



PRIVACY NOTICE
regarding the processing of personal data
"Stejarii and Range Rover Celebration" Event

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 relevant information about how and why we collect, use and disclose your personal data in the context of your participation at the event "**Stejarii and Range Rover Celebration**" organized by us on **November 25, 2023** ("the Event"), according to the provisions of art. 13, respectively art. 14, of the General Data Protection Regulation ("**GDPR**").

For the organization of this Event, Masterange acts as a Joint Controller together with Premium Auto S.R.L., headquartered in Bucharest, 42-44 Bucuresti-Ploiesti Road, Corp B1, District 1, registered with the Trade Registry under no. J40/12451/2003, with VAT ID RO 15744416, as the importer of Jaguar Land Rover automotive products.

In this regard, the photos/videos captured during the Event, according to point I.3. below, will also be transmitted to Premium Auto, to allow them to demonstrate the organization of the Event in relation to the Jaguar Land Rover manufacturer, based on its legitimate interest to comply with the manufacturer's requirements, according to Article 6(1)(f) of the GDPR. It is emphasized that the primary purpose of the photos/videos is to capture the environmental context and not to identify participating individuals. For more details, please refer to point I.3. below.

The Joint Controllers have concluded an Agreement defining the purposes and means of jointly conducted processing activities related to this Event. Responsibilities regarding ensuring transparency, legality, and fairness of processing activities, limiting the processing purposes, minimizing data, ensuring data accuracy, and limiting the storage period have been allocated. Additionally, responsibilities related to ensuring the security of personal data have been assigned to the operators.

The Joint Controllers have designated a **single point of contact**. Therefore, for any information or requests regarding the processing of personal data covered by this Privacy Notice or for the exercise of your rights as a Data Subject concerning the processing of personal data, as detailed below, you can contact our Data Protection Officer using the following coordinates:

ITH MANAGEMENT OFFICE S.R.L
Address: 24-26 Nordului Road, Sector 1, Bucharest
Email address: dataprotection@tiriachimobiliare.ro
Tel. 0040-21-4312149

In accordance with Article 26(3) of the GDPR, it is mentioned that you have the possibility to exercise your rights against any of the Joint Controllers.

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 Lessee or from the entity whose legal, conventional, or designated representative you are.

This Privacy Notice outlines when, how, and why we, Masterange, as the data controller, process your personal data, 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.

Personal data is processed as follows:

- 1. For the purpose of sending the invitation in electronic format**, we process your **identification data** (name, surname) **and your contact information** (email address), based on Article 6(1)(a) of the GDPR in case you have given consent to receive such messages.
- 2. For your registration to the Event, as well as for correspondence regarding participation details, and to maintain a record of participants for a good organization of the Event**, we process **identification data** (name, surname, apartment, staircase, floor, complex, the age of the child/children) **contact data** (email address, telephone number), **data regarding the registration** (registration list number), as well as **any 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.
- 3. In order to promote the event, we will capture environmental photos/video that will include the location (wide-angle shots aimed at capturing the overall atmosphere of the event without the purpose of identifying individuals) for the following purposes:**
 - a. To enhance our brand image** (from the photos/video taken during the event, we will select some materials for **online promotion and on social media**, while the others will be archived), and also
 - b. To transmit them to Premium Auto, as a partner in this Event, so that it can provide evidence of the Event's organization in accordance with the requirements of the Jaguar Land Rover manufacturer, based on its legitimate interest, according to Article 6, paragraph 1, letter f).**

As a general rule, we will not seek to capture photos/video that lead to the identification of participants.

However, it is quite possible that some photos/video may still capture the image of participants. As a result, the processing is carried out based on your consent expressed through your participation in the event, both for you and for your child/children.

In the case of close-up images/video (portrait-type photo/video materials, or those featuring individuals), you can express your preference regarding Event photos/video (even verbally or through your conduct in front of the camera). If you do not wish to appear in these close-up/portrait frames, please express your refusal.



No filming or photography will be captured in the area designated for children.

The retention period for the photo/video materials is 5 years from the date of the event.

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/video 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) **Our Partner, Premium Auto, according to section I.3., as well as Jaguar Land Rover;**
- b) **Service providers:**
 - event organization services,
 - marketing services,
 - cloud services,
 - communication services,
 - audit services,
 - archiving services,
 - maintenance services,
 - IT systems,
 - anonymization services for the photo/video images,
 - outsourced data protection officer,
 - photo/video 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>).
- c) 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);

- d) lawyers, specialists in the fields of audit, legal, tax consultancy etc.;
- e) third parties expressly indicated by you;
- f) 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
- website: 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

The personal data processed for the purposes mentioned in this notice will be kept as described above, until you withdraw your consent in the case of processing based on this legal basis or will be retained for the duration of the statutory limitation period to protect our rights, and in the case of data with tax relevance, they will be retained for 5/10 years, calculated from the end of the last financial year, in accordance with applicable legal provisions. Subsequently, we will delete/remove the personal data from our systems and records, or take measures to anonymize them so that you can no longer be identified. We will take all reasonable measures to ensure the deletion of personal data transmitted to recipients for the purposes mentioned above.

We assure you that we make all reasonable efforts to protect your personal data in our possession or under our control by establishing reasonable security measures to prevent unauthorized access, collection, use, disclosure, copying, alteration, or deletion, as well as other similar risks, applied to all storage methods described above.



VI. AUTOMATED DECISION MAKING AND PROFILING

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

Adopted on 16.11.2023.