

PRIVACY NOTICE
regarding the processing of personal data
Stejarii Universe – May’s events

Masterange România S.R.L., headquartered in 24-26 Nordului Road, District 1, Bucharest, registered at the Trade Register under no. J2003003330402, having the Tax registration code RO15262492 (“**Masterange**”),

Stejarii Universe S.R.L., headquartered in 24-26 Nordului Road, District 1, Bucharest, registered at the Trade Register under no. J2024051344009, having the Tax registration code RO51076380 (“**Stejarii Universe**”),

and

Medusa Hotel International S.R.L., headquartered in 14A Jandarmeriei Street, District 1, Bucharest, registered at the Trade Register under no. J1994021129406, having the Tax registration code RO6505878 (“**Medusa**”),

as joint controllers (“**Joint controllers**”) through this Privacy notice (“**Privacy notice**”) we provide you with all the relevant information about **how and why we process personal data in the context of your participation at the events organized by us in May as part of the Stejarii Universe program (“Events”)**, according to the provisions of art. 13, respectively art. 14 of the General Data Protection Regulation (“**GDPR**”).

Joint controllers have concluded a personal data processing agreement through which they have defined 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.

Joint controllers have decided to designate a single point of contact, so that for any information or requests regarding the processing of personal data in the context of your participation at the Events or for exercising your rights as a data subject with regard to the processing of personal data, you can contact **Data protection officer of Stejarii Universe** using the following contact details:

ITH Management Office S.R.L.

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

Depending on your quality as member of the Stejarii Country Club, if your request refers to the processing of personal data carried out by Medusa, your request will be forwarded to Medusa. In either case, the Joint controllers will work together to process and resolve your request.

In accordance with art. 26 para. (3) of the GDPR, we 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.

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

The Privacy notice applies to all persons participating in the Events, on a case-by-case basis, depending on the necessity related to the capacity in which you participate (for example, resident – lessee or occupant – of Stejarii Residential Club or Stejarii Collection, Stejarii Country Club member, personnel and partners

involved in organizing the events, guest), and the personal data is collected directly from you or indirectly, from the resident registering for the Events.

This Privacy notice outlines when, how and why we, as Joint controllers, process the personal data, how we use them, how we store them, what are the rights as data subject and how these rights can be exercised.

This Privacy notice also outlines when, how and why, Masterange and Stejarii Universe, in connection to the Events, process the personal data, how we the personal data is used, how it is stored, what are the rights as data subject and how these rights can be exercised.

The Joint controllers will not provide your personal data to the partners involved in the organization and conduct of the Events. However, partners, acting as independent controllers, may collect and process certain personal data of yours for their own purposes. For more details on how the partners process this data, please refer to the privacy notice provided by them.

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

Depending on the case, based on the necessity in relation to the type and specifics of the Events, as well as on your quality, we process the personal data listed below, exclusively for the purposes and grounds specified in this Privacy notice.

Your decision to participate in the Events implies acceptance of the terms of organization both for you and your children, with parental authorization presumed in this case.

A. Information regarding the data processing activities carried out by Masterange and Stejarii Universe

Masterange and Stejarii Universe will process certain personal data of you as a participant and resident (lessee or occupant) of Stejarii Residential Club or Stejarii Collection, in accordance with the details mentioned below.

- 1. For the purpose of sending the Events invitation in electronic format, Masterange and Stejarii Universe process identification data (name, surname) and contact data (e-mail address), based on art. 6 para. (1) letter a) of the GDPR in case you have given consent to receive such messages.**
- 2. In order to register for the Events, to correspond about the details of participation and the management of the Events, as well as for the good organization of the Events, Masterange and Stejarii Universe process identification data (name, surname, name of the residential complex, block, staircase, apartment, number of participating residents) and contact data (e-mail address, phone number), based on the legitimate interest to organize the Events under the best conditions, according to art. 6 para. (1) letter f) of the GDPR.**
- 3. For the purpose of capturing the testimonial and distributing it in online materials and on the social media pages of the Stejarii community, Masterange and Stejarii Universe process identification data (name, surname), image, voice, as well as the answers and statements provided in the testimonial, based on art. 6 para. (1) letter a) of the GDPR in case you have given consent to provide a testimonial.**

B. Information regarding the data processing activities carried out jointly by the Joint controllers

The Joint controllers will process certain personal data of you as a participant (resident – lessee or occupant – of Stejarii Residential Club or Stejarii Collection; Stejarii Country Club member), in accordance with the details mentioned below.

- 1. In order to maintain a record of participants for the purpose of organizing the Events effectively, the Joint controllers process identification data (name, surname), based on the legitimate interest of**

organizing the Events under the best possible conditions, according to art. 6 para. (1) letter f) of the GDPR.

2. **For the purpose of ensuring the proper organization of Events that include accommodation, following the confirmation of your participation, the Joint controllers process identification data** (name, surname), **contact data** (phone number), as well as **operational information related to accommodation** (room type, number of participants), based on the legitimate interest of organizing accommodation and facilitating your access to the Events, according to art. 6 para. (1) letter f) of the GDPR.

Furthermore, in order to provide you with a comfortable experience tailored to your needs during the Events, the Joint controllers may process information regarding your dietary options and preferences (for example, a vegetarian menu), based on their legitimate interest in ensuring appropriate catering services, according to art.6 para. (1) letter f) of the GDPR.

3. **To promote the Events, we will jointly capture environmental photos/videos, with a wide frame, aiming to convey the overall atmosphere of the Events without the purpose of identifying individuals. As a rule, we will not seek to capture photos/videos that lead to the identification of participants.**

However, it is possible that some photos/videos may inadvertently capture the image of participants. Therefore, the processing is carried out based on your consent expressed through your participation in the Events, both for you and for your child/children.

For close-up images (photo/videos materials such as portraits or those focusing on individuals), you can express your preference to be photographed/filmed or not directly to the Events photographers (even verbally or through your conduct in front of the camera). If you do not wish to appear in these close-up shots/portraits, please communicate your refusal to the photographers.

From the photos/videos taken during the Events, Masterange, Stejarii Universe and Medusa will independently decide whether and to what extent they will select some of the photos/videos that will be published on their own websites and/or on social networks, and whether they will organize an archive for the others or will delete them from their own records.

In addition to the previously purposes indicated above in letter A and B, personal data will be processed by Masterange and Stejarii Universe for the following subsequent and/or later purposes, if and as the case may be:

- a) **for compliance with the legal norms** that regulate different segments of our activity, such as: obligation related to providing you with the necessary information about the manner in which Masterange and Stejarii Universe process data, reporting obligations to public authorities and institutions, obligations in financial and accounting matters, as well as any other obligations that may derive from the normative acts in force at a given time and which are applicable to Masterange and Stejarii Universe, according to art. 6 para. (1) letter c) of the GDPR.
- b) **for the exercise and defence of our rights**, including before public authorities and courts or arbitration, according to art. 6 para. (1) letter f) of the GDPR.
- c) **for managing IT systems, networks and equipments** (information technology), such as ensuring maintenance and carrying out security audits on them, pursuant to art. 6 para. (1) letter f) of the GDPR, in order to achieve our legitimate interest in ensuring the security and proper functioning of IT systems and the entire infrastructure.
- d) **in order to electronically archive the photos/videos**, according to art. 6 para. (1) letter f) of the GDPR.

II. CATEGORIES OF RECIPIENTS

A. Information regarding the data processing activities carried out by Masterange and Stejarii Universe

For the data processing activities carried out by Masterange and Stejarii Universe 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) Joint controller – Medusa;
- b) service providers:
 - marketing services;
 - photo/video services;
 - cloud services;
 - communication services;
 - events organization services;
 - audit services;
 - archiving services;
 - maintenance services;
 - IT services;
 - outsourced data protection officer;
 - 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:
 - o <https://www.facebook.com/privacy/explanation>,
 - o <https://www.linkedin.com/legal/privacy-policy>,
 - o <https://help.instagram.com/519522125107875>,
 - o <https://policies.google.com/privacy?hl=en>);
- c) judicial or arbitral tribunals and/or other public authorities, related to the activity of these authorities to the extent that the transmission of data to them is required by law and/or is necessary in case of litigation or settlement of a dispute, as well as in case of controls or legal requests in which Masterange or Stejarii Universe has the obligation to make them available (for example National Supervisory Authority for Personal Data Processing – “ANSPDCP” –, police, prosecutor's office, others);
- d) lawyers, specialists in the fields of audit, legal, tax consultancy etc.;
- e) third parties expressly indicated by you;
- f) third party acquirers, to the extent that the activity of Masterange or Stejarii Universe 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 personal data to the service providers of Masterange or Stejarii Universe who act as processors is 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 behalf of Masterange or Stejarii Universe for no other purpose.

B. Information regarding the data processing activities carried out jointly by the Joint controllers

For the data processing activities carried out jointly by Masterange, Stejarii Universe and Medusa for the purposes mentioned in Section I letter B, 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) Joint controllers – Masterange, Stejarii Universe and Medusa;
- b) service providers:
 - archiving services;
 - photo/video services;
 - outsourced data protection officer;
 - 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:
 - o <https://www.facebook.com/privacy/explanation>,
 - o <https://www.linkedin.com/legal/privacy-policy>,
 - o <https://help.instagram.com/519522125107875>,
 - o <https://policies.google.com/privacy?hl=en>).

The disclosure of personal data to the service providers of the Joint controllers who act as processors is 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 behalf of the Joint controllers for no other purpose.

III. TRANSFERS TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

A. Information regarding the data processing activities carried out by Masterange and Stejarii Universe

As a rule, Masterange and Stejarii Universe will not transfer 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 personal data outside the area described above will be made only by applying adequate guarantees and protection measures (i.e. adequacy decisions of the European Commission) according to the specific legal provisions on the protection of personal data and with appropriate information.

B. Information regarding the data processing activities carried out jointly by the Joint controllers

Masterange, Stejarii Universe and Medusa will independently decide whether and to what extent they will transfer personal data and under what conditions these transfers will be made.

IV. RIGHTS REGARDING PERSONAL DATA

Except the cases in which 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 state the reasons relating to your particular situation or that of your child's of whom you are parent/legal representative. We will no longer process personal data, unless we can demonstrate (i) compelling legitimate grounds for processing which override the interests, rights and freedoms of you or your child's of whom you are the parent/legal representative or (ii) the purpose is the establishment, exercise or defend a right in court.

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 personal data is processed on the basis of consent, case in which you have the possibility at any time to send a request to withdraw the 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 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 the 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 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 or the rights of your child's of whom you are parent/legal representative, as data subject:

- **How to exercise:** you can contact Data protection officer of Stejarii Universe, as a single point of contact, using the contact details available above.

- **The period of time for providing a response:** we will try to resolve the 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 data necessary to identify you or your child of whom you are the parent/legal representative (name, surname, e-mail address), with the understanding that, to the extent that we cannot identify you or your child of whom you are the parent/legal representative on the basis of this information alone, we will ask you to provide additional information that will allow us to identify you or your child of whom you are the parent/legal representative.

V. STORAGE OF PERSONAL DATA

A. Information regarding the data processing activities carried out by Masterange and Stejarii Universe

Personal data processed by Masterange and Stejarii Universe will be stored as follows:

- in the case of personal data processed for the purposes mentioned in Section I letter A points 1 and 2 and letter B points 1 and 2, the data will be kept throughout the organization of the Events, and subsequently archived and retained for the duration of the 3-year statute of limitations period and accessed only to defend our rights, and in case there are data with tax relevance, these will be kept in accordance with financial accounting legislation.
- in the case of testimonials provided by you and distributed in online materials and on the social media pages of the Stejarii community, they will be kept in accordance with the internal archiving policies of Masterange and Stejarii Universe, for the period necessary to fulfill the purpose of promoting the historical activity of Masterange and Stejarii Universe, or until the withdrawal of your consent if it occurs earlier. You have the right to request their deletion at any time.
- in the case of photographs/videos, they will be kept on social media pages of Masterange and Stejarii Universe for 5 years, or until the withdrawal of your consent if it occurs earlier. You have the right to request their deletion at any time.

Subsequently, we will delete/remove the personal data from our systems and records and/or take measures to anonymize them so that 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.

B. Information regarding the data processing activities carried out jointly by the Joint controllers

Masterange, Stejarii Universe and Medusa will independently decide the storage period of personal data according to their internal policies.

Adopted on 24.04.2026