



PRIVACY NOTICE
regarding the processing of personal data
of Residents and Representatives
of the Residential Complex
”Stejarii Collection”

This Privacy notice (hereinafter referred to as ***”Privacy notice”***) explains when and why, we, **Masterange Romania S.R.L.** – a company having its headquarters in Bucharest, 24 – 26 Nordului Road, District 1, registered at the Trade Registry under no. J2003003330402, having Tax Identification Code RO15262492 (hereinafter referred to as ***”Masterange”***), and **Stejarii Universe S.R.L.** – a company 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:

1. **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 Tax Identification Code RO6435888, in its capacity of **administrator of the company Masterange Romania S.R.L. and operational partner**,
2. **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 Tax Identification Code RO6435918, in its capacity of **administrator of the company Masterange Romania S.R.L. and of the company Stejarii Universe S.R.L.**, and
3. **Hawkrige Imobiliare S.R.L.**, a company having its headquarters in Bucharest, 19 Nicolae Caramfil Street, 1st floor, District 1, registered at the Trade Registry under no. J40/11948/2012, having Tax Identification Code R030793013, in its capacity of **Co-owner of Stejarii Collection**,

process your personal data in the context of your stay in Stejarii Collection (hereinafter referred to as ***”Stejarii Collection”***), 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”*** or ***”Regulation”***).

The joint controllers have concluded personal data processing agreements, through which they have defined the purposes and means of the processing activities carried out jointly in connection with the management of Stejarii Collection, 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@tiriacimobiliare.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.

The protection of personal data is one of our major concerns. That is why we recommend you read this Privacy notice carefully as it contains important information about how and why we collect, use and disclose your personal data. This Privacy notice also explains your rights in relation to your personal data and how you can contact us or the supervisory authority.

I. TO WHOM IS THIS PRIVACY NOTICE ADDRESSED?

This Privacy notice is addressed to the **Lessees** (natural persons, holders of the lease agreement, hereinafter referred to as "*the Agreement*") and **Occupants** (natural persons entitled to reside in Stejarii Collection as per the Agreement signed by the Lessee that is natural or legal person) of **Stejarii Collection**, collectively referred to as "**Residents**", respectively to the **Lessee Representatives** (natural persons having the capacity of legal/conventional representative of the Lessee that is legal person or having the capacity of designated contact person), each hereinafter individually referred to as the "**Data subject**". We may also process personal data belonging to minors whose parent/legal representative you are. Their data will only be collected and used for the purposes of the lease and, where appropriate, to the extent that you expressed your authorisation or where we have a legal or contractual obligation to do so. In all cases, we will inform you in advance, as appropriate, and request your authorisation, if necessary.

II. SOURCE OF PERSONAL DATA

If you are a **Lessee**, personal data is obtained **directly** from you at the pre-contractual stage, during the negotiation of the lease conditions, at the stage of signing the Agreement, as well as during the execution of the Agreement, when performing activities related to your residence in Stejarii Collection, as defined



and detailed in the annexes of the Agreement, regulations and other informative documents, but also by **observation**, when you interact with our IT and/or technical systems (e.g. Stejarii App, video surveillance system, access control system in Stejarii Collection, call center system). Data may also be obtained **indirectly**, when you are represented by another natural or legal person (for example, real estate agencies), or it may be collected from public sources, when we carry out the know-your-customer process, as required by law.

If you are an **Occupant**, personal data is obtained **directly** from you during your stay and the activities related to your residence in Stejarii Collection, as defined and detailed in the annexes of the Agreement, regulations and other informative documents, but also by **observation** when you interact with our IT and/or technical systems (e.g. Stejarii App, video surveillance system, access control system in Stejarii Collection, call center system). Data is also obtained **indirectly** from the Lessee – natural or legal person – or from Lessee Representatives at the time of entering into the Agreement.

If you are a **Lessee Representative**, personal data is obtained **directly** from you, at the pre-contractual stage, during the negotiation of the lease conditions, at the stage of signing the Agreement, as well as during the execution of the Agreement, when performing activities related to your residence in Stejarii Collection, as defined and detailed in the annexes of the Agreement, regulations and other informative documents, but also by **observation**, when you interact with our IT and/or technical systems (e.g. video surveillance system, access control system in Stejarii Collection, call center system). Data may also be obtained **indirectly** from other natural/legal persons who handle the contracting process on behalf of the Lessee that is legal person (e.g., real estate agencies, other employees/representatives of the Lessee that is legal person) or may be collected from public sources when conducting the know your customer process, if applicable.

III. PERSONAL DATA PROCESSED, THE PURPOSE AND THE LEGAL BASIS OF THE PROCESSING

We process the personal data listed below only for the purposes and on the grounds specified in this Privacy notice. If we intend to process this data for other purposes, we will inform you in advance, as appropriate, and will take all necessary steps to comply with the provisions on the protection of personal data.

Personal data is processed as follows:

- 1. For the purpose of drafting and sending an offer at your express request, as well as when you request to book a tour at Stejarii Collection, as necessary by reference to the quality you have, we will process identification data** (name, surname), **contact data** (telephone number, e-mail address), **data regarding the language spoken, data regarding the preferences related to the real estate** (type of unit and facilities), **data regarding the time of the booked tour**, as well as **other details submitted which, by association, may represent personal data.**

Data subjects: Potential clients, later to become Lessee or Occupants, Lessee Representatives



Legal basis: the processing is carried out:

- in order to take steps at your request in order to conclude the Agreement, the legal basis being art. 6 para. (1) letter b) of the GDPR;
- in the legitimate interest of taking steps to conclude an Agreement with a legal person, when you are a Lessee Representative, the legal basis being art. 6 para. (1) letter f) of the GDPR.

2. **For the purpose of preventing and combating money laundering and terrorist financing**, we will conduct the Know Your Customer procedure (KYC), where applicable, so we will request relevant information from you as required by the Law no. 129/2019 and will conduct verifications based on it, including by consulting publicly available information (e.g. the Trade Register), and then determine the associated risk factors and the degree of risk resulting from the verifications.

Thus, as necessary by reference to the quality you have, we will process identification data (name, surname, date of birth, gender, personal identification number, nationality, position held within the company, handwritten signature, electronic signature), **contact data** (telephone number, e-mail address, home/residence address), **data on the purpose and nature of the business relationship, occupation or nature of own business carried out, as well as income thresholds, data on any investigations, pending lawsuits, charges and/or convictions, relating to alleged or recognized violations of anti-corruption laws, administrative, civil or criminal laws or measures, money laundering, financial crimes, data on any public positions currently held or previously held, respectively the status of the publicly exposed person/the status of a family member of the publicly exposed person or a person known to be a close associate of the publicly exposed person, as required by law, as well as any other personal data derived from the factual information provided, which may be contained in the documentation attached to the verification forms, necessary for the purpose of preventing money laundering and terrorist financing.**

Where, following the risk analysis carried out in application of the provisions of the legislation on preventing and combating money laundering, a number of additional checks are necessary, as appropriate by reference to the quality you have, we will also process other categories of relevant personal data, such as data concerning family or other relevant social circumstances (marital status, family details - e.g. parents, children, spouse, partner - etc.), **data regarding work experience** (work history, job title, goods or services provided, contractual partners), **financial data and data relating to assets held** (bank account information, income, tax liabilities, income from other sources, data relating to movable and immovable property held), **any other personal data relevant to the particular circumstances of the situation where verification is required by law.**

Data subjects: Lessee, Lessee Representatives



Legal basis: the processing is considered necessary for the purpose of implementing measures of public interest, in accordance with the provisions of the GDPR, as provided for in Article 22 of Law 129/2019.

In this case, we provide you with a dedicated privacy notice in which you will find all the details on how your personal data is processed.

3. **For the purpose of negotiating and concluding the General Terms and Conditions (HoT) for the reservation of the buildings, the Agreement, including the annexes (the transferring-receiving form/Additional facilities), or of any other document drafted in connection with the conclusion and execution of the Agreement or in connection with the transferring of the real estate, but also when an additional deed of extension and/or amendment of the Agreement is signed.** The data is processed to identify the parties and establish their rights and obligations for the performance of the Agreement, but also to comply with certain requirements imposed by the applicable legislation (e.g., Regulation no. 4/2005 regarding the currency regime in Romania).

For this purpose, as necessary by reference to the quality you have, we will process identification data (name, surname, nationality, date and place of birth, non-resident status, signature), **data regarding the language spoken, contact data** (telephone number, e-mail address, correspondence address, home/residence address), **data regarding the real estate** (number of the building, number of the real estate, entrance, floor, number of rooms, usable area, storage room number, location and usable area of the storage room, parking space number, location and usable area of the parking space, number and usable area of the garden of the real estate, information regarding the arrangements of the real estate), **data on the goods and facilities provided with the real estate, data regarding the Agreement** (number and date of conclusion of the Agreement, duration of the Agreement, monthly rent, due date, the amount of administrative costs and the option to contract one or more memberships at Stejarii Country Club), **data relating to the contractual guarantee** (amount of the guarantee), **financial data** (IBAN number), as well as **other details which, by association, may represent personal data.**

Data subjects: Lessee, Occupants, Lessee Representatives

Legal basis: the processing is carried out:

- in order to negotiate, conclude and execute the Agreement, the legal basis being art. 6 para. (1) letter b) of the GDPR in the case of Lessee;
- in the legitimate interest of taking steps to conclude an Agreement with a legal person, the legal basis being art. 6 para. (1) letter f) of the GDPR, in case of Lessee Representatives;
- in order to defend of our rights arising from the Agreement, which is the legitimate interest under art. 6 para. (1) letter f) of the GDPR;



- in order to fulfil the legal obligations that we have in connection with the conclusion and execution of the Agreement, according to art. 6 para. (1) letter c) of the GDPR.

4. **For the purpose of communication with the role to inform in relation to the execution of the Agreement** (the communication may involve, as the case may be, sending of messages of general or particular interest such as, but not limited to: information about the amendment of the Community regulation or the Privacy notice, about potential occasional interruptions of utilities, about potential works on the common spaces or on the real estate etc.) **or with the role to submit to your approval various initiatives aimed at maintaining a high level of comfort within Stejarii Collection, as necessary by reference to the quality you have, we will process identification data** (name, surname), **contact data** (telephone number, e-mail address), **data regarding the language spoken, data regarding the real estate** (number of the building, number of the real estate, entrance, floor, number of rooms, usable area, storage room number, location and usable area of the storage room, parking space number, location and usable area of the parking space, number and usable area of the garden of the real estate), as well as **other details which, by association, may represent personal data.**

Data subjects: Lessee, Occupants, Lessee Representatives

Legal basis: the processing is carried out:

- in order to execute the Agreement, the legal basis being art. 6 para. (1) letter b) of the GDPR;
- in the legitimate interest of communicating regarding the execution of the Agreement concluded with a legal person, when you are a Lessee Representative, the legal basis being art. 6 para. (1) letter f) of the GDPR.

5. **For the purpose of updating personal data, as necessary by reference to the quality you have, we will process identification data** (name, surname, nationality, non-resident status), **contact data** (telephone number, e-mail address, correspondence address, home/residence address), **data regarding the language spoken, data regarding the real estate** (number of the building, number of the real estate, entrance, floor, number of rooms, usable area, storage room number, location and usable area of the storage room, parking space number, location and usable area of the parking space, number and usable area of the garden of the real estate), **data regarding the car** (license plate number), as well as **financial data** (IBAN number).

Data subjects: Lessee, Occupants, Lessee Representatives

Legal basis: the processing is carried out in the legitimate interest of ensuring that we process updated personal data, the legal basis being art. 6 para. (1) letter f) of the GDPR.



6. **For the purpose of establishing the costs related to the Agreement, to issue the invoices and carry out the financial-accounting operations, including processing and recording of the payments, as well as recovering outstanding amounts, as necessary by reference to the quality you have, we will process identification data** (name, surname, non-resident status, personal identification number as tax identifier), **contact data** (telephone number, e-mail address, correspondence address, home/residence address), **data regarding the language spoken, data regarding the real estate** (number of the building, number of the real estate, entrance, floor, number of rooms, usable area, storage room number, location and usable area of the storage room, parking space number, location and usable area of the parking space, number and usable area of the garden of the real estate), **data regarding the Agreement** (monthly rent, amount of administrative costs and amount of the membership at Stejarii Country Club), **data regarding the cost of utilities and facilities** (electricity, water, gas for central heating, internet services, telephone, cable), **data regarding the costs of utilities for the premises and parts in common use, as well as the costs related to the operation, data regarding house repair costs, data regarding the costs of additional requests, data regarding the costs of repairs which are the responsibility of the Lessee or the Occupant, data regarding the due date of the payment obligation, data regarding the payments made and/or overdue** (amount of rent, amount of cost of utilities and facilities, amount of penalties applied, amount paid, subject of payment), **financial data** (IBAN number), as well as **data regarding the value and execution of the contractual guarantee.**

Data subjects: Lessees, Occupants

Legal basis: the processing is carried out:

- in order to execute the Agreement, the legal basis being art. 6 para. (1) letter b) of the GDPR;
 - in order to comply with financial and accounting obligations, the legal basis being art. 6 para. (1) letter c) of the GDPR;
 - in the legitimate interest of initiating the procedures provided by the law for the recovery of outstanding amounts, the legal basis being art. 6 para. (1) letter f) of the GDPR;
 - in order to comply with the requirements provided by law regarding the completion of procedures for the recovery of outstanding amounts, the legal basis being art. 6 para. (1) letter c) of the GDPR.
7. **For the purpose of communicating the invoices, as well as payment notices in case of outstanding amounts, as necessary by reference to the quality you have, we will process identification data** (name, surname, non-resident status), **contact data** (telephone number, e-mail address, correspondence address, home/residence address), **data regarding the language spoken, data regarding the real estate** (number of the building, number of the real estate, entrance, floor, number of rooms, usable area, storage room number, location and usable area of the storage room, parking space number, location and



usable area of the parking space, number and usable area of the garden of the real estate), **data regarding the Agreement** (monthly rent, amount of administrative costs and amount of the membership at Stejarii Country Club), **data regarding the due date of the payment obligation**, **data regarding the costs of utilities and facilities** (electricity, water, gas for central heating, internet services, telephone, cable), **data regarding the costs of utilities for the premises and parts in common use, as well as the costs related to the operation**, **data regarding house repair costs**, **data regarding the costs of additional requests**, **data regarding the costs of repairs which are the responsibility of the Lessee or the Occupant**, as well as **financial data** (IBAN number).

Data subjects: Lessees, Occupants, Lessees Representatives

Legal basis: the processing is carried out:

- in order to execute the Agreement, the legal basis being art. 6 para. (1) letter b) of the GDPR;
- in order to comply with financial and accounting obligations, the legal basis being art. 6 para. (1) letter c) of the GDPR;
- in the legitimate interest of communicating regarding the execution of the Agreement concluded with a legal person, when you are a Lessee Representative, the legal basis being art. 6 para. (1) letter f) of the GDPR.

- 8. For the purpose of providing maintenance services for the real estate as per your request, as necessary by reference to the quality you have, we will process identification data** (name, surname), **contact data** (telephone number, e-mail address), **data regarding the language spoken**, **data regarding the real estate** (number of the building, number of the real estate, entrance, floor, number of rooms, usable area, storage room number, location and usable area of the storage room, parking space number, location and usable area of the parking space, number and usable area of the garden of the real estate), **appointment date** (if you request an intervention in the real estate), as well as **data regarding the maintenance services requested and which, by association, may represent personal data**.

Data subjects: Lessees, Occupants, Lessee Representatives

Legal basis: the processing is carried out:

- in order to provide the requested services, the legal basis being the performance of a contract under art. 6 para. (1) letter b) of the GDPR;
- in the legitimate interest of communicating regarding the execution of the Agreement concluded with a legal person, when you are a Lessee Representative, the legal basis being art. 6 para. (1) letter f) of the GDPR.



9. **For the intermediating purpose, for carrying out the steps necessary prior to the conclusion of the contract for the provision of Concierge services, as well as for providing Concierge services expressly requested**, such as receiving mail, except for official communications, access to the building using the spare key for services as expressly requested, assistance in the real estate (e.g. watering flowers, feeding pets), facilitating business centre activities (xerox, printing, meeting room), **as necessary by reference to the quality you have, we will process identification data** (name, surname), **contact data** (telephone number, e-mail address), **data regarding the language spoken, data regarding the real estate** (number of the building, number of the real estate, entrance, floor, number of rooms, usable area, storage room number, location and usable area of the storage room, parking space number, location and usable area of the parking space, number and usable area of the garden of the real estate), **appointment date** (if you request an intervention in the real estate), as well as **data regarding the services requested and which, by association, may represent personal data.**

When you request the provision of some specific services, such as recommendations and reservations (restaurants, suppliers, services, personal chef), ordering and delivery of products, taxi orders, we will use external service providers as third parties. In this case, the Concierge team will mediate the provision of the service in question and will therefore transmit your data to the service providers as provided by you. The Concierge team will store the data requested by the providers only for the purpose of providing the intermediation services.

Please note that these providers act as independent controllers and are individually responsible for the manner in which they process your personal data. For more details on how they process your data, please contact them directly.

Data subjects: Lessees, Occupants

Legal basis: the processing is carried out in order to provide the intermediation services or additional services requested by you, the legal basis being the completion of the necessary steps prior to entering into a contract or the performance of a contract, pursuant to art. 6 para. (1) letter b) of the GDPR.

10. **For the purpose of allowing access to the Social Club for organizing private events by you, in order to approve the request for organizing such events, as necessary by reference to the quality you have, we will process identification data** (name, surname), as well as **data about the event you wish to organize** (type of event, proposed date, number of participants, duration of the event, any other information considered relevant regarding the description of the proposed event, which, by association, may represent personal data).

In the case of approval of the request to organize the private event, for the purpose of drafting and concluding the necessary documentation for making the Social Club available for the requested duration, as necessary by reference to the quality you have, we will process identification data (name, surname, citizenship, date and place of birth), **contact data** (home address),



financial data (IBAN number), as well as **data about the event organized within the Social Club** (type of event, event date, event duration, number of participants, any other relevant details regarding the description of the organized event, which, by association, may represent personal data).

Data subjects: Lessees, Occupants

Legal basis: the processing is carried out in order to allow access to the Social Club for the purpose of organizing private events, the legal basis being the completion of the necessary steps prior to entering into a contract or the performance of a contract, pursuant to art. 6 para. (1) letter b) of the GDPR.

- 11. For the purpose of allowing access to the real estate for representatives, specialist consultants or any other persons employed/designated by us to check the condition of the real estate, of the furniture, of the facilities or of the equipment, to carry out construction or repair work, to carry out an inventory or to exercise of any of our rights provided in the Agreement, to inspect, repair or replace elements of the common spaces that can only be accessed from the real estate, as necessary by reference to the quality you have, we will process identification data** (name, surname), **contact data** (telephone number, e-mail address), **data regarding the language spoken, data regarding the real estate** (number of the building, number of the real estate, entrance, floor, number of rooms, usable area, storage room number, location and usable area of the storage room, parking space number, location and usable area of the parking space, number and usable area of the garden of the real estate), **appointment date**, as well as **other details which, by association, may represent personal data.**

Data subjects: Lessees, Occupants, Lessees Representatives

Legal basis: the processing is carried out:

- in the legitimate interest of checking the condition of the real estate and of having the opportunity to exercise the rights provided in the Agreement, the legal basis being art. 6 para. (1) letter f) of the GDPR;
- in the legitimate interest of communicating regarding the execution of the Agreement concluded with a legal person, when you are a Lessee Representative, the legal basis being art. 6 para. (1) letter f) of the GDPR.

- 12. For the purpose of establishing and sending notifications in relation to the non-performance and/or non-compliance with the Agreement and/or the Community regulation, as well as of establishing and communicating the sanctions applied following non-performance and/or non-compliance, as necessary by reference to the quality you have, we will process identification data** (name, surname), **contact data** (telephone number, e-mail address), **data regarding the language spoken, data regarding the real estate** (number of the building, number of the real estate, entrance, floor, number of rooms, usable area, storage room number, location and usable area of the storage room,



parking space number, location and usable area of the parking space, number and usable area of the garden of the real estate), **data regarding the maintenance and Concierge services provided and which, by association, may represent personal data, data regarding the violation of any rules and the sanctions applied** (violations, amount of fines), **financial data** (IBAN number), **data on meetings held** (date and time of the meeting session), as well as **other details which, by association, may represent personal data.**

Data subjects: Lessees, Occupants, Lessees Representatives

Legal basis: the processing is carried out:

- in order to execute the Agreement, the legal basis being art. 6 para. (1) letter b) of the GDPR, in the context of non-execution and/or non-compliance with the Agreement;
- in the legitimate interest of ensuring a high degree of civilisation and comfort within Stejarii Collection, the legal basis being art. 6 para. (1) letter f) of the GDPR, in the context of non-execution and/or non-compliance with the Community regulation;
- in the legitimate interest of communicating regarding the execution of the Agreement concluded with a legal person, when you are a Lessee Representative, the legal basis being art. 6 para. (1) letter f) of the GDPR.

13. For the purpose of sending communications/messages, if you consent to receive:

- **commercial communications**, e.g. by e-mail, by telephone or via Stejarii App, in connection with offers or news about our services, discounts on various brands, to be invited to various events or to communicate to you suggestions regarding public events, **as necessary by reference to the quality you have, we will process identification data** (name, surname), **contact data** (telephone number, e-mail address), **data regarding the language spoken**, as well as **the preferences regarding the transmission of commercial communications** (date and time of expression/withdrawal of consent).
- **satisfaction surveys** to continuously improve the quality of our services, as we want to take your opinion into account and meet your wishes, **as necessary by reference to the quality you have, we will process identification data** (name, surname), **contact data** (telephone number, e-mail address), **data regarding the language spoken, preferences regarding the transmission of surveys** (date and time of consent/withdrawal of consent), as well as **the ratings/answers provided in the survey, respectively the degree of satisfaction identified.**

Data subjects: Lessees, Occupants

Legal basis: the processing is carried out on the basis of your consent, pursuant to art. 6 para. (1) letter a) of the GDPR.



You may withdraw your consent at any time, either by using the contact details available in the introductory section, by replying to communications received or by filling in the form available at Concierge Office.

- 14. For the purpose of sending congratulatory messages or gifts on the occasion of the celebration of your birthday or other similar events (e.g. International women's day), as necessary by reference to the quality you have, we will process identification data** (name, surname, age, gender, date of birth), **contact data** (telephone number, e-mail address), **data regarding the real estate** (number of the building, number of the real estate, entrance), as well as **data regarding the language spoken.**

Data subjects: Lessees, Occupants

Legal basis: the processing is carried out in the legitimate interest of congratulating you or offering you a symbolic gift on the occasion of your birthday or other similar events, in accordance with art. 6 para. (1) letter f) of the GDPR.

- 15. In order to be able to use Stejarii App**, at your request, we will create the specific account in Stejarii App. **As necessary by reference to the quality you have, we will process identification data** (name, surname, gender, date of birth, country of origin), **contact data** (telephone number, e-mail address), **data regarding the language spoken, data necessary to create the account** (unique code for account creation, account type, credentials), as well as **data regarding the real estate** (number of the building, number of the real estate, floor).

Data subjects: Lessees, Occupants

Legal basis: the processing is carried out:

- in order to take the necessary steps prior to entering into a contract, operation carried out by your acceptance of the Terms and Conditions of the mobile application, the legal basis being art. 6 para. (1) letter b) of the GDPR;
- in the legitimate interest of ensuring a secure use of the mobile application, the legal basis being art. 6 para. (1) letter f) of the GDPR.

You will be informed about the data collected and processed during the usage of the Stejarii App, when you first interact with it, and you can access and read it at any time you need by accessing the Stejarii App.

For a detailed information, before installing the Stejarii App, please refer to the available privacy notice, which contains full details of how your data is processed in the context of its use.



16. If you have accepted to participate in the organised events, for the purpose of:

- **registering for the event and for communicating with you regarding the details of participation in the event, we will process identification data** (name, surname), **contact data** (e-mail address and/or telephone number), **data regarding the language spoken**, as well as **other data relating to the particular details of each event** (for example, details regarding allergies or food preferences), based on the legitimate interest of organizing the event in the best conditions, in accordance with art. 6 para. (1) letter f) of the GDPR;
- **promoting the event, in which case we will capture environmental wide-screen photos/video recordings, aiming to convey the overall atmosphere of the event, but it is possible that some photos/video recordings may still capture your image, in which case we will process your image**, based on your consent, in accordance with art. 6 para. (1) letter a) of the GDPR.

Data subjects: Lessees, Occupants

In this case, we provide you with a dedicated privacy notice in which you will find all the details on how your personal data is processed.

17. For the purpose of ensuring and maintaining the security and protection of the objectives, goods, assets and persons, as well as for facilitating access to Stejarii Collection for you and your designees, through:

- **block stairwell 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, quality of the person with granted access), **data associated with the Agreement** (number of the real estate, period of validity of access rights), as well as **data on access to the premises** (access card series, logs captured by the systems, data on the time of entry/exit, access point).
- **car access control system by video identification of the license plate numbers of the vehicles registered with permitted access, 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 identifiers assigned by the system, quality of the person with granted access), **data associated with the Agreement** (number of the real estate, period of validity of access rights), as well as **data on access to the premises** (logs captured by the systems, data on the time of entry/exit in Stejarii Collection, direction of vehicle In/Out, access point).
- **Access registers of persons and vehicles, when the above-mentioned systems are not used, as necessary by reference to the quality you have, we will process identification data** (name,



surname, series and number of identity card, license plate number), as well as **data on access to the premises** (destination, time of arrival and departure).

Data subjects: Lessees, Occupants, Lessees Representatives

Legal basis: the processing is carried out:

- in order to fulfil the legal obligations established by the applicable legislation in the field of security of objectives, goods, valuables and protection of persons, namely Law no. 333/2003 on the security of objectives, goods, valuables and protection of persons ("**Law no. 333/2003**"), as amended, in accordance with art. 6 para. (1) letter c) of the GDPR;
- in the legitimate interest of demonstrating compliance with the legal provisions relating to ensuring the security of objectives, goods, valuables and the protection of persons, of preventing the loss or damage of property, of asserting, exercising or defending a right, as well as of ensuring the proper administration of access to the premises of Stejarii Collection, pursuant to art. 6 para. (1) letter f) of the GDPR.

Additionally, within Stejarii Collection premises, we use a video surveillance system. The installed video system monitors the access areas to the Stejarii Collection premises, as well as the open spaces within the complex. In this context, the video system collects by observation data consisting of video/photo images of persons and/or vehicles on or near the premises of Stejarii Collection, license plate numbers or other information which, by association, may represent personal data.

Please note that personal data collected through the video surveillance system is also processed for the purpose of managing actions that may affect our rights and interests or those of third parties, including non-compliance with the Community regulation or other applicable rules, as well as for the purpose of managing complaints and incidents.

In addition, in order to ensure the smooth and safe flow of traffic in the access area to Stejarii Collection, as well as to protect the life and physical integrity of persons on the access road to Stejarii Collection, a radar system is installed that identifies and measures the driving speed. In this case, as necessary by reference to the quality you have, we will process identification data (name, surname, license plate number in photo/video format, number of the real estate), as well as **registration data (speed, time of the registration).**

Data subjects: Lessees, Occupants, Lessees Representatives

Legal basis: the processing is carried out:

- in order to fulfil the legal obligations established by the applicable legislation in the field of security of objectives, goods, valuables and protection of persons, namely Law no. 333/2003, as amended, in accordance with art. 6 para. (1) letter c) of the GDPR;



- in the legitimate interest of demonstrating compliance with the legal provisions relating to ensuring the security of objectives, goods, valuables and the protection of persons, of preventing the loss or damage of property, of asserting, exercising or defending a right, pursuant to art. 6 para. (1) letter f) of the GDPR;
- in the legitimate interest of ensuring the protection of the life and physical integrity of persons, in accordance with art. 6 para. (1) letter f) of GDPR.

In this case, we provide you with a dedicated privacy notice in which you will find all the details on how your personal data is processed by video surveillance and access control systems in Stejarii Collection.

- 18. For the purpose of dealing with your complaints and requests, as necessary by reference to the quality you have, we will process identification data (name, surname), contact data (telephone number, e-mail address), data regarding the language spoken, data regarding the real estate (number of the building, number of the real estate, entrance, floor, number of rooms, usable area, storage room number, location and usable area of the storage room, parking space number, location and usable area of the parking space, number and usable area of the garden of the real estate), technical call data (date and time of the call, duration of the call, voice), data relating to the requests made (information relating to the requests made which may also include matters relating to the performance of the Agreement, tariffs applicable to certain services), as well as any other information which, by association, may represent personal data.**

Data subjects: Lessees, Occupants, Lessees Representatives

Legal basis: the processing is carried out in the legitimate interest of responding to requests and complaints received, as per art. 6 para. (1) letter f) of the GDPR.

- 19. When we take the necessary steps in the context of the termination of the Agreement, as necessary by reference to the quality you have, we will process identification data (name, surname, signature), contact data (telephone number, e-mail address, correspondence address, home/residence address), data regarding the real estate (number of the building, number of the real estate, entrance, floor, number of rooms, usable area, storage room number, location and usable area of the storage room, parking space number, location and usable area of the parking space, number and usable area of the garden of the real estate), data regarding the language spoken, data on the Agreement or other documents drawn up in connection with the execution of the Agreement (number and date of conclusion of the Agreement or document, duration of the Agreement), data on the contractual guarantee (amount of the guarantee), financial data (IBAN number), data on the condition of the real estate, on the goods and facilities provided with the real estate (additional facilities, modifications, damages), data regarding to the case of termination of the Agreement, data**



regarding any sums due in the context of the termination of the Agreement, as well as any other data contained in the transferring-receiving form or any other document concluded on that occasion which, by association, may represent personal data.

Data subjects: Lessees, Occupants, Lessees Representatives

Legal basis: the processing is carried out:

- in order to terminate the Agreement, the legal basis being art. 6 para. (1) letter b) of the GDPR;
- in the legitimate interest of communicating regarding the termination of the Agreement concluded with a legal person, when you are a Lessee Representative, the legal basis being art. 6 para. (1) letter f) of the GDPR.

20. In order to comply with GDPR provisions, technical and organizational measures, respectively the rights of data subjects, we will keep a record of the collected consents and requests to exercise your rights and, as necessary by reference to the quality you have, we will process identification data (name, surname, signature), contact data (e-mail address, telephone number), data regarding to requests made which, by association, may represent personal data (date of communication, subject and date of the request, data recorded in the systems used - logs), as well as data regarding the language spoken.

Data subjects: Lessees, Occupants, Lessees Representatives

Legal basis: the processing is carried out in the legitimate interest of demonstrating compliance with the legal provisions on the data protection, in accordance with art. 6 para. (1) letter f) of the GDPR.

21. When using our website, please review our Privacy policy and Cookie policy, available at www.stejarii.ro.

In addition to the previously indicated purposes, your personal data will be processed for subsequent and/or later purposes, if and as the case may be, by reference to quality you have:

1. For defencing, exercising or establishing of rights and for settling of disputes, where appropriate.

Legal basis: the processing is carried out in the legitimate interest of requesting a finding, of exercising or defending our rights under art. 6 para. (1) letter f) of the GDPR.

2. In the context of the use of IT systems and related activities, consisting of ensuring their maintenance and taking the necessary measures to protect against IT risks, including to ensure the security of Stejarii Application.

Legal basis: the processing is carried out in the legitimate interest of ensuring the proper functioning of our IT systems and of ensuring security, pursuant to art. 6 para. (1) letter f) of the GDPR.



3. **For reporting to the authorities**, in accordance with our legal obligations, the legal basis being art. 6 para. (1) letter c) of the GDPR.
4. **In order to produce statistics and aggregate reports or to conduct audits, with the aim of developing and improving our activity and services, of making the way activities are managed more efficient, of optimising processes, of centralising operations, of analysing and minimising the financial and reputational risks to which the company is exposed in connection with the performance of its activities.**

Legal basis: the processing is carried out in the legitimate interest of ensuring the proper management of the business, as per art. 6 para. (1) letter f) of the GDPR. In this case, the data is processed in an anonymised form and only exceptionally and when necessary in a clearly form.

5. **To comply with the obligations imposed to us by the law (for example, fiscal obligations, etc.),** the legal basis being art. 6 para. (1) letter c) of the GDPR.
6. **For archiving the documentation resulting from or in connection with the Agreement and all other related activities.**

Legal basis: the processing is carried out in the legitimate interest of archiving the resulting documentation in the context of the conduct of the business activity, pursuant to art. 6 para. (1) letter f) of the 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 relating to the conduct of anti-money laundering and anti-terrorist financing procedures;
- personal data protection services;
- IT systems development and maintenance services;
- cybersecurity services;
- accounting services;
- audit services;
- security audit and IT infrastructure security services;



- electronic communication services – e.g. Microsoft Office 365, WhatsApp;
- electronic signature services;
- telephone and internet services;
- cloud services;
- call center system provision services;
- marketing services;
- archiving services;
- guard and security services;
- maintenance services for access, video surveillance and speed monitoring systems;
- services such as: repairs, maintenance work, interior fittings, etc.;
- anonymisation or blurring services for images captured by CCTV system;
- software solutions, platforms or other IT systems, such as those for customer management, financial and accounting operations management, marketing platforms, etc.;
- Concierge services;
- courier and postal services;
- transport services;
- photography and video services;
- event organization services;
- banking services;
- payment processing services;
- sports and wellness services;
- social media platforms, as the case may be, such as Facebook, LinkedIn, Instagram, YouTube (in this case, please consult their privacy notices available as follows:
 - <https://www.facebook.com/privacy/explanation>,
 - <https://www.linkedin.com/legal/privacy-policy>,
 - <https://help.instagram.com/519522125107875>,
 - <https://policies.google.com/privacy?hl=en>).

3. External consultants we contact in specific situations (e.g., lawyers, tax consultants, experts, other advisors).



4. **Public authorities and bodies**, 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., tax authorities, National Supervisory Authority for Personal Data Processing – hereinafter referred to as “*ANSPDCP*”, ONPCSB, ANCPI, ANAF).
5. **Persons expressly indicated by you** (e.g., service providers expressly indicated by you, such as relocation companies).
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 for the purposes set out in Section III will be retained in accordance with our internal policies for limited periods of time such as:

1. **In the case of a request for an offer or in the case of booking a tour**, the data will be kept for a period equal to the contractual duration, plus the periods required by law (e.g., financial accounting legislation) of at least 10 years from the end of the financial year of the year in which the Agreement ends, plus the 3 years limitation period.
2. **In the case of data processed for anti-money laundering or terrorist financing activities purposes under Law no. 129/2019**, the data will be processed/stored for the duration of our professional relationship, as well as for a period of 5 years from the date of termination of our professional relationship, in accordance with the requirements of the legislation on preventing and combating money laundering, respectively 5 years from the date of verification of third parties with whom we do not enter into business relations. The processing of personal data will be extended if there are legitimate and compelling reasons justifying the continued storage (e.g. it is required by state authorities) or if the



processing is required by the relevant legal provisions in connection with the fulfillment of the above-mentioned purpose of processing.

3. **As regards personal data processed in the context of the performance and execution of the Agreement** and related activities (e.g. maintenance services, Concierge services), handling of notifications and complaints, it will be kept for a period equal to the contractual term, plus the periods required by law (e.g. financial and accounting legislation) of at least 10 years from the end of the financial year of the year of termination of the Agreement, if the data are relevant in this respect, plus the limitation period of 3 years.
4. **In the case of invoicing and financial-accounting activities**, the data will be kept for the entire duration of the Agreement, plus a period of 10 years, according to the financial-accounting legislation, as well as the applicable general limitation period.
5. **If you use Stejarii App**, your account will be deleted upon termination of the Agreement or if you notify us of this decision during the course of the Agreement. In either case, the data associated with the account will be retained for the 3 years limitation period.
6. **If you have given your consent for the transmission of commercial communications or satisfaction surveys**, the data will be kept until you withdraw your consent or until the Agreement is terminated, whichever comes first. After withdrawal of consent or termination of the Agreement the data will be kept for a period of 3 years of that moment to protect our rights and interests.
7. **The storage period of data in the access registers of persons and vehicles** is 2 years from the date of collection, in accordance with the applicable legal provisions, plus the general limitation period applicable 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), in which case the relevant data will be kept for the duration of the investigation and thereafter, in accordance with the applicable limitation periods.
8. **The retention period 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), in which case the relevant images will be kept for the duration of the investigation and thereafter in accordance with the applicable limitation periods.
9. **Personal data processed in the context of disputes** will be processed for the duration of the dispute resolution and thereafter according to applicable limitation periods of at least 3 years.



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, in which case you may at any time submit a request to withdraw consent using the contact details available above.

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 personal data shall have the effect of cessation of 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 ANSPDCP, to file a complaint by using the following contact details:

- headquarters: Bucharest, 28-30 Gen. Gheorghe Magheru Blvd., District 1, CP 010336,
- telephone: +40.318.05.92.11
- fax: +40.318.05.96.02
- e-mail: anspdcpc@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 the Data protection officer, as single point of contact, 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.

VIII. CONSEQUENCES OF REFUSAL OF PROCESSING

Failure to provide the personal data necessary for the conclusion and execution of the Agreement or to fulfil the legal obligations we have leads to the impossibility of the completion and execution of the Agreement.

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 25.09.2025