

GDPR / Data Protection Policy

Controller: Qwerty development macada-m srl

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1. GDPR Principles

We process personal data in line with lawfulness, fairness and transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity and confidentiality; accountability.

2. Roles & responsibilities

- **Controller:** Qwerty development macada-m srl.
- **Processors:** IT infrastructure (hosting/CDN/e-mail), ticketing/CRM, transactional messaging, logistics, advisors. Each engaged under a **DPA** and documented instructions.
- **DPO (if appointed):** contact details will be published on the site.

3. Data categories (B2B)

- **Business identity:** company legal name, VAT, registered/shipping addresses.
- **Business contacts:** representatives' name, title, e-mail, phone.
- **Operational:** RFQ content, attachments (BOM/drawings), quotation/order history, commercial terms.
- **Technical & security:** IP, auth events, app logs, user agent, cookies (as applicable).

4. Purposes & legal bases (GDPR Art. 6)

- **Contract performance / pre-contract steps** (B2B account, RFQ, quotation, orders, delivery): Art. 6(1)(b).
- **Legal obligation** (billing, accounting, record retention): Art. 6(1)(c).
- **Legitimate interests** (security, fraud prevention, B2B service improvement, RFQ follow-ups): Art. 6(1)(f) – balancing test retained.
- **Consent** (optional communications, non-essential cookies): Art. 6(1)(a) – revocable anytime.

5. Recipients (categories)

IT/cloud/CDN/e-mail providers, CRM/ticketing tools, transactional messaging providers, carriers/3PL, advisors. Data is shared strictly under our instructions and with appropriate safeguards.

6. International transfers

Where non-EEA processors are used, we rely on **Standard Contractual Clauses** and apply technical/organisational measures (in-transit encryption, access controls, data segregation). Details available upon request.

7. Retention (indicative)

- Contractual/commercial data: for the relationship duration plus statutory terms (e.g., finance records min. 10 years).
- Technical/security logs: typically **6–12 months**.
- Cookies: per **Cookie Policy**.
Upon expiry, data is deleted or anonymised, as appropriate.

8. Data subject rights

Access, rectification, erasure, restriction, portability, objection, consent withdrawal. Standard response time: **1 month** (extendable where justified). Contact: **office@metal-direct.ro**. You may lodge a complaint with the Romanian DPA.

9. Security (TOMs)

TLS, least-privilege access, logging and alerting, backups, in-transit encryption, retention controls, periodic testing, staff training. Access is limited to authorised staff and approved processors.

10. ROPA – Record of processing (public summary)

- **Website visitors:** cookies/technical logs (purpose: operation/analytics where applicable; legal basis: legitimate interests/consent).
- **B2B customers/partners:** contact & operational data (purpose: quoting, contracting, delivery; legal basis: contract/legal obligation/legitimate interests).
- **Suppliers:** business contact data (purpose: supplier management; legal basis: contract/legitimate interests).

11. DPIA

We conduct DPIAs when processing is likely to result in high risk (e.g., large-scale monitoring or new technologies).

12. Data subject requests (DSR)

Internal workflow with request logging, identity verification, assessment, response within **1 month**; possible justified extension by one month. We keep an audit trail of requests and outcomes.

13. Personal data breaches

We assess incidents promptly and, where required, notify the **supervisory authority** within **72 hours** and **data subjects** when the risk is high. We maintain a breach register.

14. Children & profiling

Services target B2B customers; we do not knowingly target children. No automated decisions with legal or similar effects without explicit consent or a clear legal basis.

15. Related policies

Privacy Policy, Cookie Policy, Terms & Conditions — published on the website and updated periodically.

16. Changes

We publish the **last update date** on the website; new versions apply from publication. **GDPR contact:** office@metal-direct.ro