

# Privacy Policy

## INTRODUCTION

This privacy policy aims to explain how Field Data Zoom SRL (hereinafter "Field Data Zoom") processes your personal data, in accordance with the relevant all data protection laws and regulations, including the General Data Protection Regulation (EU) 2016/679 (hereinafter "GDPR").

More specifically, through this document we want to inform you about the personal data that we collect from you or that you make available to us through OGOR Journal mobile application and how we process your personal data when you interact with us.

Please read this Privacy Policy carefully, together with any other privacy notice we may provide, so that you are fully informed of how and why we are using your data.

## CONTROLLER. WHO WE ARE?

Field Data Zoom SRL is a company established and functioning in accordance with the Romanian legislation, with its headquarters in Str. Gheorghe Missail, nr.67, 011542 Sector 1, București, Romania, having unique registration code 41399686, email: [contact@ogor.ro](mailto:contact@ogor.ro).

We offer you our services by means of which we made available to you OGOR Jurnal application, a mobile application for scout monitoring your farm.

## TO WHOM THIS PRIVACY POLICY IS APPLYING?

This privacy policy covers the processing of personal data of our users (customers) as well as our business partners.

## HOW WE COLECT YOUR DATA?

As a rule, we collect your personal data that you provide to us directly, by creating a user account on OGOR Jurnal or while you discuss with our representatives. In some cases, personal data may be collected by filling in the forms requesting information about our services.

## WHAT DATA WE COLLECT ABOUT YOU?

Personal data, or personal information, means any information that relates to an identified or identifiable natural person or any information about an individual from which that person can be identified. Also, personal data that has been anonymized, encrypted or pseudonymized, but can be used to re-identify a person, remains personal data.

Processing personal data includes all the operations we can perform regarding the data, such as collecting, recording, storing, adjusting, organizing, using, disclosing, transferring and deleting them.

Our policy is to process data that are necessary to provide you with our services by means of OGOR Jurnal application (including the conclusion of the contract). OGOR Jurnal collects the following data from these sources:

**1. Data provided by the user.** We collect data when users create or update their accounts in OGOR Jurnal. This includes name and surname, email address, phone number, login name and password, profile picture, and user settings.

**2. Data created during the use of the service.** We collect content and other information users provide when they use our service, including when they create an account, post or share content, and communicate with other users. This may include information from or about the content they provide (e.g., the location of a photo or the date it was created). Our systems automatically process user communication content to analyze the context and information for purposes described below.

**3. Service usage information.** We collect information about how users use our service, such as the types of content they view or interact with, the features they use, actions they take, as well as the time, frequency, and location of activities. For example, we record when they use and when they last accessed our service, as well as the posts or content they view on OGOR Jurnal.

**4. Device data.** We collect data about the devices used to access our services, including hardware models, IP addresses, or other unique device identifiers, operating systems and their versions, and preferred languages.

## TO WHOM WE MAY DISCLOSE YOUR PERSONAL DATA?

As a rule, we will not disclose your personal information with any third party, unless required by law or when necessary to perform the contract with you and administrate our business.

Your personal data may be disclosed, as follows:

- To business partners and subcontractors, for the purpose of performing our contracts;
- To service providers that offer technical support for IT matters (maintenance, software development etc.) and security;
- To external consultants (i.e. lawyers, accountants, auditors), when necessary, in order to carry out their activity.

## TRANSFERRING YOUR PERSONAL DATA ABROAD

When performing our activity, your personal data may be transferred abroad to countries of the European Union ("EU") or the European Economic Area ("EEA"), in accordance with the GDPR provisions.

Outside EEA, we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

## **FOR HOW LONG WILL WE USE YOUR PERSONAL DATA?**

For the purposes above-mentioned, we will process your personal data throughout the contractual relationship.

We will also process your data after the termination of the contractual relationship in order to fulfil our legal obligations (for example, within the legal deadlines, including those on accounting/fiscal aspects).

Last but not least, if you are still a user of the customer account, we will retain your personal data for as long as your account is active.

## **WHAT ARE YOUR LEGAL RIGHTS?**

We respect your rights as a customer to determine how your personal information is used. These rights include:

- Right to information: you have the right to obtain, free of charge, on request, information on the processing of your personal data
- Access to your personal data: you have the right to obtain from us the confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, you may access to the personal data and the conditions under which they are processed, by making a request in this sense. We shall provide you with a copy of the personal data undergoing processing.
- Right to rectification: you have the right to obtain the correction of inaccurate data and complete any incomplete data.
- Right to erasure: you have the right to obtain erasure of personal data without undue delay in case: (a) the data is no longer required for the original purpose (and there is no new legal purpose), (b) the legal basis for the processing is the consent of the data subject, the data subject withdraws his consent and there is no other legal basis, (c) the data subject exercises his right to object and the controller has no legitimate reasons to continue processing, (d) the data has been processed unlawfully, (e) the deletion is necessary for compliance with EU or Romanian law; or (f) data has been collected in connection with information society services provided to children (if applicable), when specific consent requirements apply. We will not delete your personal data if we are required to comply with legal obligations to retain the data or if your personal data is necessary for us to establish, exercise or defend a right in court.
- The right to restriction of processing: the right to obtain from the controller restriction of processing where one of the following applies: (a) you contest the accuracy of the personal data, for a period enabling us to verify the accuracy of the personal data; (b) you consider the processing is unlawful and you do not want us to erase the personal data but request the restriction of their use instead; (c) if we no longer need your personal data for the purposes mentioned above, but they are required by you for the establishment, exercise or defense of legal claims; (d) you objected to the processing, for the period of time in which to verify whether the legitimate grounds of the data controller prevail over the rights of the data subject.
- Right to data portability: you have the right to receive the personal data concerning you, which you provided to a controller, in a structured, commonly used and machine-readable format and also the right to transmit those data to another controller if the

processing is based on your consent or the performance of a contract and is performed by automatic means.

- Right to oppose: you have the right to object to processing of personal data on grounds relating to your particular situation, when the processing is based on a legitimate interest, as well as to oppose the processing of data for direct marketing purposes, including the creation of profiles.
- Automated individual decision-making, including profiling: you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.
- The right to withdraw your consent: you have the right to withdraw your consent to the processing at any time, when the processing is based on the consent, without affecting the legality of the processing activities carried out up to that time.
- Right to file a complaint: you have the right to file a complaint with the Data Protection Authority (ANSPDCP) and the right to go to the competent courts in case of unlawful processing.

## **SECURITY OF THE DATA**

To ensure that your personal data is not subject to unauthorized access, unauthorized use of data, or destruction, loss or alteration of data, we use appropriate technical and organizational measures, taking all reasonable safeguards.

We work to protect you and OGOR Jurnal from unauthorized access, alteration, disclosure, or destruction of information we hold, including:

- We use encryption to keep your data private while in transit
- We restrict access to personal information to OGOR employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## **AMENDING THE PRIVACY POLICY**

From time to time, we may update or modify our Privacy Policy. If case, such amendments will be made available on our application, section Privacy Policy and will be communicated to you by any means that ensures an effective communication.

## **USE OF COOKIES**

Cookies are small text files stored in the browser or on devices by websites and applications. OGOR Jurnal uses cookies for purposes such as:

- Authenticating users
- Saving user preferences and settings

## **CONTACT**

You may contact us in respect to any issue or concern regarding the Privacy Policy by email: [contact@ogor.ro](mailto:contact@ogor.ro).

This policy was last updated on October 14, 2024.