

PRIVACY NOTICE
regarding the processing of personal data
- satisfaction survey-

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 conducting the satisfaction survey regarding the quality of the services provided by the Concierge Office ("Survey,,).

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@tiriacimobiliare.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).

I. PERSONAL DATA PROCESSED, PURPOSES, LEGAL BASIS

Personal data is processed as follows:

- 1. When we contact you to express your option regarding your participation in the satisfaction survey regarding the quality of services of the Concierge Office**, we process your identification data (name, surname) and your contact data (email address, phone number), as well as the expressed option, based on Article 6(1)(f) of the GDPR, to document your option so that the survey is transmitted only to residents who have given their consent in this regard.

Refusal to give consent to participate in satisfaction surveys has no consequences for you, but your opinion may lead to the improvement of the services provided.

- 2. If you have consented to participate in the satisfaction survey during the phone interaction**, we will send the survey form to the email address provided by you. In this form, you will be able to allocate a rating based on the level of satisfaction you experienced during the interaction with the Concierge Office, and you will also have the opportunity to provide detailed feedback (e.g., regarding communication, understanding of requests, appropriate attire, responsiveness, and client attitude of the Concierge Office).

When necessary, after completing the survey form, we may contact you by phone to better understand the situations you have reported, so that we can improve the services provided.

Subsequently, we will aggregate the responses provided to identify areas that require improvement, in order to implement the necessary measures to ensure a high level of satisfaction among residents, and to improve the quality of services provided. Therefore, we will process the following personal data: name, surname, email address, phone number, responses provided in the satisfaction survey.

The legal basis for processing your personal data is your consent expressed by completing the received form, according to Article 6(1)(a) of the GDPR.

- 3. In addition to the previously indicated purposes, your personal data will also be processed for the following subsequent and/or secondary purposes, if and as the case may be:**
- a) for compliance with legal norms**, such as in the case where you exercise your GDPR rights, or when we have the obligation to respond to requests addressed by certain authorities (e.g., ANSPDCP), according to Article 6(1)(c) of the GDPR;
 - b) for the exercise and defence of our rights**, including before public authorities and courts or arbitration bodies, according to Article 6(1)(f) of the GDPR;
 - c) for the management of IT systems, networks, and equipment** (information technology), such as ensuring maintenance and conducting security audits, based on Article 6(1)(f) of the GDPR, in order to achieve our legitimate interest in ensuring the security and proper functioning of the entire infrastructure.

II. WITHDRAWAL OF CONSENT

You can withdraw your consent at any time, for example by contacting our Data Protection Officer using the coordinates available on the first page of this notice, or by using the unsubscribe link in the email you will receive with the invitation to participate in satisfaction surveys. If you subsequently choose to express your consent again to participate in satisfaction surveys, we will take your option into account.

III. 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 processors, as follows:

- a) Service providers:**
 - business administration and management services (Fergus Construct International S.R.L., ITH Management Office S.R.L)
 - cloud services,
 - communication services,
 - audit services,
 - archiving services,
 - maintenance services,
 - IT systems,
 - anonymization services for the photo images,
 - outsourced data protection officer,
- 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.

IV. 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.

V. STORAGE OF PERSONAL DATA

We will keep your data included in the survey form during the conduct of the satisfaction survey and the analysis of responses for the implementation of measures necessary to improve services.

Subsequently, the data will be archived for the general prescription period of 3 years, in order to defend our rights and interests, plus an additional year for the legitimate interest of managing the archive, and will be accessed only if necessary for the defense of rights and/or interests. Subsequently, we will delete or anonymize personal data from our systems and records, and/or take measures to anonymize them, so that you can no longer be identified, and we will also request that these measures be taken by the data recipients.

Personal data processed in the context of requests/disputes will be processed for the entire duration of their resolution, as well as subsequently according to the applicable prescription periods of at least 3 years.

In case there are tax-relevant data, they will be kept for 10 years, a period calculated from July 1 of the year following the end of the last financial year in which they were used, as follows: a period of 5 years for compliance with the legal obligation to keep according to Article 25(1) of Accounting Law no. 82/1991, republished, with subsequent amendments, to which we add another period of 3 years for compliance with the general prescription term, followed by an additional period of 2 years considering the legitimate interest to retain documents for archive management analysis.

Subsequently, we will delete/remove personal data from our systems and records and/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.

VI. 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: anspdc@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 GDPR, 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.

VII. AUTOMATED DECISION MAKING AND PROFILING

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