

PRIVACY POLICY PROCESSING OF PERSONAL DATA

I. IDENTITY AND CONTACT DETAILS OF THE CONTROLLER

GLOBAL EAST EUROPEAN INVESTMENT S.R.L. (hereinafter referred to as the “**Company**” or the “**Controller**”), having its headquarters in Bucharest, Șos. Nordului no. 24-26, 2nd floor, room 17, District 1, Tax Identification Code RO28472658, registered at the Trade Registry under no. J2011005836404, acting as a controller, operates the website www.tiriactower.ro and its connected subdomains (hereinafter referred to as the “**Website**”), as well as the social media pages dedicated to Tiriac Tower (hereinafter referred to as the “**Social media pages**”).

This Privacy Policy (hereinafter referred to as the “**Policy**”) **sets out in detail how the Company collects and processes your personal data, as well as the rights you have as a data subject and how such rights may be exercised**, in accordance with Regulation (EU) No. 679/2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as with the applicable national legislation (“**GDPR**”), and in accordance with the legislation on the protection of privacy in the electronic communications sector.

For any **information or requests regarding the processing of personal data**, or for the **exercise of your rights** as a data subject in relation to the Company, please contact us using the following contact details:

- **Data Protection Officer:** ITH Management Office S.R.L.;
- **Postal address:** Bucharest, District 1, Șos. Nordului no. 24-26;
- **E-mail address:** dataprotection@tiriacimobiliare.ro.

II. TO WHOM IS THIS POLICY ADDRESSED

This Policy is addressed to visitors of the Website and the Social media pages, as well as to individuals who contact us through other available means of communication, namely by telephone or e-mail.

III. SOURCE OF DATA

We collect your personal data when you interact with the Website and the Social media pages (for example, when you fill in a form available on the Social media pages or when you contact us through them), or when you contact us by telephone or e-mail.

In order to ensure that the data collected is accurate and up to date, we kindly ask you to notify us of any changes regarding the personal data you have provided. We also recommend that you limit the information submitted strictly to what is necessary for the stated purposes.

IV. PERSONAL DATA PROCESSED, PURPOSES AND LEGAL GROUNDS FOR PROCESSING

We collect the personal data described below solely for the purposes and on the legal grounds specified in this Policy. Should we intend to process the data for other purposes, we will duly inform you in advance and take all necessary measures to ensure compliance with the applicable provisions on the protection of personal data.

The personal data is processed as follows:

A. MANAGING OF REQUESTS SUBMITTED BY YOU

When you choose to complete a form via the Social media pages or to contact us through them or by e-mail, or by telephone, we will process **your identification data** (first name, last name, username), **your contact data** (e-mail address, telephone number), as well as **details regarding your specific request**, for the purpose of:

1. Conducting pre-contractual steps

The **legal basis** is:

- taking steps at your **request for the purpose of submitting an offer/concluding a contract**, pursuant to art. 6 para (1) letter b) of the GDPR; or
- when you act as a legal representative or a designated contact person of a legal entity, **based on the legitimate interest of taking steps to conclude a contract with a legal entity**, pursuant to art. 6 para. (1) letter f) of the GDPR.

In case of concluding a contract, we will provide you with a separate privacy notice explaining the processing of your personal data in the course of concluding and performing the contract.

2. Managing any other requests you submit to us

The **legal basis** is the **legitimate interest in responding to the requests addressed to us**, pursuant to art. 6 para. (1) letter f) of the GDPR.

B. INTERACTIONS THROUGH SOCIAL MEDIA PAGES

In the context of using the Social media pages, we process your personal data for the purposes described below.

1. When we manage the Social media pages created on social networking platforms, we process the **identification data of followers** (first name, last name, username), as well as **data regarding the interactions of individuals interested in our activities, products, and services** (comments, likes, tags, reposts, etc.).

The **legal basis** is the **legitimate interest in using such pages to ensure our online visibility and presence**, pursuant to art. 6 para. (1) letter f) of the GDPR.

2. For conducting analyses and statistics regarding general opinion, we process the **feedback expressed on these platforms or in other publicly available online media** by individuals interested in our services in connection with Țiriac Tower.

The **legal basis** is the **legitimate interest in improving the experience of clients and potential clients, in order to meet their needs**, pursuant to art. 6 para. (1) letter f) of the GDPR.

C. STATISTICAL ANALYSES AND IMPROVEMENT OF THE WEBSITE NAVIGATION EXPERIENCE

When you visit the Website, we process personal data through cookies and other similar technologies. For more details, you can access the Cookie policy available on the Website.

D. OTHER PURPOSES

In addition, your personal data will also be processed for subsequent and/or related purposes, if and as the case may be:

1. **Preparation of statistics and aggregated reports aimed at developing and improving our activities and services, enhancing the management of operations, optimizing processes, centralizing operations and maintaining an internal database, as well as analyzing and minimizing financial and reputational risks associated with the conduct of our activities.**

The **legal basis** is the **legitimate interest in ensuring proper business management**, pursuant to art. 6 para. (1) letter f) of the GDPR.

In this case, the data is processed in anonymized form and only exceptionally and when necessary in identifiable form.

2. **Ensuring the security of the systems, networks, and equipment used, as well as their maintenance.**

The **legal basis** is the **legitimate interest in ensuring the security and proper functioning of systems, equipment, and networks**, pursuant to art. 6 para. (1) letter f) of the GDPR.

3. **Compliance with the legal obligations imposed on us** (for example, obligations under tax legislation, archiving obligations, data protection obligations, etc.), including reporting to certain institutions and/or public authorities.

The **legal basis** is the **fulfillment of our legal obligations**, pursuant to art. 6 para. (1) letter c) of the GDPR.

4. **Defense, exercise, or establishment of rights, including dispute resolution.**

The **legal basis** is the **legitimate interest in asserting, exercising, or defending our rights**, pursuant to art. 6 para. (1) letter f) of the GDPR.

V. USE OF THE WEBSITE AND THIRD-PARTY PLUG-INS/WEBSITES

The Website contains links to third-party websites that you can access directly.

In such cases, these third-party websites may carry out personal data processing activities that is not under our control. Accordingly, the operators of these third-party websites act as independent controllers and have their own policies regarding how they process personal data, including through cookies.

Please consult the privacy policies of the third-party websites for complete information regarding their processing of your personal data.

VI. CATEGORIES OF RECIPIENTS

Personal data may be disclosed, strictly to the extent necessary for the purposes detailed above or in cases where this is required by law, or when we have a legitimate interest duly justified, to the following categories of recipients, who may act as independent controllers, joint controllers, or processors, as follows:

1. Service providers:
 - a) management and business consultancy services;
 - b) personal data protection services;

- c) IT systems development and maintenance services;
 - d) cybersecurity services;
 - e) electronic communication services;
 - f) archiving services;
 - g) audit services;
 - h) providers of software solutions, platforms, or other IT systems, such as those used for managing information collected through the Website, marketing platforms, etc.;
 - i) cloud/hosting services;
 - j) social media platforms;
2. External consultants contacted in specific situations (for example, lawyers, consultants, experts);
 3. Public authorities and bodies, including criminal investigation authorities and courts, or institutions competent to carry out inspections and audits of the operator's activities and assets, to the extent that the transfer of data to them is required by law and/or necessary in the case of a dispute or litigation, as well as during inspections, where we are obliged to provide the requested information (for example, the National Supervisory Authority for Personal Data Processing – **"ANSPDCP"**);
 4. Persons expressly indicated by you;
 5. Third-party acquirers, to the extent that our business activity would be transferred (in whole or in part), and the personal data of data subjects is inherently related to the assets that are the subject of such a transaction.

VII. TRANSFERS TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

As a rule, 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 according to the specific legal provisions on the protection of personal data and with appropriate information.

VIII. STORAGE OF PERSONAL DATA

The personal data indicated in the sections above will be processed only for the period necessary to achieve the purposes stated in this Policy.

Thus, the periods for processing personal data are as follows:

1. **In the case of a request submitted by you**, we will process your data throughout the period necessary to resolve the request, as well as for a period of 3 years from the date of the last interaction, both for the purposes of conducting statistical analyses and reporting, and for defending ourselves in the event of disputes.
2. **When interacting with the Social media pages**, interactions, posts, and comments will be retained until you exercise your deletion option or will be kept according to our internal archiving policy, for the period necessary to preserve the historical record of the activity.

3. **Regarding data collected via cookies**, such data is retained for the duration specified in each case in the Cookie policy.
4. **Personal data processed in the context of disputes, litigation, or mediations** will be retained beyond the durations mentioned above until their resolution, and thereafter, in accordance with the applicable limitation periods.

The retention periods mentioned above may be modified if it becomes necessary to protect our legitimate interests or if there are changes to legal retention obligations. In such cases, we will act in accordance with the law, including with regard to informing you.

Subsequently, we will delete or remove personal data from our systems and records and/or take measures to anonymize it so that you can no longer be identified, and we will also request that the recipients of the data take similar measures.

IX. YOUR RIGHTS REGARDING PERSONAL DATA

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. We will no longer process personal data, unless we can demonstrate (i) compelling legitimate grounds for processing which override your interests, rights and freedoms 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 Policy 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 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: 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 data subject:

- **How to exercise:** you can contact the 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.