

Ensuring the right to personal data protection is a fundamental commitment of STB SA, which is why your personal data will be processed in accordance with EU Regulation No 679/2016 ("General Data Protection Regulation" or "GDPR"), as well as any other legislation applicable in Romania. Thus, upon your request (formally addressed through the means of communication mentioned in the contact section of the application), the application administrator, implicitly STB SA, undertakes: to rectify, update, block, delete or anonymize data, free of charge. Bearing in mind that transparency is one of the essential principles that is found in the aforementioned legal framework, we will describe below how we collect, use, transfer and protect your personal data when you interact with us through the YOUth TB application.

When you create an account in the YOUth TB app or use our services, you enter into an agreement with us and accept our terms and conditions of use and by default our privacy policy. Each time you use your YOUth TB account or our services, or when you provide us with information, the processing of your personal data will be in accordance with the current version of these provisions.

Your personal data that you provide to us is strictly confidential. The application administrator, implicitly STB SA, undertakes not to provide your personal data to third parties or unauthorised companies. In order to benefit from a free student subscription, your data will be verified in the Ministry of Education's records. Your personal data may be passed on to the authorities in law for the purpose of verifying transactions or to other authorities in law for carrying out any checks justified by law.

### **What personal data we collect**

In general, we collect your personal data directly from you, so you have control over the type of information you provide to us. The transmission of data to us is encrypted (HTTPS). When you create an account in the YOUth TB application, you provide us with: **your email, first and last name, phone number and your ID**. This information is **stored** and will be used for authentication in the app. If your purchase involves paying for travel tickets online, this information will be **transmitted** to the payment processor at the time of the transaction. The YOUth TB application redirects to the payment processor's page. **Bank card** details are entered directly into the payment processor page/application. STB SA does **not store** or **process bank card** information. It is received and managed entirely by the online payment processor. If an error occurs when using the YOUth TB application, STB SA **collects** and **stores** data and information about the error in order to maintain the system.

The YOUth TB app does not use cookies. STB SA also does not collect or otherwise process sensitive data included in the EU Regulation No 679/2016.

### **What are the purposes and grounds for processing**

STB SA uses your personal data for the following purposes:

- **To provide STB SA services for your benefit**

This general purpose may include, as appropriate, the following situations:

- a) create and manage your account within the YOUth TB application;

- b) processing requests, including retrieving, validating, dispatching and billing them;
- c) handling changes or problems of any kind relating to the purchase of travel tickets online;
- d) refunding the value of the products, as provided for by law;
- e) providing support services, including answering your questions about your orders, travel tickets or services offered in the application.

In this context, the processing of your personal data is necessary, in most cases, for the conclusion and performance of a contract between STB SA and you. Also, certain processing subsumed to this purpose is required by applicable legislation, including tax and accounting legislation.

- **In defence of our legitimate interests**

There may be situations where we use or transmit information to protect our rights and business. These may include:

- a) measures to protect YOUth TB users from cyber attacks;
- b) measures to prevent and detect fraud attempts, including the transmission of information to the competent public authorities;
- c) measures to manage other types of risks.

In this case, the processing of your personal data is carried out in order to protect our business, and any measures we take guarantee a balance between our interests and your fundamental rights and freedoms.

### **How long we keep your personal data**

Your personal data is stored for as long as you have an account with YOUth TB. You may request the deletion of certain information or the closure of your account at any time, and STB SA will comply with such requests, subject to the retention of certain information even after account closure, where required by applicable law or our legitimate interests.

### **To whom we transmit your personal data**

If we are under a legal obligation or if it is necessary to protect a legitimate interest, we may transmit certain personal data to public authorities. We ensure that access to your data by third parties (private legal entities) is carried out in accordance with the legal provisions on data protection and confidentiality of information, on the basis of contracts concluded with them.

### **To which countries we transfer your personal data**

We currently store and process your personal data in Romania.

### **How we protect the security of your personal data**

We are committed to ensuring the security of personal data by implementing appropriate technical and organisational measures in accordance with industry standards. Your personal data is transferred using state-of-the-art encryption algorithms and stored on secure servers, thus ensuring data redundancy.

Any payment information is encrypted (HTTPS). However, despite the measures we take to protect your personal data, please be aware that transferring information over the Internet in general, or via other public networks, is not completely secure and there is a risk that data may be seen and used by unauthorised third parties. We cannot be responsible for such vulnerabilities of systems not under our control. We would like to inform you that whenever you use our service, in the event of an in-app error, we collect data and information about the error which is automatically transmitted to us. This data includes information encapsulated in the Error javascript object such as Error.prototype.columnNumber, Error.prototype.fileName, Error.prototype.lineNumber, Error.prototype.message, Error.prototype.name, Error.prototype.stack.

### **What rights do you have**

**the right to information** - you can request information on the processing activities of your personal data;

**the right to rectification** - refers to the correction of inaccurate personal data without undue delay. You have the right to obtain the completion of personal data that is incomplete, including by providing an additional statement, and the rectified data will be communicated to each recipient who received the data, unless this proves impossible or involves disproportionate efforts;

**the right to erase your data** ("right to be forgotten") - you can have your data erased if the processing was not lawful or in other cases provided for by law;

**the right to restrict processing** - you can request restriction of processing if you contest the accuracy of the data and in other cases provided for by law;

**the right to object** - the right to object, on grounds relating to your particular situation, to the processing of personal data relating to you, including the creation of profiles on the basis of such data, where the processing is carried out pursuant to Article 6(6)(a) of Regulation (EC) No 45/2001. (1)(e) and (f), namely for the purposes of the legitimate interest of the controller or for the performance of a task carried out in the public interest;

**the right to data portability** - you can receive, under certain conditions, the personal data you have provided to us in a machine-readable format or you can request that the data be transferred to another controller;

**the right to lodge a complaint** - you can lodge a complaint about the way personal data are processed with the National Supervisory Authority for Personal Data Processing;

**the right to withdraw consent** - in cases where the processing is based on your consent, you can withdraw it at any time. Withdrawal of consent will take effect from the date of the request and processing carried out prior to the request for withdrawal will remain valid;

**additional rights** - related to automated decisions: you can request and obtain human intervention with regard to the processing of your personal data, you can express your point of view on it and you can challenge the decision.

If you wish to exercise the above-mentioned rights or if you have any questions regarding the privacy policy, you may contact the Data Protection Officer at the following e-mail address: [dpo@stbsa.ro](mailto:dpo@stbsa.ro).

## **Complaints**

Individuals have the right to lodge a complaint about the processing of personal data. All queries and complaints will be handled by the Data Protection Officer in a timely manner and in accordance with internal procedures.

In the unlikely event that customers have suffered damage due to breach of rights under the personal data protection policy and STB SA has not dealt with the complaint appropriately, customers have the possibility to send a complaint to the competent authority.

The Personal Data Protection Officer of STB SA can be contacted at the institution's headquarters, located on Bd. Dinicu Golescu nr. 1, Sector 1, Bucharest, as well as at the telephone number: 021.307.45.88 or at the e-mail address: [dpo@stbsa.ro](mailto:dpo@stbsa.ro).