

PRIVACY POLICY

Thank you for visiting our site. When you visit the tmk-artrom.eu site, when you contact us or when you access our services, you entrust us with your information. The purpose of this Privacy Policy is to explain what data we process, why we process it and what we do with it. We take privacy seriously and never sell lists or email addresses. Being fully aware that your personal information will belong to us, we do our best to safely store and process the information you share with us. We do not provide information to third parties without informing you. This information is important. We hope you read it carefully.

By browsing the www.tmk-artrom.eu site, you declare that you have been properly informed of the data processing by going through this document, called the "Privacy Policy".

DEFINITIONS

We will begin to define some concepts to help you understand this Privacy Policy.

According to Regulation (EU) 679/2016 applied in Romania starting with 25 May 2018, TMK European Division companies are personal data controllers.

When we say "**GDPR**" we refer to Regulation (EU) 679/2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC.

"Personal data" means any information relating to an identified or identifiable natural person ("the data subject");

According to the legislation, you, as a site visitor, are a „data subject", that is an identified or identifiable individual. An identifiable individual is a person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more many specific elements, of his physical, physiological, genetic, psychic, economic, cultural or social identity.

WHO WE ARE

Component companies of the European Division of TMK and our partners pay special attention to protecting your personal data. Compliance with EU law, namely Regulation 679/2016 on the protection of personal data and good practices in the field, and ensuring a climate of transparency, security and trust for our present and future customers is a priority for us, for which employees, collaborators, our partners and our leadership firmly declare our support.

The European TMK division (TMK-ED) is a group of companies with a consolidated business activity of TMK. This is based on TMK-ARTROM SA (Romania), the seamless pipe manufacturer of TMK-ED, which operates together with the TMK-RESITA SA (Romania) steel semi-manufactures and three commercial agents - TMK-Italia s.r.l. (Italy), TMK-Europe GmbH (Germany) and TMK-Industrial Solutions LLC (USA).

QUESTIONS AND REQUESTS

If you have any questions or concerns regarding the processing of your data or wish to exercise your legal rights in relation to our data or if you are concerned about the way we deal with any confidentiality issue, you can write to us at e- mail: dpo@tmk-artrom.eu.

WHAT INFORMATION DO WE COLLECT, FROM WHOM AND FOR WHICH PURPOSE (categories of data subjects)?

- Candidates for vacant positions:

- Identity and contact details of the candidate (name, surname, date of birth, marital status, telephone number, email, driving license, nationality, sex);
- Relevant data in recruitment / selection procedures through which the candidate demonstrates that he / she fulfills the legal requirements and requirements of the post / competition.

PURPOSE: To carry out recruitment / selection activities for filling vacant posts and to manage recruitment / contest files during the various stages of recruitment / selection procedures, with a view to organizing the vacancy / job vacancy.

-The Employees of our companies:

- data on studies, qualifications and specializations;
- data on seniority - to provide seniority;
- name and surname;
- serial number and ID card number;
- personal identification code;
- home address - as the mailing address;
- bank account number - for wage transfer;
- shoe size and shoe number - for ordering work equipment;
- civil status, military flight data (required for Job Mobilization in case of necessity or state of war); criminal record (only to verify compatibility with the post);
- brand number - as an identifier within TMK-ARTROM;
- family member data - for personal deduction and private health insurance;
- health status - to establish working conditions and payment of medical leave, the issuance of medical certificates;

PURPOSE: Contractual and legal purpose for determining salary, working conditions, rights and obligations for employees, this work being done by our employees, professionals who have the obligation to keep professional secrecy and confidentiality.

- Practitioners or interns in our companies:

- Identity and contact details of the practitioner (name, surname, date of birth, marital status, telephone number)

- Relevant data by which the practitioner demonstrates that he / she fulfills the legal conditions to be able to practice in a particular department / section (data included in the practice agreement, health data included in the medical file required for the release of the aptitude sheet by the Doctor of Labor Medicine).

PURPOSE:

- Managing practice dossiers in the various stages of the TMK-ARTROM practice internship.

- Former employees requesting the issuance of documents regarding the activity carried out in our companies:

- identity and contact details of former employees (name, surname, date of birth, surname, address, home address, telephone number).
- data contained in the personnel file and in the payment accounts in the company's archive, data necessary for the issuance of the required certificates (the period worked, the bonuses, the days of sick leave).

PURPOSE:

- Issuing seniority certificates for former TMK-ARTROM employees, as requested by them.

- Business partners (suppliers, carriers, customer, etc.):

- identification and contact data
- goods data and delivery dates
- billing and payment data
- data from the communication between your company and you
- if you visit us personally, we also process the camera records from our headquarters.

PURPOSE:

- If you have purchased goods from us or have given us permission to send commercial messages, we may send you information about our products.
- Goods identification, billing and payment.
- Personality of the company's legal obligations (tax laws, accounting act, etc.).
- Your identification for the purpose of concluding a contract and its subsequent performance (for example, you are the contact person or the person acting in the contract).
- Recovery of claims from the contract and protection against claims, the conduct of economic activity and the protection of goods and safety.
- Solving litigation, investigations or any other petitions / complaints / requests to which the company is a party.
- For a number of secondary purposes (eg for archiving, internal audit, external, etc.), which are always consistent with the main purposes for which the data was originally collected by the company.
- Centralization of operations and maintenance of an internal database, in which the information about the data subjects is stored, so that they can be used by TMK ARTROM, TMK-RESITA, TMK-ITALIA and TMK-EUROPE departments and structures in their activity (e.g., the use of

these data involves processing them by internal applications that are used by the relevant departments to carry out the activity);

- Visitors and delegates:

- Name and surname
- The company represented by the visitor / delegate
- The compartment / section where it moves
- Entry / Exit Time and Signature.

PURPOSE: The purpose of the processing is to have a record of persons / vehicles that have received access to the premises of the company in order to maintain a high level of Security according to Law 333/2003 updated on 20 January 2007 (Annex 2d and 2e).

The information you provide voluntarily

When you contact us by phone or email or communicate with us in any way, you voluntarily give us the information we process. This information includes name, surname, e-mail address and phone number.

By providing this information, we keep it securely and confidentially in our database. We do not disclose or transfer information to third parties.

WHAT IS THE LEGAL BASIS FOR PROCESSING?

According to the GDPR (starting with May 25, 2018), your consent is not required if the processing is required to perform a contract, fulfill a legal obligation or legitimate interest.

HOW LONG WE STORE DATA?

We store personal data only for the time required to meet the purposes or for archiving purposes in accordance with applicable law.

HOW DO WE DISCLAIM YOUR DATA?

We will not disclose your information to third parties without your consent. However, it is possible, where necessary, to disclose your information to the following entities:

- Service providers. We may disclose your information to other companies that provide us with services and act as empowered persons. These entities are selected with special care to ensure that they meet the specific privacy protection requirements. These entities have a limited capacity to use your information for purposes other than providing us with services;
- Courts, prosecutors or other public authorities to comply with the law or in response to a mandatory legal procedure (such as a search warrant or court order);
- Other parties with your consent or instructions. In addition to the disclosures described in this Privacy Policy, we may disclose the information to third parties that you consent to or request to make such disclosure.

The personal data you have provided to us is processed in our companies only by our employees whom are authorized to have access to this information, professionals who have the obligation to keep professional secrecy and confidentiality. Where appropriate, the processing is also done by our processor who are subject to the same legal obligations regarding the protection of personal data.

WE TRANSFER DATA TO THIRD COUNTRIES?

We do not currently transfer your data to countries outside the European Union. If we change the policy, we will inform you accordingly, we will provide you with the related warranties and we will ask for your consent if this is necessary.

WHAT ARE YOUR RIGHTS?

- **The right to withdraw consent;**
- **The right to lodge a complaint with a supervisor;**
- **The right to appeal to justice;**
- **Right of access;**

You have the right to obtain from us a confirmation that personal data are processed or not, and, if so, you have the right to access that data.

- **The right to rectification;**

You have the right to obtain from us, without undue delay, the rectification of inaccurate personal data that concerns you. Taking into account the purposes for which data was processed, you have the right to obtain incomplete personal data, including by providing a supplementary statement.

- **The right to delete data (the "right to be forgotten");**

Where (1) the data are no longer necessary for the fulfillment of the purposes, (2) the consent has been withdrawn and there is no other legal basis for the processing, (3) you are opposed to the processing, and there are no legitimate reasons to prevail processing or (4) personal data have been processed unlawfully, you have the right to obtain the deletion of the data that concerns you without undue delay.

- **The right to restrict the processing;**

You have the right to obtain from us restriction of processing if one of the following cases applies:

- (a) contest the accuracy of the data for a period that allows us to verify the accuracy of the data;
- (b) processing is illegal, and you will oppose the deletion of your personal data, requesting instead the restriction of their use;
- (c) we no longer require personal data for processing, but you ask us to find, exercise or defend a right in court;

(d) opposed to processing pursuant to GDPR Article 21 (1), for the time to verify whether our legitimate rights outweigh your rights.

• **The right to data portability**

You have the right to receive the personal data which you regard and which you have provided to us in a structured, commonly used and readable form, and you are entitled to transmit this data to another operator without any barriers from our part, where:

(a) processing is based on consent under Article 6 (1) (a) or Article 9 (2) (a) of the GDPR or on a contract pursuant to Article 6 (1) (b) of GDPR; and

(b) processing is carried out by automatic means.

• **The right not to be the subject of a decision based solely on automatic processing**, including profile creation, which produces legal effects that affect you or affect you to a similar extent.

You do not have this right if the decision:

(a) is required for the conclusion or performance of a contract between you and a data controller;

(b) is authorized by Union law or the national law applicable to the controller and which also provides for appropriate measures to protect the legitimate rights, freedoms and interests of the data subject; or

(c) is based on your explicit consent.

Please note the following:

• **Time period:** We'll try to respond to the request within 30 days. However, the time limit may be extended for specific reasons related to the specific legal law or complexity of your application.

• **Access restriction:** In certain situations, we may not be able to provide you with access to all or some of your personal data due to legal provisions. If we refuse your access request, we will inform you of the reason for your refusal.

• **Failure to identify yourself**

In some cases, we may not be able to search for your personal data because of the identifiers you provide in your request.

In such cases, if we can't identify you as a data subject, we are unable to comply with your request unless you provide us with additional identification information.

Our company details

a) **Romania**

Company name: TMK-ARTROM S.A.

Address of registered office: Str. Draganesti, nr 30, Slatina, Olt County, postal code 230119

Fax: +40(249)434330

Phone no: +40(372)498100
Mail Slatina Office : office.slatina@tmk-artrom.eu
Website: <http://www.tmk-artrom.eu/>

Company name: TMK-RESITA S.A

Address of registered office: Str. Traian Lalescu nr 36, postal code 320050, Resita, Caras Severin County
Fax: +40(255)211883
Phone no: +40(255)211783
Mail Resita Office: office.resita@tmk-artrom.eu
Website: <http://tmk-resita.tmk-artrom.eu>

Contact details of the person in charge of personal data protection

Mail address: Str. Draganesti, nr 30, postal code 230119
Phone number: +4 0372.498.241
Email address: dpo@tmk-artrom.eu

b) Germany

Company name: TMK-EUROPE GmbH

Address of registered office: Immermannstrasse 65d, 40210, Dusseldorf, Germania
Phone no: +49(211)91348830
Fax : +49(211)15983882
Email address: info@tmk-europe.eu
Website: <http://www.tmk-europe.eu>

Contact details of the person in charge of personal data protection

Address of registered office: Immermannstrasse 65d, 40210, Dusseldorf, Germania
Phone no: +49(211)9134883-251
Email address: ekaterina.rosenthal@tmk-europe.eu

c) Italy

Company name: TMK-ITALIA Srl

Address of registered office: Piazza degli Affari, 12, 23900, Lecco, Italia
Phone no: +39(0341)365151
Fax : +39(0341)360044
Email address: info@tmk-italia.eu
Website: <http://tmk-italy.tmk-european-division.eu>

Contact details of the person in charge of personal data protection

Address of registered office: Piazza degli Affari, 12, 23900, Lecco, Italia
Phone no: +39(0341)1920073
Email address: alberto@tmk-italia.eu

For more information on personal data protection, please access the following link:
http://www.dataprotection.ro/index.jsp?page=Regulamentul_nr_679_2016