



**PRIVACY NOTICE**  
**regarding the processing of personal data**  
**belonging to the guests for STEJARII BBQ PARTY**  
**organized at Stejarii - The Residential Club**

We, **Masterange Romania S.R.L.**, headquartered in Bucharest, 24-26 Nordului Road, 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*", the "*Controller*" or "*Masterange*", hereby provide you with all the necessary information about how and why we collect, use and disclose your personal data in the context of your participation as a guest for the event **STEJARII BBQ PARTY organized by us on October 21, 2023 ("the Event")**, according to the provisions of art. 13, respectively art. 14, of the General Data Protection Regulation ("**GDPR**").

For any other information or requests regarding the processing of your personal data, or to exercise your rights according to the GDPR, you can contact our **Data Protection Officer** using the following contact details:

**ITH Management Office S.R.L.**

- Address: 24-26 Nordului Road, District 1, Bucharest;
- Email to: [dataprotection@tiriachimobiliare.ro](mailto:dataprotection@tiriachimobiliare.ro);
- Phone: 0040214312149.

**Please read this Privacy Notice carefully, as it contains important information for you!**

Your personal data is obtained by us directly from you, as a Resident (lessee or occupant), from the entity whose legal, conventional, or designated representative you are or from your friends/acquaintances who live in Stejarii – The Residential Club or Stejarii Collection and who provided you with the invite to this Event. The generic term „**Guest**” will be used in this document regarding any person who receives an invitation to the Event.

This Privacy Notice outlines when, how, and why we, Masterange, as the data controller, process the personal data of Guests, how we use them, how we store them, what your rights are as data subjects, and how these rights can be exercised.

**I. PERSONAL DATA PROCESSED, PURPOSES, GROUNDS OF THE PROCESSING AND RETENTION PERIODS**

Your decision to participate in the Event implies acceptance of the conditions for the organization of the Event, both for you and for any accompanying adult or child and the parental consent to participate is presumed. In order to organize or promote the Event, the Controller (and, where applicable, our partners, collaborators, or suppliers), will process certain personal data of the Guests to the Event, according to the details mentioned below.

Thus, personal data is processed as follows:

- 1. In order to register for the Event, for correspondence regarding participation details, and also to keep a record of Guests for a good organization of the Event, we process identification data** (name, surname, apartment no, block, staircase, complex) **contact data** (email address, telephone number), as well as the information provided during the correspondence, and which may constitute personal data. The legal basis for the processing of your personal data is **the**



**legitimate interest pursued by us to organize the Event in optimal conditions**, 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.*

- 2. In order to promote the Event**, we will make photos in dynamics, and we will allow guests to take their own photos. For this purpose, we can process the image and location of the guests. From the photos that will be taken on the occasion of the Event, we will select a part that will be promoted in the online and on social media platforms, and for the others we will organize the photo archive. As a rule, on social media platforms, which are public, we will not seek to include photos leading to the identification of the Guests.

**It is quite possible, however, that some photos may still capture the image of the Guests. Therefore, your participation represents your consent to this processing of your personal data.**

**Depending on the context, legal basis may be:**

- in case of ambient images (wide-frame photo materials, which aim to capture the general atmosphere of the Event, without the purpose of identifying individuals), data processing is carried out on the basis of our legitimate interest in coordinating the smooth progress of the Event and for promoting our brand image.
- in case of close-up images (portrait photo materials, or which have individuals in the foreground), data processing is carried out on the basis of your consent expressed to the Event photographers, both for yourself and for the children that accompany you. For this purpose, the consent can be expressed by any clear means whereby you express your consent (even verbally or even by your conduct in front of the camera) to be photographed. **If you do not wish to appear in these close-up images, please express your refusal to the photographers.**

*The storage period for photo materials is 5 years from the date of the Event. The images will be stored on electronic media.*

- 3. To ensure and maintain security and protection of the premises, property, assets, and individuals, in accordance with our obligations to maintain the Registers of Access for Persons and Vehicles, in the event that you are invited as Guest of the Residents, we will process identification data** (name, surname, ID card series and number, vehicle registration number), as well as **access data** (details of entry/exist times).

**Furthermore, within our premises, we utilize video surveillance systems.** In this context, the video systems collect data including video/photo images of individuals and/or vehicles within or in the vicinity of our premises, vehicles registration numbers, or other information that, through association, can become personal data. **The legal basis for processing is the necessity to fulfil legal obligations** imposed on us by the applicable legislation concerning the protection of premises, property, assets, and the safeguarding of individuals, specifically Law no. 333/2003, as amended, in accordance with art. 6 (1)(c) of the GDPR. Additionally, **in the legitimate interest of preventing property loss or damage**, as well as to establish or exercise a right, or defend in the context of legal claims, in accordance with art. 6 (1) (f) of the GDPR.

**The storage duration** for data in the Registers of Access for Persons and Vehicles is 2 years from the date of collection, in accordance with applicable legal provisions, plus the general statutory limitation period of three years. **The storage duration for data obtained through the video surveillance system is 25 days**, except in cases expressly regulated by law or in well-justified circumstances (for example, in the case of an investigation, requests from authorities, requests



from you, or in case of a dispute). Relevant images will be retained for the entire duration of such circumstances and subsequently, in accordance with applicable limitation periods. In the event of the exercise of a right, we will retain proof of the resolution of your request in accordance with applicable limitation periods. Upon expiration of the storage periods, the data will be securely destroyed or overwritten, as applicable, based on the storage medium.

4. In addition to the previously indicated purposes, we will process your personal data for the following subsequent and/or later 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, the obligation related to providing you with the necessary information about the manner in which we process your data, 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 defence 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, considering the applicable laws.
  - c) **for managing IT systems** (information technology), such as ensuring maintenance and carrying out security audits on our IT systems and 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 photos taken electronically, according to art. 6 para. 1 lit. f) from RGPD or according to legal retention obligations.

## II. CATEGORIES OF RECIPIENTS

Personal data may be disclosed, only to the extent necessary for the purposes detailed above or in cases required by law, to the following categories of recipients who may act as independent controllers, joint controllers, or persons authorized by the controller, as follows:

- a) **Service providers:**
  - companies within the Tiriac Group, for the provision of services (such as marketing, outsourced data protection officer, event organization),
  - security and protection services,
  - cloud services,
  - communication services,
  - audit services,
  - archiving services,
  - maintenance services,
  - IT systems,
  - anonymization services for the photo images,
  - photo services.
  - social media platform, as the case may be, such as Facebook, Instagram, YouTube (in these cases, please consult their privacy notices available as follows <https://www.facebook.com/privacy/explanation>, <https://help.instagram.com/519522125107875>, <https://policies.google.com/privacy?hl=en>).
- 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 etc.;
  - d) third parties expressly indicated by you;
  - e) third party acquirers, to the extent that the activity of Masterange 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.

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

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 area described above will be made only by applying adequate guarantees and protection measures according to the specific legal provisions on the protection of personal data and with your appropriate information.

### IV. YOUR RIGHTS REGARDING PERSONAL DATA

Except the cases in which Romanian law or GDPR provides otherwise, you have the following rights:

- a) **The right to be informed**: The controller facilitates this right by making available this Information Notice, as well as other particular information notices when requesting your personal data.
- b) **The right of access** to personal data concerning you: you have the right to obtain confirmation as to whether or not your personal data is being processed by the Controller and, if affirmative, to have access thereto and to obtain information on the processing, under the conditions of art. 15 of GDPR.
- c) **The right to request the rectification** of personal data, if it is incorrect or incomplete, under the conditions of art. 16 of GDPR.
- d) **The right to request deletion** of personal data: you have the possibility to request the Controller to delete your personal data if (i) the data is no longer necessary for the purposes for which it was collected or processed, (ii) the legal basis for the processing is your consent and you withdraw your consent and there is no other legal basis to continue the processing, (iii) you exercise your right to object (where applicable) and the Controller has no overriding legitimate basis to continue the processing, (iv) the data has been processed unlawfully, (v) the deletion is necessary for compliance with EU or Romanian law.

Please note that the right to deletion is not an absolute right and we may continue the processing of your personal data when the above conditions are not applicable or when the processing is necessary for (i) exercising the right to free expression and information, (ii) compliance with a legal obligation, (iii) archiving in the public interest or (iv) establishing, exercising or defending a right in court.

- e) **The right to request restriction** of the processing: you have the right to obtain the restriction of processing in cases where: (i) you consider that the processed personal data is inaccurate, for a period of time that allows the controller to verify the accuracy of personal data; (ii) the processing is illegal, but you do not want us to delete your personal data, but to restrict the use of such data; (iii) if the data controller no longer needs your personal data for the purposes mentioned above, but you need the data in order to establish, exercise or defend a right in court; or (iv) you have



objected to the processing, for the period of time in which we verify whether the legitimate grounds of the data controller prevail over the rights of the data subject;

f) **The right to withdraw your consent at any time**

You have the right to withdraw your consent at any time by submitting a request using the contact details indicated on the first page of this information.

g) **The right to object** to the data processing on grounds related to your particular situation, when the processing is based on the legitimate interest of the Controller.

Please note that, even in case of exercising the right to object, we will still be able to process your personal data if we demonstrate that your rights and freedoms do not prevail over our legitimate interest.

h) **The right not to be subject to a decision based exclusively on automated processing**, including profiling, which causes legal effects on you or similarly affects you in a significant manner.

i) **The right to data portability**, meaning the right to receive your personal data that you have provided to the Controller in a structured, commonly used and machine-readable form, as well as the right to transfer that data to another controller, if the processing is based on your consent or the performance of a contract and is carried out by automatic means.

j) **The right to file a complaint** with the National Supervisory Authority for Personal Data Processing (ANSPDCP) or another competent supervisory authority. The contact details of the National Supervisory Authority for Personal Data Processing:

- address: Bucharest, 28-30 Gen. Gheorghe Magheru Blvd., 1st District, PC 010336
- phone: +40.318.05.92.11
- fax: +40.318.05.96.02
- email: [anspdcp@dataprotection.ro](mailto:anspdcp@dataprotection.ro)
- website: [www.dataprotection.ro](http://www.dataprotection.ro)

k) **The right to appeal to courts**

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.

## V. STORAGE OF PERSONAL DATA

Personal data processed for the purposes mentioned in this information notice will be kept only for as long as necessary, as described above, respectively until your consent is withdrawn in case of the processing based on this legal basis. Subsequently, we will remove/delete personal data from our systems and records and/or take steps to anonymize them so that you can no longer be identified. We will take all reasonable steps to ensure the deletion of personal data transmitted to the recipients for the aforementioned purposes. If tax-relevant data exists in the context of the processed data, they will be kept for a period of 10 years calculated from the end date of the last financial year of the period, according to the applicable legal provisions.

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.

## VI. AUTOMATED DECISION MAKING AND PROFILING

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

**Adopted on 12.10.2023.**