to these provisions is the additional request for documents required to pay the dividends for non-resident shareholders.
- Personal data related to employees
- Information we obtain from other sources, like credit agencies, fraud prevention agencies, as well as other data providers.

#### **Who has access to your personal data?**

The only persons authorized to access the data specified in this Policy are those who require such data to perform their professional activity. Data shall not be distributed unofficially neither within the organization nor outside the organization. When access to personal data is required, the employee may request the approval of such access to their hierarchic managers. SNN SA shall ensure training for all employees in order to assist them in understanding their responsibilities related to the personal data management. Employees shall keep all data secured, taking all technical and/or organizational actions for the data protection. Data shall be regularly reviewed and updated when it is found that these are obsolete/outdated. When no longer required, such data shall be deleted or eliminated.

#### **Personal data storage**

When data are stored on conventional support, these shall be kept in a secured location where unauthorized persons cannot view and/or access them.

When data are stored on electronic format, these shall be protected against unauthorized access, accidental deletion and hacking attempts:

- Data shall be protected by strong passwords which must be changed regularly and kept secret.
- If data are stored on portable support (like CD or DVD), these shall be kept locked and adequately secured when not in use.
- Data shall be stored only on designated units and servers and shall be uploaded only by

authorized persons (including persons with access rights/approvals).

- Personal data servers shall be installed in a secure location, separately/away from the general office space.
- Backups shall be executed frequently for the data. These backups shall be regularly tested, according to the standard procedures for valid backup execution at company level.
- Data shall not be saved directly on laptops or other portable devices, like tablets or smartphones.
- All Servers and PCs with data shall be protected by approved security software and firewall.

### **Recipients of processed personal data**

Personal data shall be processed only for the purpose of performing the company's current business. At the same time, data may be processed by other companies based on service contracts or for the execution of already signed contracts or for signing new contracts or for any other services specified in the contracts signed by the company. Registered data shall be used by NUCLEARELECTRICA S.A. suppliers and contractual partners in good faith, for legitimate purposes and by complying with the technical and organizations requirements adequate for the protection of personal data against accidental or illegal destruction, loss, change, disclosure or unauthorized access, as well as against any method of illegal processing. To this end, SNN shall ensure that its partners are observing the clauses for correct processing of personal data and information confidentiality.

### **What are your rights?**

- 1. Right to information:** the right to receive information related to personal data processing operations executed by SNN. Compliance of SNN with this right shall be achieved based on this notice;
- 2. Right to access:** the right to obtain from SNN a confirmation whether SNN is processing or not his/her personal data and if yes, the right of access to such data and the right to receive information about the data processing procedures;
- 3. The right to revoke consent:** the right to withdraw, at any time, the consent for personal data processing.
- 4. The right to rectify:** the right to obtain from SNN, without unjustified delays, the rectification of inaccurate data related to you or supplementation of incomplete personal data;
- 5. The right to delete data:** the right to obtain from SNN, without unjustified delays, the deletion of personal data related to you, when any of the following events, specified in regulation GDPR, occurs:
  - personal data are no longer required to fulfil the purposes they were collected or processed for by SNN;



- you revoke your consent for data processing related to the above mentioned purposes;
  - personal data were illegally processed by SNN;
  - personal data must be deleted to comply with a legal obligation imposed on SNN.
- 6. The right to restrict processing:** the right to obtain from SNN a limitation of personal data processing in any of the following situations specified by regulation GDPR:
- you challenge the accuracy of data processed by SNN. Processing shall be restricted for a time frame which enables SNN to verify the accuracy of relevant data;
  - personal data processing by SNN is illegal and you do not want the deletion of such personal data but a limitation of their use by SNN;
  - SNN no longer requires your personal data and you are asking this limitation for the purpose of establishing, exercising or protecting a right in a court of law or through an administrative procedure;
- 7. The right to data portability:** the right to receive from SNN the personal data provided in your candidate file and which were supplied by SNN in a structured format, regularly used and which can be automatically read, as well as the right to send these data to another data operator when the technical means enables this operation. You enjoy this right only when processing is based on your consent or when processing is performed using automatic means. SNN shall not be entitled to send your candidate file to other companies or own branches, being your responsibility to apply for each desired job.
- 8. The right to oppose:** the right to oppose, due to reasons related to your particular circumstances, the processing performed by SNN, based on the legal ground of your legitimate interest.
- 9. The right to not be subjected to a decision exclusively based on automatic processing,** including the request for profiles (any automatic processing which uses your personal data to assess certain personal aspects, like automatic selection of CVs executed by a dedicated software app of ATS type - Applicant Tracking System, personal preferences, health condition, etc.) which generates legal effects and relates to the targeted person.
- 10. The right to submit a complaint:** You shall be entitled to submit a complaint with SNN's person in charge of personal data processing ([dpo@nuclearelectrica.ro](mailto:dpo@nuclearelectrica.ro)) and when you feel that your complaint is not solved, you may submit a complaint with the National Authority for Personal Data Processing Supervision (ANSPDCP) in case you wish to protect your rights and ask that your situation be remedied, as well as in case of SNN breach of personal data processing protection.

In order to exercise the above mentioned rights, you may send a written request (i) via email at: [dpo@nuclearelectrica.ro](mailto:dpo@nuclearelectrica.ro) , (ii) by mail/express courier at the following address: Bucharest, 65 Polona Street, District 1 or (iii) you may hand it directly at SNN head office. After receipt of such request, SNN shall sent you a reply, for free and without unreasonable delays, within maximum 30 days as of the receipt date.

### **Personal data keeping period**

We shall store your data as long as this is required by law or, in the absence of any legal provision, we shall store your personal data as long as this is required to fulfil the purpose they were collected for and, subsequently, for the time frame required to protect certain rights of SNN or your rights in a court of law or in relation to a third party, including authorities.