

GENERAL NOTICE ON PERSONAL DATA PROTECTION

1. ABOUT US

- Iulius Group has 20-plus years of experience in the development and operation of mixed-use projects in Romania, revolutionizing the Romanian real estate market.
- We would like you to know about our constant preoccupation for protecting your personal data and also to hereby inform you about a few important aspects in this regard.

2. THE TYPES OF PERSONAL DATA WE PROCESS, THE PURPOSES AND GROUNDS FOR PROCESSING

(a) CONCLUSION AND/OR EXECUTION OF CONTRACTS WITH POTENTIAL AND/OR EXISTING BUSINESS PARTNERS OF IULIUS GROUP:

- We will process your personal data for the purpose of concluding and/or executing the contract, communicating with you during the negotiation and performance of the contract, as well as for maintaining our contractual relationship with you.
- The grounds for processing the personal data are as follows: concluding and/or executing the contract with you; your consent.
- In these cases, the personal data we may process include: name and surname, telephone number, email address, current address and/or permanent address and/or mailing address, series and number of ID document, personal identification number (CNP), signature; as applicable, such data may be processed in regards to your collaborators, your representatives and/or your collaborators' representatives, your contact persons and/or your collaborators' contact persons and/or your employees and/or your collaborators' employees.

(b) ORGANIZING AND CARRYING OUT CAMPAIGNS (WITH OR WITHOUT PRIZES):

- We will process your personal data for the purpose of running advertising campaigns (with or without prizes), for maintaining an active relationship within the community, with our clients, with the visitors and/or users of the mixed-use centers in the portfolio of Iulius Group.
- The grounds for processing the personal data are as follows: our interest in promoting the mixed-use centers we manage and the various actions we embark upon within the community; communicating with you during the campaign; signing up participants when organizing and/or running of campaigns; identification, validation and notification of winners (in the case of campaigns with prizes); satisfying the legal obligations incumbent upon us per the provisions of the tax laws in force (in the case of campaigns with prizes); your consent.
- In these cases, the personal data we may process include: name and surname, sex, date of birth, telephone number, email address, current address and/or permanent address and/or mailing address, series and number of ID document, personal identification number (CNP), signature, photo and/or video footage, as applicable.

(c) RUNNING LOYALTY PROGRAMS:

- We will process your personal data for the purpose of running certain loyalty programs, maintaining an active relationship with our clients, with the visitors and/or users of the mixed-use centers in the portfolio of Iulius Group.
- The grounds for processing the personal data are as follows: our interest in promoting the mixed-use centers we manage, as well as the various services of the operators conducting their activity in these centers; signing you up in loyalty programs; your consent.
- In these cases, the personal data we may process include: name and surname, sex, date of birth, telephone number, email address, current address and/or permanent address, occupation, as applicable.

(d) CARRYING OUT VARIOUS EVENTS ORGANIZED BY IULIUS GROUP:

- We will process your personal data for the purpose of conducting and promoting cultural, musical, entertainment and other types of events, for maintaining an active relationship within the community, with our clients, with the visitors and/or users of the mixed-use centers in the portfolio of Iulius Group.

- The grounds for processing the personal data are as follows: our interest in promoting the mixed-use centers we manage and the various actions we embark upon within the community; your consent.
- In these cases, we shoot photo/video footage of people in the audience of events organized by us and it is possible for this footage to be published on our websites and/or social media pages and/or in the media. If you do not wish to be featured in this footage, please exercise this right by informing the people shooting the footage in due time and/or by sending us a request to destroy the footage featuring you or to limit future processing thereof.

(e) SENDING NEWSLETTERS:

- We will process your personal data for the purpose of promoting the mixed-use centers we manage, the campaigns and events we organize and/or the actions we embark upon within the community, as well as for improving your experience in the future.
- The grounds for processing the personal data are as follows: your consent; our interest in promoting the mixed-use centers we manage, the campaigns and events we organize and/or the various actions we embark upon within the community; our interest in evaluating and improving your experience.
- In these cases, the personal data we process refers to email addresses.

(f) RUNNING RECRUITMENT PROCESSES FOR POTENTIAL EMPLOYEES AND/OR INTERNS WITHIN IULIUS GROUP:

- We will process your personal data for the purpose of analyzing your profile and your training level, communicating with you throughout the recruitment process, as well as for the purpose of concluding and/or executing the individual employment agreement and/or internship, as applicable.
- The grounds for processing the personal data are as follows: our interest in determining how well you fit in with a company within Iulius Group; conclusion and/or execution of your individual employment agreement and/or internship, as applicable; your consent.
- In these cases, the personal data we may process include: name and surname, date of birth, telephone number, email address, education and training, work experience, other data provided in your C.V., as well as any other relevant information we might request to this end.

(g) PERSONAL AND PROPERTY SECURITY:

- We will process your personal data in order to ensure the security of people and property within the mixed-use centers we manage.
- The grounds for processing the personal data refer to our legitimate interest in ensuring the security of people and assets within our enclosed premises.
- In these cases, the personal data we may process include: video footage recorded via surveillance cameras, data collected via our reception desks, namely the data featured on the visitor's valid identification document, purpose of their visit and other relevant information we might request to this end.

(h) ACCESSING OUR WEBSITES AND/OR SOCIAL MEDIA PAGES:

- We will process your personal data for the purpose of improving user experience, as well as for answering your requests.
- The grounds for processing the personal data are as follows: our interest in improving the content of our websites and social media pages; our interest in knowing your opinion and preferences, as well as improving user experience when accessing our websites and social media pages; answering your requests for offer (submitted via our websites); answering your requests to be recruited by Iulius Group and/or other operators conducting their activity within the centers managed by Iulius Group (submitted via our websites); answering your notifications and complaints (submitted via the websites and/or via social media pages); your consent.
- In these cases, the personal data we may process include: cookie identifiers, user name and profile picture, photos published via our websites and/or social media pages, surname, name, email address, telephone number, the data comprised in your C.V., as well as any other relevant information we might request to this end.

(i) SATISFYING CERTAIN LEGAL OBLIGATIONS:

- We will process your personal data for the purpose of satisfying certain legal obligations that are incumbent on Iulius Group, for answering any requests, notifications, complaints or questions formulated by the public authorities and institutions, or in any other cases where we are legally bound to do so.
- The grounds for processing the personal data include satisfying the legal obligations incumbent on us.
- In these cases, the personal data we process are those requested and/or provided by the public authorities and institutions, as well as any other necessary data for satisfying a legal obligation.

(j) DEFENDING OUR RIGHTS AND INTERESTS AND/OR THOSE OF ANY PERSON AFFILIATED WITH IULIUS GROUP:

- We will process your personal data for the purpose of defending our rights and interests (as well as those of any person affiliated with Iulius Group) before courts of law, court appointed receivers, notaries public, other public authorities or institutions, courts of arbitration, mediators and/or other public or private bodies that settle disputes, before our lawyers, consultants or other natural or legal persons involved in the respective negotiations and/or disputes.
- The grounds for processing the personal data are as follows: satisfying the legal obligations that are incumbent on us and/or defending our legitimate rights and interests, as applicable.
- In these cases, the personal data we process are those necessary for satisfying a legal obligation and/or for the purpose of defending our legitimate rights and interests.

(k) DATA PROCESSING FOR INDIVIDUALLY DETERMINED PURPOSES:

- In certain cases, we will process your personal data for individually determined purposes, based on your consent which you can grant to us by filling in a document we provide to you.
- In such cases, the grounds for processing the personal data are as follows: your consent (most of the times); other grounds provided in the document we provide to you.
- In these cases, the personal data we may process include those provided and/or mentioned in the document we provide to you.

(l) COMMUNICATING WITH YOU:

- We will process your personal data in the situations described above, as well as in any other situations in order to answer any of the requests, notifications, complaints or inquiries you may address to us.
- The grounds for processing the personal data are as follows: your consent; satisfying a specific legal obligation or defending our interests and rights, as applicable.
- In these cases, the personal data we may process include: name and surname, telephone number, email address, and any other relevant information in this respect.

3. THE SOURCE OF PERSONAL DATA

- The personal data we process may be collected both from you and from external sources (business partners, public authorities and/or institutions, etc.).
- In case you send us personal data in reference to other persons, please inform such persons in advance about the purpose, grounds and other necessary information regarding the manner of processing their data and provide them with this notice herein on how Iulius Group processes their personal data and/or explain the provisions therein. When applicable, we will inform such persons about the manner in which we process their personal data.

4. NO OBLIGATION TO PROVIDE US WITH YOUR PERSONAL DATA

- You can choose not to provide us with specific types of personal data. If you choose to proceed as such, this may incur the impossibility to conclude and/or execute certain contracts with you, it may affect our capacity to provide the requested services, to answer your questions/notices/requests or to send you specific communications, as well as your capacity to use certain applications and/or services or functionalities and their features. However, in most of the cases, your choice to not provide us with such data will not have legal consequences for you.

5. PERSONAL DATA STORAGE PERIOD

- The storage period for your personal data varies depending on the purpose of processing thereof and the type of data.

- In certain situations, the processing period will be indicated in the document we provide to you when collecting your data and/or when you give your consent.
- In all cases, we will store the personal data in accordance with the legal provisions in force, the applicable statutes of limitation and/or the recommended practices in the field of data protection.

6. DISCLOSURE OF PERSONAL DATA

- As a rule, we will not disclose your personal data; however, in certain cases we might be bound to disclose certain data in relation to you.
- In order to achieve the processing purposes, we may disclose your data to the companies within Iulius Group, to the contractual partners of Iulius Group, or to other authorized persons that process your data for Iulius Group. We may also disclose your data to the central and/or local public authorities or to other natural and/or legal persons when there is a legal obligation to this end or for our legitimate interest (e.g. in order to obtain financing and for performing the obligations incumbent on us, we may send the contracts entered into with you to the financing banks of Iulius Group).
- In order to achieve certain individually determined purposes, we may disclose your data to third parties and/or persons indicated in the document you fill in when granting your consent.
- In the context of certain transactions, restructuring or other corporate operations (respectively on the grounds of our legitimate interests or the fulfillment of a legal obligation), it is possible for us to disclose your data to potential buyers, collaborators or consultants thereof, or to the authorities, as applicable.
- In all these cases we will exercise all reasonable efforts to make sure that the data recipients process the data securely and confidentially, in accordance with the purpose for the transmission thereof and in compliance with your rights and interests.

7. TRANSFER OF DATA TO THIRD PARTY COUNTRIES OR INTERNATIONAL ORGANIZATIONS

- We do not transfer and do not intend to transfer your data to companies, organizations or persons in third-party countries or to international organizations.
- Should a need arise to transfer data in reference to you to either of the recipients mentioned above, we will inform you in advance about this matter.

8. NO AUTOMATED DECISION-MAKING PROCESS

- Iulius Group does not adopt decisions based exclusively on automated processing of your data and that would produce legal effects in reference to you or that would impact you in a significant manner.

9. YOUR RIGHTS

(a) The RIGHT OF ACCESS – means you have the right to obtain a confirmation from us on whether or not we process your personal data; if we do process your personal data, you have the right to access said data, as well as any other information regarding the processing manner thereof.

(b) The RIGHT TO RECTIFICATION allows you to obtain the rectification of your data that we process, in case of inaccuracy of such data.

(c) The RIGHT TO DATA PORTABILITY refers to your right to receive your personal data in a structured, commonly used and machine-readable format, as well as your right to obtain the transfer of such data to another personal data operator.

(d) The RIGHT TO OBJECT is your right to oppose the processing of your personal data, except for the cases when such processing is necessary for legal purposes.

(e) The RIGHT TO RESTRICT gives you the right to restrict the processing of your personal data in certain circumstances.

(f) The RIGHT TO DATA ERASURE (“RIGHT TO BE FORGOTTEN”) means you have the right to request the deletion of your data in certain cases (e.g.: the data is no longer necessary for the initial purposes of collection and processing thereof; you withdraw your consent and there are no other legal grounds for processing; you oppose processing and there are no prevailing legitimate reasons; the personal data was illegally processed; the personal data must be deleted to comply with a legal obligation, etc.).

(g) The RIGHT TO WITHDRAW CONSENT means you have the right to withdraw your consent at any time when the processing activity is based on your consent; however, revoking your consent will not affect the lawfulness of any processing based on your consent prior to withdrawal thereof.

(h) The RIGHT TO LODGE A COMPLAINT WITH THE COMPETENT SUPERVISORY AUTHORITY refers to your right to lodge a complaint with the personal data processing supervisory authority (www.dataprotection.ro) regarding the processing of your data by us or on our behalf.

10. OUR CONTACT DATA

- Do not hesitate to contact us to answer any of your requests regarding the processing of your personal data using the following contact details:

Data Protection Officer:

Surname and name: **Iulian Gânju**

Mailing address: **Iași City, 7A Palas Street, building A1, 2nd floor, Iași County** and/or email address: gdpr@iuliusmall.com.

11. AMENDMENTS TO THIS NOTICE

- In case of any amendments to this notice, such amendments will enter into force as of the time of publishing the new version on our websites (in the dedicated sections for personal data protection), and the respective amendments shall also be applicable for any processing that is underway at the time of publishing the new version.