

# Privacy policy

## I. General information

The confidentiality of your personal data is one of the main concerns of SC ICONTI CERT SRL, based in Al. Vlahuta, no. 6, pp. M46, sc. 1, ap. 3, sector 3, Bucharest, as a data operator.

This document is intended to inform you about the processing of your personal data in the context of using the website <https://codensoftwareacademy.com>.

## II. Categories of personal data processed

**II.1.** If you are a visitor to the Site, SC ICONTI CERT SRL will process your personal data that you provide directly in the context of using the Site, such as the data that you provide in the contact / registration section, in the extent to which you contact us in this way.

## III. Purposes and grounds for processing

**III.1.** If you are a visitor to the Site, SC ICONTI CERT SRL processes your personal data in this way:

- for marketing activities, respectively for the transmission, through the means of distance communication (e-mail, sms), of commercial communications regarding the products and services offered by SC ICONTI CERT SRL, through the Site.

*Rationale: The processing of your data for this purpose is based on your consent, if you choose to provide it.*

Providing your data for this purpose is voluntary. Refusal to provide consent for the processing of your data for this purpose will not have negative consequences for you.

- to resolve complaints, grievances and monitor traffic and improve your experience on the Site.

*Rationale: The processing of your data for this purpose is based on the legitimate interest of SC ICONTI CERT SRL to ensure the proper functioning of the Site, as well as to permanently improve the experience of Site visitors, including by resolving various comments, questions or complaints.*

*Providing your data for this purpose is voluntary. Refusal to provide data for this purpose will not have negative consequences for you.*

#### **IV. The length of time we process your data**

In principle, SC ICONTI CERT SRL will process your personal data as long as necessary to achieve the processing purposes mentioned above.

If you withdraw your consent for the processing of data for marketing purposes, SC ICONTI CERT SRL will stop processing your personal data for this purpose, without affecting the processing carried out by SC ICONTI CERT SRL based on the consent expressed by you before its withdrawal.

#### **V. Disclosure of personal data**

In order to fulfill the processing purposes, SC ICONTI CERT SRL may disclose your data to partners, third parties or entities that support SC ICONTI CERT SRL in carrying out the activity through the Site (eg courier companies, IT service providers), or to the central / local public authorities, in the following exemplary cases listed:

- for the administration of the Site;

- in situations where this communication would be necessary for the awarding of prizes or other facilities to the persons concerned, obtained as a result of their participation in various promotional campaigns organized by SC ICONTI CERT SRL through the Site;
- for maintaining, customizing and improving the Site and the services provided through it;
- for performing data analysis, testing and research, monitoring usage and activity trends, developing security features and user authentication;
- for the transmission of commercial marketing communications, under the conditions and limits provided by law;
- when the disclosure of personal data is provided by law, etc.

## **VI. Transfer of personal data**

The personal data provided to SC ICONTI CERT SRL can be transferred outside Romania, but only to European Union countries.

## **VII. The rights you enjoy**

Under the conditions provided for by the legislation on the processing of personal data, as data subjects, you enjoy the following rights:

- the right to information, respectively the right to receive details regarding the processing activities performed by SC ICONTI CERT SRL, according to those described in this document;
- the right to access data, respectively the right to obtain confirmation from SC ICONTI CERT SRL regarding the processing of personal data, as well as details on the processing activities such as the way the data is processed, the purpose for which the processing is done, the recipients or categories of data recipients, etc .;
- the right to rectification, respectively the right to obtain the correction, without justified delays, by SC ICONTI CERT SRL of inaccurate /

unjustified personal data, as well as the completion of incomplete data; The rectification / completion will be communicated to each recipient to whom the data have been transmitted, unless this proves impossible or involves disproportionate efforts.

- the right to delete data, without undue delay, ("right to be forgotten"), if one of the following reasons applies:
  - they are no longer necessary for the purposes for which they were collected or processed;
  - if the consent is withdrawn and there is no other legal basis for the processing;
  - if the data subject objects to the processing and there are no legitimate reasons prevailing;
  - if personal data have been processed illegally;
  - if personal data must be deleted in order to comply with a legal obligation;
  - personal data have been collected in connection with the provision of information society services under Union or national law under which the controller is subject.

It is possible that, following the request to delete the data, SC ICONTI CERT SRL to anonymize these data (thus lacking their personal character) and to continue in these conditions the processing for statistical purposes;

- the right to restrict processing to the extent that:
  - the person disputes the accuracy of the data, for a period that allows us to verify the correctness of the data;
  - the processing is illegal and the data subject opposes the deletion of personal data, instead requesting the restriction of their use;

- the controller no longer needs personal data for the purpose of processing, but the data subject requests them for the establishment, exercise or defense of a right in court; or
  - the data subject has objected to the processing (other than direct marketing), for the period during which it is verified whether the legitimate rights of the controller prevail over those of the data subject.
- the right to data portability, namely (i) the right to receive personal data in a structured, commonly used and easy-to-read format, and (ii) the right to have such data transmitted by SC ICONTI CERT SRL to another data operator, insofar as the conditions provided by law are met;
- the right to object - in respect of processing activities may be exercised by submitting a request as indicated below;
  - at any time, for reasons related to the particular situation of the data subject, that the data concerning him be processed under the legitimate interest of SC ICONTI CERT SRL or under the public interest, except in cases where SC ICONTI CERT SRL may demonstrate that it has legitimate and compelling reasons justifying the processing and prevailing over the interests, rights and freedoms of the data subjects or that the purpose is to establish, exercise or defend a right in court;
  - at any time, free of charge and without any justification, that the data concerning it be processed for the purpose of direct marketing.
- the right not to be subject to an automatic individual decision, ie the right not to be the subject of a decision taken solely on the basis of automatic processing activities, including the creation of profiles, which produce legal effects concerning the data subject or -a significant measure;
- the right to apply to the National Authority for the Processing of Personal Data or to the competent courts, to the extent deemed necessary.

For any further questions regarding how personal data is processed and to exercise your rights mentioned above, please contact us at:  
[email@codensoftwareacademy.com](mailto:email@codensoftwareacademy.com).