

PRIVACY POLICY

Controller Identity

SOLUNA HARMONY S.R.L., with its registered office in Buftea, Ilfov County, registered with the Trade Register under no. 585919 dated 15.07.2025, unique registration code 52147285, represented by Pascu Mariana Alexandra, owner of www.harmonrise.com and personal data controller for the data processed through this website. This Privacy Policy applies to this website and we kindly ask you to read it in full.

Categories of Personal Data we process

As a personal data controller within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter referred to as "GDPR"), SOLUNA HARMONY S.R.L. processes the following categories of personal data through www.harmonrise.com, strictly necessary for fulfilling the stated purposes:

A. Identification data:

- First and last name;

B. Contact data:

- Email address;
- Telephone number;

C. Details regarding purchased services:

- Purchased service;

D. Technical data (cookies):

- IP address;
- Login data;
- Browser type;
- Location and time zone settings;

E. Preferences regarding receiving marketing communications.

In what situations do we collect and process your data?

We collect and process your personal data in the following situations:

- When you participate in online or offline events, paid or free of charge;
- When you register for a discovery call;
- When you subscribe to our newsletter;
- When we prepare the legal and necessary documents for registration, participation and completion of the programs we conduct;
- When we send marketing communications via email.

From whom and how we collect your personal data:

Your data may be collected:

- Directly from you, through web forms, by phone or by email;
- Indirectly, when another person purchases one of our services for you.

If you order a service/product for another person, you represent and warrant that you have obtained that person's prior consent for the processing of their personal data.

Where we ask you to complete personal data in order to provide access to certain website functionalities or services, we will mark certain fields as mandatory, as they are necessary to provide the requested service or access.

If you choose not to provide such information, you may not be able to benefit from those services or functionalities. In such cases, we may need to limit your access to a product or service you request, and we will notify you accordingly. For example, if you wish to book an online session, we will require your email address; without a valid email address, we cannot complete the booking process.

If we cannot verify your identity when you submit a request via the contact details provided on the website, we reserve the right not to respond to such request.

Purposes of Processing

- If you subscribe to our newsletter, we will process your personal data (first name, last name and email address) for marketing purposes and to manage your communication preferences. You may unsubscribe at any time, free of charge, by using the instructions included in each communication.
- Personal data will be used exclusively for the purpose of carrying out our business activities, namely: Online correspondence (first name, last name, email address); Providing alternative therapy and coaching services; Registration for events, courses and workshops (first name, last name, email address, phone number). Your data will not be further processed for purposes incompatible with those activities stated under this paragraph.
- If you participate in an event organized by us, your image may be published on our website and social media channels only with your explicit consent.
- Personal data processed for testimonials displayed on the website (first name, last name, profession/job title) will be disclosed only after obtaining your consent.
- We may also store and collect information through cookies, in accordance with our Cookie Policy.

Legal Basis for Processing

Personal data will be processed by SOLUNA HARMONY S.R.L. for the purposes mentioned above, based on your consent, the performance of a contract to which you are a party, or compliance with a legal obligation. Refusal to provide such data may result in the impossibility of accessing the requested services.

Pursuant to Article 7(3) GDPR, you may withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing carried out prior to withdrawal.

Recipients of Personal Data

Your non-sensitive personal data may be processed by third parties with whom we have contractual relationships, for purposes serving our legitimate or legal interests: WIX Analytics – website statistics; Mailchimp – newsletter services; WIX Booking – online scheduling; Zoom and Google Meet (Workspace) – for delivering online sessions. These providers act as data processors on behalf of SOLUNA HARMONY S.R.L.

We do not transfer personal data outside the European Economic Area, except where our service providers (Mailchimp.com, WIX.com, Zoom.com & Google Workspace - Google Meet) are certified to ensure adequate safeguards.

For further information, access:

Mailchimp Privacy Policy: <https://mailchimp.com/legal/privacy/>

WIX Privacy Policy: <https://www.wix.com/about/privacy>

Google Meet Security & Privacy:

<https://support.google.com/meet/answer/9852160?hl=en>

Zoom Privacy Statement: <https://www.zoom.com/en/trust/privacy/privacy-statement/>

We work only with internal or external providers offering sufficient guarantees of compliance with GDPR.

Certain categories of your personal data are transmitted to and may be processed by service providers with whom we have entered into contractual relationships, strictly for the purpose of delivering our services (and only for the purposes mentioned below), as follows:

1. Newsletter services (Mailchimp): email address;
2. Online appointment scheduling services (WIX Booking): first name, last name, email address;
3. Online analytics services (WIX Analytics): website interactions, duration of visit, pages viewed, region/city from which the website is accessed, purchases, IP address. Within these analytics services, personal data such as first and last name are not collected; the applications store and process only user actions and technical interaction data.

The Controller owns and operates the website www.harmonrise.com, which is associated with a WIX Analytics account. You may opt out of the retention of such analytics data by installing the WIX Analytics Opt-out Browser Add-on.

The personal data collected and processed are stored on the territory of Romania and will not be disclosed or transferred to third parties, except as expressly stated above. In such cases, we have ensured that our partners comply with GDPR requirements by executing appropriate data processing agreements or addenda to the existing contracts.

Please note that, where required by applicable law, your personal data may be disclosed to competent public authorities.

Data Retention Period

We limit the retention period of your personal data to what is necessary for the purposes for which it is processed. We delete personal data at your request, except where processing is required by a legal provision; in such cases, the data will be deleted within the timeframe established by the applicable legal requirement.

Personal data collected for the purpose of receiving Newsletter communications will be stored until you decide to stop receiving such messages and use the Unsubscribe button.

Personal data collected for the purpose of carrying out online correspondence with you will be stored until you request their deletion. Personal data displayed within Testimonials published on the website will be processed until you exercise your right to erasure as provided under applicable legislation. If any of the personal data you have provided to us changes, we kindly ask you to inform us as soon as possible so that we may update it accordingly.

Your Rights under the GDPR

The General Data Protection Regulation grants you a number of rights in relation to your personal data:

I. Right of Access

The data subject has the right to obtain from the controller confirmation as to whether or not personal data concerning them is being processed and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) GDPR, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

II. Right to Rectification

The data subject has the right to obtain from the controller, without undue delay, the rectification of inaccurate personal data concerning them.

Taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

III. Right to Erasure (“Right to Be Forgotten”)

The data subject has the right to obtain from the controller the erasure of personal data concerning them without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based pursuant to Article 6(1)(a) or Article 9(2)(a) GDPR, and there is no other legal ground for the processing;
- c) the data subject objects to the processing pursuant to Article 21(1) GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) GDPR;
- d) the personal data have been unlawfully processed;
- e) the personal data must be erased for compliance with a legal obligation under Union law or Member State law to which the controller is subject;
- f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1) GDPR.

IV. Right to Restriction of Processing

The data subject has the right to obtain from the controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- d) the data subject has objected to processing pursuant to Article 21(1) GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

V. Right to Data Portability

The data subject has the right to receive the personal data concerning them, which they have provided to the controller, in a structured, commonly used and machine-readable format, and has the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

VI. Right to Object

At any time, the data subject has the right to object, on grounds relating to their particular situation, to processing of personal data concerning them which is based on Article 6(1)(e) or (f) GDPR, including profiling based on those provisions.

The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

You also have the right to lodge a complaint with the National Supervisory Authority for Personal Data Processing.

If you wish to exercise your rights, you may do so by submitting a written, dated and signed request to the email address alexandra@harmonrise.com.

Your request must include a detailed description of the right you wish to exercise, and the response will be communicated to the email address from which the request was sent.

The rights listed above are not absolute. Exceptions apply, and each request received will be analysed in order to determine whether it is well-founded.

Where the request is well-founded, we will facilitate the exercise of your rights. Where the request is unfounded, we will refuse it, informing you of the reasons for refusal and of your right to lodge a complaint with the Supervisory Authority and to seek judicial remedy.

We will endeavour to respond to your request within 30 days. However, this period may be extended depending on the complexity of the request, the large number of requests received, or the impossibility of identifying you within a reasonable timeframe.

In order to respond to your requests, we may require additional information to verify your identity. If, despite making reasonable efforts, we are unable to identify you and you do not provide additional information, we are not obliged to comply with the request.

You will not be required to pay any fee for exercising your rights. However, we may charge a reasonable fee if your request is manifestly unfounded, excessive or repetitive. Alternatively, we may refuse to act on such request in these circumstances.

How We Protect Your Personal Data

We ensure the security of your personal data by implementing appropriate technical and organisational measures designed to protect it against unauthorised access, alteration, disclosure or destruction, unauthorised processing, accidental or unlawful loss.

We continuously review our internal personal data processing practices and policies (including physical and electronic security measures) in order to protect our systems against unauthorised access and other potential security threats.

We ensure that the personal data we process is limited to what is necessary, adequate and relevant for the stated purposes.

At the same time, we restrict access to personal data to the minimum necessary, namely to collaborators and other persons who need access to such data in order to process it and provide services. Our partners and collaborators are subject to strict confidentiality obligations (either contractual or statutory).

We use technologies aimed at ensuring the security of our clients and always seek to implement optimal data protection solutions. However, please note that no website, application or internet connection is completely secure.

Although we make constant efforts to ensure the security of the data entrusted to us, security incidents or breaches may still occur. In such cases, we will take all necessary measures to mitigate risks, remedy the security breach, recover data and restore the situation as quickly as possible.

As the transmission of information over the internet is not entirely secure, we cannot guarantee the security of data transmitted over the internet.