

**AD NET TELECOM
PRIVACY POLICY**

Last Revised: 24 May 2018

NOTICE: The Privacy Policy below will become effective May 25, 2018.

AD NET TELECOM cares about your privacy. For this reason, we collect and use personal data only as it might be needed for us to deliver to you our world-class products, services, websites and mobile applications (collectively, our “Services”). Your personal data includes information such as:

- Name
- Address
- Telephone number
- Date of birth
- Email address
- Other data collected that could directly or indirectly identify you.

Our Privacy Policy is intended to describe to you how and what data we collect, and how and why we use your personal data. It also describes options we provide for you to access, update or otherwise take control of your personal data that we process.

If at any time you have questions about our practices or any of your rights described below, you may reach our Data Protection Officer (“DPO”) and our dedicated team that supports this office by contacting us at office@adnet.ro. This inbox is actively monitored and managed so that we can deliver an experience that you can confidently trust.

What information do we collect?

We collect information so that we can provide the best possible experience when you utilize our Services. Much of what you likely consider personal data is collected directly from you when you:

- (1) create an account or purchase any of our Services (ex: billing information, including name, address, credit card number, government identification);

(2) request assistance from our award-winning customer support team (ex: phone number);

(3) complete contact forms or request newsletters or other information from us (ex: email); or

(4) participate in contests and surveys, apply for a job, or otherwise participate in activities we promote that might require information about you.

However, we also collect additional information when delivering our Services to you to ensure necessary and optimal performance. These methods of collection may not be as obvious to you, so we wanted to highlight and explain below a bit more about what these might be (as they vary from time to time) and how they work:

Account related information is collected in association with your use of our Services, such as account number, purchases, when products renew or expire, information requests, and customer service requests and notes or details explaining what you asked for and how we responded.

Cookies and similar technologies on our websites and our mobile applications allow us to track your browsing behavior, links clicked, items purchased, your device type, and to collect various data, including analytics, about how you use and interact with our Services. This allows us to provide you with more relevant product offerings, a better experience on our sites and mobile applications, and to collect, analyze and improve the performance of our Services. We may also collect your location (IP address) so that we can personalize our Services.

Data about Usage of Services is automatically collected when you use and interact with our Services, including metadata, log files, cookie/device IDs and location information. This information includes specific data about your interactions with the features, content and links (including those of third-parties, such as social media plugins) contained within the Services, Internet Protocol (IP) address, browser type and settings, the date and time the Services were used, information about browser configuration and plugins, language preferences and cookie data, information about devices accessing the Services, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and error data, and some of this data collected might be capable of and be used to approximate your location.

Supplemented Data may be received about you from other sources, including publicly available databases or third parties from whom we have purchased data, in which case we may combine this data with information we already have about you so that we can update, expand and analyze the accuracy of our records, identify new customers, and

provide products and services that may be of interest to you. If you provide us personal information about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us.

How we utilize information.

We strongly believe in both minimizing the data we collect and limiting its use and purpose to only that (1) *for which we have been given permission*, (2) *as necessary to deliver the Services you purchase or interact with*, or (3) *as we might be required or permitted for legal compliance or other lawful purposes*. These uses include:

Delivering, improving, updating and enhancing the Services we provide to you. We collect various information relating to your purchase, use and/or interactions with our Services. We utilize this information to:

- Improve and optimize the operation and performance of our Services (again, including our websites and mobile applications)
- Diagnose problems with and identify any security risks, errors, or needed enhancements to the Services
- Detect and prevent fraud and abuse of our Services and systems
- Collecting aggregate statistics about use of the Services
- Understand and analyze how you use our Services and what products and services are most relevant to you.

Often, much of the data collected is aggregated or statistical data about how individuals use our Services, and is not linked to any personal data, but to the extent it is itself personal data, or is linked or linkable to personal data, we treat it accordingly.

If we collect information from you in connection with a co-branded offer, it will be clear at the point of collection who is collecting the information and whose privacy policy applies. In addition, it will describe any choice options you have in regards to the use and/or sharing of your personal data with a co-branded partner, as well as how to exercise those options.

If you make use of a service that allows you to import contacts (ex. using email marketing services to send emails on your behalf), we will only use the contacts and any other personal information for the requested service. If you believe that anyone

has provided us with your personal information and you would like to request that it be removed from our database, please contact us at office@adnet.ro.

Transfer of personal data abroad. If you utilize our Services from a country other than the country where our servers are located, your communications with us may result in transferring your personal data across international borders. Also, when you call us or initiate a chat, we may provide you with support from one of our global locations outside your country of origin. In these cases, your personal data is handled according to this Privacy Policy.

Compliance with legal, regulatory and law enforcement requests. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (such as subpoena requests), to protect our property and rights or the property and rights of a third party, to protect the safety of the public or any person, or to prevent or stop activity we consider to be illegal or unethical.

How you can access, update or delete your data.

To easily update, delete or port your personal data (where available), or to update your subscription preferences, please contact us at office@adnet.ro. If you make a request to delete your personal data and that data is necessary for the products or services you have purchased, the request will be honored only to the extent it is no longer necessary for any Services purchased or required for our legitimate business purposes or legal or contractual record keeping requirements.

How we secure, store and retain your data.

We follow generally accepted standards to store and protect the personal data we collect, both during transmission and once received and stored, including utilization of encryption where appropriate.

We retain personal data only for as long as necessary to provide the Services you have requested and thereafter for a variety of legitimate legal or business purposes. These might include retention periods:

- mandated by law, contract or similar obligations applicable to our business operations;
- for preserving, resolving, defending or enforcing our legal/contractual rights; or
- needed to maintain adequate and accurate business and financial records.

If you have any questions about the security or retention of your personal data, you can contact us at office@adnet.ro.

Age restrictions.

Our Services are available for purchase only for those over the age of 18. Our Services are not targeted to, intended to be consumed by or designed to entice individuals under the age of 18. If you know of or have reason to believe anyone under the age of 18 has provided us with any personal data, please contact us.

Changes in our Privacy Policy.

We reserve the right to modify this Privacy Policy at any time. If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy and any other places we deem appropriate, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If we make material changes to this Privacy Policy, we will notify you here, by email, or by means of a notice on our home page, at least thirty (30) days prior to the implementation of the changes.

Contact us.

If you have any questions, concerns or complaints about our Privacy Policy, our practices or our Services, you may contact our Office of the DPO by email at office@adnet.ro.

We will respond to all requests, inquiries or concerns within thirty (30) days.

Revised: 24/05/2018

Copyright © 2018 AD NET MARKET MEDIA, All Rights Reserved. [Privacy Policy](#)