

ELA'S PARTNERS' DUTIES AS GDPR OWNERS

Any Partner of ELA shall be a GDPR Owner (manager with GDPR responsibilities in regard of certain categories of personal data) in regard of personal data pertaining to cases or project which he/she leads.

Each GDPR Owner of **Epure, Lizac si Asociatii SCA** ("ELA") shall be accountable to the Managing Partner for the management of personal data within ELA. The General Manager must ensure that compliance with data protection legislation under the GDPR and any other data protection legislation and good practice can be demonstrated.

GDPR Owner's specific responsibilities

A GDPR owner shall be responsible for managing compliance with ELA's data protection policy on a day-to-day basis. It shall have the following responsibilities:

- a. ensuring implementation of the data protection policy;
- b. development and review of the data protection policy;
- c. training and ongoing awareness as required by the data protection policy;
- d. approval of procedures where personal data is processed, such as:
 - the management and communication of privacy notices;
 - the handling of requests from individuals, including requests for access, rectification, erasure, etc.;
 - the collection and handling of personal data;
 - complaints handling;
 - the management of security incidents; and
 - outsourcing and off-shoring.
- e. liaising with those responsible for risk management and security issues within ELA;
- f. provision of expert advice and guidance on legislative and regulatory data protection matters;
- g. the interpretation and application of the various exemptions applicable to the processing of personal data;
- h. advise and inform on the data protection impact assessment and monitor performance against the requirements of the GDPR;
- i. provision of advice in relation to data sharing projects (including security issues when data are off site);
- j. ensuring ELA's access to legislative updates and appropriate guidance related to data protection legislation;
- k. continually checking that ELA's data protection regime reflects changes in legislation, practice and technology;
- l. completing, submitting and managing notifications to the Romanian Supervisory Authority (ANSPDCP), where required under the GDPR and other data protection regulations; and
- m. implementing, as appropriate, the practices related to the processing of personal data outlined in any mandatory or advisory sectoral codes that apply to ELA.

Document Owner and Approval

The Managing Partner is the owner of this document and shall ensure that it is kept up to date. A current version of this document is available to all members of staff on ELA's website on page "Data Protection", section "Policies & Procedures". This policy was approved by Decision of Partners on 15.02.2018 and is issued under the signature of the Managing Partner.

Signature: Doru Epure – Managing Partner

Date: 15.02.2018