

# Information on personal data processing

## 1. Who we are

WELLINGTON CONSULTING SRL is a company that manages the Wellington platform. We act as a proxy for our clients, as does your employer.

## 2. Personal data that we process

We process the following personal data on behalf of your employer:

- Name & surname
- Email
- Picture

## 3. Why we need them

On behalf of your employer, we process personal data for the following purposes:

- Registration on the Wellington platform
- Account management in the Wellington platform
- Client's employees' training

## 4. What we do with them

Your personal data is processed within the company WELLINGTON CONSULTING SRL located in Romania which acts as a person authorized by your employer. The hosting and storage of your data takes place in Romania on the servers of Găzduire Web SRL, which acts as a person authorized by WELLINGTON CONSULTING SRL.

Your personal data is also processed by Hosterion SRL who acts as a person authorized by WELLINGTON CONSULTING SRL, providing the maintenance of the site.

Your personal data is also processed by Microsoft Ireland Operations Ltd who acts as a proxy for WELLINGTON CONSULTING SRL, offering the Microsoft 365 service and the Teams application.

Your personal data is also processed by Zoom, Inc, from the United States of America acting as a proxy for WELLINGTON CONSULTING SRL offering the Zoom conference service; the transfer of personal data to the United States is based on the Standard Contract Terms signed between Wellington and Zoom, Inc. This document is available for review here: [https://zoom.us/docs/doc/Zoom\\_Pre-Signed\\_Standard\\_Contractual\\_Clauses\\_with\\_DocuSign\\_Fields.pdf](https://zoom.us/docs/doc/Zoom_Pre-Signed_Standard_Contractual_Clauses_with_DocuSign_Fields.pdf).

Your personal data is also processed by Google Cloud Emea LTD, which acts as a proxy for WELLINGTON CONSULTING SRL, offering the Google Meet service.

Your personal data is also processed by Fast Soft Developers who acts as a proxy for WELLINGTON CONSULTING SRL, providing support for the Wellington application database.

## 5. How long we keep personal data

Your personal data is held on the Wellington platform as long as your employer decides as your personal data controller. At the end of the contract between Wellington and your employer, the data will be returned to him.

## **6. What are your rights?**

If you have reason to believe that your personal data is incorrect or incomplete, please contact your employer to exercise your rights: the right to request access to personal data, to correct it, to request its deletion, to request the restriction of the processing or to oppose the processing. You also have the right to data portability.

You can also contact the National Authority for the Supervision of Personal Data Processing at [www.dataprotection.ro](http://www.dataprotection.ro) and you can file a complaint with them.

## **7. What are your obligations regarding using of the platform and posting information?**

Prior to posting any type of material on the Platform, please ensure that:

- a) You are the owner of the posted material, the holder of an authorization or have obtained consent / permission to use the said material in any way and thus you can dispose of it by including, reproducing, distributing it on the Platform;
- b) You have the consent, authorization from each identifiable person, visually or audibly, in the content of the materials posted on the Platform to use their image and / or voice;
- c) You will not post materials that are defamatory of the Provider;
- d) You will not post materials with indecent or inappropriate content, scenes of violence or that encourage the violation of human rights recognized by Romanian legislation and / or dealt with by international conventions in the field;
- e) You will not post materials that promote illegal activities in any way;
- f) You will avoid under any circumstances using the identity of another real person, identity theft is punishable according to the existing laws in force.