



INFORMATION NOTICE

regarding the processing of personal data belonging to the guests at the event of November 13, 2022 organized at Stejarii - The Residential Club

We, **Masterange Romania SRL**, headquartered in Bucharest, Șos. Nordului no. 24-26, District 1, Bucharest, registered at the Trade Register under no. J40/3330/2003, having the Tax registration code RO15262492, hereinafter referred to as the "**Company**" or the "**Controller**", **we provide you with all the information regarding the processing of your personal data in the context of participation as a guest in the event organized by us on November 13, 2022 ("the Event")**, according to the provisions of art. 13, respectively art. 14, of the General Data Protection Regulation ("**RGPD**").

For details on the processing of your personal data, but also to exercise your rights according to the RGPD, our data protection officer can be contacted by any of the methods described below:

- Post/courier: Șos. Nordului, 24-26, district 1, Bucharest;
- Email to: **dataprotection@tiriachimobiliare.ro**;
- Phone: **0040214312149**.

Your personal data is obtained by us directly from you, as a customer, from the entity whose legal, conventional or designated representative you are or from your friends/acquaintances who live in Stejarii – The Residential Club. The generic term **invited** will be used in this document regarding any person who receives an invitation to the Event.

This information details when, how and why we, **Masterange Romania SRL**, as the controller, process the personal data of the **Guests**, how we use them, how we store them, what are your rights as data subjects and how they can be exercised.

I. What data do we process? The purposes and grounds on which we do the processing.

- 1. For the purpose of sending invitations and the records of the Guests, we process the following personal data: name, surname, email address, telephone number and position (the latter exclusively in the case of representatives of legal entities). The legal basis for the processing of your personal data is **the legitimate interest pursued by us to organize the Event in optimal conditions and to promote the residential complex**, according to art. 6 para. (1) lit. (f) of the GDPR.**

The record keeping period is 5 years from the end of the financial year of the year in which the Event took place.



To promote the Event we will film, photograph and allow guests to take their own photographs. For this purpose we can process the image, voice and location of the guests. From the entire archive of films and photos that will be taken on the occasion of the Event, we will select a part that will be promoted in the online and social media environment. We can also create promotional materials that will be posted on the YouTube channel. As a rule, in the mass media, social networks, online - public - we will not try to include photos or films that lead to the identification of the Guests. It is very possible, however, that some images or films still capture the image of the guests. In this context, the legal basis for the processing of this personal data is **your consent** expressed by participating in the Event according to art. 6 para. (1) lit. (a) of the GDPR. Also, these personal data will also be processed based on **our legitimate interest to promote the event and Stejarii - The Residential Club**, according to art. 6 para. (1) lit. (f) of the GDPR. This processing is carried out on our behalf by an authorized person, based on a contract regarding photo/video services and with which we have signed specific agreements regarding the protection of personal data, personal data not being processed by this person for other own purposes, but only by us for the aforementioned purposes.

The storage period for photo-video materials is 5 years from the date of the Event. The images will be stored on electronic media in Romania. They will not be distributed for storage to other people, regardless of their quality, with the exception of service providers who have the obligation to delete them after the creation of promotional materials according to this purpose of processing and for whom we have taken the necessary technical and organizational measures according to the RGPD.

- 2. By participating in the Event, visit its location**. We will process your personal data (respectively, your identification data: name, surname, series and number of the identity document, as well as your image and data regarding the physical location) **in order to ensure the security and protection of the space where the Event takes place, but and the goods, values and people in this space. We process this data** by using the video surveillance system of the space intended for the Event. The processing is done according to the provisions of art. 6 para. (1) lit. (c) from the RGPD (this obligation is provided for by Law no. 333/2003 on the protection of objectives, assets and values and the protection of persons, amended and supplemented, HG 301/2012 approving the methodological norms for implementation), as well as for (ii) satisfying **our legitimate interest to protect our spaces** according to art. 6 para. (1) lit. (f) of the GDPR. This processing may be carried out on our behalf by an authorized person, based on a contract and with whom we have signed specific agreements on the protection of personal data, personal data not being processed by him for purposes other than those mentioned above.

The storage duration of the images captured by the surveillance cameras is 30 days, and the deletion is done by overwriting. In the case of the visitors' access register, the data contained in these registers will be kept for a period of 2 years by the service provider or the authorized person, according to art. 10, para. (2) from the 2012



Methodological Norms for the application of Law no. 333/2003 regarding the protection of objectives, assets, values and the protection of persons, with subsequent amendments and additions.

3. In addition and in addition to the previously indicated purposes, we will process your personal data for the following subsequent and/or subsequent purposes, if and as the case may be:
 - a) **for compliance with the legal norms** that regulate different segments of our activity, such as: reporting obligations to public authorities and institutions, obligations in financial and accounting matters, as well as any other obligations that may derive from the normative acts in force at a given time and which are applicable to us.
 - b) **for the exercise and defense of our rights** , including before public authorities and courts or arbitration, according to art. 6, para. (1), lit. f) from GDPR. Depending on the specific situation, personal data will be stored according to the retention terms established by the internal nomenclature, taking into account the applicable laws.
 - c) **for managing IT systems** (information technology), such as ensuring maintenance and carrying out security audits on our IT networks, pursuant to art. 6 para. 1 lit. f) of the GDPR, in order to achieve our legitimate interest in ensuring the security and proper functioning of IT systems and the entire infrastructure. *The personal data existing in our IT systems will be kept according to the legal terms or established according to the main purpose of the processing described above.*
 - d) in order to archive the films and photos taken electronically, according to art. 6 para. 1 lit. f) from RGPD or according to legal retention obligations;

II. Disclosure or transmission of your data to third parties

1. In thoroughly justified situations, for the purposes detailed above, the **Controller** may disclose your personal data to third parties, respectively to:
 - a) Service providers - companies within the Țiriac Group, for the provision of services or, at your request, to respond to questions, requests or comments;
 - b) judicial or arbitral tribunals and/or other public authorities, related to the activity of these authorities to the extent that the transmission of data to them is required by law and/or is necessary in case of litigation or settlement of a dispute, as well as in case of controls or legal requests in which we have the obligation to make them available (for example ANSPDCP, police, prosecutor's office, others);
 - c) lawyers, specialists in the fields of audit, legal, tax consultancy, data protection, for the development of business activities or at your request, to answer questions, requests or comments, or, as the case may be, if these service providers carry out data processing activities personal data as our proxies, in compliance with legal conditions and guarantees;



- d) third parties expressly indicated by you;
- e) our service providers (for example: outsourced data protection officer, security and protection service providers, translation service providers, insurance services, cloud services, IT services and maintenance of IT systems, providers of IT systems, providers archiving services, etc.), for the development of our business activities or at your request, to respond to questions, requests or comments, or, as the case may be, if these providers carry out personal data processing activities as our proxies, with compliance with legal conditions and guarantees;
- f) third party acquirers, to the extent that the activity of **Masterange Romania SRL** would be transferred (in whole or in part) to another entity, and the data of the data subjects would be part of the assets that are the subject of such a transaction, based on a legitimate development interest and adaptation of our business activities.

The disclosure of your personal data to our service providers who act as persons authorized by the controller, are limited to the information strictly necessary for the provision of those services, these providers having the contractual obligation not to use the personal data processed on our behalf for no other purpose.

- 2. As a rule, we will not transfer your personal data outside the European Economic Area, respectively in countries that are not agreed as ensuring an adequate level of data protection. In exceptional situations and only if necessary, the transfer of your personal data outside the previously described area will only be done with the application of adequate guarantees and protection measures according to the specific legal provisions on the protection of personal data and with your appropriate information .

III. Your rights regarding personal data

Except in situations where Romanian law or RGPD provides otherwise, you have the following rights:

- 1. the right to be informed, as it happens in this information notice;
- 2. 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 provision of information about the processing method;
- 3. the right to rectification, which refers to the correction without undue delay, of inaccurate personal data and/or to the completion of incomplete data;
- 4. the right to erasure(delete)/the right to be forgotten, i.e. the right to obtain the erasure without undue delay of personal data collected or otherwise processed, if these data are no longer necessary to fulfill the purposes for which they were collected and there is no other legal basis for processing, the data was collected illegally or the data must be deleted to comply with a legal obligation;
- 5. the right to restriction of processing, which applies if (i) you dispute the accuracy of the personal data, (ii) the processing is illegal and you object to the deletion of the personal data, requesting instead the restriction of processing, (iii) we no longer we need your personal data, but you request it for establishing, exercising or defending a right in court, or (iv) you have objected to the processing for the time period in which it is verified that



- our legitimate interests in the processing of the personal data personally overrides your rights;
6. the right to object to the processing , unless we demonstrate that we have legitimate reasons to process your data, reasons that prevail over your interests, rights and freedoms or to establish, exercise or defend a right in court;
 7. the right to portability , i.e. your right to receive the personal data, which you have provided us for the purposes indicated herein, in a structured, commonly used and machine-readable format, as well as the right to send this data to another Controller (to the extent that this transfer is technically feasible), if the processing is based on your consent or a contract and the processing is carried out by automated means;
 8. the right to file a complaint in court and/or before the National Authority for the Supervision of Personal Data Processing (headquarters: Bucharest, Bdul Gen. Gheorghe Magheru no. 28-30, sector 1, CP 010336; phone: +40.318. 05.92.11, fax: +40.318.05.96.02 email: anspdcp@dataprotection.ro, website: www.dataprotection.ro);
 9. the right not to be the subject of a decision based exclusively on automated processing, including profiling , which produces legal effects on you or affects you in a similar way, unless such processing is necessary for the performance of the contract or is permitted by law or is based on your explicit consent.

With the exception of the right to file a complaint in court and/or before the National Authority for the Supervision of Personal Data Processing, according to the above, these rights can be initially exercised by sending a written request:

- ✓ by post, to the address: Bucharest, Șoseaua Nordului, no. 24 – 26, sector 1, Romania;
- ✓ by email, to the address: dataprotection@tiriachimobiliare.ro;
- ✓ Telephone: 0040214312149.

Please note that if we have any doubts about the identity of the access requester, we may ask for additional information to confirm the identity.

If you have addressed the Company or sent us a request to exercise the rights recognized by the RGPD, you will receive a response within one month at the latest from the receipt of the request. The period can be extended by two months, for justified situations and with your appropriate information.

If, after receiving our answers, you consider that your personal data have not been treated properly and in accordance with the law, you can contact the National Authority for the Supervision of the Processing of Personal Data to file a complaint or you can address the competent courts.

Contact details of **the National Authority for the Supervision of Personal Data Processing**:

- address: Bucharest, Bdul Gen. Gheorghe Magheru no. 28-30, district 1, CP 010336
- telephone: +40.318.05.92.11
- fax: +40.318.05.96.02
- email: anspdcp@dataprotection.ro
- website: www.dataprotection.ro



IV. Storage of personal data

The hosting and storage of your personal data takes place on our servers in Romania.

The storage of data is also done in the programs and applications that we use in the current activity, provided and/or developed and/or implemented on the local workstations of our staff, but it is possible that they are also stored on the workstations and local servers of our headquarters and work points . We ensure the existence of the necessary technical and organizational measures to keep your data safe.

We assure you that we use all reasonable efforts to protect your personal data in our possession or control by establishing reasonable security measures to prevent unauthorized access, collection, use, disclosure, copying, modification or deletion, and of other similar risks, applied to all storage methods described previously.

V. Automated decision making and automated profiling

The personal data referred to herein are not subject to automated processes.

Date: November 9, 2022