



INFORMATION NOTICE

regarding the processing of personal data belonging to residents in order to conduct the Exit Survey - 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 all the information regarding the processing of your personal data in the context of participation to the Exit Survey - Stejarii the Residential Club**, 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: Sos. Nordului, 24-26, district 1, Bucharest;
- Email to: **dataprotection@tiriachimobiliare.ro**;
- Phone: **021-4312149**.

Your personal data is obtained by us, as the case may be, directly from you as a customer or occupant, from the entity that signed the rental contract or from the entity whose legal, conventional or appointed representative you are

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

I. PERSONAL DATA PROCESSED, PURPOSES AND THE LEGAL GROUNDS OF PROCESSING

1. In order to send the invitation to participate in the survey, we process personal data, respectively: name, first name, apartment number, e-mail address.

2. For the direct purpose of processing the survey, we process the following personal data: apartment number lived in, e-mail address, date of expression of consent, general data resulting from the questionnaire with the questions we ask you and the IP transmitted by the device on who accessed the survey.

The legal basis for the processing of personal data is our legitimate interest (Art. 6 para. (1) letter (f) of the RGPD) to improve the quality of life in Stejarii - the residential club, for which purpose we want to know the reasons that determine a tenant to leave the space and whether or not these reasons are related to life, comfort and services in Stejarii - the residential club, but we consider that the processing takes place based on your consent given according to art. 6 para. (1) lit. (a) from the General Data Protection Regulation no. 679/2016 (RGPD), expressed by accessing the link received by e-mail. This consent is requested for a single survey upon departure from Stejarii - the residential club.



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) reporting to the authorities** according to the legal obligations we have, based on art. 6 para. 1 lit. c) from GDPR;
- b) 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) from GDPR, in order to achieve our interest in ensuring the proper functioning of IT systems;
- c) settlement of disputes**, pursuant to art. 6 para. 1 lit. f) of the GDPR, in order to achieve our legitimate interest in requesting the finding, exercising or defending our rights in court.
- d) in order to archive electronically and maintain records of the consents** granted by accessing the link dedicated to the survey, pursuant to art. 6 para. 1 letter f) of the GDPR in order to satisfy our legitimate interest in documenting these activities.

II. CATEGORIES OF RECIPIENTS OF PERSONAL DATA

1. 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:

- a)** companies authorized to perform processing on our behalf and for us, such as our service providers (contract management, marketing services, IT system maintenance services, cloud service providers, etc.);
- b)** lawyers, judicial or arbitral tribunals and/or other public authorities (including, but not limited to the National Authority for the Supervision of the Processing of Personal Data); Service providers - companies within the Țiriac Group, for the provision of services or, at your request, to respond to questions, requests or comments, including requests addressed to the data protection officer;
- c)** third parties expressly indicated by you;
- d)** 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.

2. 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.

III. TRANSFERS TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

1. 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 .

IV. STORAGE PERIOD

1. Personal data processed for the purposes mentioned in this information note will be kept for a period of **3 (three) years from the date of termination of the rental contract**, with the exception of those data that are relevant from a legal point of view, for actions or the defense of our rights in court, which will be kept for a period of 10 years from the date of termination of the litigation, according to the applicable legal provisions.

V. RIGHTS RELATING TO PERSONAL DATA PROCESSED

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, respectively 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 withdraw your consent. This right is applicable if your data is processed as a result of the expressed consent, in which case you have the possibility at any time to send an e-mail to the address: concierge@stejarii.ro, to contact directly the Concierge Office on the premises Stejarii – Residential Club or send an address by post/courier to the address in: Sos. Nordului, 24-26, sector 1, Bucharest, to inform us that you no longer agree with the processing of personal data.
The withdrawal of consent does not affect the legality of the processing carried out on the basis of the consent before its withdrawal. Withdrawal of consent to the processing of your personal data has the effect of stopping the processing for the future.
8. the right to portability, respectively 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);



9. 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);
10. 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 RGD, 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.

VI. SECURITY OF PERSONAL DATA

The hosting and storage of your personal data takes place on our servers in Romania, but it is possible that in the future we will use cloud services for electronic archiving, in the EU or the European Economic Area.

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 places of work.

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 way. 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 herein are not subject to automated processes.



VIII. REFUSAL OF PROCESSING AND ITS CONSEQUENCES

The refusal to give consent or to process the data in the survey has no legal or other consequences for you, but is simply manifested by the lack of response to the e-mail and the failure to complete the survey.