

**INFORMATION NOTICE  
REGARDING THE PROCESSING OF PERSONAL DATA**

**STEJARII BIRTHDAY - PROGRAM FOR LADY RESIDENT**

Taking into consideration the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (hereinafter referred to as "**GDPR**"), through this information, we, **Masterange Romania S.R.L.** – with headquarters in Bucharest, 1st District, 24-26 Nordului Road, 2nd Floor, room 25, in our capacity **as controller** (hereinafter referred to as "**Masterange**"), we transparently provide you with the details regarding the processing of personal data within the program "*STEJARII BIRTHDAY - for lady resident*", initiated with the **purpose of sending appreciations to the ladies who live in Stejarii - residential club** (congratulations/gifts on special occasions: birthdays, 1st of March - *Mărțișor*, others).

Please read this information notice carefully, as it contains important details about how and why we collect, use and disclose your personal data. This information notice also explains your rights in relation to your personal data and how you can contact us or address the supervisory authority.

For any information or requests regarding the processing of personal data or to exercise your rights in your capacity as data subject, you can use the following coordinates:

**Data protection officer:**

ITH Management Office S.R.L.

Address: 24-26 Nordului Road, 1st District, Bucharest

E-mail address: [dataprotection@tiriacimobiliare.ro](mailto:dataprotection@tiriacimobiliare.ro)

Phone: 021 431 21 49

**I. PERSONAL DATA PROCESSED, PURPOSES AND BASIS OF THE PROCESSING**

We **process** under art. 6 para. (1), letter f) of GDPR and for the **purpose** of sending appreciations, greetings/gifts, on the occasion of birthday or on other significant days for ladies, the following personal data:

- **name and surname;**
- **address of the apartment** occupied in Stejarii – residential club: block, staircase, apartment (e.g.: 9C55)
- **date of birth** (dd/mm/yy);
- **capacity as resident;**
- **gender** (M/F);

- **e-mail address.**

Data processing for this purpose will only be possible if you fill in the form available to you online, through the concierge service or in the link received by e-mail. This is: <https://stejarii.ro/birthday/>. You have direct access to this page and by scanning the existing QR code in all our communications regarding this program.

The refusal of the ladies to provide us with their date of birth and the permission to use the data from the form for the subsidiary purpose of sending greetings/gifts has no legal consequences, but it prevents us and we will not be able to send them our appreciation and congratulations.

Filling in the online form is considered your consent. You can withdraw the consent thus granted at any time by accessing the "**Consent withdrawal**" section from the same page of the link intended for enrollment in the program or by sending a request using the coordinates of the data protection officer indicated in the introductory part of this information notice or by submitting a request at the concierge service. The withdrawal of the consent does not affect the processing carried out prior to the date of receipt of this request from you, but only has effect for the future. From the date of withdrawal of the consent to the date of processing the request, up to 3 or 5 working days may pass.

At the same time, we process the personal data listed in order to archive and keep records of the consents granted by filling in the form, pursuant to art. 6 para. 1 letter f) of GDPR in order to satisfy our legitimate interest in documenting and carrying out these activities, including the activity of delivering greetings/gifts.

In certain cases, the personal data mentioned above will also be processed for the following purposes:

- (i) managing IT (information technology) systems, such as ensuring maintenance and performing security audits on our IT networks, pursuant to art. 6 para. 1 letter f) from GDPR, in order to achieve our interest in ensuring the proper functioning of the IT systems;
- (ii) information organization and efficient data management through the use of software programs;
- (iii) settlement of disputes, pursuant to art. 6 para. 1 letter f) of GDPR, in order to achieve our legitimate interest to request the ascertainment, to exercise or defend our rights in court or before any authority.

## **II. CATEGORIES OF RECIPIENTS OF PERSONAL DATA**

Personal data may be disclosed, strictly to the extent necessary for the purposes detailed previously or in cases where this is required by law, to the following categories of recipients:

- (i) companies authorized to perform processing on our behalf and for us, such as our

- suppliers (collaborators, IT systems maintenance services, etc.);
- (ii) lawyers, specialists in the fields of audit, legal, tax consultancy, accounting;
  - (iii) third parties expressly indicated by you;
  - (iv) third party acquirers, to the extent that our business would be transferred (in whole or in part) and the data of the data subjects would be part of the assets that are the subject of such a transaction.

### **III. TRANSFERS TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS**

We will not directly transfer personal data outside the European Economic Area. In exceptional situations and only if necessary, the transfer of personal data outside the European Economic Area will only be done by applying appropriate protection measures according to the specific legal provisions on the protection of personal data and by informing you correspondingly.

### **IV. STORAGE PERIOD**

Personal data will be processed for the purpose of sending greetings/gifts until the date on which your status as a resident of Stejarii – residential club ceases or, previously, until you withdraw your consent.

Afterwards, your data will be kept for a period of 3 years (for invoking the statute of limitations, plus 1 year – period required for archiving).

### **V. RIGHTS RELATED TO THE PERSONAL DATA PROCESSED**

Unless the Romanian/European law or GDPR provides otherwise, you have the following rights:

- (i) the right to be informed, as it happens in this Information Notice;
- (ii) the right of access, respectively the right to obtain a confirmation from us that we are processing your personal data, as well as access to them and the supply of information about the processing method;
- (iii) the right to rectification, which refers to the correction without undue delay, of inaccurate personal data and/or to the completion of incomplete data;
- (iv) the right to erasure/the right to be forgotten, i.e. the right to ask us to delete your personal data without undue delay, if these data is no longer necessary to fulfill the purposes for which it was collected and there is no other legal basis for the processing, the data was collected illegally or the data must be deleted in order to comply with a legal obligation;
- (v) the right to the restriction of processing, which applies if (i) you contest the accuracy of your personal data, (ii) the processing is illegal and you object to the deletion of your personal data, requesting instead the restriction of the processing, (iii) we no longer

need your personal data, but you request it for the ascertainment, exercise or defense of a right in court, (iv) you objected to the processing for the time interval in which it is verified whether our legitimate interests in processing your personal data prevail over your rights;

- (vi) the right to object to the processing, unless we demonstrate that we have legitimate reasons to process your personal data, which reasons prevail over your interests, rights and freedoms or for the ascertainment, exercise or defense of a right in court;
- (vii) the right to portability, i.e. your right to receive your personal data, which you have provided to us for the purposes indicated herein, in a structured, commonly used and machine-readable format, such as and the right to send this data to another controller;
- (viii) the right not to be subject to a decision based solely on automated processing, including profiling, which causes legal effects on you or affects you in a similar manner, unless such processing is necessary for the performance of the contract or is permitted by the law;
- (ix) the right to submit a complaint to the National Supervisory Authority For Personal Data Processing (ANSPDCP) at the postal address 28-30 G-ral. Gheorghe Magheru Blvd., 1st district, 010336 Bucharest or according to the instructions on the website [www.dataprotection.ro](http://www.dataprotection.ro).

With the exception of the right to file a complaint before ANSPDCP, you can contact us using the contact details indicated in the introductory part of this information notice in order to exercise the above rights.

## **VI. SECURITY OF PERSONAL DATA**

We inform you that we have implemented appropriate technical and organizational measures in order to ensure a level of security corresponding to the personal data processed. When assessing the appropriate level of security, we take into account in particular the risks presented by the processing of personal data, generated in particular, accidentally or illegally, by the destruction, loss, modification, unauthorized disclosure or unauthorized access to the personal data transmitted, stored or processed in any other manner. We also ensure that access to personal data is granted to our staff only to the extent necessary for the performance of work duties.

## **VII. AUTOMATED DECISIONS AND PROFILING**

The personal data referred to in this information notice is not subject of profiling or automated decision-making.