

## **General Data Protection Regulation**

Since 25 May 2018, SC HyperMedia SRL, as owner of HyperTalk.Net system and of the whole suite of software and hardware elements, will apply EU Regulation 2016/679 also known as GDPR or General Data Protection Regulation, a measure that will come into effect across EU Member States.

### **What is personal data and how do we get them?**

‘Personal data’ means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number or to one or more factors specific to the physical, physiological, mental, economic, cultural or social identity of that natural person.

In order to secure customized access to video collaboration tools, HyperMedia collects the following personal data, directly from the users:

- First and last name(s)
- Postal and email addresses
- Phone number and others

Note: We are not collecting through our system and we are not storing in our database any information in relation to your debit or credit cards that you enter when you acquire any of the service packages that are provided to you or your bank account number or any other banking information.

HyperMedia can request some data on user experience during the process of using HyperTalk.Net tools in order to improve our video collaboration products and services by means of our systems.

### **Who is responsible for personal data when offers serve several users?**

In the case of offers made to businesses, called *business plan* – as they serve several persons, the account holder is accountable for the data that he introduces during the process of registration or updating user profiles from its own business plan. If another user fails to indicate in advance his option, the options made by the account holder will be applied to all the user profiles within the same business plan. If there were any differences between the users’ and account holder’s options, the latter will indicate which option will have precedence.

## Personal data collection

We are using the collected personal data for the following purposes:

- to ensure that the sections of the HyperTalk.Net system that are being accessed are relevant to your needs;
- to deliver the products and to ensure your access to the tools that you have demanded or acquired;
- to ensure access to limited access sections of HyperTalk.Net, according to the requests coming from you;
- to allow us to examine any potential errors with the intent to continuously improve our systems and to ensure that you have a unique experience when using them

## What rights do users have with regard to personal data processing?

The user enjoys the following rights:

- **Right to rectification**  
If the data that we hold are not correct or they must be updated, you can ask for their rectification by sending us a request, using our assistance form available on our site, at [www.hypertalk.net](http://www.hypertalk.net), section Contact or by accessing the account data editing section (Authentication > My account).
- **Right of access to personal data**, to modify, restrict the processing of such data and to withdraw the consent or refuse that they be processed or request their erasure (right to be forgotten), as the case may be.
- **Right to data portability**  
That means the right to receive personal data that relate to you, in a structured format, and to request that such data be transmitted to another controller. To implement the latter request, please use the assistance form on our site, [www.hypertalk.net](http://www.hypertalk.net), section Contact.
- **Right to object**  
Filing an objection in connection with the processing of personal data. Such an objection can be transmitted to us, using the assistance form available on our site, [www.hypertalk.net](http://www.hypertalk.net), section Contact or, in the event that you still consider yourself dissatisfied with the way your data are being processed, you can proceed with the filing of a complaint with the National Authority for the Supervision of Personal Data Processing (ANSPDCP in Romanian).
- **Right to disconnect from some personal data collection and processing tools**, including the use of some cookies and of similar technologies.  
HyperMedia collects data and processes them as statistical data in respect of your access to our systems, including the IP address where our site is accessed from. HyperMedia can use, within HyperTalk.Net, cookies, for temporary storage of personal data for the purpose of providing optimal services and improve security of access to video

collaboration tools. For more information on the use of cookies please see section [www.hypertalk.net/cookie-declaration](http://www.hypertalk.net/cookie-declaration)

Any user can exercise his right to shut down/erase his own account, using the assistance form provided on our site, [www.hypertalk.net](http://www.hypertalk.net), section Contact.

### **How does GDPR apply to children?**

HyperMedia does not collect personal data of children under 18 years old without the prior consent from their parent or holder of parental responsibility. By validating the registration form you consent that you are at least 18 years old and that you make such registration in your own name or that you are duly authorized to represent and to accept the terms and conditions on behalf of the person for whom you make the registration.

### **How do we protect your personal data?**

#### **Data security**

HyperMedia SRL employs security methods and technologies, together with staff policies and work procedures, including control and audit, to protect personal data according to regulations in force. The servers on which our systems run, including a suite of tools for video collaboration HyperTalk.Net, are protected from limited physical and distance access, being set-up in premises that are appropriate in terms of technical and security conditions. We are deploying any reasonable and commercially sound efforts to examine new technologies in the field, and if necessary, we apply such technologies in order to update our security systems. In addition, the hardware and software infrastructure that is being used to run the Hypertalk.Net solution, is periodically scrutinized in terms of security.

#### **Data storage**

Hypermedia SRL will store personal data as long as necessary for the purposes that have been stated, taking into consideration the need to reply to queries or to solve issues, to provide new services or improve them and to comply with applicable regulations.

When user personal data are no longer necessary to the purpose which they have been collected or agreed for and there is no legal storage requirement, HyperMedia SRL will safely destroy or erase them.

### **What does automated data processing means?**

As we already indicated, we process personal data mostly to help us continuously improve the video collaboration products and services that you access by means of HyperTalk.Net. In

addition, we do that to ensure that the sections of HyperTalk.Net system that are being accessed are relevant to your needs.

### **Can your personal data be processed by third parties for other purposes?**

In the case that the user provides his explicit consent or if there is a legitimate interest in respect of the use of his personal data, HyperMedia SRL can disclose such data to third parties.

As a rule, HyperMedia will not transfer personal data of its customer to any third party that intends to use them for direct marketing purposes, save for the case when the user gave his explicit consent.

HyperMedia can however transfer the user's personal data to third parties, without his consent, in the following cases and to the following entities:

- Affiliates: personal data can be transferred to HyperMedia affiliates for the performance of regular and business activities
- Service providers: when entering data in respect of late payments, as the case may be
- Foreign consultants or partners of HyperMedia that provide assistance to the company (such as foreign lawyers, debt collection agencies, call centers)
- Public authorities: HyperMedia can disclose user's data in the case this is required by law or in the case it considers, in good faith, that such disclosure is reasonably necessary for the appropriate performance of legal procedures, investigations or to reply to any complaints or requests from the authorities.

### **HyperMedia SRL**

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