

## **Data Protection Policy**

**Date of last modification: 10.03.2018**

AmRest Coffee S.R.L., based in Grigore Cobalcescu Str. 46, 2<sup>nd</sup> floor, Room 11, Sector 1, Bucharest, having unique registration code 20119287, registered at the Trade Register under No. J40/21510/2006, as author, owner, administrator of the site <https://card.starbucksromania.ro> collects and processes personal data, according to the legal provisions regarding the processing of personal data and free Circulation of these data.

This policy applies to all devices used for the purpose of accessing the <https://card.starbucksromania.ro> website, smartphones, and tablet devices. If you do not agree to the terms and conditions related to their use (shown in this document from the point of view of the protection of personal data but also in the rest of the documents on the website from the point of view of Confidential information, etc.), please do not use the <https://card.starbucksromania.ro> website.

This policy entered into force on the date indicated at the top of this web page. This policy can be amended from time to time. If we make material changes, we will post the updated statement on this page and change the date at the top of this web page. We encourage you to check for updates and changes to this statement by checking this date when accessing our websites and mobile apps. We will notify you of any changes to this statement that could significantly affect how we use or disclose your personal information before the change becomes effective through a message on this site.

In accordance with the provisions of Law No. 677/2001 for the protection of individuals with regard to the processing of personal data and the free circulation of such data and of Law No. 506/2004 on the processing of personal data and the protection of private life, AmRest Coffee S.R.L. has the obligation to administrate the personal data provided to it in safety and process it only for the purposes listed below

AmRest Coffee S.R.L. undertakes to keep the confidentiality of personal data provided through the <https://card.starbucksromania.ro> website, as stipulated by the provisions of law 677/2001 with subsequent changes in the protection of personal data.

The rules apply to the processing of personal data by electronic means and in systematically accessible paper recording systems. Examples of operations that fall here include but are not limited to the following:

- Customer support, which involves requesting information or making claims, post-sales activities, including customer service services, informing users/customers regarding the evaluation of the services offered
- Submission of special offers, personalized promotions, advertising messages, promotion of products and events, loyalty programs or other marketing purposes
- Maintaining, improving and analyzing our web sites, products and services we offer;
- Maintaining appropriate records for internal administrative purposes, maintaining the functionality of our web sites and as well as maintaining their relevance for customer needs
- Providing important information on product safety

Personal data will be kept as long as necessary for the purposes mentioned above.

## **Information We Collect**

As you use website, we collect information about you and the services you use. The information we collect falls into three different categories: (1) information you give us; (2) information we collect from you automatically; and (3) information we collect from other sources. Some examples of when we collect this information include when you browse-create a Starbucks account; use our website to reload Starbucks Card or participate in a survey or promotion.

## **Information You Give Us**

Some information we collect is provided when you use our services. This may include your first and last name, username, password, email address, postal address, phone number, birthday and any other information you give us. .

## **Information We Collect Automatically**

Some information is collected by us automatically, including when you access our websites, or otherwise use our services. This information includes:

**Purchasing Information** – We may collect information about your transactions in our stores, on our websites including what products you purchase, how frequently you purchase them, any rewards or promotions associated with a purchase.

**Device and Usage Information** – We may collect information about your browser or device. This information may include the type of device you are using, your operating system, your browser, your internet service provider, your domain name, your internet protocol (IP) address, your device and mobile ad identifiers, the website that referred you to our website, the web pages you view (including the date and time you viewed them), the services or functionality you access or use (including the date and time of your access or use), and the subject of the ads you click or scroll over. To collect this information, we use cookies, web beacons and similar technologies.

## **Rights of data subjects**

In accordance with the provisions of Law No. 677/2001, persons registered as persons concerned shall have the following rights:

- The right to information (art. 12)
- The right of access to personal data (article 13);
- The right of intervention on personal data (article 14);
- The right of opposition (art. 15);
- The right not to be subject of an individual decision (article 17);
- The right to address justice (art. 18).

Any information provided by you will be considered and will constitute your express consent that your personal data may be used by AmRest Coffee SRL for the purposes stated above.

You are not required to provide the data, as such data is required for:

- creating your account, your website authentication for loyalty programs; due to your refusal, your account will not be created and you will not be able to access the pages for members registered in the system.

- for obtaining marketing information or for the purposes mentioned above;

Personal data can be used to send you information about products, services, events, etc. we offer and host, provided that you ticked the box corresponding to this option in the Loyalty Program registration form, or you submitted such data for one of the purposes mentioned above.

AmRest Coffee SRL may disclose your personal data to third parties. Categories of recipients personal data can be shared with are:

- AmRest Coffee SRL's contractual partners (such as the companies AmRest Coffee SRL has a partnership with, but only pursuant to a confidentiality commitment on the latter's part to ensure that the said data are kept secure and that the provision of such personal information is according to the legislation in force)
- service providers (e.g. marketing, payment / banking services or other services), including entities assisting AmRest Coffee SRL in data processing as empowered agents, insurers, etc.)
- public authorities (prosecution bodies, police, courts of law, and other competent bodies of the state), pursuant to and within the limits of the legal provisions and as a result of expressly formulated requests,
- other companies in the same group as AmRest Coffee SRL, its subsidiaries, and affiliated companies for management and assessment purposes, decision-making, and other business purposes. For example, we can share your information with affiliates and affiliated companies to manage our loyalty programs, orders, and process requests, and to expand and promote our product and service offerings.
- and you as a person concerned in the context of exercising your right of access.

Should AmRest Coffee SRL be required to provide personal data or is not allowed to do so, only the data necessary to fulfill the strict purpose of the request will be disclosed.

If you want your personal data to be accessed, updated, rectified, deleted under certain circumstances (e.g. when personal data are no longer required for the purposes mentioned above), if you wish to request the data processing restriction under certain circumstances (e.g. when you challenge the accuracy of the data - for a period that would allow us to verify the accuracy of the data concerned); if you wish to file a complaint with us, if you wish to oppose your data processing and wish, at any time, to withdraw your consent for the processing of your personal data that you have previously consented to, you may notify us at any time by means of a written application, dated and signed, to the following address: str.Grigore Cobalcescu no. 46, et. 2, room 11, Sector 1, Bucharest, Romania or to the email address [starbuckscardo@amrest.eu](mailto:starbuckscardo@amrest.eu).

### **Special provisions relating to minors**

In its data processing activities, AmRest Coffee SRL does not pursue the processing of personal data of minors. Particular attention is paid to ensuring that any processing of personal data pertaining to minors is carried out in accordance with legal requirements and in strictly limited cases.

AmRest Coffee SRL does not carry out promotional direct marketing activities towards minors. Minors under the age of 14 are not allowed to request services, as well as any communications on the <https://card.starbucksromania.ro> Site or to participate in AmRest Coffee SRL competitions or campaigns unless this is done on behalf of the minor by the legal representative or guardian of the minor concerned, according to the law.

Minors under the age of 14 may purchase products or services and request and receive communications from AmRest Coffee SRL only if they have the consent of their legal representative or guardian, according to the law.

Also, any person who provides us with personal data through the Site or other applications or devices covered by this Policy warrants they are major and have full exercise capacity.

Any collection or processing of minors' personal data shall be carried out only under the law and in view of the above.

### **Using statistical data and anonymous data**

AmRest Coffee SRL may use the statistical data or the anonymous data resulting from the processing for the following purposes:

- preparing reports / analyzes;
- gathering information for own purposes;
- publishing, promoting, offering the services provided by AmRest Coffee SRL

### **Using cookies**

Cookies (the term includes "Cookie Internet", "cookie browser", "HTTP cookie" or simply "cookie") are files or information that can be stored on your computer or on mobile devices with Internet access (smartphone or tablet) when you access the Internet. The cookie is installed via the request issued by a webserver to a browser (e.g. Internet Explorer, Chrome) and cannot access information from the user's computer. Please note that this technology does not contain software, viruses or spyware.

We use cookies to make the Site easier to use and to better tailor it to our interests and needs through our offers. Cookies are also used to increase the speed of your future activities and experiences on our Site. These refer to your preference for online privacy or relevant advertising. We also use cookies to compile anonymous aggregated statistics that allow us to understand how people use the Site and to help us improve its structure and contents, excluding the user's personal identification.

## **How do I control or delete cookies?**

Most Internet browsers are initially set to automatically accept cookies. You can change settings to block cookies or be notified when cookies are sent to your computer or mobile device (smartphone, tablet).

If you cancel the cookies we use, you no longer receive personalized information when you visit <https://card.starbucksromania.ro>.

If you use multiple devices to view and access the Site (e.g., your computer, smartphone, tablet, etc.), you need to make sure that each browser on each device is set to match your cookie preferences.

By accessing the existing cookie settings in your browsers, you will find indications explaining how you can change the cookie settings. These settings are usually found in the Browser's "Options" or "Preferences" menu. For further information, you can also use your browser's "Help" option.

**\*As of the entry into force of EU Regulation 679/2016, namely 25<sup>th</sup> of May 2018, you will benefit from and be able to further exercise:**

- Your right to be forgotten, in the sense of making a request to AmRest Coffee SRL to delete the personal data records existing in the on-line environment;
- Your right to data portability, in the sense of transferring your personal data to another personal data operator of your choice;
- Your right to be notified by the operator in the event of data security breaches.

For the exercise of these rights, as well as for any additional questions regarding this notice or relating to AmRest Coffee SRL's use of personal data, please contact us by choosing any of the communication ways described above, specifying, at the same time, your name, your postal or email address (subject to your communication preference), your phone number, and the purpose of your request.