



PRIVACY NOTICE

regarding the processing of personal data

”Your at home automotive showroom” Event

We, **Masterange Romania S.R.L.**, headquartered in Bucharest, 24-26 Nordului Road, District 1, registered at the Trade Register under no. J40/3330/2003, having the Tax registration code RO15262492, hereinafter referred to as the *”Company”, the ”Controller” or ”Masterange”*, hereby provide you with all the relevant information about how we process your personal data in the context of your participation at the event **”Your at home automotive showroom”** (**”the Event”**), organised by us on **October 19, 2024**, according to the provisions of art. 13, respectively art. 14 of the General Data Protection Regulation (**”GDPR”**).

For any other information or requests regarding the processing of your personal data or to exercise your rights according to the GDPR, you can contact our **Data Protection Officer** using the following contact details:

ITH Management Office S.R.L.

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

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

Your personal data is obtained by us directly from you, as a Resident (lessee or occupant) of Stejarii Residential Club or Stejarii Collection.

This privacy notice outlines when, how, and why we, Masterange, as the data controller, process the personal data of the participants, how we use them, how we store them, what your rights are as data subject, and how these rights can be exercised.

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

Your decision to participate in the Event implies the acceptance of the terms of organization.

In order to organize and to promote the Event, the Controller will process certain personal data of the participants to the Event, according to the details mentioned below.

Personal data is processed as follows:

- 1. For the purpose of sending the invitation in electronic format**, Masterange processes **identification data** (first name, last name) **and contact information** (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 Event, to correspond regarding the details of participation in the Event, to maintain a record of participants for the purpose of organizing the Event effectively, as well as for the organization of the Event and registration of the appointment for carrying out test drive activities**, we process **identification data** (first name, last name), **contact information** (e-mail address, phone number), **data regarding the vehicle you wish to test** (type, brand, model), as well as **data related to the appointment for the test drive**

activities (appointment time). The legal basis for processing your personal data is the legitimate interest to organize the Event under the best conditions, in accordance with art. 6 para. (1) letter f) of the GDPR.

Masterange will not make your personal data available to Țiriac Auto S.R.L. as a provider of the test drive activities. However, Țiriac Auto S.R.L., as an independent controller, will collect from you on the day of the Event certain personal data and will process this data for its own purposes. For more details regarding how it processes this data as an independent controller, please refer to the privacy notices provided by it.

3. **To promote the Event, we will capture environmental photos, with a wide frame, aiming to convey the overall atmosphere of the Event without the purpose of identifying individuals. From the photos taken during the Event, we will select some of them for promotion on our website or on social networks, and the rest will be archived. As a rule, we will not seek to capture photos that lead to the identification of participants.**

However, it is possible that some photos may inadvertently capture the image of participants. Therefore, the processing is carried out based on your consent expressed through your participation in the Event.

For close-up images (photo materials such as portraits or those focusing on individuals), you can express your preference to be photographed or not directly to the event 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.

During the Event, photographs will also be taken by Țiriac Auto S.R.L., as the provider of the test drive activities. For more details regarding how it processes this data as an independent controller, please refer to the privacy notices provided by it.

4. In addition to the previously indicated purposes, personal data will be processed 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 we 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 us, 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. Depending on the specific situation, personal data will be stored according to the retention terms established by the internal nomenclature, considering the applicable laws.
 - c) **for managing IT systems, 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**, according to art. 6 para. (1) letter f) of the GDPR.
 - e) **for internal reporting**, according to art. 6 para. (1) letter f) of the GDPR, in order to achieve our legitimate interest in ensuring the proper management of the business.

II. CATEGORIES OF RECIPIENTS

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

a) Service providers:

- Event organization services;
- photo services;
- marketing services;
- cloud services;
- communication services;
- audit services;
- archiving services;
- anonymization services for the photo images;
- maintenance services;
- IT services;
- outsourced data protection officer;
- social media platform, as the case may be, such as Facebook, LinkedIn, Instagram, YouTube (in these cases, 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>);

b) judicial or arbitral tribunals and/or other public authorities, related to the activity of these authorities to the extent that the transmission of data to them is required by law and/or is necessary in case of litigation or settlement of a dispute, as well as in case of controls or legal requests in which we have the obligation to make them available (for example National Supervisory Authority for Personal Data Processing – “ANSPDCP”, police, prosecutor's office, others);

c) lawyers, specialists in the fields of audit, legal, tax consultancy etc.;

d) third parties expressly indicated by you;

e) third party acquirers, to the extent that the activity of Masterange would be transferred (in whole or in part) to another entity, and the data of the data subjects would be part of the assets that are the subject of such a transaction, based on a legitimate development interest and adaptation of our business activities.

The disclosure of personal data to our service providers 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 our behalf for no other purpose.

III. TRANSFERS TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

As a rule, we 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.

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 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 personal data is processed on the basis of consent, case in which you have the possibility at any time:

- to send an email at: dataprotection@tiriacimobiliare.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 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 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 as 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 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 (name, surname, e-mail address), with the understanding that, to the extent that we cannot identify you on the basis of this information alone, we will ask you to provide additional information that will allow us to identify you.

V. STORAGE OF PERSONAL DATA

The personal data processed for the purposes mentioned in this privacy notice will be kept throughout the organization of the Event, 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 photographs, they will be kept on our social media pages 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 you can no longer be identified. We will take all reasonable measures to ensure the deletion of personal data transmitted to recipients for the purposes mentioned above.

In the case of personal data processed for subsequent and/or later purposes, the data will be kept according to internal policies of Masterange.

Adopted on 04.10.2024