

COMPLIANCE INFORMATION
FREE WIFI SYSTEM S.R.L.
WITH THE APPLICABLE LEGAL PROVISIONS IN THE MATTER
PROCESSING OF PERSONAL DATA

Taking into account:

- i. Conclusion of the legal assistance contract series B no. 2104900/27.06.2019 and Annex no. 1 to it, dated 27.06.2019, having as object the performance of the activities specific to the position of Data Protection Officer (DPO) for the company FREE WIFI SYSTEM S.R.L. by SCA GRECU AND ASSOCIATES;
- ii. The fact that, at the time of signing the legal assistance contract, SCA GRECU & ASSOCIATES proceeded to implement the provisions provided by Regulation no. 679 of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation or GDPR) at the level of FREE WIFI SYSTEM S.R.L.;
- iii. The fact that the implementation of the GDPR carried out at the level of FREE WIFI SYSTEM S.R.L. also aimed at complying with the European and national rigors in the field of personal data processing,
- iv. The fact that the implementation of privacy policies and technical mechanisms within the Wiacom platform has been carried out taking into account international data protection standards, as follows:
 - United Kingdom (UK): Compliance with the Data Protection Act 2018 and the UK GDPR, ensuring a level of protection equivalent to the European post-Brexit one.
 - United States of America (USA): Alignment with the transparency and control principles set forth in the California Consumer Privacy Act (CCPA), including CPRA amendments, as well as compliance with notice and opt-out requirements relevant to the rest of the federal states.
 - United Arab Emirates (UAE): Compliance with Federal Decree-Law No. 45 of 2021 regarding the Protection of Personal Data, as well as, where applicable, regulations specific to financial free zones (such as the DIFC Data Protection Law or ADGM Data Protection Regulations).
 - Asia-Pacific (APAC) Region: Integration of the core standards found in the APEC Privacy Framework, as well as compliance with the limited collection and purpose-driven principles specific to the laws of Asian jurisdictions where the platform is operational.

v. Specific certification for global functionalities

Also, SCA GRECU & ASSOCIATES certifies that the Wiacom platform allows the configuration of privacy policies dynamically, depending on the user's geographical location, ensuring:

1. **Transparency of data flows**, informing users about the cross-border storage and transfer of data, according to the transfer mechanisms recognized by the aforementioned laws.
2. **Protection by design**, through the *Wiacom Splash Page* function, which allows "Guest WIFI" providers to operate in a completely anonymous way, eliminating the incidence of data protection laws if no personal identifiers (PII) are collected.

SCA GRECU AND ASSOCIATES, established by the decision of the Bucharest Bar no. 182 of 16.02.2016 with headquarters in Bucharest, Sector 1, 8 Aleksandr Sergheevici Pushkin Street, having the fiscal code no. 35771768 and through Elena Greco – Associate Lawyer, certifies that the company FREE WIFI SYSTEM S.R.L. complies, in carrying out its activity, the provisions of the worldwide General Data Protection Regulation.

Also, hereby, **SCA GRECU & ASSOCIATES** certifies the operation of the Wiacom IT platform in compliance with the legal provisions provided by the aforementioned normative acts, at the level of the online platform being exposed including the relevant GDPR policies, which contain detailed information sent to the data subjects regarding the data processing belonging to them, carried out in the context of using Wiacom.

Last but not least, **SCA GRECU & ASSOCIATES** certifies the possibility of companies that use and offer the data subjects the "Guest WIFI" service not to collect personal data in this context by implementing the *Wiacom Splash Page function*.

Date,
25.04.2024

SCA GRECU & ASSOCIATES
By Elena Greco

