



**PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA
ACCESS TO THE PREMISES AND VIDEO SURVEILLANCE WITHIN THE RESIDENTIAL
COMPLEX**

„Stejarii Residential Club”

Through this Privacy notice (hereinafter referred to as "**Privacy notice**"), **Masterange România S.R.L.** – having its headquarters in Bucharest, 24 – 26 Nordului Road, District 1, registered at the Trade Registry under no. J2003003330402, having Unique Identification Code RO15262492 (hereinafter referred to as "**Masterange**"), and **Stejarii Universe S.R.L.** – having its headquarters in Bucharest, 24-26 Nordului Road, District 1, registered at the Trade Register under no. J2024051344009, having Tax Identification Code RO51076380 (hereinafter referred to as "**Stejarii Universe**"), as **joint controllers**, together with each of the following companies:

- **Fergus Construct International S.R.L.**, a company having its headquarters in Bucharest, 24 – 26 Nordului Road, District 1, registered at the Trade Registry under no. J40/20491/1994, having Unique Identification Code RO6435888, in its capacity of **administrator of the company Masterange România S.R.L., and operational partner, and**
- **ITH Management Office S.R.L.**, a company having its headquarters in Bucharest, 24 – 26 Nordului Road, District 1, registered at the Trade Registry under no. J40/20487/1994, having Unique Identification Code RO6435918, in its capacity of **administrator of the company Masterange România S.R.L. and of the company Stejarii Universe S.R.L.,**

we inform you about how we process your personal data in the context of managing access to Stejarii Residential Club (hereinafter referred to as "Stejarii Residential") and using the video surveillance system (CCTV), as well as the speed monitoring system, according to the art. 13 and 14 of the Regulation (UE) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as "GDPR").

This Privacy notice aims to inform individuals who access the premises of Stejarii Residential (i.e., lessees, occupants, potential clients, representatives/employees of lessees, guests of lessees/occupants, employees/representatives of service providers or partners, permanent representatives of administrators, own employees and other visitors etc.), each hereinafter individually referred to as the "Data subject".

The joint controllers have concluded personal data processing agreements through which they have define the purposes and means of the processing activities carried out jointly, have assigned responsibilities for ensuring transparency, legality and fairness of the processing activities, limiting the purposes of the processing and minimising the data, ensuring the accuracy of the data and limiting the data storage period, as well as the responsibilities of the controllers for ensuring the security of the personal data.

The joint controllers have decided to designate **a single point of contact**, so that for any information or requests regarding the processing of personal data which is subject of this Privacy notice or for exercising your rights as a



data subject with regard to the processing of personal data as detailed below, 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

E-mail address: dataprotection@tiriachimobiliare.ro

Telephone number: 0040-21-4312149

In accordance with art. 26 para. (3) of the GDPR, we would like to point out that you have the possibility to exercise your rights with regard to any of the joint controllers, and the joint controller contacted by you will inform the other joint controllers about the request received.

I. VIDEO SURVEILLANCE

1. Source of personal data

Personal data is collected through surveillance cameras that make up the video surveillance system and is generally processed through observation.

2. Personal data processed, the purposes and the legal basis of the processing

The joint controllers use the video surveillance system **to ensure the security of the objective, goods and valuables, as well as the protection of individuals**, in accordance with the obligations imposed by the Law no. 333/2003 regarding the security of objectives, goods, valuables and the protection of individuals (hereinafter referred to as "**Law no. 333/2003**"), the Methodological norms for the implementation of Law no. 333/2003, as well as the Instruction no. 9/2013 concerning risk analyses for the physical security of units concerned by Law no. 333/2003.

The installed video system monitors access areas within Stejarii Residential, as well as common areas within the complex, collecting the **following personal data: facial images and/or actions of individuals or other information that, through association, may represent personal data**, such as the license plate number, brand and colour of vehicles that pass through or park within Stejarii Residential. Additionally, the system records the **date and time of events**, which can be correlated with other data from the images captured by the surveillance cameras.

Personal data is processed for:

- fulfilling legal obligations imposed on us by applicable legislation regarding the security of objectives, goods, valuables and the protection of individuals established by Law no. 333/2003, according to art. 6 para. (1) letter c) of GDPR;
- the legitimate interest in demonstrating compliance with legal provisions regarding the security of objectives, goods, valuables and the protection of individuals, preventing the loss or damage to property and establishing, exercising or defending a right, according to art. 6 para. (1) letter f) of GDPR.



II. ACCESS CONTROL

1. Source of personal data

Personal data is collected either **directly** from you or **indirectly** from lessees, occupants of Stejarii Residential or their representatives, from our service providers or from our partners whose representatives/collaborators/employees you are, as well as through observation via our access control systems within Stejarii Residential.

2. Personal data processed, the purposes and the legal basis of the processing

The joint controllers process your personal data to monitor access within Stejarii Residential as follows:

- a. **to ensure and maintain the security of the objective, goods, valuables and the protection of individuals we keep Access registers of persons and vehicles**, according to the obligations established by Law no. 333/2003, the Methodological norms for the implementation of Law no. 333/2003, as well as the Instruction no. 9/2013 concerning risk analyses for the physical security of units concerned by Law no. 333/2003, according to art. 6 para. (1) letter c) of GDPR.

In this regard, as necessary by reference to the quality you have, when accessing Stejarii Residential, we will process the following personal data: identification data (name, surname, series and number of the identity card, license plate number), **data on access to the premises** (destination, time of arrival and departure).

Personal data is processed to fulfil the legal obligations imposed on us by applicable legislation regarding the security of objectives, goods, valuables and individuals established by Law no. 333/2003, according to art. 6 para. (1) letter c) of GDPR.

- b. **to facilitate your access to Stejarii Residential, through:**

- **pedestrian access control system (based on access cards)**, as necessary by reference to the quality you have, we will process **identification data** (name, surname, other unique electronic identifiers assigned by the system used, the name of your employer if you provide a service for the joint controllers, the quality of the person who was granted the right of access), **data associated with the lease agreement** (number of the real estate, period of validity of the access right), as well as **data on access to the premises** (access card serial number, logs captured by the access control system used, data on the time of entry/exit in Stejarii Residential, access point);
- **car access control system by video identification of the license plates numbers of the vehicles registered in the system with permitted access, through automatic scanning of license plates**, as necessary by reference to the quality you have, we will process **identification data** (name, surname, license plate number, including in photo/video format, other unique electronic identifiers assigned by the system used, the name of your employer if you provide a service for the joint controllers, the quality of the person who was granted the right of access), **data associated with the lease agreement** (number of the real estate, period of validity of the access right), as well as **data on access to the premises** (logs captured by the access control system used, data on the time of entry/exit in Stejarii Residential, direction of vehicle In/Out, access point);

- **car access control system by identifying the access stickers allocated to vehicles registered in the system with permitted access, through automatic identification of access stickers, as necessary by reference to the quality you have, we will process identification data** (name, surname, license plate number, other unique identifiers assigned by the system used, the quality of the person who was granted the right of access), **data associated with the lease agreement** (number of the real estate, period of validity of the access right), as well as **data on access to the premises** (access sticker serial number, logs captured by the access control system used, data on the time of entry/exit in Stejarii Residential, direction of vehicle In/Out, access point).

Personal data is processed for:

- fulfil the legal obligations imposed on us by applicable legislation regarding the security of objectives, goods, valuables and the protection of individuals established by Law no. 333/2003, according to art. 6 para. (1) letter c) of GDPR;
- the legitimate interest in demonstrating compliance with legal provisions regarding the security of objectives, goods, valuables and the protection of individuals, preventing the loss or damage to property and establishing, exercising or defending a right, as well as ensuring proper management of access to the Stejarii Residential, according to art. 6 para. (1) letter f) of GDPR.

III. SPEED MONITORING

Within Stejarii Residential, a radar system is implemented to identify and measure the speed of vehicles circulating within the complex.

1. Source of personal data

Personal data is collected **indirectly** through the radar system.

2. Personal data processed, the purposes and the legal basis of the processing

To ensure the safe of traffic within Stejarii Residential, as well as to protect the life and physical integrity of individuals present within the complex, as necessary by reference to the quality you have, through radar system we process **identification data** (name, surname, license plate number in photo/video format, number of the real estate), as well as **data regarding the registration** (speed, time of recording).

Personal data is processed for the legitimate interest of ensuring the protection of life and physical integrity of individuals, according to art. 6 para. (1) letter f) of GDPR.

In the event that the radar system identifies a violation of the Community regulation regarding speed limits within the complex, the joint controllers will take the necessary measures as established by the Community regulation.

Please note that the personal data mentioned in points I, II and III above may also be processed for the following purposes:

- a. **managing incidents that may affect our rights and interests or those of third parties, including non-compliance with Community regulation or other applicable norms, managing complaints and incidents,** based on the legitimate interest of ensuring a high level of safety and comfort, as well as preserving evidence

related to these actions for the purpose of establishing, exercising or defending a right or interest, according to art. 6 para. (1) letter f) of GDPR;

- b. reporting to authorities**, in accordance with our legal obligations, with the legal basis represented by art. 6 para. (1) letter c) of GDPR;
- c. for managing IT systems, networks and equipments** (information technology), such as ensuring maintenance and carrying out security audits on them in order to achieve the legitimate interest in ensuring their security and proper functioning, pursuant to art. 6 para. (1) letter f) of the GDPR;
- d. settlement of disputes**, to achieve the legitimate interest of seeking recognition, exercising or defending rights in court, based on art. 6 para. (1) letter f) of GDPR;
- e. addressing requests and complaints received**, based on the legitimate interest of appropriately managing these requests, according to art. 6 para. (1) letter f) of GDPR;
- f. compliance with certain requirements imposed by applicable legislation**, based on art. 6 para. (1) letter c) of GDPR.

IV. DATA RECIPIENTS

Personal data may be disclosed, strictly to the extent necessary for the purposes detailed above or where required by law, to the following categories of recipients who may be independent controllers, joint controllers or processors, as follows:

1. Joint controllers;

2. Service providers:

- management and business consultancy services;
- services related to managing access, security and surveillance of the entire residential complex;
- services for monitoring the functionality of networks, systems and equipment, as well as their maintenance and repair;
- security and safety services, including monitoring the video system and surveillance cameras through dispatchers;
- maintenance services for access, video surveillance and speed monitoring systems;
- anonymisation or blurring services for images captured by CCTV system;
- services for assessing physical security risks;
- personal data protection services;
- IT systems development and maintenance services;
- cybersecurity services;
- audit services;
- security audit and IT infrastructure security services;
- electronic communication services – e.g. Microsoft Office 365, WhatsApp;



- archiving services;
- cloud services.

- 3. External consultants we contact in specific situations** (e.g. lawyers, tax consultants, experts, other advisors).
- 4. Public authorities and bodies, i.e., criminal investigation bodies and courts, bailiffs**, insofar as the transmission of personal data to them is required by law and/or necessary in the event of a dispute or settlement of a dispute, as well as in the case of controls where we are obliged to make them available the requested information (e.g. National Supervisory Authority for Personal Data Processing – hereinafter referred to as “*ANSPDCP*”, police, prosecutor's office etc.).
- 5. Persons expressly indicated by you**, e.g. the lessees /occupants you are visiting, in cases where the visit has not been announced in advance by them.
- 6. Third-party acquirers**, to the extent that our business would be transferred (in whole or in part) and data subjects' data would be inherently linked to the assets that are the subject of such a transaction.

V. TRANSFERS TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

As a rule, we will not transfer your personal data outside the European Economic Area. In exceptional circumstances and only if necessary, the transfer of your personal data outside the European Economic Area will only take place with the application of appropriate safeguards in accordance with specific legal provisions on the protection of personal data and with your appropriate information.

VI. RETENTION PERIOD

The personal data indicated in the above sections will only be processed for the period necessary to fulfil the purposes mentioned in this Privacy notice. Thereafter, we will remove or delete the personal data from our systems and records and/or take measures to anonymise it so that you can no longer be identified, and we will also require the recipients of the data to take these measures.

Personal data processed to achieve the purposes indicated in the sections above will be stored in accordance with our internal policies, for limited periods of time, such as:

- **the duration of storage of the data obtained through the video surveillance system is 30 days**, except in situations expressly regulated by law or in duly justified cases (e.g. in the event of the opening of an investigation, requests from the authorities, requests from you or in the event of a dispute), the relevant images and other data will be kept for the duration of the investigation and thereafter in accordance with the applicable limitation periods. Upon expiry of the retention periods, the data will be destroyed or deleted by overwriting, as appropriate, depending on the medium on which it was stored.
- **the retention period for data from the Access registers of persons and vehicles is 2 years from the date of collection**, in accordance with applicable legal provisions, plus the applicable statute of limitations on a case-by-case basis, except in situations expressly regulated by law or in duly justified cases (e.g. in the event of the opening of an investigation, requests from the authorities, requests from you or in the event of a dispute), the relevant data will be kept for the duration of the investigation and thereafter in accordance with the applicable

limitation periods. Upon expiry of the retention periods, the data will be destroyed or deleted, as appropriate, depending on the medium on which it was stored.

VII. RIGHTS REGARDING PERSONAL DATA

Except where Romanian law or GDPR provides otherwise, you have the following rights:

1. **Right to be informed**, according to art. 13 and art. 14 of the GDPR, as per this document.
2. **Right of access**, according to art. 15 of the GDPR.
3. **Right to rectification**, according to art. 16 of the GDPR.
4. **Right to erasure/right to be forgotten**, according to art. 17 of the GDPR.
5. **Right to restriction of processing**, according to art. 18 of the GDPR.
6. **Right to data portability**, according to art. 20 of the GDPR.
7. **Right to object**, according to art. 21 of the GDPR.

When you send us a request to exercise this right, please also mention the grounds related to your particular situation. We will no longer process your personal data, unless we demonstrate that (i) we have legitimate grounds for processing your data that override your interests, rights, and freedoms or that (ii) the purpose of the processing is the establishment, exercise or defence of legal claims.

8. **Right not to be subject to a decision based solely on automated processing, including profiling**, according to art. 22 of the GDPR.

The personal data referred to in this Privacy notice is not subject to automated decision-making processes.

Please note that these rights are not absolute, which means that there are certain exceptions to their exercise. These rights are applicable on a case-by-case basis.

9. **Right to withdraw your consent**, according to art. 13 para. (2) letter c) and art. 14 para. (2) letter d) of the GDPR.

This right is applicable if your data is processed on the basis of your consent, case in which you have the possibility at any time:

- To send an email at: dataprotection@tiriachimobiliare.ro;
- To send your request by post to the address: 24-26 Nordului Road, District 1, Bucharest.

Withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent prior to the withdrawal of consent. Withdrawal of consent to the processing of your personal data has the effect of terminating the processing.



10. Right to lodge a complaint with the supervisory authority, according to art. 13 para. (2) letter d) and art. 14 para. (2) letter e) of the GDPR.

Without prejudice to your right to contact ANSPDPC at any time, please contact us in advance in relation to the exercise of your rights mentioned above.

If you consider that we have not resolved all your requests or you are not satisfied with our responses, you can contact the ANSPDPC, to file a complaint by using the following contact details:

- headquarters: Bucharest, 28-30 Gen. Gheorghe Magheru Bvd., District 1, CP 010336,
- telephone: +40.318.05.92.11
- fax: +40.318.05.96.02
- e-mail: anspdcp@dataprotection.ro
- website: www.dataprotection.ro

or you can address a complaint to the competent court.

Please note the following in relation to the exercise of your rights as a data subject:

- **How to exercise:** you can contact our Data Protection Officer using the contact details available above.
- **The period of time for providing a response:** we will try to resolve your request within one month, which may be extended with two months for specific reasons related to the complexity of the request. In all cases, if this time limit is extended, we will inform you of the length of the extension and the reasons for it.
- **Identification:** please provide us with the information necessary to identify you (name, surname, email address), with the understanding that, if we cannot identify you on the basis of this information alone, we will ask you to provide us with additional information to enable us to identify you.

If necessary, we will update this Privacy notice to reflect any changes to the way we process your personal data. In the event of any such update, we will communicate a new version of the Privacy notice and will indicate the update by changing the date on which the revised Privacy notice will be adopted.

Adopted on 12.08.2025