

Politica privind utilizarea tehnologiilor de tip cookie in aplicatia Smart Market

I. Informatii cu privire la operatorul aplicatiei

Aplicatia Smart Market apartine si este administrata de Raiffeisen Bank S.A. („**Raiffeisen Bank**” sau „**Banca**”), persoana juridica romana, administrata in sistem dualist, cu sediul in Cladirea Sky Tower, Calea Floreasca nr. 246 C, Sector 1, Bucuresti, numar de ordine in Registrul Comertului J40/44/1991, inmatriculata in Registrul Bancar sub nr. RB-PJR-40-009/1999, cod unic de inregistrare 361820, cod de inregistrare fiscala in scopuri de TVA RO361820.

Prezenta Politica privind utilizarea tehnologiilor de tip cookie prezinta informatii despre plasarea, utilizarea si administrarea tehnologiilor de tip cookie in cadrul aplicatiei Smart Market („**aplicatia**”).

Informatii detaliate privind activitatile de prelucrare a datelor cu caracter personal in contextul utilizarii aplicatiei sunt disponibile in Politica de confidentialitate a aplicatiei Smart Market disponibila [aici](#), precum si in Politica de confidentialitate Raiffeisen Bank in contextul relatiei cu Raiffeisen Bank, ce poate fi accesata in partea de jos a site-ului www.raiffeisen.ro si [aici](#).

II. Informatii generale privind tehnologiile de tip cookie

Tehnologia de tip cookie este o tehnologie ce permite stocarea de informatii si/sau obtinerea accesului la informatia stocata in echipamentul terminal al unui utilizator, ce poate fi de tipul cookie, pixel, kit-uri software, SDK etc.

Un SDK este un set de unelte folosite de un programator pentru a scrie programe pentru un anumit sistem de operare, platforma hardware sau pachet de programe existent. SDK-urile contin de regula biblioteci sau API-uri apelabile de catre programatori. Unele SDK-uri pot veni cu compilatoare, depanatoare si alte unelte.

III. Tehnologiile de tip cookie utilizate

SDK - prin instalarea acestora in aplicatie se permite colectarea de informatii de catre Banca cu privire la modul de utilizare a aplicatiei de catre utilizatori pentru a asigura functionarea corespunzatoare a aplicatiei, pentru a intelege mai bine utilizatorii si nevoile acestora, modul in care este folosita aplicatia, eventualele erori si pentru a imbunatati aplicatia si serviciile oferite. In aceste scopuri, utilizam tehnologia SDK potrivit celor descrise in tabelul de mai jos.

Utilizarea acestei tehnologii si colectarea de informatii de pe dispozitivul terminal al utilizatorilor in scopuri analitice se realizeaza doar cu acordul utilizatorilor exprimat prin mecanismele de obtinere a acordului disponibile in aplicatie.

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Tipul si denumirea tehnologiilor de tip cookie utilizate	Scopul	Categoriile de informatii colectate	Durata de stocare a informatiilor colectate
Strict necesar SDK JavaScript Furnizor: Count.ly	Acesta este strict necesar pentru functionarea si furnizarea aplicatiei, prin identificarea incidentelor/ crash-urilor ce pot surveni in cadrul aplicatiei, cu scopul de a le solutiona. Acesta nu necesita acordul utilizatorilor si nu poate fi dezactivat.	Informatii cu privire la: Crash-uri/ incidente/ erori care pot aparea in cadrul aplicatiei.	3 ani de la momentul colectarii.
Strict necesar Firebase Crashlytics	Firestore Crashlytics utilizeaza SDK in scopul identificarii	ID anonim Firestore, log-uri ale Crash-urilor/ incidentelor/	Atat cat este necesar pentru indeplinirea scopului in care se

<p>Furnizor: Google Ireland Limited</p>	<p>incidentelor, erorilor sau blocajelor de ordin tehnic ce pot apărea și determina disfuncționalități ale aplicației.</p> <p>Acesta este strict necesar pentru funcționarea aplicației, pentru identificarea incidentelor/ crash-urilor ce pot surveni, cu scopul de a le soluționa și a continua furnizarea aplicației la parametri optimi, conform obligațiilor contractuale asumate de Banca cu clienții</p>	<p>erorilor care apar în aplicație sau în trimiterea notificărilor de tip push (pentru utilizatorii care și-au exprimat consimțământul de a primi notificări de tip push).</p>	<p>utilizează Firebase Crashlytics sau până la deinstalarea aplicației, oricare dintre cele două cazuri intervine primul. Furnizorul va lua măsuri pentru ștergerea informațiilor într-un termen determinat contractual de la momentul la care Banca transmite instrucțiunea de ștergere.</p>
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	<p>sai, utilizatori ai aplicatiei.</p> <p>Acesta nu necesita acordul utilizatorilor si nu poate fi dezactivat.</p>		
<p>Analitic</p> <p>SDK JavaScript</p> <p>Furnizor: Count.ly</p>	<p>Prin utilizarea SDK-ului Count.ly in scop analitic, urmarim:</p> <ul style="list-style-type: none">• analiza modului in care este utilizata aplicatia pentru a intelege cat mai bine modalitatea in care aceasta functioneaza si care sunt nevoile utilizatorilor;• imbunatatirea	<p>Informatii agregate/ statistice cu privire la:</p> <ul style="list-style-type: none">• numarul total de utilizatori unici dintr-o anumita perioada, numarul utilizatorilor care au accesat anumite campanii/ sectiuni, perioada in care aplicatia este utilizata cu precadere;	<p>3 ani de la momentul colectarii.</p>

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	<p>aplicatiei si a experientei utilizatorilor in aplicatie, respectiv imbunatatirea produselor si serviciilor pe care le furnizam in cadrul aplicatiei.</p>	<ul style="list-style-type: none">• sesiunile, durata si frecventa sesiunilor, timpul petrecut in aplicatie;• dispozitiv, platforme, locatii, versiuni de aplicatii, rezolutii, densitati, operator de telefonie mobila;• alte informatii in functie de evenimentele specifice setate in aplicatie cum ar fi: accesarea anumitor sectiuni, butoane din	
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		aplicatie, realizarea anumitor operatiuni, urmarirea anumitor evenimente si activitati realizate de utilizatori in aplicatie.	
Strict necesar SDK Sales.UP Mobile Furnizor: Sales.UP	Utilizarea acestui SDK permite realizarea geo-localizarii utilizatorilor care au solicitat in mod expres aceasta functionalitate prin exprimarea consimtamantului pentru geo-localizare, pentru a le putea afisa utilizatorilor ofertele relevante in	Coordonatele geografice ale utilizatorului (longitudine, latitudine, altitudine).	Atat cat este necesar pentru indeplinirea scopului in care se utilizeaza acest SDK, in principal, pentru o durata de pana la 2 ani de la momentul colectarii. Informatiile vor fi sterse din dispozitivul utilizatorului, oricand intervine unul din

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	<p>functie de locatia lor intr-un anumit moment.</p> <p>Acest SDK este utilizat in cazul si pe durata cat utilizatorul si-a exprimat consimtamantul pentru geo-localizare.</p>		<p>urmatoarele evenimente:</p> <ul style="list-style-type: none">• dupa 60 secunde de la momentul colectarii;• in cazul modificarii locatiei utilizatorului;• in cazul in care spatiul de stocare local a atins capacitatea maxima.
<p>Strict necesar</p> <p>SDK Firebase push notifications</p> <p>Furnizor: Sales.UP</p>	<p>Utilizarea acestui SDK permite implementarea si transmiterea notificarilor de tip</p>	<p>ID anonim - instalare Firebase</p>	<p>Atat cat este necesar pentru indeplinirea scopului in care se utilizeaza acest SDK sau pana la</p>

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	<p>push, utilizatorilor care au solicitat in mod expres aceasta functionalitate prin exprimarea consimtamantului pentru aceasta functionalitate.</p> <p>Acest SDK este utilizat in cazul si pe durata cat utilizatorul si-a exprimat consimtamantul pentru primirea de notificari push.</p>		<p>dezinstalarea aplicatiei, oricare dintre cele doua cazuri intervine primul. Furnizorul va lua masuri pentru stergerea informatiilor intr-un termen determinat contractual de la momentul la care Banca transmite instructiunea de stergere.</p>
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IV. Informatii privind modul in care poate fi gestionat acordul utilizatorilor

Cu privire la SDK-ul utilizat in scop analitic si care nu face parte din categoria celor strict necesare, utilizatorii au posibilitatea de a-si exprima optiunile (respectiv, refuzul/ acordul cu

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privire la utilizarea acestuia), fie pe parcursul procesului de inrolare in aplicatie, fie ulterior, din setarile profilului de utilizator, sectiunea „Administrare acorduri”.

In cazul in care utilizatorii aleg sa-si furnizeze acordul, acesta va avea in vedere SDK-ul utilizat in scop analitic in cadrul acestei aplicatii, iar nu si pentru alte pagini web sau aplicatii pe care le utilizeaza in relatia cu Raiffeisen Bank.

Acordul utilizatorilor este valabil pana la retragerea acestuia.

In orice moment, utilizatorii au posibilitatea sa revina asupra optiunilor exprimate initial, prin accesarea setarilor profilului de utilizator, sectiunea „Administrare acorduri”.

V. Dezvaluirea si transferurile de date catre state din afara SEE

Informatiile colectate prin intermediul tehnologiilor similare cookie-urilor pot fi transmise/ accesate catre/ de catre Google, alte persoane fizice sau juridice care prelucreaza date in numele Bancii. Aceste informatii pot fi transferate catre urmatoarele state din UE/ SEE sau din afara UE/ SEE mentionate la urmatoarea adresa Google: <https://www.google.com/about/datacenters/inside/locations/index.html>

VI. Drepturile utilizatorilor aplicatiei cu privire la prelucrarea datelor cu caracter personal

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În calitate de persoane vizate, utilizatorii aplicației beneficiază de următoarele drepturi cu privire la prelucrarea datelor lor cu caracter personal, în limitele și condițiile stabilite de Regulamentul General privind Protecția Datelor:

- dreptul de a solicita accesul la date;
- dreptul la rectificarea datelor;
- dreptul la ștergerea datelor;
- dreptul la restricționarea prelucrării;
- dreptul de a se opune prelucrării;
- dreptul la portabilitatea datelor;
- dreptul de a nu fi supuși unor decizii individuale automate, inclusiv crearea de profiluri, care produc efecte juridice sau care îi afectează în mod similar într-o măsură semnificativă.

Pentru mai multe informații cu privire la drepturile de care beneficiați în calitate de persoană vizată, puteți accesa Politica de confidențialitate a aplicației disponibilă [aici](#).

Pentru detalii suplimentare cu privire la activitățile de prelucrare efectuate de către Raiffeisen Bank, precum și cu privire la drepturile de care beneficiați ca utilizator Smart Market în acest context, ne puteți transmite o solicitare la adresele oricăreia dintre unitățile Raiffeisen Bank (pentru lista completă a unităților, se poate accesa pagina <https://www.raiffeisen.ro/retea/>) sau printr-un e-mail către Banca în acest sens, la

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urmatoarea adresa: centrala@raiffeisen.ro. In plus, ai posibilitatea de a contacta si Responsabilul privind Protectia Datelor la nivelul Raiffeisen Bank, la urmatoarea adresa de e-mail: dpo@raiffeisen.ro.

De asemenea, toti utilizatorii au dreptul de a depune plangere la Autoritatea Nationala de Supraveghere a Prelucrarii Datelor cu Caracter Personal.

VII. Alte informatii utile

Pentru mai multe informatii cu privire la modul in care Raiffeisen Bank prelucreaza datele tale in cadrul aplicatiei poti accesa Politica de confidentialitate disponibila [aici](#).

Policy on the use of cookie-type technologies in the Smart Market application

VIII. Information about the Application's operator

The Smart Market Application belongs to and is operated by Raiffeisen Bank S.A. ("**Raiffeisen Bank**" or the "**Bank**"), a Romanian legal entity managed under a dual-tier system, with the

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seat in Sky Tower Building, 246C Calea Floreasca, District 1, Bucharest, order number in the Trade Register J40/44/1991, entered in the Banking Register under no. RB-PJR-40-009/1999, Single Code of Registration 361820, registration code for tax VAT purposes RO361820.

This Policy on the use of cookie-type technologies presents information about placement, use and management of cookie-type technologies in the Smart Market application (the "**application**").

Detailed information about the processing of personal data in relation to the use of the application is available in the Privacy Policy of the Smart Market application available [here](#), as well as in Raiffeisen Bank Privacy Policy, in connection with the relationship with Raiffeisen Bank, which can be accessed at the bottom of the website www.raiffeisen.ro and [here](#).

IX. General information about the cookie-type technologies

The cookie-type technology is a technology that allows storage of information and/or access to the information stored on a user's terminal equipment, which can be of the cookie, pixels, software kits, SDK, etc. type.

An SDK is a set of tools used by a programmer to write programs for a particular operating system, hardware platform or existing software package. SDKs usually contain libraries or

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APIs callable by programmers. Some SDKs may come with compilers, debuggers and other tools.

X. **Cookie-type technologies**

SDK - their installation in the Application allows the Bank to collect information about how users use the Application with the aim of ensuring the smooth operation of the Application, better understanding users and their needs, how the Application is used or any possible errors, and improving the Application and the services offered. For these purposes, we use the SDK technology as described in the table below.

The use of this technology and collection of information from the users' terminal for analytical purposes is done only with the consent of users expressed through the consenting mechanisms put in and available in the Application.

<i>Type and name of cookie-type technologies</i>	<i>Purpose</i>	<i>Categories of information collected</i>	<i>Storage duration of the collected information</i>
Strictly necessary SDK JavaScript	This is strictly necessary for operation	Information about: Crashes/ incidents/ errors that could	3 years of collection.

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<p>Supplier: Count.ly</p>	<p>provision of the Application, by identifying incidents/ crashes that could occur in the Application, to address them This neither requires the user's agreement, nor can it be disabled.</p>	<p>occur in the Application.</p>	
<p>Strictly necessary Firebase Crashlytics Supplier: Google Ireland Limited</p>	<p>Firebase Crashlytics uses SDK to identify incidents, errors or technical blockages that could occur and cause Application malfunctions.</p>	<p>Firebase anonymous ID, logs on crashes/ incidents/ errors that occur in the Application or when sending push notifications (for users who have consented to</p>	<p>For as long as necessary to attain the purpose Firebase Crashlytics is used for, or until the Application is uninstalled, depending on which occurs the first. The</p>

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	<p>It is strictly necessary for operation of the Application, to identify incidents/ crashes that could occur and address them, and for the continued provision of the Application at optimal parameters, according to the contractual obligations assumed by the Bank to its clients using the Application.</p> <p>This neither requires the user's agreement, nor can it be disabled.</p>	receiving notifications). push	Supplier shall take actions to have the information deleted during a contractually determined term as of the time when the Banks send the delete instruction.
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<p>Analytical</p> <p>SDK JavaScript</p> <p>Supplier: Count.ly</p>	<p>When we use Count.ly SDK for analytical purposes, our aim is to:</p> <ul style="list-style-type: none">• analyse how the Application is used and better understand how it works and what the needs of users are;• improve the Application and the user experience in the Application, as well as improve the products and services we provide in the	<p>Aggregate/ statistical information about:</p> <ul style="list-style-type: none">• the total number of unique users during a given period, the number of users who accessed certain campaigns/ sections, the period during which the Application is most used;• sessions, duration and frequency of sessions, time spent in the Application;• device, platforms, locations,	<p>3 years of collection.</p>
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	<p>Application.</p>	<p>application versions, resolutions, densities, mobile phoning operator;</p> <ul style="list-style-type: none">• other information depending on the specific events set in the Application - such as, access of given sections, buttons in the Application, performance of certain operations, tracking of certain events and activities performed by users in the Application.	
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<p>Strictly necessary</p> <p>SDK Sales.UP Mobile</p> <p>Supplier: Sales.UP</p>	<p>The use of this SDK allows geo-localization of the users who have expressly requested this function by expressing their consent to geo-localization, to display them the relevant offers according to their location at a given time.</p> <p>This SDK is used in the case and for as long as the user maintains their consent to geo-localization.</p>	<p>Geographical coordinates of the user (longitude, latitude, altitude).</p>	<p>For as long as necessary to attain the purpose this SDK is used for, in particular during a 2-year term of collection.</p> <p>The information shall be deleted from the user's device, whenever one of the following events occurs:</p> <ul style="list-style-type: none">• after 60 seconds of collection;• when the user's location changes;• when the local storage space
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			has reached maximum capacity.
<p>Strictly necessary</p> <p>SDK Firebase push notifications</p> <p>Supplier: Sales.UP</p>	<p>The use of this SDK allows implementation and transmission of push notifications to the users who have expressly requested this function by expressing their consent thereto.</p> <p>This SDK is used in the case and for as long as the user maintains their consent to</p>	<p>Anonymous ID - Firebase installation</p>	<p>For as long as necessary to attain the purpose this SDK is used for, or until the Application is uninstalled, depending on which occurs the first. The Supplier shall take actions to have the information deleted during a contractually determined term as of the time when the</p>

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	receiving push notifications.		Banks send the delete instruction.
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XI. Information about how the user agreement can be managed

As to the SDK used for analytical purposes and which is not included in the strictly necessary category, users have the possibility to express their options (meaning their refusal/agreement to its use), either during the Application signing up process, or at a later date, in the user profile settings, "Agreement Management" section.

When users choose to issue their consent, this shall consider the SDK used for analytical purposes in this Application, and not for other web pages or applications that you use in relation to Raiffeisen Bank.

The user agreement remains valid until it is withdrawn.

At any time, users can reconsider their initially expressed options, by accessing the user profile settings, "Agreement Management" section.

XII. Data disclosure and transfers to non-EEA countries

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The information collected through cookie-type technologies can be transmitted/ accessed to/ by Google, other natural or legal entities that process data on behalf of the Bank. This information may be transferred to the following EU/ EEA or non-EU/ EEA states, as listed at the following Google address:
<https://www.google.com/about/datacenters/inside/locations/index.html>

XIII. Application user rights concerning personal data processing

As data subjects, the users of the Application enjoy the following rights as to the processing of their personal data, subject to the limitations and terms laid down in the General Regulation on Data Protection:

- the right to request access to data;
- the right to rectification of data;
- the right to delete data;
- the right to restrict processing;
- the right to object processing;
- the right to data portability;
- the right not to be subject to automated decision making, including profiling, which takes legal effects or which affects them in a similar way to a significant extent.

For more information about your rights as data subject, you can be accessed the Privacy Policy of the Application [here](#).

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For additional information about the processing activities carried out by Raiffeisen Bank, as well as about the rights user have in this regard, you can file an application to the address of any Raiffeisen Bank unit (for a full list of such units, please access the page <https://www.raiffeisen.ro/retea/>), or can send an email to the Bank at: centrala@raiffeisen.ro. You can also contact the Data Protection Officer of Raiffeisen Bank SA, at the following email address: dpo@raiffeisen.ro.

Also, all users have the right to file a complaint with the National Supervisory Authority for Personal Data Processing.

XIV. Other useful Information

For more information about how Raiffeisen Bank processes your data in the Application, you can access the Privacy Policy [here](#).