

Notification concerning the processing of personal data of website's users

When you access the website, certain personal data of yours will be processed by our company, mainly to ensure website accessibility.

The general legal framework governing the protection of personal data is the General Regulation on the Protection of Data no. 679/2016 ("**GDPR**") applicable in the European Union, and this notification follows the requirements of GDPR.

What are the entities involved in the processing of your personal data?

First of all, your personal data are processed by **Modatim Business Facility S.A.**, a Romanian company, headquartered in Bucharest, 169A Calea Floreasca, Floreasca 169, Cladirea A, 5th floor, 1st District, registered under no. J40/7309/2002, having Fiscal Identification Code 14803379. Modatim Business Facility S.A. acts as Data Controller.

Whereas **Modatim Business Facility S.A.** is part of the Nepi Rockcastle Group of companies (the "**Group**"), your personal data will be processed for the purposes set out below also by other companies of the group, where we (Modatim Business Facility S.A. or the recipient companies in the Group) can justify a legitimate basis in doing so or if we have your consent to do so. List of companies in the group you can find at the following address www.nepirockcastle.com.

What kind of data do we process?

Modatim Business Facility S.A. processes your identification and contact details (i.e., name, surname, e-mail address, telephone number), as and if provided by you. Also, when visiting our website, we process the following personal data: the IP address, the browser type, the type of computer used and the usage system, the date and time of access and your location.

As a result of the use of the Website, we place cookies or other similar technical means on your computer to help you access the services of our Website with ease and efficiency, and to provide, protect and improve our Website's features. More information about cookies can be found in the Cookie Policy available on our website, at "Cookies" section.

For what purposes do we process the above data and which is our legal basis ?

The personal data described above are processed for the following purposes:

- a) to contact you through the means of communication to provide you with information (i.e. non-marketing information),
- b) to create and analyse profiles about you in order to present you content that is suited to your preferences and to improve our services,
- c) to perform marketing or general advertising activities as well as customer loyalty activities and surveys,
- d) to perform economic, financial and/or administrative management activities,
- e) to centralize your operations and maintain an internal database that stores your information about you in order for us to access it for use (that is, the use of these data involves processing by the means of our internal applications),
- f) to perform internal analyses (including statistical analyses, reports) on the customer portfolio, improving and developing services, and to conduct market studies and analyses to improve and develop our services, NEPI Rockcastle Group and its Partners' services,
- g) to archive, settle disputes, investigations or any other petitions/complaints which involve us and to perform risk checks on our procedures and processes and to conduct audits or investigations in our company,

- h) to ensure a high level of security both in what concerns the computer systems (e.g. applications, network, infrastructure, website) and physical locations,
- i) to provide you with support services when and if you request so.

To whom do we transmit your personal data?

- a) IT service providers (e.g. software maintenance and development, site maintenance and development),
- b) market research service providers, service providers used for the transmission of the marketing communications, providers of traffic monitoring service and online tools users' behavior, providers of customization of various types of marketing, providers of marketing services through social media resources, content providers for marketing,
- c) companies in the Nepi Rockcastle Group (details at www.nepirockcastle.com).

We will require these entities and their staff to respect the confidentiality of these data, ensuring a high level of security for your data processing. We will also provide your personal data to judicial bodies, public institutions, or central and local public authorities, based on a duly substantiated request or legal obligation.

For how long do we store your personal data?

Your personal data are processed and stored during the necessary period for which we provide the access to the website.

What are your rights with respect to the processing of your personal data?

As a Website user, you have the following rights which can be exercised individually or cumulatively with respect to the personal data we hold about you:

- a) **Right of access** - you may request confirmation if your personal data are processed or not by us, and if so, you may request access thereto, as well as certain information about this. Upon request, we will also issue a copy of the processed personal data. The request for additional copies will be charged based on the actual costs incurred by us,
- b) **Right to rectification** - you can get your inaccurate personal data rectified and also supplement incomplete data, including by providing additional information.
- c) **Right to delete data ("the right to be forgotten")** - in situations expressly regulated by law, you can obtain from us the deletion of the data. Thus, you can request deletion of personal data if:
 - the data are no longer necessary for the purposes for which they were collected or otherwise processed;
 - you withdraw your consent on the basis of which processing takes place;
 - you oppose to the processing under the right of opposition;
 - processing your personal data is illegal;
 - data must be deleted for compliance with a legal obligation incumbent on us.
- d) **Right to restrict processing** - you may request the restriction of processing of personal data in certain situations governed by law, as follows:
 - you contest the accuracy of your data, for the time the accuracy of the concerned data is checked;
 - processing is illegal and you oppose to the deletion of data;
 - you need these data to establish, exercise or defend some rights in court, and we no longer need this data;

- you opposed the processing of personal data for the period in which we check if our legitimate interests prevail over the interests of your rights and freedoms.

In these situations, except for storage, the data will not be processed anymore.

- e) **Right to object to the processing of personal data** - you can object at any time, for reasons related to your particular situation, to processing (including profiling) based on our legitimate interest or, where appropriate, on us exercising a task which is in the public interest or results from the exercise of a public authority with which we would have been invested thereby.

Marketing materials sent electronically may contain brief information on your option of objecting to the processing of personal data in order to perform direct marketing. If you object to the processing of personal data for direct marketing purposes, your personal data will no longer be used in for these purposes.

The right to object to the direct marketing activity is available when the processing of personal data for direct marketing purposes is based on (i) our legitimate interest, or (ii) on the existing contractual relationship with us and concerns products that are similar to those already contracted, and not on the consent given.

- f) **Right to data portability** - you can receive your personal data in a structured, readable format, and you can request that the data be passed to another operator. This right applies only to personal data provided directly by you, and only if the processing of personal data is done by automated means and is legally based on either the execution of a contract or the consent of that person,
- g) **Right to complain** - you can complain about how we processes your personal data. The complaint will be filed with the National Supervisory Authority for Personal Data Processing ("**ANSPDCP**") – details at www.dataprotection.ro ,
- h) **Right to withdraw your consent** - you may at any time withdraw your consent to the processing of personal data in cases where processing is based on consent. Withdrawal of the consent will only have effect for the future, and processing prior to the withdrawal remains valid.
- i) **Additional rights related to automated decisions** used in the delivery of services - if we make automated decisions about personal data and these decisions affect you significantly, you can (a) obtain human intervention with respect to said intervention, (b) express your point of views on such processing, (c) obtain explanations of the decision made and (d) contest that decision.

These rights (except the right to contact ANSPDCP, which you can exercise under the conditions established by this authority - in this regard you can see the official website www.dataprotection.ro) may be exercised, either individually or by aggregation sending a letter/message in the following ways:

- by post, at: Calea Floreasca nr. 169A, Floreasca 169, Cladirea A, etajul 5, Sector 1, Bucuresti, Romania (to the attention of NEPI Rockcastle);
- by email, at the email address: Data.Protection@nepirockcastle.com.

In addition, a Data Protection Officer ("**DPO**") has been appointed at the Group level, who can be contacted if there are any concerns about the protection of personal data and the exercise of data protection rights. The OPD may be contacted by the means of a written, dated and signed application, using the contact details mentioned above.

What profiles do we make about your activity?

For statistical purposes, Modatim Business Facility S.A. makes various profiles regarding website users, including you. Such profiles involve analyzing personal data that we hold about you.

We use measures to ensure that fundamental data protection rights are respected. In addition, correct mathematical or statistical procedures are used, personal data are secured, and measures are in place to allow anomalies to be corrected with a minimum of risk of error.

Last update

This notification was updated on 26.11.2018.

We reserve the right to revise and update this Privacy Policy at any time. Additional information will be included in this updated document, available on our website. Therefore, please check the relevant section of our Privacy Policy and Information Notice when you visit the Website, because they may have changed since your last visit. If you have any questions about the information contained in this page, please contact us at data.protection@nepirockcastle.com .