AIRSTREAM SRL
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AIRSTREAM SRL POLICY ON THE PROCESSING OF PERSONAL DATA AND THE USE OF COOKIES

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Main legal act: Law of the Republic of Moldova No. 195/2024 on personal data protection, in force since 23 August 2026. Official CNPDCP page on Law No. 195/2024

1. Purpose of the Policy and data controller

This Policy explains how AIRSTREAM SRL collects, uses, stores, transfers and protects the personal data of clients, representatives of corporate clients, prospective clients, and visitors to the office and to the website www.airstream.md. It applies to the website, online forms, correspondence, contractual relations, technical support and visits to AIRSTREAM premises.

Data controller: AIRSTREAM SRL, IDNO 1018600007654; registered address: 34/1 Vasile Lupu St., apt. 59, Chișinău, MD-2008; contact office: 59 Sfatul Țării St., Chișinău; e-mail: office@airstream.md; phone: +373 22 300 000.

Where AIRSTREAM processes data only on the documented instructions of a client while providing IT, hosting, communication or security services, AIRSTREAM acts as a processor. The roles, purposes, security measures and obligations of the parties are set out in the contract and, where necessary, in a data processing agreement.

2. Principles, categories of data and sources

AIRSTREAM follows the principles of Article 5 of Law No. 195/2024: lawfulness, fairness and transparency; purpose limitation; data minimisation and accuracy; storage limitation; integrity and confidentiality; accountability. Only data that is objectively necessary for the stated purpose is collected.

Depending on the relationship with the person, the following may be processed:

- Identification and contact data: first name, last name, company, position, address, country, e-mail, phone, signature; personal identification number (IDNP) only where necessary for a contract, identification or compliance with the law;
- Contractual and financial data: services requested, contracts, orders, invoices, payments, debts, claims and the history of business relations. Full card details are processed by the payment provider where the payment is made on its platform;
- Communications and support: messages, requests, tickets, replies and call recordings, only after proper notice;
- Technical data: IP address, online identifiers, device, browser, operating system, URL and referrer, date and time, technical logs, security events and data needed to provide communication and IT services;
- Website and form protection: cookie settings, user agent, time taken to fill in a form, token and the result of the anti-spam/anti-bot check;
- Video data: image, date, time and area filmed when visiting premises marked as being under video surveillance.

Data comes from the person themselves, from the organisation they represent, from the use of the website and services, from publicly available sources or from authorised partners. Where data has not been obtained from the person, AIRSTREAM provides the information required by law within the prescribed period and no later than the first contact or disclosure of the data, unless a legal exemption applies.

AIRSTREAM does not intentionally request special categories of data through the regular website forms. If processing them becomes necessary, a separate basis under Article 9 is determined, enhanced protection is applied and the minimum amount of data is collected.

3. Purposes and legal bases

- Enquiries, demonstrations and quotes: replying, checking the enquiry and preparing a quote; basis: steps taken at the person's request before entering into a contract and the legitimate interest in answering professional enquiries;
- Provision of services: concluding and performing the contract, connection, administration, support, invoicing and payment; basis: the contract and legal obligations;
- Security and abuse prevention: protecting networks, systems, accounts and forms, preventing fraud, spam, attacks and incidents; basis: legitimate interest and, where applicable, a legal obligation;
- Record keeping, audit and protection of rights: accounting and internal records, reporting, claims and disputes; basis: legal obligation and legitimate interest;
- Website analytics: visit statistics and improving pages; basis: prior consent for non-essential cookies or similar technologies;
- Direct marketing: news and offers by e-mail or phone; basis: separate, freely given consent that may be withdrawn at any time.

3.1. Website forms and consent

Fields marked with * are mandatory only to the extent that a specific request cannot be processed without them. For a B2B demonstration these may be first and last name, company, e-mail, phone and country. If the mandatory information is not provided, AIRSTREAM will not be able to arrange the demonstration or prepare a quote.

Recommended wording of the mandatory confirmation: "I have read the Privacy Policy and ask AIRSTREAM SRL to use the data provided to contact me about the demonstration." This confirms that the information has been received and contact has been requested, but it is not consent to advertising. A separate checkbox, not ticked in advance, is used for marketing; declining it does not affect the handling of the request. Withdrawing consent must be as easy as giving it; AIRSTREAM keeps a record of the choice.

Before using data for a new purpose, AIRSTREAM assesses its compatibility with the original purpose and informs the person in advance of the new purpose, the legal basis and the necessary information. Decisions with legal or similarly significant effects are not taken solely by automated means. A security filter may temporarily reject a suspicious request; a review by a staff member may be requested.

4. Cookies and similar technologies

The website www.airstream.md uses cookies. On the first visit, the banner must allow accepting all cookies, keeping only the necessary ones or opening the settings. Non-essential cookies are not loaded until active consent is given. The choice can be changed at any time through "Cookie settings" on the website or in the browser.

- Necessary: technical operation, security, form submission, language and storing the choice; used without additional consent where the function is not possible without them;
- Statistical and extended: visits, referrer and interaction with pages; activated only after consent and may be declined without losing the main functions;
- Third-party technologies: Google Tag Manager may manage tags; analytics or marketing tags are only triggered after consent. External resources, including fonts, must be configured with data minimisation in mind.

An up-to-date list of cookies with their name, provider, purpose and duration is published in the cookie settings and kept in line with the actual configuration of the website. Withdrawing consent does not affect the lawfulness of processing carried out before the withdrawal.

5. Recipients and international transfers

To the extent necessary, access may be given to:

- authorised employees and contractors of AIRSTREAM;
- providers of hosting, cloud, communication, e-mail, CRM, anti-bot, technical, backup and security services;

- payment providers, banks, accountants, auditors, lawyers and professional advisers;
- public authorities, courts and law enforcement bodies, where disclosure is required by law or for the protection of rights.

Processors are chosen on the basis of sufficient guarantees and are bound by a written contract under Article 28 covering: the subject matter, duration, nature and purposes of processing, categories of data and data subjects, confidentiality, security, assistance with the exercise of rights, return or deletion of data and audits. Data is not passed to third parties for their own marketing without a separate basis.

Transfers outside the Republic of Moldova are made under Articles 44-50 of Law No. 195/2024: on the basis of an adequacy decision, standard contractual clauses, binding corporate rules, another lawful mechanism or an applicable exemption and, where necessary, with additional technical measures. Information about specific recipients and a copy of the applicable safeguards can be requested from AIRSTREAM.

6. Retention periods

Data is kept no longer than necessary for the purpose, the contract and the applicable obligations:

- contact, demonstration or quote requests: up to 12 months after the last meaningful interaction, if no contract has been concluded;
- contracts, invoices and commercial documents: for the duration of the relationship and the statutory period after it ends, as a rule up to 6 years, or longer in the event of a debt, dispute or mandatory retention;
- website, anti-bot and security logs: usually up to 90 days, longer only to investigate an incident or comply with the law;
- technical data of communication services: in accordance with the contract and the applicable legislation on electronic communications; the specific period is communicated for the relevant service;
- video recordings of visitors: usually no more than 60 days and, in the event of an incident, dispute or lawful request, until the relevant procedure is completed;
- marketing data: until consent is withdrawn or no more than 24 months without interaction;
- cookies and settings: for the period stated in the cookie settings or until they are deleted or consent is withdrawn.

Once the period expires, data is securely deleted, destroyed or irreversibly anonymised. Backups are overwritten according to the established technical cycle and access to them is restricted. If the law requires a different period, it takes precedence and is documented.

7. Accountability, security and incidents

AIRSTREAM applies data protection by design and by default (Article 25), keeps a record of processing activities (Article 30) and reviews legal bases, retention periods, access rights and providers. Before high-risk processing, a data protection impact assessment is carried out (DPIA, Article 35), in particular for large-scale or systematic monitoring, video surveillance, employee monitoring, processing of location or traffic data or special categories of data, or the use of new technologies.

Security measures under Article 32 are chosen according to risk and may include TLS, access control and regular access reviews, least privilege, multi-factor authentication, logging, backups, updates, anti-spam/anti-bot protection, staff training, supplier checks and an incident response plan.

7.1. Personal data breaches

Incidents are documented and assessed. Where there is a risk to rights and freedoms, AIRSTREAM notifies the CNPDCP without undue delay and, where feasible, within 72 hours of becoming aware of the incident. Where the risk is high, the affected persons are informed without undue delay, except in cases provided for by law.

8. Rights of the data subject

Under the conditions provided by law, the person has the right to:

- receive information about and access to their data, its sources, purposes, retention periods, recipients and transfer safeguards;
- have inaccurate data corrected and incomplete data completed;
- request erasure or restriction of processing in the cases provided for;
- receive and transfer the data they have provided, where the right to data portability applies;
- object to processing based on legitimate interest and, at any time, to direct marketing;
- withdraw consent without affecting the lawfulness of processing before the withdrawal;
- not be subject to a decision based solely on automated processing that produces legal or similarly significant effects;
- lodge a complaint with the CNPDCP and seek judicial remedy.

Requests are sent to office@airstream.md with the subject "Personal data" or to the registered address. Please state your name, contact details and the right you are exercising. Reasonable proof of identity may be required to prevent unauthorised disclosure. A reply is given, as a rule, within one month. For complex or numerous requests, this period may be extended by up to two further months; the person is informed of this and the reasons within the first month.

A complaint can be filed with the National Center for Personal Data Protection (CNPDCP): 48 Serghei Lazo St., Chișinău, MD-2004; e-mail: centru@datepersonale.md; phone: +373 22 820 801; website: datepersonale.md.

9. Data protection officer, minors and updates

Contact for data protection matters: office@airstream.md. AIRSTREAM assesses whether it is required to appoint a data protection officer under Articles 37-39. If the appointment is mandatory, the officer's contact details are published on the website and communicated to the CNPDCP.

The website and services are intended mainly for professional clients and are not aimed at collecting data from minors. If such data has been received without a proper basis, AIRSTREAM reviews the situation and deletes it or processes it only in accordance with the law.

The Policy is updated when legislation, the website, services, providers or processing operations change. The current version, with the date of the update, is published at www.airstream.md. Material changes are communicated in an appropriate way before they take effect, where the law requires it. The Policy enters into force on the date of publication on the website and remains in force until a new version is published.